



EUROPEAN  
COMMISSION

Strasbourg, 6.10.2026  
SWD(2026) 705 final

**COMMISSION STAFF WORKING DOCUMENT**

*Accompanying the document*

**COMMUNICATION FROM THE COMMISSION TO THE EUROPEAN  
PARLIAMENT, THE EUROPEAN COUNCIL, THE COUNCIL, THE EUROPEAN  
ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE  
REGIONS**

**Preparing for a wider Union**

{COM(2026) 705 final}

**STAFF WORKING DOCUMENT – ACCOMPANYING THE COMMUNICATION  
‘PREPARING FOR A WIDER UNION’**

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## EXECUTIVE SUMMARY

This staff working document provides the key findings of the Commission's in-depth sectoral policy reviews along the seven examined policy clusters. It covers EU sectoral policies that require specific preparations for enlargement and support the EU's and enlargement countries' readiness to tackle the impact of enlargement, grasp key opportunities or critical policy challenges, and contribute to the pursuit of the EU's strategic priorities as it enlarges to welcome new members. It presents EU policy changes and reforms that should help to ensure that an enlarged Union will remain fit for the future.

### *Freedom, security and justice*

Enlargement has the potential to strengthen the effectiveness of EU justice and home affairs policies ranging from better cooperation on criminal investigations, including information exchange, to the protection of consumer rights and the broadening of the geographical scope of EU fundamental rights. Enlargement would also expand the Schengen area of free movement and help to manage migration more effectively, in line with the new Pact on Migration and Asylum, becoming part of the Common European Asylum System. To unlock this potential, gradual integration of enlargement countries could be deepened in the EU-wide law enforcement cooperation and border management. This and further cooperation measures with enlargement partners would also help combat terrorism and organised crime and other cross-border crimes, including crimes affecting the Union's financial interests, more effectively. As part of a more transparent and merit-based approach for full Schengen integration, advanced enlargement countries could be integrated into the Schengen evaluation and monitoring mechanism framework before accession.

### *Single market*

The EU can stand to benefit from enhanced mobility, trade, and competition, as well as supported modernisation and development, through a larger, more diversified single market resulting from enlargement. For these benefits to materialise swiftly, there is the need for phased, rules-based gradual integration of enlargement countries into EU structures and governance mechanisms. Opportunities should also be exploited to support administrative capacity before accession, such as by leveraging the European Supervisory Authorities in the financial sector and the Anti-Money Laundering Authority for checks on the administrative capacity of enlargement countries. Existing single market support tools, including the Single Market Enforcement Taskforce, could be strengthened already before enlargement, while certain support tools, such as the Internal Market Information System, or the Single Digital Gateway can be selectively opened to enlargement countries. Transitional measures have been applied to manage free movement of workers in previous enlargement rounds and could apply to future enlargements as well.

### *Competitiveness and inclusive growth*

The EU's competitiveness would be enhanced through enlargement via the removal of trade barriers, opportunities for scaling up production and access to key inputs, strengthened infrastructure and connectivity, and thus an enhanced capacity of the Union to compete and respond to crises. In line with the EU's pro-active approach on economic security, it will be important that enlargement countries embrace the EU's economic security approach and gradually align with relevant EU legislation while benefiting from effective EU support in the implementation of policies and programmes relevant to economic security. Gradual integration can be beneficial in several other areas and through a variety of initiatives, such as by associating enlargement countries to specific Important Projects of Common European Interest, to digital and cybersecurity cooperation, including in roaming and Digital innovation hubs, and

to the Customs Union's reformed framework, along with associating all enlargement countries to the Erasmus+ programme.

#### *Green agenda and sustainable connectivity*

A larger EU would have a stronger voice on the global stage and give a stronger contribution to reducing greenhouse gas emissions globally and improving environmental and public health protection, along with benefiting from more opportunities for energy security and stronger transport connectivity. A gradually integrated energy and transport connectivity with enlargement countries is essential for the security and competitiveness of those countries and of the EU. This can be achieved by facilitating the participation of enlargement countries in cross-border energy cooperation and include enlargement considerations in the review of the EU energy security framework, along with the further development of the trans-European Transport Corridors in enlargement countries and fostering investment in environment infrastructure.

#### *Agriculture and cohesion*

Addressing disparities across regions and the potential impact on the single market for agricultural products brought by the membership of large producing countries comes with challenges. At the same time enlargement, if prepared well, allows the EU and enlargement countries to reap benefits such as greater food security and agri-food competitiveness or a stronger link between necessary reforms and public investment. In an expanded EU, cohesion policy will play a key role in supporting convergence and integration into the single market through an investment and reform agenda, with regions at the centre and focusing on joint priorities, including promoting economic, social and territorial cohesion.

To prepare for and effectively address the challenges that farmers in the EU and enlargement countries will face, gradual integration of enlargement countries together with the adoption of EU production methods and standards will also be essential. Continuity should also be given to the implementation of the Deep and Comprehensive Free Trade Areas agreements with Ukraine and with Moldova, providing for opening the EU market for agricultural products in parallel with the enlargement countries' alignment with EU standards. Well targeted pre-accession support and effective administrative capacity building will be essential. At the same time, on agriculture and access to the market for sensitive agricultural products, transitional measures and periods may have to be considered

#### *External relations*

Enlargement would make the EU stronger and more influential on the global stage, with an expanded internal market giving the EU greater weight in global trade and politics. Enlargement would increase the EU's collective defence capabilities, joint capacity to counter hybrid threats and shared ability to safeguard its economic security. To maximise the impact of the EU in international affairs, it is important that enlargement countries align with the EU common foreign and security policy. This would also facilitate further cooperation in the area of security and defence already before accession. To develop defence capabilities, enlargement countries could be progressively associated to defence and defence industrial initiatives. In addition, the EU and enlargement countries could benefit from closer cooperation on advancing mutual resilience by gradually associating enlargement countries to relevant EU preparedness initiatives and actions to counter hybrid threats.

#### *Administrative policies*

Effective implementation of EU rules is crucial for a well-functioning and enlarged Union. The Commission's enhanced drive for simplification will help accelerate compliance with EU laws,

benefiting both current and future member states. Pre-accession support and operational tools like TAIEX and Twinning will be essential in supporting enlargement countries build the required administrative capacity, ensuring they are well-prepared for accession and membership obligations. Effective communication on the benefits and challenges of enlargement is also crucial, both in current EU Member States and in enlargement countries, to make EU enlargement a success.

## INTRODUCTION

This Staff Working Document accompanies the Communication ‘Preparing for a wider Union’<sup>1</sup>. It provides the key findings and reform orientations from the in-depth sectoral policy reviews. The reviews assessed the extent to which EU policies and governance will be affected by future enlargements. They examined the EU policy changes and reforms needed to ensure that an enlarged Union will remain fit for the future. They are an important step within the broader, longer-term and dynamic EU reform agenda. Several related initiatives have been already presented, while others are scheduled for adoption following the reviews<sup>2</sup>. The policy reviews are distinct from the monitoring of the enlargement countries<sup>3</sup> preparations for EU membership while reflecting the close links and interactions between the two exercises<sup>4</sup>.

The Commission services and European External Action Service (EEAS) conducted a comprehensive analysis across all policy areas to assess to what extent these may be impacted by enlargement. Impacts can be directly triggered by the prospect of enlargement, or they can be an indirect result when enlargement intensifies the policy and governance challenges faced by the current Union at 27. Following an initial impact screening, a more detailed examination was undertaken, concentrating on aspects where significant impacts on policies are most likely. For other areas, it was generally concluded that policies are either well-suited for enlargement or that the impacts are small. These findings are not included in this Staff Working Document in principle to avoid an overly long document. As a result, it is important to note that this document does not enumerate all the screened policies or activities managed by the Commission or by extension, EU institutions in specific sectors.

The Commission's analysis focuses on the general impact of enlargement without considering and addressing specific scenarios in terms of sequencing or time-horizons. This approach ensures that the exercise does not pre-empt the accession process, which is strictly merit-based. The Commission primarily considered potential enlargement impacts based on the current state of the sectoral policy while reflecting the expected effects of several related reform initiatives that were recently proposed.

When it comes to the budgetary impacts of enlargement on policies, the focus is on expected funding needs, while indicating, if relevant, how the next generation of funding programmes may already anticipate for such needs<sup>5</sup>. In this context it should be noted that the proposed 2028-2034 multiannual financial framework (MFF) regulation<sup>6</sup> includes a revision clause, which would allow the Commission to take account of the expenditure requirements resulting

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<sup>1</sup> COM (2026) 705.

<sup>2</sup> Such as the Competitiveness Compass, the vision for Agriculture and Food, the Clean Industrial Deal, the White Paper for European Defence Readiness 2030 and the proposals for the next Multiannual Financial Framework for 2028-2034. See for example COM (2025) 45, COM (2025) 46, COM (2025) 75, JOIN (2025) 120, COM (2025) 500, COM (2025) 570, COM (2025) 870.

<sup>3</sup> Enlargement countries include Albania, Bosnia and Herzegovina, Moldova, Montenegro, North Macedonia, Serbia, Ukraine, Kosovo\*, Georgia and Türkiye. The accession process of Georgia is *de facto* halted, in line with European Council conclusions. Accession negotiations with Türkiye, a candidate country and a key EU partner in many areas of joint interest, have been at standstill since 2018, in line with the European Council conclusions.

\*This designation is without prejudice to positions on status and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.

<sup>4</sup> COM 2025 (690).

<sup>5</sup> The estimated impact on expenditure and staffing for 2028 and beyond is added for illustrative purposes only and does not prejudice the next Multiannual Financial Framework. The source of financing and scope of Union financial commitment in the post-2027 period remain subject to the outcome of interinstitutional negotiations on the MFF 2028-2034 and thereafter shall be determined through the annual budgetary procedure. All appropriations and staffing allocations as of 2028-2034 are indicative.

<sup>6</sup> COM (2025) 571.

from new countries joining the EU. This ensures that the EU will be able to adjust its financial framework to respond to the expenditure needs arising from enlargement. In this vein, the Commission on 30 June 2026 adopted a financial package for Montenegro, proposing how EU funding and budget-related policies could apply after Montenegro becomes an EU Member State and how to ensure a smooth transition of the new Member State into internal policies<sup>7</sup>.

The key results of the in-depth sectoral policy reviews are presented along several key thematic clusters. Each cluster brings together several closely interrelated policy areas. The clusters are broadly structured in line with the revised enlargement methodology of 2020. In addition, there is also a dedicated chapter on administrative policies.

## **1. PREPARING FOR AN EXPANDED AREA OF FREEDOM, SECURITY AND JUSTICE**

### **1.1 Free movement of persons, justice and consumer policies**

The EU's policies on the free movement of persons, justice and consumers aim to foster a fair, safe and just society where citizens can move and reside freely within the territory of Member States<sup>8</sup>. Justice policy aims to ensure that EU citizens can enjoy fundamental rights and has provided EU judicial authorities with opportunities for cooperation and EU companies with legal certainty to operate in the single market. Consumer policy aims to make the EU citizens' daily life easier in different key areas of the economy. Effective consumer protection also ensures that the single market functions properly: it safeguards consumers' rights and promotes fairer markets.

Expanding the EU will help uphold and further these goals. The reforms that are taking place in the enlargement countries in these areas may also encourage existing Member States to do more, learn from recent lessons and replicate good practices.

#### **1.1.1 Challenges and opportunities**

Enlargement would **increase judicial cooperation and deepen the existing forms of judicial collaboration**. This includes cooperation at the international level in the context of the Council of Europe, the United Nations Commission on International Trade and the Hague Conference on Private International Law, where the EU will be able to adopt a stronger common position.

On judicial cooperation in civil matters, enlargement would expand the application of the *acquis* already adopted based on mutual trust with benefits for citizens and businesses. On judicial cooperation in criminal law, enlargement would extend cooperation based on existing instruments, thereby strengthening the EU's collective ability to investigate and prosecute cross-border crime. Based on the experience of an EU with 27 countries, cross-border judicial cooperation requires mutual trust between Member States on their compliance with EU law and with the fundamental rights recognised at Treaty level. This is particularly the case for mutual recognition instruments based on several Framework Decisions, such as the European Arrest Warrant and for the rules on cross-border access to electronic evidence.

