



NON-PAPER FOR DISCUSSION

Friends of Cohesion Meeting, 22 April 2026

In light of ongoing discussions on the future Multiannual Financial Framework 2028-2034 and the design of the National and Regional Partnership Plans (NRPP) Regulation, this non-paper aims to facilitate debate among the Friends of Cohesion (FoC) by outlining key elements requiring further consideration. It reflects our shared priorities for ensuring that the NRPPs remain a tool that strengthens cohesion, competitiveness and resilience; providing legal certainty; and supporting effective implementation across all Member States. The document is intended as a constructive contribution to collective reflections within the Council and does not prejudge national positions. After the meeting in Warsaw, a joint summary of the key takeaways will be prepared.

1. Strengthening cohesion as an objective and the territorial dimension in NRPP

Although the NRPP Fund is presented as a cohesion-oriented instrument, its current framework does not ensure that cohesion becomes a secured objective. Financial safeguards apply primarily to Treaty-based policies other than Cohesion Policy, leaving development-oriented and cohesion-related actions without comparable protection. Such an approach risks reducing territorial interventions to whatever resources remain after other priorities are funded. Moreover, the structure of objectives promotes sectoral rather than territorial programming, weakening integrated regional development. While significant progress has already been made in the area of objective(s) formulation (as proposed in the PRES CY note and the following Member States discussion), a comprehensive approach to strengthening cohesion requires additional improvements of NRPP framework such as: securing dedicated resources for cohesion objectives; reinforcing the role of regions, which means at least keeping the solutions already introduced in the compromise text of the regulation; embedding territorial dimension in programming - for instance through adding a horizontal principle related to place-based approach; and ensuring balanced treatment of cohesion countries with GNI per capita below 90% of the EU average - through eliminating additional programming obligations for these Member States or providing appropriate incentives to implement them.

2. Ensuring balance between the European Commission and Member States in NRPP programming and implementation

Member States have repeatedly expressed concerns about the wide discretion afforded to the Commission in the current NRPP regulation proposal. The absence of transparent criteria for assessing compliance or approval of the NRPPs, extensive reliance on delegated acts, and the possibility for the Commission to suggest modifications to NRPPs risk undermining shared management model. Past experience shows that unclear requirements lead to the situation



where Member States have to implement measures that do not fully align with their specific needs and development priorities. Restoring the right balance is crucial to strengthen the Member States' ownership and effective implementation of NRPPs, thus contributing to the benefit of the whole EU. This requires for instance: enhancing the role of Member States in the decision-making process; limiting the scope of delegated acts; ensuring full transparency of assessment criteria including, inter alia, the assessment of horizontal conditions; providing complete documentation and rules before programming begins; and clarifying provisions that may unintentionally shift powers towards centralised management.

3. A realistic implementation model for the NRPPs

An effective NRPP implementation system must be coherent and aligned with national administrative structures. Despite references to a performance-based model in the proposed regulation, the need to verify real costs would create a dual system similar to the RRF experience, thus increasing the administrative burden. Simplifications appear to benefit mainly the Commission, while the observations from the latest ECA opinion indicate risks of overlapping audits for the Member States. A realistic implementation model requires clear settlement rules in the NRPP Regulation; a single coherent approach to implementation; alignment with ECA guidance; prompt decision on whether funding is based primarily on results or actually incurred costs; and last but not least, substantial technical assistance for Member States, which need to introduce radical changes in the functioning of Cohesion Policy, CAP, CFP or DG Home funds and to provide appropriate staff and systems to effectively program and implement their NRPPs.

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The NRPPs should adopt a coherent and result-oriented framework tailored to the nature of necessary interventions and building on existing national audit and control systems. There should be a clear approach to reforms supporting long-term transformation. The new model needs to offer flexibility while maintaining feasibility, transparency and respect for established public finance principles.

QUESTIONS FOR DISCUSSION

Please provide specific proposals and concrete solutions.

1. What is the delegations view on the proposed methods of strengthening cohesion in the NRPP framework? Are they appropriate or do you see any other areas for improvement in this context?



2. How can a balanced division of responsibilities between the Commission and Member States be ensured, particularly regarding NRPP approval, modifications and compliance assessments?
3. What is the most feasible way to avoid the emergence of a dual system (result-based vs. real costs) that would both increase the legality and predictability of the new model and ensure an appropriate level of flexibility?