Enlargement would enable the wider use of certain cross-border investigative tools, such as the European Investigation Order. In addition, Eurojust, as the agency responsible for supporting

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<sup>7</sup> COM (2026) 334.

<sup>8</sup> This chapter covers the policies for consumers, free movement, equality and non-discrimination and anti-corruption. The justice policies on rule of law, fundamental rights and democracy are discussed in Chapter II.2 of the Communication.

the competent authorities of the Member States in this area, would optimise its work for the benefit of the new Member States, going beyond the current strategic partnerships in targeted areas of serious and cross-border crime. Furthermore, enlargement would allow the European Public Prosecutor's Office (EPPO) to conduct its investigations and prosecutions of crimes affecting the Union's financial interests in more Member States. Given that the EPPO Regulation ceased to be a measure under enhanced cooperation and has become part of the *acquis*<sup>9</sup>, new Member States will be required to participate in the EPPO.

The addition of new Member States would significantly increase the number of limited liability companies and partnerships covered by **EU company law rules**<sup>10</sup>. This would lead to more cross-border operations (mergers, divisions, conversions) and searches for company information in the Business Register Interconnection System, requiring increased cross-border cooperation between business registers.

Enlargement would bring tangible benefits to **consumers**, such as a greater choice of goods and services at competitive prices. At the same time, specific challenges for consumers in enlargement countries, including lower incomes and limited use of digital financial services, would need to guide future EU consumer policies. Cost of living concerns, and being able to afford everyday expenses, are already prevalent among consumers in the EU, and may increase in an expanded EU. Affordability is the top perceived barrier to sustainable consumption across the EU. For consumers in the new Member States with less spending power, this factor may be even more important.

Enlargement would also lead to more **products** circulating in the EU market. Coupled with a rise in online trade from third countries, this will require such products to be checked for conformity with the General Product Safety Regulation. Sufficient administrative and organisational structures and enforcement will need to be ensured in the new Member States (for instance, the establishment of a new infrastructure of market surveillance authorities and Safety Gate system). Related to product safety, consumers in the enlargement countries will be protected against the harms caused by unsafe and defective products, including AI systems and software, under the revised Product Liability Directive. Additionally, while enlargement could present an opportunity to fight against industrialised fraud in these countries, a low level of enforcement could also lead to more notifications on consumer fraud.

Extending **EU equality and non-discrimination** legislation to the enlargement partners is expected to have several positive implications. These will include aligning protection from discrimination on all grounds with the EU standards, reinforced fight against biases and stereotypes and improved access to public services and social inclusion. In this context, enlargement can also help address human rights issues related to treatment of migrants, asylum-seekers and refugees, especially in the Western Balkans. Enlargement could also exacerbate current challenges faced by the EU on equality and related matters. Given the significant challenges faced by the large Roma population in some enlargement countries, sustained efforts in this area by the new Member States will remain essential. Efforts are also needed in combatting discrimination faced by other ethnic minorities. Furthermore, enlargement countries experience challenges in upholding the right to non-discrimination, including

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<sup>9</sup> Commission Decision (EU) 2026/1701 10 July 2026 confirming the participation of Hungary in the enhanced cooperation on the establishment of the European Public Prosecutor's Office and Commission Notice concerning the effects of Commission Decision (EU) 2026/1701 of 10 July 2026 on Regulation (EU) 2017/1939 implementing enhanced cooperation on the establishment of the European Public Prosecutor's Office, which ceases to be an act under enhanced cooperation and becomes part of the *acquis*.

<sup>10</sup> Limited liability companies, their cross-border branches and partnerships currently amount to 16, 4 and 2 million, respectively.

tackling violence, hatred and discrimination as well as in ensuring equality of LGBTIQ+ persons, exacerbated by narratives against them, and in ensuring the full participation of persons with disabilities in the economy, education and society at large. At the same time, most enlargement countries support policies to strengthen gender equality and to prevent and address gender-based and domestic violence and all, except for Kosovo due to its status, are Parties to the Istanbul Convention<sup>11</sup>.

Expanding the EU will help to fight **corruption**. With EU instruments to be applied to the new Member States, positive effects in protecting democracy, the economy and security are expected. The fight against corruption is prioritised in the accession process, looking at both prevention and repression of corruption. Issues in enlargement countries range from weak institutional cooperation in corruption cases, insufficient staffing of authorities that investigate corruption to legal frameworks that create a high risk of corruption (e.g. in public procurement). This was evidenced by the annual enlargement reports and the Rule of Law reports, which now also include four enlargement countries<sup>12</sup>.

### 1.1.2 Impact of enlargement on free movement of persons, justice and consumer policies

#### *Policy aspects*

From a purely legal perspective, enlargement might not have any immediate impacts on the policies concerned, as the **current EU legal framework is fit for an expanded EU**. However, the administrative burden for Member States in implementing the policies may increase in some areas. For example, in the case of free movement of persons, a higher number of mobile EU citizens also implies additional work for the authorities dealing with residence registrations and cross-border social security coordination. Already today, some Member States face difficulties in providing timely services to mobile EU citizens and their family members, with LGBTIQ+ persons, persons with disabilities and families facing additional obstacles.

#### *Institutional aspects*

Enlargement may imply more **complex decision-making** in areas covered by unanimity. These areas include, among others, family law, measures on identity cards, equality and certain areas of non-discrimination, EU legal forms for companies, and the amendment of Regulation (EU) 2017/1939 on the establishment of the European Public Prosecutor's Office (EPPO). The European Council's unanimous decision is also required to extend the competence of the EPPO to serious crimes with a cross-border dimension other than crimes affecting the financial interests of the EU<sup>13</sup>.

#### *Budgetary aspects*

Currently, the two main EU programmes in this field, the **Citizens, Equality, Rights and Values (CERV) programme** and the **Justice programme**, are both already open for participation by enlargement countries. Some of the enlargement countries have negotiated, signed and ratified agreements with the EU enabling them to participate.

The accession of new countries to the EU might entail new actions with beneficiaries from these countries. Under the current rules, this would imply a growing base of applicants. This would possibly make some of the calls for projects more competitive. In addition, the co-

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<sup>11</sup> Council of Europe Treaty Series - No. 210 - Council of Europe Convention on preventing and combating violence against women and domestic violence, Istanbul, 11.V.2011.

<sup>12</sup> COM (2026) 900, SWD (2026) 928, (Albania); SWD (2026) 929, (Montenegro); SWD (2026) 930, (North Macedonia); SWD (2026) 931(Serbia).

<sup>13</sup> Article 86(4) TFEU.

financing requirements could be more challenging for civil society organisations (CSOs) promoting equality, in particular for LGBTIQ+ persons, and those working to reach out to persons with a minority racial or ethnic background, in the current global context where corporate partnerships and funding from other governments, including third countries, is at stake.

Considering that recent EU law and upcoming legislative initiatives in the area of justice all now have **significant digitalisation elements**, enlargement might require more resources for justice policies together with needs and policy priorities for judicial training, judicial cooperation and access to justice.

Enlargement would require adequate administrative and financial resources to ensure the **effective implementation** of EU justice and consumer policies. A significant effort would be needed to align the enforcement efficiency and / or compliance in new Member States with that of current Member States. This would concern in particular authorities, such as consumer enforcement bodies and associations, data protection authorities, judicial bodies, alternative dispute resolution bodies. The resources needs of relevant EU agencies and bodies, for example, the EPPO, Eurojust, the European Data Protection Board, the EU Agency for Fundamental Rights, and European Institute for Gender Equality would also need to be further re-assessed. In the new MFF 2028-2034 proposal it is proposed that decentralised agencies be reinforced while maintaining budget flexibility to be able to adjust.

In light of the EU's reinforced emphasis on the fight against corruption across the Union with the new EU Anti-Corruption Directive and the upcoming first EU Anti-Corruption Strategy, sufficient resources will be needed to help enlargement countries meaningfully improve their **fight against corruption** and keep them up to speed with the changing regulatory landscape, both in providing expertise and building capacity.

### 1.1.3 Policy gaps and delivery risks

The effectiveness of some instruments in an expanded EU will depend on the level of trust and compliance that can be ensured between a higher number of Member States, by way of example, in the field of judicial cooperation in civil law matters, in criminal law<sup>14</sup> and in company law. The **principle of mutual trust** is based on the premise that EU Member States share a set of common values and is therefore closely related to the rule of law and values policy strand discussion and the gaps and measures identified in this context.<sup>15</sup>

### 1.1.4 Reform orientations

To **reduce the administrative burden** resulting from the possible need to register EU citizens making use of the right to free movement, the Commission could explore to what extent available and upcoming policy instruments (Single Digital Gateway, EU Digital Identity Wallet, digital travel credentials, the European Social Security Pass, ESPASS) could be (better) utilised. This approach is enlargement-neutral, meaning that it is expected to bring benefits to Member States even in the absence of the addition of new Member States.

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<sup>14</sup> EU criminal law has some particularities as it includes several Framework Decisions such as the European Arrest Warrant. These instruments (except for the conventions and international agreements with third countries) are based on the principle of mutual recognition, i.e. enabling a judicial authority to transmit a decision directly to an authority in another EU country and to have it recognised and executed without any further formality (with some exceptions) and provide for a detailed framework for cross-border cooperation between Member States.

<sup>15</sup> See Chapter II.2 of the Communication.

**Establishing robust monitoring mechanisms** (including through comprehensive data collection, which could be conducted in partnership with the EU Fundamental Rights Agency) will be needed in all areas related to **equality and non-discrimination**.

The EU **anti-corruption policy** area is expected to be further developed in the coming years, based on a strategy to be presented in 2026. The EU Directive on combating corruption entered into force on 31 May 2026. An enlargement of the EU may require a revision of those initiatives to reflect the nature of corruption risks in enlargement partners.

## **1.2 Home affairs policies**

Home affairs policies contribute to a safer, more resilient and prosperous Europe. They strengthen cross-border cooperation on law enforcement and border management and help to fight terrorism, organised crime and drug trafficking. They are essential to protect critical infrastructure and strengthen the resilience of critical in the online and offline dimension. They fight hybrid threats and create conditions for stability, trust and freedom of movement, which are key foundations for economic growth and social cohesion. They also underpin an effective, sustainable, humanitarian safe European migration policy. This includes legal migration, integration as well as addressing, in line with EU and international law, including fundamental rights. The Pact on Migration and Asylum together with the new Common European system on returns provide for a comprehensive migration framework.

A key overarching objective of home affairs policies is to ensure the integrity and security of the Schengen area. The Schengen system involves the abolishment of checks at the internal borders and the coordinated implementation of a single comprehensive set of rules at external borders, in third countries and within the Schengen area to ensure a high level of security and freedom for its citizens. As a core element of EU membership, full application of the Schengen *acquis* will allow for economic growth, cross-border exchanges and increased prosperity in an expanded EU. As laid down in the Negotiating Frameworks, new Member States will not join the Schengen area upon accession but only after a subsequent Council decision, confirming that all conditions are met.

### **1.2.1 Impact of enlargement on home affairs policies**

Policies in the home affairs area would likely be impacted to some degree as a result of enlargement.

Enlargement could enhance the effectiveness of home affairs policies. This would happen by encouraging greater regional and cross-border cooperation and integrating new perspectives and resources into the EU's migration, security frameworks and, overall, into Schengen cooperation. However, due to variable geometry participation in the relevant EU *acquis*, certain areas may inevitably face challenges and/or are particularly sensitive to a possible incomplete and/or incorrect implementation of the *acquis*, legally or in practice.

On the **management of borders and irregular migration**, the EU's integrated border management policy would cover a larger (geographical) area and the EU's external borders would include new neighbouring countries. This could bring risks such as increased migratory pressure and changes in the pattern of migratory routes, affecting irregular migration and associated human rights risks, acts of sabotage and hybrid attacks, including through the instrumentalisation of migrants, requiring effective common response and integrated border management, while ensuring full respect of fundamental rights. The Western Balkans are likely to continue to play an important role both as a transit and destination region. Nonetheless, the Western Balkans also give the EU a more evenly distributed external frontier, allowing for

greater shared responsibility, promoting solidarity and strengthening the EU's burden-sharing system.

Once new Member States have joined the EU, they are automatically entitled and obliged to join the **Schengen area without internal borders**. Joining the Schengen area in full would lead to transformative changes, due to geographical expansion. Considering a different security and migratory environment, a more fundamental review of the Schengen system in terms of external border and internal security aspects may be necessary. To ensure that new Member States can fully benefit from the Schengen system, ongoing efforts to improve implementation, including through the Schengen evaluation and monitoring mechanism, need to be maintained and stepped up.

A wider Schengen area could impact **migrant smuggling and trafficking in human beings**. The removal of internal border controls may have an impact on the Eastern Mediterranean migratory route; the Western Balkans region may become not only a transit region but also a destination region. The countries in the region would have to rapidly adapt to these developments and, in line with the relevant legal provisions, and human rights obligations, consolidate national capacity, strengthen internal and cross-border cooperation and exchange information. Effectively detecting, investigating and prosecuting migrant smuggling and trafficking in human beings is already a challenge for enlargement countries in the Western Balkans region. They receive substantial assistance from the EU with some successes, as evidenced by the reduction of irregular migration through the Western Balkan region. Sustained efforts to prevent, detect and combat migrant smuggling and trafficking in human beings and to protect the victims across the enlarged EU will be necessary, in line with the EU Strategy on combatting trafficking in human beings.

As migrant smuggling and trafficking in human beings are of serious concern, the EU is committed to strengthening cooperation in the framework of the **Global Alliance to Counter Migrant Smuggling**, through a comprehensive whole-of-route approach. The Global Alliance Joint Declaration, presented in December 2025, and endorsed by 62 partners including the Western Balkans, is a signal of a political commitment to tackle migrant smuggling and irregular migration based on the whole-of-route approach. These political commitments will be operationalised in the Global Alliance Work Plan for 2026-2028, focusing in particular on strengthening the legal framework and capacity of partner countries to tackle these phenomena, to fight digital smuggling, follow-the-money and irregular migration by air.

Under the **Pact on Migration and Asylum** the Asylum Procedure Regulation and the Asylum and Migration Management Regulation in particular are relevant for enlargement. As regards the Asylum Procedure Regulation, provisions related to adequate capacity for the mandatory border procedure (both at EU and national level) and related to the EU list of safe countries of origin are of importance. The Asylum and Migration Management Regulation establishes a comprehensive set of rules in the area of determining the Member State responsible for examining an application for international protection registered in the Member States and introduces a permanent solidarity mechanism (minimum thresholds for solidarity measures). The 5-year European Asylum and Migration Management Strategy adopted on 29 January 2026 establishes further strategic vision, which needs enlargement countries, aligning their migration management goals with those of the EU<sup>16</sup>.

The **EU Agency for Asylum** would need to develop significant capacities to support operational challenges in the enlarged areas. This would also require tailoring dedicated technical assistance tools, guidelines, and country of origin information material. The ongoing

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<sup>16</sup> COM (2026) 45.

assistance provided to enlargement countries might be transformed into operating plans to ensure enhanced support.

**Frontex** (the European Border and Coast Guard Agency) will need to review its activities on operational cooperation (e.g. situational awareness, risks and vulnerability assessment). It will also need to develop its capacities to support the new Member States in protecting the expanded external borders. Such border management support would take place in line with the conditions set out in the European Border and Coast Guards Regulation<sup>17</sup> and therefore upon request by Member States. Nearly all enlargement partners already host Frontex operations under status agreements. They all exchange information, including risk analysis information with Frontex, and therefore we have already gained a good insight and are prepared for their future roles. The new Member States must contribute to the operational capabilities of Frontex with staff and equipment in numbers to be determined in due time. To that end, the European Border and Coast Guard Regulation would need to be amended.

Enlargement would result in strengthened cross-border cooperation over the medium to long term in the area of **fight against drug trafficking, counterterrorism and prevention of violent extremism**. It would bolster the EU's overall capacity to respond to complex and transnational security challenges and create a more unified and resilient approach to preventing and combating terrorism. The new Joint Action Plan on Preventing and Countering of Terrorism and Violent Extremism, signed during the Justice and Home Affairs Ministerial in October 2025 in Sarajevo, sets an adequate framework to improve the counterterrorism capacities and enhance cooperation with the Western Balkans partners. Within the Joint Action Plan architecture, the EU Knowledge Hub on prevention of radicalisation will keep supporting the partners through regional activities, while progressively integrating them into the general EU prevention framework.

The enlargement countries' authorities would also have better access to **Europol's** tools, analyses, services and, most notably, to the agency's relevant databases in compliance with its legal mandate. Granting these countries access to advanced capabilities, such as secure information processing and analysis services and tools, forensic capabilities including on crypto assets, and artificial intelligence-enabled applications will boost the EU's capacity to conduct major cross-border investigations in those regions. They will also be fully integrated in the threat assessment cycle led by the agency. Enlargement would also expand the geographical scope of Europol's operations with regard to anti-terrorism policies.

When it comes to **internal security**, enlargement presents opportunities and challenges. Due to the inherently transnational nature of organised crime, the enlargement countries are already of key relevance for this policy area. Organised criminal groups are active in several enlargement countries and use them as hubs for their activities. These are active in areas like drug and arms trafficking, trafficking in human beings and the smuggling of goods. The Western Balkans region remains a key source and transit route for illicit trade flows, for instance for firearms or drugs. Despite efforts in these countries to fight organised crime, their institutional capacity is often still insufficient, including their ability to conduct financial investigations. However, the alignment with and effective implementation of existing anti-money laundering and asset recovery legislation and the future new EU legal framework on **organised crime**, which enlargement countries will be required to convert into national law upon joining the Union, will strengthen the countries' capacities to more effectively counter the

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<sup>17</sup> Regulation (EU) 2019/1896 of the European Parliament and of the Council of 13 November 2019 on the European Border and Coast Guard and repealing Regulations (EU) No 1052/2013 and (EU) 2016/1624. OJ L 295, 14.11.2019, p. 1–. ELI: <http://data.europa.eu/eli/reg/2019/1896/oj>

threats posed by criminal networks.

In parallel, increased operational cooperation among the relevant authorities of EU Member States and the enlargement countries, including in relation to financial investigations and asset recovery, is crucial to step up efforts in fighting organised crime. As the impact of digitalisation grows stronger over time, enlargement countries will need to continue to update their capacity to fight cybercrime and retrieve and exchange digital evidence.

At the same time, the ongoing work to tackle **corruption** issues in enlargement countries needs to continue to avoid that it hampers their capacity to tackle organised crime. Enhanced and effective **law enforcement cooperation** will therefore become indispensable for maintaining internal security. This will be the case in particular in an expanded Schengen area without internal border controls. In parallel, increased cooperation will help to combat organised crime in Europe in general. Enlargement countries already display a willingness to engage and cooperate actively with EU Member States in the **European Multidisciplinary Platform Against Criminal Threats** (EMPACT). The platform offers enlargement countries a practical bridge between strategic alignment with the EU security *acquis* and concrete operational cooperation against serious and organised crime. By fully integrating enlargement countries in the EMPACT cycle, they can better align with EU priorities their national priorities in fighting crimes, strengthen intelligence-led policing, and build experience in multi-agency and cross-border operations.

Another tool to step up cooperation with enlargement countries on combatting crime are the Operational Task Forces between Member States and coordinated by Europol, where third countries can participate. As highlighted by the EMPACT firearms and explosives operational action plan, several enlargement countries have been involved in past or current armed conflicts, making the availability of illegal firearms, ammunition and explosives a potential concern for their regions. The impact in the mid- to long term could be an increase in illicit firearms and other small arms and light weapons (SALW) within the EU stemming from enlargement countries.

**Effective cross-border information exchange** will also be essential in tackling organised crime. Instruments such as the Prüm II Regulation and the Directive on information exchange between law enforcement authorities will play a central role in enabling swift and secure data sharing between existing and future Member States<sup>18</sup>. The **gradual integration** of enlargement countries into these legal and operational frameworks would be a crucial step towards aligning their systems with EU standards. This would contribute directly to the EU's internal security and its collective ability to tackle serious and organised crime effectively.

There are several policy areas that would remain largely unaffected by the accession of new Member States and can be considered 'fit for enlargement'. These include EU visa lists, the EU legal migration directives, the Union Resettlement and Humanitarian Admission Framework, the law enforcement cooperation *acquis*, organised crime and drugs policies, the fight against cybercrime, preventing and combating child sexual abuse, e-evidence, combating migrant smuggling and trafficking in human beings, as well as the mandates of Europol and the EU Agency for Law Enforcement Training (CEPOL).

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<sup>18</sup> The Directive improves the conditions for timely and efficient sharing of criminal intelligence between Member States, setting clear obligations and deadlines for information responses. Complementing this, the Prüm II Regulation significantly improves the automation and scope of data exchange (such as fingerprints, DNA profiles, facial images, police records, and vehicle registration data) among Member States' law enforcement authorities. It also streamlines access to these datasets via a central router, ensuring faster cross-border exchanges.

### *Institutional aspects*

The policy making process might become more challenging in operational law enforcement cooperation, governed by unanimity<sup>19</sup>. A more transparent and predictable process along with robust requirements may also be envisaged towards integrating a new Member State into the Schengen area with the focus on meeting all established conditions for full participation<sup>20</sup>.

### *Budgetary aspects*

The Commission Communication on ‘The road to the next multiannual financial framework’<sup>21</sup> underscores the importance of safeguarding a high level of freedom and security for our citizens, while ensuring the effective functioning of the Schengen area, including through reinforced presence and cooperation in third countries, as regional stability has a direct impact on the EU’s external borders and shapes both migratory and security risks. Considering the critical importance of strengthening the EU’s capacity in this context, the Commission proposal of 16 July 2025 triples financial support – amounting to EUR 81 billion – for the Home Affairs area under the next MFF 2028-2034, of which EUR 21,5 billion is addressed to the HOME agencies.

EU enlargement would require financial investments and carry budgetary implications that need to be considered in a timely manner. This includes the question on how these will help bridge gaps and enhance the effectiveness of policies in an enlarged Union and Schengen area. Timely identification of the required funding and human resources will be key to adequately addressing the significant opportunities and challenges which enlargement represents for migration and border management, as well as for internal security, thereby contributing to a well-functioning Schengen area. It will be important to ensure sufficient flexibility in the structure and implementation of funding to allow a common EU response tailored to pressing needs and new challenges. The Commission proposal of 16 July 2025 provides for the possibility to use the EU facility, including for the Home Affairs area, to meet flexibility needs in the 2028-2034 financial period.

In the area of border management and considering the implications for the Schengen area as a whole, funding needs would likely increase. In particular, the protection and integrated management of Ukraine’s external border would require adequate support. The full alignment of enlargement countries’ visa policy with EU standards and the implementation of the rules on interoperability of IT systems and digitalisation of travel documents (once in place at EU level) would also require EU support. Direct financial benefits and savings would be available once these countries are part of the Schengen area without internal frontiers. In the short and mid-term, for example, technical upgrades and update of the numerous outdated border crossing points in terms of IT infrastructure for border checks, as well as upgrading infrastructure, equipment and training in line with EU standards point to investment needs in those new Member States whose national administrations might not be adequately prepared. As countries progress towards full Schengen integration, dedicated technical, administrative and financial resources might be required, both at national and central level, for the setting-up and operation of fully functioning large-scale IT systems.

On EU home affairs agencies (e.g. Frontex, European Union Agency for Asylum), eu-LISA, Europol), potential transitions towards more centralised solutions would also have financial implications: in terms of impact on their work, adequate resources would be needed to meet an increasing number of requests for operational and technical assistance. While central solutions

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<sup>19</sup> Articles 87 and 89 TFEU.

<sup>20</sup> Unanimity requirement issues are covered in greater detail in Chapter II.1 of the Communication.

<sup>21</sup> COM (2025) 46.

would entail increased costs at EU level for certain agencies, such as eu-LISA, such solutions would lead to a decrease of national costs (currently also supported by EU funding for current Member States).

**Additional resources** could be needed by eu-LISA and Europol to ensure that infrastructure for the exchange of data (routers, SIENA) are available to an increased number of countries. Europol would also need resources to carry out additional tasks to support future Member States in monitoring and referring terrorist content online, including through the extension of access to PERCI (platform developed to support the implementation of the Regulation on terrorist content online and transmitting referrals), which would require technical adaptations as well as capacity building in new Member States (i.e. organisation of Internet Referral Days). In addition, Europol might need to expand its support measures (i.e. training, technical assistance, capacity-building support and knowledge sharing initiatives) to future Member States regarding actions aimed at tackling child sexual abuse, as well as other crime areas such as organised crime, cybercrime or financial crime.

For CEPOL, enlargement is expected to increase demand for training and resources, including notably the increased need for training tailored to the specific needs of law enforcement officials in new Member States (such as limited resources, underdeveloped institutional frameworks, different modalities, gaps in technical expertise and potentially in the national training offer for implementing EU policies/tools), and to the language and cultural diversity of a larger area and operational strain on existing platforms (current e-learning platforms, training networks, and exchange programmes).

Enlargement would have an impact in terms of resources when it comes to the EU Drugs Agency (EUDA) as the countries will have to appoint a national focal point who will be part of the agency's information network on drugs and drug addiction (Reitox) and participate in the EU Early Warning System. The countries will also have to continue the efforts to set-up and ensure the functioning of their national early warning systems and national drug observatories to participate in the work of EUDA.

Enlargement is also likely to pose greater demands on the preparation of the EU Terrorism Situation and Trend Report (TE-SAT), as larger membership will result in more data to collect, process, and analyse. This will require enhanced analytical capabilities and potentially the adoption of new methodologies to ensure timely and comprehensive assessments.

### **1.2.2 Policy gaps and delivery risks**

Some current EU policies might require adaptations in an expanded EU due to increasing complexities and challenges that call for assessing current governance models and the impact on migration management, triggering the need to evaluate mechanisms and thresholds.

On **Schengen cooperation** (including policies on border management, visas, large-scale IT-systems, police cooperation and return of third-country nationals in irregular stay), which is a shared competence, Member States have a crucial role to play in implementation. The future enlargement of the EU and the resulting wider Schengen area, together with the obligation to deliver on the Treaty-based policy objective to offer citizens an area of freedom, security and justice without internal frontiers, may justify moving towards a more centralised approach based on more effective common governance. This would need to happen in respect of Member States' competences (and sensitivities). The geopolitical situation of some enlargement partners may also require reflection on the nature of border management, adapting to new operational needs.

It will also be crucial to ensure consistent and accurate implementation of rules under the **Pact**

**on Migration and Asylum** to avoid unauthorised onwards movements both from and to the new Member States.

On **counterterrorism**, the integration of new Member States will require updates to the EU's counter-terrorism frameworks to accommodate additional stakeholders, potentially requiring increased resources and coordination efforts also at the Europol's **European Counter-Terrorism Centre**.

### 1.2.3 Reform orientations

To fully realise the benefits of a wider Schengen, the EU should use the time ahead to deepen and strengthen Schengen, ensuring it can operate effectively with more members and is adapted to the new geopolitical environment. In this context, full implementation of the structural reforms identified through the Schengen evaluation and monitoring mechanism is imperative, building on ongoing efforts to ensure Schengen rules are implemented to the highest standards. A **stronger Schengen governance framework** is essential to ensure the implementation of these reforms, as well as strengthen mutual trust and mutual recognition. This will allow an area without internal borders to be created and maintained.

As new Member States will eventually be required to join the Schengen area without internal borders, new approaches with more transparent and robust requirements should be considered to allow for a well-supported integration process into the Schengen area, ensuring that it delivers benefits both for new Member States and for the Schengen area as a whole.

The period between accession to the EU and the actual lifting of internal border control varied in the past between three years for Austria to more than nine years for Croatia and 18 years for Bulgaria and Romania. The integration of Bulgaria and Romania into the Schengen area merits renewed reflection on the need to revise the provision on the full application of the Schengen *acquis* in Accession Treaties. While following its assessment of technical readiness the Commission confirmed that both Member States were ready to become part of the Schengen area in 2011 as set out in their Accession Treaty, the Council only considered that all 'necessary conditions' were met in December 2024. A new merit-based process that matches the reality of how integration into the Schengen area works in practice is to be established, which is grounded in common, objective and transparent criteria. This would better reflect evolving realities and strengthen – not erode – the mutual trust needed for a well-functioning Schengen area.

A **more centralised approach** could be considered towards **border management** via for example additional roles and responsibilities for EU agencies, accompanied by a revised governance model. This would make these agencies more operational and more accountable. The upcoming revision of the Frontex mandate will strengthen the Agency and make it more agile and effective, preparing the ground for the future, including for the enlargement. Reflection will be required on border management, in particular with regards to new operational needs arising from the geopolitical situation of some enlargement countries and the role of agencies in that regard.

**EU agencies and bodies** active in the justice and home affairs area (Eurojust, Frontex, Europol, CEPOL, eu-LISA, the EU Drugs Agency, the European Union Asylum Agency, EPPO) will need to adapt, possibly take on additional roles, and deepen inter-agency cooperation and safe and secure information exchange between Member States, enlargement countries, agencies and international organisations.

In relation to the **Pact on Migration and Asylum**, the **Asylum Procedure Regulation** does not require substantive amendments. However, specific changes would need to be reflected in

the implementing decision establishing individual adequate capacity as well as the maximum number of applications a Member State is required to examine in the border procedure per year.

Some parameters in the **Asylum and Migration Management Regulation** would require reconsideration, in addition to technical adjustments. The Regulation establishes a mechanism for solidarity and lays down the criteria and mechanisms for determining the Member State responsible for examining an application for international protection (previous Dublin rules). The solidarity mechanism entails a Commission proposal for a Council Implementing Decision establishing the Annual Solidarity Pool to address the migratory situation in the upcoming year, identifying the total annual number of required relocations (minimum 30 000) and the financial contributions (minimum EUR 600 million) at EU level. The proposal must also set out the indicative contributions of each Member State for the relevant solidarity cycle. This will be done by applying the reference key, which is calculated based on the population size and GDP of each Member State. Should new countries join the EU, the reference key would also apply to them.<sup>22</sup> Further reflection would be required as to whether the minimum thresholds will suffice for the needs of a higher number of Member States. In addition, Annex I to the European Union Agency for Asylum Regulation would also need to be amended to indicate the number of experts that each country is obliged to provide for the Asylum Reserve Pool. The Agency's monitoring methodology would also need to be revised, and in particular the monitoring programme that sets out the Member States to be monitored each year, in accordance with Article 15 of the Regulation.

Enlargement countries need to be committed to **strengthening internal security**. They would need to enhance their operational law enforcement cooperation with EU Member States and Agencies to tackle the most pressing criminal threats and dismantle high-risk criminal networks. Closer cooperation on security matters with enlargement countries will be required. In its recent ProtectEU – a European Internal Security Strategy, the Commission has called for the **accelerated integration of enlargement countries into the EU's security architecture** and announced that it will support enlargement countries to better respond to threats, to increase operational cooperation and information exchange, and to ensure alignment with EU values, principles, legislation and tools.

Specifically on drugs, the 2025 EU Drugs Strategy and the EU Action Plan against drug trafficking<sup>23</sup> reaffirmed that the EU will collaborate with enlargement partners to align strategies against organised crime networks, improve drug information systems, and strengthen operational cooperation. As part of this, the development of national drug observatories and early warning systems for new psychoactive substances, in line with EU law will be supported.<sup>24</sup> The European Drugs Agency will support promoting evidence-based, integrated, and balanced drug policies.

To ensure an accelerated integration of enlargement countries into EU's security architecture, the EU should systematically involve and support enlargement partners ensuring their access to tools, guidance, and capacity-building opportunities. Similarly, the Commission will also explore cooperation with enlargement countries on port security, and has already taken steps

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<sup>22</sup> The formula for the reference key in Annex I to the Regulation does not have to be changed as it is flexible regarding the overall number of Member States), and they could equally benefit from solidarity if assessed by the Commission as being under migratory pressure. Their accession would also affect the indicative contributions of all Member States for a given reference number of relocations and financial contributions, since the solidarity effort is spread over a larger number of Member States) and would require reflection as to whether the minimum thresholds will suffice for the needs of a higher number of Member States.

<sup>23</sup> COM (2025) 744.

<sup>24</sup> COM (2025) 743.

to include them, for instance as observers in European Ports Alliance meetings.

New and specific EU initiatives are expected to be announced as part of the next **EU action plan on firearms trafficking**, with specific actions focussing on enlargement countries. The conditions for enlargement countries regarding policy on firearms, including specific strategies and action plans, should align as closely as possible with the EU action plan. The state of play regarding the harmonisation of their legislation with the EU *acquis* and the establishment of National Firearms Focal Points could also be a consideration when preparing their national action plans. The EU could consider a **programme for improving expert co-operation in preventing and combating corruption** in particular in ports, with a focus on restricting the influence of organised crime groups.

## 2. A LARGER AND STRONGER SINGLE MARKET

Enlargement would bring with it a larger single market, with the potential for greater economies of scale. It will facilitate the free movement of workers, goods, services and capital, and boost mobility and trade. The process of **gradual integration of enlargement countries into the single market** and EU value chains is ongoing and can boost convergence and spur investment and trade<sup>25</sup>. Furthermore, despite significant efforts to remove barriers between the existing EU countries, many barriers persist, and new ones arise, and this will continue in the context of enlargement.

The **Single Market Strategy**<sup>26</sup> therefore proposes a ‘highway’ to the single market, a structured framework to boost the inclusion of the Western Balkans, Ukraine and Moldova, which would include closer regulatory alignment and facilitating the integration of their industries into European value chains ahead of EU accession. The Strategy also announced that future legislative initiatives will provide simpler rules. This objective is particularly relevant in the context of enlargement, where the single market *acquis* will need to remain effective, coherent and easy to implement across a larger and more diverse Union. One example is the revision of the EU public procurement framework through the **Public Procurement Act**<sup>27</sup>, which aims to make public investment more efficient by simplifying procurement procedures, establishing a consistent, coherent legal framework, and creating a digital EU procurement marketplace.

The **Single Digital Gateway**,<sup>28</sup> one of the existing single market support tools, is not yet fully optimised to address the complexity of the Single Market. These challenges highlight the need for upgrades and better coordination of tools to support enlargement. In particular, there is a need to support early legal and technical alignment in enlargement countries, with a focus on the Once-Only Technical System and the establishment of eID schemes, envisaged under the Electronic Identification, Authentication and Trust Services (eIDAS) regulations. For the

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<sup>25</sup> COM (2024) 146, COM (2024) 690.

<sup>26</sup> COM (2025) 500.

<sup>27</sup> COM (2026) 590, SWD (2026) 590, SWD (2026) 591, SWD (2026) 592.

<sup>28</sup> The Single Digital Gateway provides seamless online access to information, administrative procedures, and assistance services across policy areas. It is built on three main pillars: the Information Pillar, which ensures multilingual content on rights and obligations via the ‘Your Europe’ portal; the Digitalisation Pillar, which requires key administrative procedures to be fully available online; and the Once-Only Technical System (OOTS), facilitating the automated exchange of official documents across borders. The decentralised design of the Gateway allows new Member States to integrate into the Information Pillar without structural changes, and OOTS is designed to be scalable, minimising disruption. With enlargement, the number of national pages submitted to ‘Your Europe’ will likely increase, raising translation costs and increasing validation processes. Legal and technical barriers may also delay their integration into OOTS unless early evidence mapping, and technical alignment begin before accession.

Internal Market Information (IMI) System<sup>29</sup> (including the SOLVIT module), readiness of the enlargement countries to fully implement the *acquis* in the policy areas covered is essential for being able to gain access to the system and cooperate effectively with the other authorities from the EU. The Single Market Strategy has called on Member States to strengthen their SOLVIT Centres, focusing on staffing, expertise, the network of contacts and the capacity to influence other national authorities. In addition, the Strategy also calls on Member States and the Commission to follow up on systemic issues that are evidenced through the cases that the SOLVIT network deals with.

The **Single Market Enforcement Taskforce** (SMET) has successfully addressed sector-specific barriers by encouraging the exchange of best practices among Member States. The Single Market Strategy has announced a political reinforcement of SMET via an annual high-level political meeting that brings together Member States' ministers responsible for the single market, high-level single market Sherpas and the Commission's Executive Vice-President in charge of the single market. They will provide strategic steer for SMET's work and political support for the implementation of jointly identified solutions to address barriers, including any resulting from enlargement.

Overall, increasing resources for translation, validation, and training at EU level would ensure that single market tools function optimally in an enlarged single market. Enlargement would also trigger the need for enhanced resources to manage and upgrade IT support tools (e.g. the Technical Regulation Information System (TRIS) database on single market transparency; the IMI System; Single Digital Gateway) considering translation of existing content, community management, testing, training and user assistance needs. The Single Market Strategy already announced general measures for boosting digitalisation of the single market and improving interoperability. For example, for the IMI System there are plans to facilitate its further and continuous expansion to new legal areas, including by simplifying the procedure for this expansion as well as building a generic, reusable IMI portal to connect businesses to IMI, piloting an IMI notification hub and connecting IMI with other systems. Overall, the Strategy emphasises the objective of streamlining data exchange and digital reporting via a cohesive ecosystem of existing and future digital solutions.

Enlargement adds challenges to the enforcement architecture set out in the Single Market Strategy, which rests on the principle that application and enforcement of the single market rules is a shared responsibility of the Commission and the Member States, including authorities from national to regional and municipal level. For new Member States, genuine joint ownership of the single market must be actively built, so that compliance is embedded as a structural responsibility and not perceived merely as an obligation arising at the point of accession or imposed by the Commission. This is particularly relevant when conducting a thorough assessment of proportionality before adoption of national rules and in the context of prior notifications to the Commission, in particular under the Single Market Transparency Directive with respect to goods. Furthermore, as the Commission remains the guardian of the Treaties, enlargement entails additional enforcement work at EU level to ensure the respect of the single market principles, with direct implications for the Commission's own enforcement workload and resourcing needs.

The Commission continues to monitor single market barriers and as announced in the Single Market Strategy, would consider proposing a Single Market Barriers Prevention Act, if

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<sup>29</sup> The Internal Market Information System is a horizontal digital tool that facilitates administrative cooperation across 21 policy areas to support the implementation and enforcement of single market rules.

necessary, based on the assessment of the functioning of existing preventive tools and taking into account an enlarged single market.

## 2.1 Free movement of workers

### 2.1.1 Impact of enlargement on labour markets

Enlargement would have impact on labour markets. . With enlargement, ‘new’ mobile EU citizens will move in this Single Market. The larger pool of skills could help current Member States **address possible labour shortages resulting from demographic change<sup>30</sup> and skills mismatches**. At the same time, the reverse could also be expected with the ‘new’ citizens acquiring new skills during their stay abroad, which could benefit the economies of the new Member States when they return.

The impacts of free movement of workers on the labour markets of current Member States are not that unusual, and experience has shown that they can be handled effectively. Moreover, mobility of workers from enlargement countries already occurs today to a lesser extent under the regime applicable to third country nationals<sup>31</sup> and will be further facilitated by the proposal for a Directive on the recognition of qualifications of third country nationals<sup>32</sup>, recently proposed as part of the Fair Labour Mobility Package. While further analysis of demography and other trends might need to be considered, as a first indication it is realistic to assume that outward mobility from the enlargement countries after accession would not exceed the mobility trends in those countries that joined last (Romania, Bulgaria and Croatia)<sup>33</sup>.

**Gradual integration** provides several promising avenues for incorporating enlargement countries into relevant activities and initiatives before accession. All enlargement countries are participating in the European Qualifications Framework (EQF) and have developed national qualifications frameworks. So far, six enlargement countries have referenced to the EQF, establishing links between their national frameworks and the European framework. To further support up and reskilling, the Union of Skills aims to continue the implementation of Individual Learning Accounts and to strengthen and streamline the Pact for Skills to support strategic sectors, including through Large Scale Partnerships. The Commission is also calling on members of the Pact for Skills to at least double their commitments. Stakeholders of enlargement countries are eligible and can be further encouraged to join the Pact and take part in the activities of Large-Scale partnerships. A regional skills partnership in the cultural and creative industries sector has been established with stakeholders from the Western Balkans. To further encourage the uptake up and re-skilling actions in the region more Pact for Skills regional skills partnerships can be established. With 45 countries already participating in the European Alliance for Apprenticeship, including all enlargement countries, and more countries expected to join, the internationalisation of the Alliance is also encouraging greater learning

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<sup>30</sup> In this context, it is also worth noting that the median age in the countries concerned (approx. 40 years) is lower than in the EU-27 (44.5 years).

<sup>31</sup> As regards the assessment of impacts on free movement of workers, one unknown element is linked to the fact that there are already approx. 4.3 million Ukrainians who are currently in the EU, benefitting from temporary protection and with the right to access the EU labour market. Moreover, already before Russia’s war of aggression against Ukraine, Ukrainians were the biggest nationality being issued first-time residents permits in the EU for work purpose. It is not possible to estimate what the situation, numbers and status of current beneficiaries of temporary protection would be at the potential date of accession of Ukraine and how this would shape/impact labour mobility from Ukraine into the EU (and vice-versa).

<sup>32</sup> COM (2026) 990.

<sup>33</sup> This assumption takes into account that, although income per capita levels and income differentials vis-à-vis the EU average may still be lower in the enlargement countries, significant outward migration from these countries has already taken place, thereby reducing the potential for additional outward mobility following accession.

mobility among apprentices. This enables young people and adult learners to gain valuable cross-border experience, enhance their skills and employability, while helping companies access a more skilled and adaptable workforce.

Beyond qualifications frameworks, enlargement would inevitably increase the diversity of professional regulations across the Union. To ensure that increased mobility does not encounter disproportionate administrative or legal barriers, enlargement countries must prepare to fully incorporate and implement the relevant *acquis*, particularly regarding the mutual recognition of professional qualifications<sup>34</sup> and the future Skills Portability Act framework when adopted. Early alignment, institutional capacity building, and transparency in regulated professions will be essential to facilitate smooth cross-border practice, maintain high service and public safety standards, and maximise the mutual benefits of a larger, integrated European workforce.

At the same time, new Member States would likely face significant **labour market and social challenges** upon accession, notably in terms of possessing adequate structural capacities to implement effective labour market and social policies. Enlargement could therefore affect the overall EU aggregates on most labour market and social figures. If average wages or labour standards in new Member States would be lower than in the other Member States, companies may also outsource to the new Member States labour-intensive tasks that can be delocalised, which may in turn affect jobs and wages in the current Member States. At the same time, experience shows that the net economic effect of work and labour reallocation between new and current Member States should be positive in the longer term.

The countries fully participating in the Employment and Social Innovation strand of the European Social Fund Plus, the EU's main instrument for investing in people, are Serbia, Montenegro, Moldova and Ukraine. The agreement with Bosnia-Herzegovina is already provisionally applicable as of 2 September 2025.

Enlargement would increase the number of social security systems in the EU. To ensure that the free movement of workers is matched by seamless **social security coordination**, it is crucial that the social security systems of the new Member States are adequately prepared for EU **social security coordination** in all relevant branches - in particular the reimbursement of sickness benefits with the European Health Insurance Card (EHIC) for persons staying temporarily in another Member State, pensions, unemployment benefits - and fully ready for participation in the Electronic Exchange of Social Security Information (EESSI<sup>35</sup>) system and the proposed European Social Security Pass (ESSPASS).

#### *Budgetary aspects*

The overall impact of enlargement on the performance of employment, social affairs and inclusion policies on the ground is expected to require significant efforts in terms of implementation and support from the EU and from new Member States for it to function well. This would help to prevent risks such as a worsening of EU aggregates on most labour markets and social figures or risks of brain drain. Overall, there are financial support needs that would allow for capacity building in several areas, including for example labour law, social dialogue and occupational safety and health, vocational education and training (VET) and adult learning (to support the mobility of VET learners and adult learning/upskilling and reskilling).

As the EU prepares to welcome new members, the challenges posed by regional disparities will necessitate a strategic shift of how funds are allocated and managed. The National and Regional Partnership (NRP) Plans will be a means for Member States and regions to propose relevant

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<sup>34</sup> Directive 2005/36/EC.

<sup>35</sup> COM (2026) 980.

investments, reforms and other tailored interventions to better support tomorrow's challenges through EU funds under shared management<sup>36</sup>. The NRP Plans will cover cohesion policy including social policy, regional policy, common agricultural policy, fisheries and maritime policy, migration, border management and internal security. Furthermore, the NRP Plans will empower new Member States to actively participate in their growth journey, fostering a greater sense of ownership and accountability. By emphasizing the importance of tailored strategies based on needs on the ground and the integration of a performance-based delivery system, the EU can create a more cohesive and resilient Union that benefits all Member States and regions, current and new alike. It is proposed that at least 14% of the financial envelope of the NRP Plans will be dedicated to social objectives. This would correspond to at least EUR 100 billion.

After accession, new Member States would need to continue supporting their less developed regions and address the specific needs of other territories, such as just transition or regions suffering from demographic decline. The countries would also need to be covered by support for social economy / social enterprises (currently provided under ESF+, ERDF, InvestEU). This is possible under the NRP Plans and the EU facility will provide budgetary guarantees to promote microfinance and social enterprise finance.

Support to ensure sufficient administrative capacities for the implementation of EU funds, including for the monitoring and evaluation of supported activities is provided for in the proposal on the NRP Plans Regulation<sup>37</sup>. Administrative capacity at national, regional and local levels is critical for enlargement countries. Resilient, innovative, and well-organised institutions are essential for effective public investments, competitiveness and quality public services.

With an additional number of Member States, the Commission will have additional human and financial resources needs in view of additional work on extension of EU rules and initiatives, enforcement and greater membership and participation in existing networks, data collection, technical integration of statistics in IT systems and technical support overall. Furthermore, relevant decentralised agencies would need to provide services to an extended number of countries, which would imply additional operational costs.

### 2.1.2 Policy gaps and delivery risks

The effectiveness of the policies can be affected if not enough attention is paid, during the accession process, to **preventing possible adverse effects** (such as a worsening of EU aggregates on most labour market and social figures; risks of brain drain and social dumping) and if no **corresponding investments** are made.

The analysis has also highlighted a **lack of data on key indicators** across all main policy areas in several of the enlargement countries assessed. For instance, lack of recent data on the labour markets of many enlargement countries will make it more difficult to use evidence to develop EU policies in the future. The lack of information also concerns platform work as well as policies that are being considered, such as the right to disconnect. This would require **further capacity building** and efforts to ensure the necessary systems are in place to help the enlargement countries under assessment to meet the data collection and reporting obligations of EU Member States.

Other examples include the area of **social security coordination** and **professional qualifications**, where a recurring gap identified in past enlargement dossiers concerned the

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<sup>36</sup> COM (2025) 565.

<sup>37</sup> COM (2025) 565.

potentially low level of national preparedness. This includes a lack of adequate administrative structures and capacity, insufficient budgetary resources, limited digital readiness, inadequate capacity-building and expertise developed well in advance, as well as insufficient staff allocation and IT system development.

### 2.1.3 Reform orientations

In the last three enlargement rounds, **transitional measures** applicable to free movement of workers allowed for gradual opening of the right to free movement of workers of newly joining Member States after their accession to the EU. This helped mitigate unintended consequences on host economies in the short term<sup>38</sup>. It can be expected that a similar approach regarding transitional measures will be taken in the next enlargement rounds.

Built-in flexibility in the design of transitional measures is key to ensure that these can adapt to developments and the individual situations of the Member States. It is important that the transitional measures envisioned allow each Member State to decide whether to apply national measures to regulate the access of workers from new Member States to their labour markets upon accession or whether to apply EU law instead. In the framework of accession negotiations, Member States have already agreed to include transitional measures providing this type of flexibility for the drafting of the Accession Treaty with Montenegro.

In view of future enlargements, and if established by the Council in the EU Common Position for the opening of the chapter on free movement of workers, the Commission can assess *ex ante* the impact of the opening of labour markets to new Member States' nationals and, as a result, evaluate the necessity for any such transitional measures, which can help Member States to develop bespoke solutions considering their need for skills intelligence, attracting talent and consider demographic aspects and sectoral needs.

Enlargement countries already have access to '**Europass**', designed to improve the free movement of workers and the transparency of skills and qualifications for European citizens. Additionally, as enlargement countries align with the EU *acquis*, the **European Labour Authority** can conclude cooperation arrangements with enlargement countries prior to their accession to involve them when appropriate in some of its activities<sup>39</sup>. This could further smoothen their integration into the EU labour market.

On **social security coordination** and on **recognition of professional qualifications**, early cooperation and experience-sharing between new Member States and existing ones on administrative and technical alignment and development would help reduce bottlenecks at a later stage. The **Skills Portability Act**<sup>40</sup> should be put in place quickly at EU level to strengthen the transparency and portability of qualifications and skills, including through digital tools, and allow enlargement countries to take full advantage of the potential of the single market.

The **Union of Skills**<sup>41</sup> aims to accelerate the education and skills transformation that Europe urgently needs to tackle skills gaps. It is paramount to closely link enlargement countries to these reforms and initiatives, as they also face similar challenges to the EU. In this context, investing in adult learning is crucial to address labour shortages and skills gaps. The Commission, in cooperation with the International Labour Organization and the European

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<sup>38</sup> <https://ec.europa.eu/social/BlobServlet?docId=7191&langId=en>

<sup>39</sup> One such Arrangement was concluded with Moldova in May 2025.

<sup>40</sup> COM (2026) 992. The initiative is made up of three actions: the digitalisation of qualifications and skills (Action 1), the modernisation and digitalisation of the recognition system for regulated professions (Action 2), and measures to improve the recognition of the qualifications and skills of third-country nationals (Action 3).

<sup>41</sup> COM (2025) 90.

Training Foundation is supporting the preparation or implementation of the Youth Guarantee in the Western Balkans, Ukraine and Moldova with an aim to support the schools-to-work transition of young people not in education, employment or training (NEETs). Implementation by Moldova of Union of Skills-related initiative is discussed in the context of the EU – Moldova High Level Dialogue on Education, Skills, Labour, Social and Child Policies launched in June 2025.

Investing in skills will be crucial for enlargement countries to boost their competitiveness in view of their integration into the single market as well as to ensure economic social and territorial cohesion. To support national reforms and address emerging challenges, the Commission has proposed several initiatives under this strategy, some of which are particularly relevant for the school sector. These include the Action Plan on Basic Skills and the STEM Education Strategic Plan, which were delivered together with the Union of Skills Communication.

As part of the Union of Skills initiative, an **Education Package** including actions on basic skills and EU Teachers and Trainers Agenda as well as an EU VET Strategy will be launched in 2026. These initiatives will also be relevant for the enlargement countries to support their efforts in strengthening and modernising VET in line with EU priorities.

## **2.2 Free movement of goods**

### **2.2.1 Impact of enlargement on free movement of goods policies**

Common standards, rules and trust among national authorities are a prerequisite for effective free movement of goods in the single market. To this end, the preparedness of authorities is crucial. Authorities that perform well is key for authorisations (for instance in the automotive, medicines and chemicals sectors), certification by notified bodies accredited by accreditation bodies, and in market surveillance.

Enlargement would have a substantial impact on market surveillance policies. While Regulation 2019/1020 on market surveillance can accommodate new Member States, enlargement may exacerbate existing challenges, particularly on cooperation and trust among authorities. As market surveillance authorities have responsibilities limited to their respective national borders, and each candidate country has at least one such authority, they can effectively be incorporated into the present system. The revision of the EU market surveillance Regulation should support better product compliance also in an expanded EU. Similarly, the Union Product Compliance Network, established under the Regulation and comprising representatives from these authorities, can maintain its effective functioning. Authorities of enlargement countries can already participate as observers in the EU-wide Administrative Cooperation Groups for various product groups, among others.

Nevertheless, incorporating new countries may introduce specific challenges and aggravate existing issues, particularly on cooperation, trust and the utilisation of IT tools. The current system relies on the principle of mutual recognition of investigations of products conducted by various authorities (when a product is found to be non-compliant with EU legislation by one authority, this is recognised by other Member States, who can act on this information). These investigations and their outcomes are recorded in the **Information and Communication System on Market Surveillance (ICSMS)**, which is used by authorities across the EU to share information. Equally important is cross-border mutual assistance, whereby an authority can ask its counterparts to perform enforcement measures in their respective Member State to prevent non-compliant products from being placed on the market. These principles and actions rely on

mutual trust between authorities, sound procedures and enforcement, and competent inspectors.

### 2.2.2 Policy gaps and delivery risks

The main challenges lie in the potential sub-optimal preparedness of new Member States and a potential lack of trust in the effectiveness of their enforcement capacities. Even if those concerns are unfounded, failing to address them could undermine the broader market surveillance system and exacerbate current deficiencies. Authorities in the existing EU countries may hesitate to use mutual assistance and cross-border enforcement tools in the new Member States and might avoid recording investigations in the ICSMS due to concerns about sensitive information leakage. The latter already faces challenges to its use by Member States, due to competing national systems, all with similar missions and objectives.

As regards the EU-27, the existing **standardisation** framework struggles to meet market and policy needs, in particular in the field of green and digital transformation of EU industry. Recent evaluation of Regulation 1025/2012 revealed certain weaknesses in implementation concerning timeliness, inclusiveness and access to standards. Also, the EU **product framework** needs to be protected from abuse and would benefit from further legal clarity and the use of digital solutions.

### 2.2.3 Reform orientations

To address these challenges, several initiatives can be undertaken using available tools, and targeted policy changes can be considered.

To build mutual trust and working methods between current Member States and enlargement countries, the Commission could further encourage and enable new Member States to take the opportunity to actively engage, as far as practicable and security concerns permitting, in cooperative networks and groupings of market surveillance and relevant authorities. These are namely the **EU Product Compliance Network** and the **Consumer Safety Network**. To this end, financial and technical support for the Technical Assistance and Information Exchange (TAIEX) can be leveraged. Furthermore, to demonstrate their competency, professionalism, and proper enforcement, enlargement countries can use the **ICSMS** and the **Safety Gate Portal** as their primary tools for managing market surveillance. This approach can help prevent duplications with domestic systems. If domestic systems are already in place, these countries can be encouraged to transition to the Commission's systems, possibly with training and guidance by the Commission.

The proposal for a **European Product Act** would strengthen market surveillance rules in the EU, including by tapping into synergies with capacities of the EU and national customs and market surveillance authorities and by strengthening the role of the EU in market surveillance activities.

In addition, the proposal for a revision of the **Standardisation** Regulation increases the speed and flexibility of the standardisation process, ensure a stakeholder-driven process, improve access to standards and strengthen the EU's role as the global standard-setter. It will also contribute to the effective functioning of the EU product legislation framework. These actions should also help to maximise the benefits from an extended single market.

## 2.3 Freedom to provide services

### 2.3.1 Impact of enlargement on free movement of services policies and challenges

While the **Services Directive** remains fit for purpose overall, its full effectiveness depends on **improved implementation at the national level**. Harmonising rules across an increasingly diverse EU will be even more challenging. The Services Directive is largely based on broad legal principles. These grant significant regulatory discretion to Member States, resulting in minimum regulatory harmonisation.

On **professional qualifications**, institutions in new Member States that offer training in the seven professions for which minimum training requirements are set in EU law may face challenges. Investments in educational infrastructure (including professional practice in hospitals for certain health professions) may be necessary to meet minimum training requirements. Accession may also alter statistics, such as the number of specific professionals moving to practice their profession in other Member States. This may influence the overall direction of EU policies in this domain. The existing EU countries already experience challenges in lengthy and complex recognition procedures, while automatic recognition only applies to a few professions.

#### *Budgetary aspects<sup>42</sup>*

Prospective enlargement could impact the budgetary needs for single market-related actions currently financed under the Single Market Programme (SMP), implying potential adjustments in terms of priority setting, resources focus and design of the programme activities in line with the orientations set out in the Commission's MFF Communications. Nine association agreements have been signed since 2021 with enlargement countries<sup>43</sup>. All enlargement countries participate in the SME pillar of the SMP with support to businesses being a high priority, complemented by participation by some countries in the areas of mainly market surveillance, standardisation, competition policy, consumer protection and product safety, and European statistics.

Effective implementation of EU standards, compliance with EU rules, and strengthened cooperation between authorities will also constitute challenges to be addressed, partly via targeted support, training, and initiatives fostering collaborative opportunities. In general, efforts to accompany reconstruction after a crisis or the transition to fully functioning market economies in all enlargement countries would require assistance via capacity building and training.

The Commission's proposals for the MFF 2028–2034 set a strengthened framework for single market policies in place through inter alia the European Competitiveness Fund, under which support to SMEs will continue, and a new Single Market and Customs Programme (SMCP). As proposed by the Commission, the SMCP would provide a consolidated basis to channel support towards businesses, regulatory cooperation, data collection and other actions relevant to integration, including in areas such as administrative capacity, awareness raising among businesses, consumers and citizens, cooperation between authorities, and the digitalisation of public services. The SMCP would also provide support to the Customs Union, which constitutes the foundation of the Union as well as a fundamental enabler and guardian of the Single Market. The SMCP proposal also covers EU tax and anti-fraud policy, which are key to improving the functioning of the Single Market.

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<sup>42</sup> This budgetary aspects section covers also the free movement of goods section 2.1.

<sup>43</sup> Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia, Serbia, Türkiye, Moldova, Ukraine.

The proposed establishment of a new European Competitiveness Fund is intended to strengthen the competitiveness of the EU, following the relevant recommendations of the Draghi report. A larger Union would entail higher overall needs to integrate new markets, align industrial capacities, and foster competitive ecosystems across more Member States. Funding from the European Competitiveness Fund could, in principle, support activities such as cross-border industrial innovation projects and capacity-building initiatives that include new Member States, helping to strengthen value chains and competitiveness throughout the single market. By targeting strategic sectors and supporting the development of industrial value chains, the European Competitiveness Fund could contribute to addressing the challenges and opportunities associated with a larger Union, while complementing other dedicated instruments aimed at enlargement countries.

### 2.3.2 Reform orientations

Strengthening regulatory convergence can be beneficial to the EU, also as a preparedness measure for enlargement:

To better align Member States' services rules and ease the integration of new Member States, the EU can more effectively utilise, and strengthen as appropriate, single market support tools (cfr. above under Single Market).

As also announced in the Single Market Strategy, the Commission adopted in March 2026 a legislative proposal on **EU Inc.**<sup>44</sup> to establish '**28<sup>th</sup> regime**', providing common rules to facilitate the digital setup of businesses and their operations across the single market. The proposal for an EU Inc. corporate legal framework provides faster (within 48 hours), cheaper (maximum EUR 100) and fully digital company registration, simplified procedures throughout the company life cycle, easier digital share transfers and capital operations, support for modern financing instruments, and the possibility for Member States to allow access to public equity markets. It also introduces fully digital insolvency procedures and automatic transmission of company data to relevant authorities in line with the "once-only principle," while including safeguards against fraud and abuse. Moreover, it will provide a common optional scheme for employee stock options with harmonised deferred taxation, which will enable EU Inc. companies to attract the best talents.

To address existing regulatory and administrative restrictions to services across the Member States, the Single Market Strategy also announced an initiative to **facilitate the provision of pan-EU services** by providers authorised or certified in one Member State based on EU law, potentially including the harmonisation of such authorisation and certification schemes. It also committed the Commission to develop legal guidance and recommendations to Member States to provide clarity on the right to provide cross-border services on a temporary basis. The Single Market Strategy also announced an initiative to **facilitate the cross-border provision of industry-related services** such as installation, maintenance and repair services. This will be in addition to **sector-specific services' initiatives** that will focus on services sectors which are the most relevant for the twin transitions and could bring the highest economic added value and replace diverging national rules that create legal fragmentation.

On **professional qualifications**, the EU could investigate enhancements including through potential legislative adjustments. The Skills Portability Act<sup>45</sup> has highlighted the importance of greater use of digital tools measures to make the procedures for the recognition of professional qualifications faster and more efficient; extend automatic recognition schemes,

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<sup>44</sup> COM (2026) 321.

<sup>45</sup> COM (2026) 992.

for instance via Common Training Frameworks; and explore common rules for recognition and validation of qualifications and skills of third country nationals. In addition, the Commission could assess changes in the minimum training requirements of sectoral professions and into the possibility of introducing common training frameworks or tests for more professions. This domain has the potential for **gradual integration**. Western Balkan partners are bound by mobility agreements encompassing minimum EU training requirements. Such agreements could serve as a basis for pilot frameworks on mutual recognition with the EU.

**Opportunities for gradual integration** also exist in additional areas, such as e-commerce related services including parcel delivery services and tourism. On postal services, the Deep and Comprehensive Free Trade Areas with Ukraine and Moldova offer one of several possible pathways for integration, while e-commerce related services including parcel delivery services and tourism are highlighted as priority areas for gradual integration under the Growth Plan for the Western Balkans.

## 2.4 Free movement of capital

### 2.4.1 Impact of enlargement on free movement of capital and financial services policy

The governance and decision-making processes of the several European authorities competent in this domain<sup>46</sup>, which cooperate with national competent authorities, will become more complex, given the increased variety in the state of development of financial markets and experience in the sector. It may also become more difficult and challenging to reach consensus in enlarged European Supervisory Authorities where currently the final decision-making body, the Board of Supervisors is composed of one representative per each national competent authority.

For the above reasons, while the EU **financial services policy** is fit for future enlargement overall, there would be merit in involving the European Supervisory Authorities and the Anti-Money Laundering Authority in the pre-accession phase to assess and help consolidate and strengthen enlargement countries' supervisory capacities. At the same time, joining these Authorities, subject to the degree of advancement and a decision by the governing bodies after signature of the Accession Treaty, can allow these countries to strengthen their ability to cooperate with other Member States on supervisory matters.

On **sanctions, anti-money laundering and countering the financing of terrorism**, EU policies are fit for enlargement. However, (unanimous) decision-making in the Council on sanctions may become even more challenging in an enlarged Union.

On **free movement of capital**, where there is no EU-level secondary legislation, a greater number of Member States could entail the need for increased efforts in monitoring the correct application of EU law and preventing barriers to market integration.

Upon accession, investor-State dispute settlement clauses in extra-EU **bilateral investment treaties** (BITs) between current and new Member States will become contrary to EU law, in light of the Achmea case-law. The Commission's recent policy has been to only authorise bilateral investment treaties between Member States and (potential) candidates which provide for automatic and full termination upon accession of the latter.

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<sup>46</sup> European Banking Authority; the European Insurance and Occupational Pensions Authority; the European Securities and Markets Authority; the European Systemic Risk Board; the Single Resolution Board; the Single Supervisory Mechanism; the Anti-Money Laundering Authority.

Over the past year, Montenegro, Albania, Moldova, North Macedonia and Serbia have joined the geographical scope of **Single Euro Payments Area (SEPA)** schemes<sup>47</sup>. This allows their financial institutions to participate in SEPA payment schemes, easing and speeding up Euro transfers. To join SEPA, countries must align with key EU financial rules, including on Anti-money laundering and countering the financing of terrorism, thereby facilitating **gradual integration** into the EU single market.

Given the overall favourable financial stability environment to date, the 2024 Vienna Initiative Bank Lending Survey found that cross-border banking groups overall intended to expand or maintain exposure to the Central, Eastern and South-Eastern European region, including to enlargement countries. In most of the countries in the region, the banking markets are concentrated. At the same time, they belong to a region that continues to undergo economic and social developments. Accession of new Member States from the region could provide good opportunities for growth and profitability for EU financial institutions, while improving access to finance, reducing costs for consumers and increasing competition in the enlargement countries. However, with stronger ties between new Member States and the rest of the EU, the risk of contagion may also increase, therefore making the case for appropriate supervision in new Member States.

#### *Budgetary aspects*

The European supervisory authorities and the Anti-Money Laundering Authority would need additional, non-recurring resources to assist the Commission in carrying out pre-enlargement administrative capacity checks. The Commission would also need additional resources to support new Member States and monitor compliance with the Treaty provisions on free movement of capital and the correct implementation of the financial services legislation.

### **2.4.2 Policy gaps and delivery risks**

A lack of sufficient supervisory capacity and expertise in new Member States could pose a risk to the application of EU legislation and the orderly functioning of the single market, and with it to investor protection, market integrity and financial stability. It is therefore important that before accession, the Commission is fully satisfied that candidate country supervisors have sufficient administrative capacity for the implementation and enforcement of the *acquis* in the field of financial services.

### **2.4.3 Reform orientations**

Due to their role in the European system of financial supervision, the European supervisory authorities and the Anti-Money Laundering Authority are best placed to perform such checks and ensure that no gaps remain. By assisting the Commission in the pre-enlargement phase, the authorities should check whether the framework and administrative capacity of enlargement countries can ensure that the rules applicable to the financial sector in enlargement countries are adequately implemented and enforced to preserve financial stability and to ensure confidence in the financial system as a whole, as well as effective and sufficient protection for financial services consumers.

Some of the European supervisory authorities already provide technical assistance in assessing confidentiality and professional secrecy or supporting the Commission, where applicable, with the assessment of regulatory and supervisory equivalence with the EU of certain enlargement

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<sup>47</sup> The SEPA project was launched by the European banking and payment industry represented by the European Payments Council (EPC).

countries, such as that of Montenegro and Albania. Such types of assessment typically span between one and three years. For planning and efficiency purposes, to avoid duplication with pre-enlargement efforts, it is to be considered when and if such upcoming/ongoing technical assessments should take place. This could simultaneously help enlargement countries integrate their markets within the EU and gradually strengthen their regulatory and supervisory capacities.

The EU should also continue supporting gradual integration of enlargement countries into SEPA schemes, as they meet the necessary conditions.

## **2.5 Health policy**

**Health protection** directly impacts, beyond citizens, the single market and external trade. The relevant EU *acquis* aims to deliver resilient, modernised, innovation-based, and digitalised health systems. This ensures quality, safe, efficacious and accessible medicinal products, medical devices and life-saving treatments, and maintains prevention, preparedness, quality and safety oversight, surveillance systems and response mechanisms. Under a ‘One Health’ approach, innovation and access to market of animal vaccines and other alternatives to minimise the use of antimicrobials is crucial for addressing antimicrobial resistance, zoonoses and other major diseases with zoonotic potential.

**Prevention, preparedness and response** to serious cross-border threats to health is a key part of the EU’s preparedness policy, with the risk of serious cross-border threats to health being further amplified by the globalised and highly interconnected nature of our societies and economies. Maintaining and reinforcing a strong health crisis prevention, preparedness and response framework through an all hazard and ‘One Health’ approach is crucial for protecting the safety of EU citizens and safeguarding public health.

It will be essential for enlargement countries to establish robust and sustainable health systems capacity, quality and safety oversight, surveillance and reporting mechanisms, as well as response capacities. The same applies to the capacity of the relevant authorities dealing with medicinal products for human and veterinary use and medical devices. The EU will assist enlargement countries to align with EU standards and build administrative capacity and expertise to participate fully to all relevant EU networks when they join the EU. Establishing administrative capacity and health-system arrangements are also necessary to ensure the implementation of Directive 2011/24/EU on the application of patients' rights in cross-border healthcare. Tobacco consumption continues to be the leading cause of preventable cancer. The tobacco control legislation is a key component of the EU cancer prevention policy. To tackle tobacco and nicotine consumption and contribute to the objectives of Europe’s Beating Cancer Plan, it will be essential for EU enlargement countries to ensure alignment with and the implementation of the Tobacco Products Directive 2014/40/EU and Tobacco Advertising Directive 2003/33/EC.

### **2.5.1 Impact of enlargement on health policy and prevention of, preparedness for and response to cross-border health threats**

Enlargement could affect the EU's efforts to uphold its all hazard and ‘One Health’ approach, critical for the protection of the health of humans, animals, plants and the environment and the integrity of the single market.

From a competitiveness standpoint, a larger EU population creates an economy of scale that makes the EU a more attractive market for the pharmaceutical industry. Expanding the EU will

boost the health and social care sectors and increase the potential for health innovation and entrepreneurship. With regard to the availability of critical medicines in the EU, the Critical Medicines Act<sup>48</sup>, acknowledges the value of exploring international strategic partnerships with third countries, especially enlargement countries, that may contribute to diversifying supply sources and strengthening the resilience of supply chains. Furthermore, the Act will introduce the possibility for Member States to request the Commission's support to purchase certain medicines together. An enlargement country may participate in such **EU collaborative procurement initiatives** upon invitation by the participating EU Member States when the Union has entered into a bilateral agreement with that enlargement country.

As observed during the COVID-19 pandemic, varying levels of **preparedness** and policy approaches across Member States trigger difficulties in coordinating crisis response. A unified approach in an enlarged EU could therefore be a challenge. However, the new Member States would have to report about the status of preparedness to the Commission and would undergo a public health emergency preparedness assessment that would result in action plans and hence improve their overall preparedness. Also, experts would join the disease networks of ECDC and this would ensure a closer collaboration and exchange of surveillance data based on agreed case definitions.

Enlargement would also provide an opportunity to strengthen **supply chains for medical countermeasures** and **critical medicines** thanks to potential new suppliers offering new capacities, greater diversification and less strategic dependence on non-EU countries regarding the manufacturing of critical medicines. There could also be opportunities for increased participation in joint procurement either improving access to medical countermeasures under the Joint Procurement Agreement<sup>49</sup> and/or enhancing availability of critical medicines and medicines of common interest via the proposed collaborative procurement tools under the Critical Medicines Act.

Enlargement would increase the EU's population and geographic coverage, making stronger surveillance systems essential for the early detection of and response to emerging threats. Increased participation in wastewater and environmental surveillance networks, under the coordination of the European Centre for Disease Prevention and Control, as well as in EU reference laboratories, and including through initiatives like the Global Consortium for Wastewater and Environmental Surveillance for Public Health (GLOWACON) or the EU Sentinel system, would improve the collection and sharing of information on emerging biological and chemical threats<sup>50</sup>.

Enlargement might also have an impact on the EU's efforts to strengthen its role in the **World Health Organization** (WHO), of which the EU is not a member, only its Member States.

### *Budgetary aspects*

Enlargement would require an adequate budget for EU health policies. Current funding (under the EU4Health Programme, the Single Market Programme, operational programmes under cohesion policy) supports multiple important health policy objectives including but not limited to prevention, health promotion, digitalisation, health system resilience, disease surveillance and crises preparedness as well as workforce/expert training. Under the current MFF, some

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<sup>48</sup> Political agreement in May 2025.

<sup>49</sup> C(2014) 2258: Albania, Bosnia and Herzegovina, Moldova, Montenegro, North Macedonia, Serbia, Kosovo and Ukraine are already participating countries to the joint procurement agreement to procure medical countermeasures,

<sup>50</sup> Enlargement countries can also already participate in wastewater and environmental surveillance networks, such as GLOWACON. Ukraine is already a part of the joint action EU WISH.

enlargement countries are already benefitting from participation in actions funded by the EU4Health programme. The European Commission signed association agreements with authorities from Ukraine, Moldova, Montenegro, Bosnia and Herzegovina and North Macedonia that opens access to EU4Health funding for these countries.

Besides EU4Health, some enlargement countries are already associated to the other main instruments used under the current MFF to finance activities in health, including health emergency preparedness and response (Horizon Europe, Union Civil Protection Mechanism (UCPM)) and are consulted as part of the respective programme committees.

The instruments proposed under the MFF 2028-2034 relevant for health, including health emergency preparedness and response (notably the European Competitiveness Fund; the new Horizon Europe programme; the National and Regional Partnership Plans; UCPM and Union support for health emergency preparedness and response (UCPM/HER)<sup>51</sup>) allow for the association and participation of enlargement countries.

With enlargement, decentralised agencies, notably the European Medicines Agency (EMA), the European Centre for Disease Prevention and Control (ECDC), the European Food Safety Authority (EFSA), the European Chemicals Agency (ECHA for biocides), would need to provide services to an extended number of Member States, which would imply additional operational and operating costs.

The Commission will similarly need to manage an increased workload to provide technical assistance and capacity-building support, respond to queries of stakeholders, which will require additional staff, budget, and infrastructure to support the integration of future Member States into the EU's health. For example, marketing authorisation and pharmacovigilance is an area where enlargement would directly increase the workload of EMA and of the Commission. The Commission will also need to increase capacity to perform controls (including audits, fact-finding missions and other assessment activities) to evaluate the implementation of relevant Union legislation. The intensity of controls required in future Member States will increase the demand profile significantly and require an upward adjustment of the allocated resources.

### 2.5.2 Policy gaps and delivery gaps

The main gaps relate to the **capacity** (and absorption facility) of the new Member States **to implement effectively the EU *acquis***, considering their current level of administrative, IT and operational preparedness (for those areas where data is available) to establish a well-functioning and sustainable health system based on the required EU standards that will be capable to respond to health emergencies, such as epidemics.

### 2.5.3 Reform orientations

Revisions of several important pieces of legislation in the field of health are ongoing to simplify and streamline processes and improve their effectiveness, with a view to making them fit for the future and enlargement:

The adoption and timely implementation of the revision of the pharmaceutical legislation and the Critical Medicines Act, will be crucial to ensure fair and equitable access to safe, efficacious and quality medicines and improve availability and security of supply, faster entry of generics and biosimilar medicines products on the market, and reward the placing of a medicinal product

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<sup>51</sup> COM (2025) 548.

in all Member States (those measures may be important for smaller Member States and those with fewer financial resources).

In the field of medical devices, evaluation and revision of legislation<sup>52</sup> is currently ongoing as well, with a view to simplifying EU rules, aiming to ensure availability of safe and innovative devices to support competitiveness and safeguarding a high level of patient safety and public health protection.

The proposal for a European Biotech Act<sup>53</sup> aims to strengthen the competitiveness of the health biotechnology sector, by establishing the conditions for research, development and timely placing on the Union market and production of health biotechnology innovations, products and services and simplifying and streamlining the Union legislative frameworks.

As part of the gradual integration process, extended participation of enlargement countries as observers in the European Medicines Agency Working Groups and in the networks of the European Centre for Disease Prevention and Control will support capacity building in the area of health and strengthen their technical expertise.

To ensure that high quality and safety health standards are in place upon the accession of new Member States, the Commission will grant enlargement countries access to the Early Warning and Response System for serious cross-border threats to health once the necessary administrative arrangements are in place.

Otherwise, the current policy framework in health policy and health emergency prevention, preparedness and response can be considered as fit for enlargement.

## **2.6 Competition policy**

Competition policy is an important lever to strengthen Europe's competitiveness. Rigorous and effective enforcement of the antitrust, merger and State aid rules protects fair competition and incentivises companies to innovate and become more efficient. At the same time, in the global race to develop technologies and breakthrough innovations, competition policy needs to keep pace with evolving markets and innovation, be better geared to common goals and allow companies to scale up in global markets while ensuring a level playing field in the single market. As the EU looks to enlargement, a robust competition policy based on clear rules will be crucial in ensuring that the enlargement countries can integrate smoothly into the single market, while also safeguarding healthy and undistorted competition.

### **2.6.1 Impact of enlargement on competition policy**

#### *Policy impacts*

The enlargement of the EU will significantly increase the size of the single market – with tens of millions more consumers and businesses of all sizes and sectors – from SMEs, start-ups and semi-subsistence farms to large conglomerates and corporations, also including State-Owned

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<sup>52</sup> Proposal for a Regulation of the European Parliament and of the Council amending Regulations (EU) 2017/745 and (EU) 2017/746 as regards simplifying and reducing the burden of the rules on medical devices and in vitro diagnostic medical devices, and amending Regulation (EU) 2022/123 as regards the support of the European Medicines Agency for the expert panels on medical devices and Regulation (EU) 2024/1689 as regards the list of Union harmonisation legislation referred to in its Annex I (COM/2025/1023 final).

EUR-Lex: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52025PC1023>.

<sup>53</sup> [https://health.ec.europa.eu/publications/proposal-regulation-establish-measures-strengthen-unions-biotechnology-and-biomanufacturing-sectors\\_en](https://health.ec.europa.eu/publications/proposal-regulation-establish-measures-strengthen-unions-biotechnology-and-biomanufacturing-sectors_en)

Enterprises. It will require the continued and effective enforcement of the competition rules to protect a level playing field and fair competition in the enlarged single market.

The most significant enforcement impacts of enlargement can be expected for State aid, while for the merger area only limited impact is expected. As regards antitrust, the main impact will be on coordination needs between the Commission and national competition authorities within the European Competition Network (ECN) and national courts, given an increased number of national competition authorities. It will also have a marginal impact on the number of Commission antitrust cases and their complexity due to the higher number of Member States.

For State aid, a more significant impact is expected on the review of existing State aid schemes and their compatibility with the EU *acquis* and the assessment of notifications of new aid measures. In the medium term, there will also be an impact on State aid guidelines and regulations which may need to be revised to reflect updates of relevant EU sectoral legislation<sup>54</sup>. For example, the State aid agricultural guidelines and block exemptions are usually revised in regular cycles to reflect changes in the Common Agricultural Policy (CAP). There may also be a more technical impact on instruments that rely on input from the Member States. A set of guidelines rely on data from Member States (GDP figures, reference rates) and they would need to be revised to factor in new economic data. If the EU's average GDP declines because of enlargement, this may directly impact the designation of regions under the Regional aid Guidelines. The exact impact will depend on the direction and the extent of changes introduced also to the overall EU regional policy.

#### *Budgetary aspects*

Enlargement would create additional enforcement work for the Commission and potentially additional human resources needs, if rationalisation measures do not free up the resources needed. For State aid, the number of notifications, complaints and general requests for guidance is likely to increase. For antitrust, the economies of the new Member States may initially merit more intense enforcement than for current Member States, also coming with a possible increase in formal complaints and market information letters.<sup>55</sup> Antitrust investigations may become more complex, in particular where they cover several Member States in markets with a national dimension (e.g. pharmaceuticals, consumer goods, telecommunications). The number of cases in which the Commission is consulted by national competition authorities and needs to collaborate with national courts may also increase.

In addition, enlargement would trigger the need for adequate financing of activities and increased human, financial and IT resources in the Commission, currently funded by the Single Market Programme:

- National competition authorities and the Commission exchange information via the ECN2 IT tool. Enlargement would also affect IT capabilities, with an increased need for access and a higher level of exchanges. Given that the enlargement countries will not yet have experience with this tool, there is likely to be an increased need for IT assistance.

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<sup>54</sup> Concerning State aid, it is, first, useful to distinguish between the assessment of the existence of State aid and the compatibility assessment. Whereas the Commission has no discretion to decide whether State aid exists and is bound by the jurisprudence of the Court of Justice, it has discretion in its compatibility assessment when applying Article 107(3) TFEU. Thus, an analysis as to whether State aid rules and policy are “enlargement proof” can only concern those areas where the Commission has discretion and can make choices, i.e. in the compatibility analysis. Second, State aid compatibility rules may be impacted by changes in sectoral legislation.

<sup>55</sup> Citizens and undertakings who prefer not to submit a formal complaint can send market information letters to the Commission to provide information on a specific market where they have concerns regarding compliance with EU competition rules.

- With enlargement, adequate support will be needed for continued capacity building activities (meetings/trainings for key stakeholders such as national competition authorities, training of judges on competition law and awareness raising for specialised target audiences, e.g. the business community) as well as for the operation of the European Competition Network.

## **2.6.2 Policy gaps, delivery risks and reform orientations**

Based on the experience of previous enlargement rounds, developing competition law enforcement, know-how and culture to ensure the effective and consistent application of the law takes a long time and requires adequate financial support.

State aid guidelines and regulations may have to be revised to reflect the potential changes of EU legislation post-enlargement in the various policy areas.

## **3. COMPETITIVENESS AND INCLUSIVE GROWTH**

### **3.1 Enterprise and industrial policy**

EU industrial policy serves as a roof area that draws together a range of policy initiatives that aim to strengthen the EU's competitiveness. It includes nine drivers of competitiveness in the EU: a functioning single market, access to private capital, public investment and infrastructure, research and innovation, energy, circular economy, digitalisation, education and skills, trade and open strategic autonomy. It is a domain in which EU and national competences are strongly connected, with an important role for policy making at national level.

The main challenges to Europe's competitiveness, such as high energy prices and overcapacities in third countries, affect the industrial fabric across the EU. It is therefore, in this context even more important to strengthen the EU industrial policy and foster the coordination of policies and initiatives across the EU and between Member States. For this reason, the Commission adopted a Clean Industrial Deal, a proposal for a European Competitiveness Fund and for an Industrial Accelerator Act and deploys a Competitiveness Coordination Tool, among other things.

The EU is developing targeted policies under the main axes and overarching objectives of its industrial policy: closing the innovation gap; decarbonisation and competitiveness; reducing excessive dependencies and increasing security. Upon accession, new Member States will also benefit from the initiatives that have been launched in line with this renewed industrial logic – namely the European Chips Act, the Critical Raw Materials Act and the Net Zero Industry Act.

#### **3.1.1 Impact of enlargement on the EU enterprise and industrial policy**

Enlargement would have a significant impact on the industrial structure in the EU, primarily in terms of greater heterogeneity. Enlargement countries generally come from an overall lower economic base than the EU average, with lower wages and significant potential to grow their economies to converge with the EU-27. Some have economies that rely on traditional industry sectors, in particular energy intensive industries, whilst others are more oriented towards services. The economies of most enlargement countries are rather carbon-intensive (apart from Albania, relying mainly on hydropower) and have low levels of energy efficiency.

It is expected that enlargement would create a rise in productivity in the new Member States and entail a significant economic adjustment across the EU. A significant uptick in investment

activity in the run-up to and after enlargement is likely in the new Member States, typically in sectors where they have a comparative advantage (e.g. labour costs). Also, it is possible that the competitiveness of some industrial sectors will be challenged once they are in the EU, for instance due to lower carbon-efficiency. Vice versa, this new competition may affect the relative position of these industries in the 27 Member States.

#### *Budgetary aspects*

The Commission will need more human resources because EU rules and initiatives on industry will apply to more Member States. EU Agencies work will also face a higher workload (e.g. the European Chemicals Agency (ECHA) will have to manage additional registrations of substances).

### **3.1.2 Policy gaps, delivery risks and reform orientations**

At present, the competitiveness of several EU industrial sectors is under pressure. An increased heterogeneity of industry coming with future enlargement would make it even more important to strengthen the EU's industrial policy toolbox and to involve enlargement countries.

There are several opportunities to strengthen partnerships with enlargement countries in various forms. In October 2023, upon request from Member States, the Commission put in place the Joint European Forum for **Important Projects of Common European Interest** (IPCEIs), where Commission and Member States collaborate closely to identify areas of strategic EU interest for potential future IPCEIs and work to increase their effective design, assessment and implementation. IPCEIs are not limited to specific industry sectors. Inviting enlargement countries to participate to specific meetings of the Forum could be a way to prepare them to participate to IPCEIs.

In addition, there is an opportunity to continue the EU's work on **strategic industrial partnerships**, such as the strategic raw materials partnership with Serbia and Ukraine and the Industrial Policy Dialogues already ongoing with Ukraine. In line with the Western Balkans Growth Plan, through bilateral dialogues on industrial cooperation, the EU will target strategic industries such as raw materials, batteries, and machinery, while advancing regulatory integration for their early and gradual access to the single market and enhancing business cooperation for further integration in EU industrial ecosystems. For example, work on the Agreements on Conformity Assessment and Acceptance of Industrial Products (ACAA) is underway with Ukraine, Moldova and Serbia with the possibility offered to all Western Balkans to start the process to conclude an ACAA. In its Action Plan to secure a competitive and decarbonised steel and metals industry in Europe<sup>56</sup> the Commission said that it would consider creating EU partnerships with non-EU countries, especially enlargement countries, as they integrate into the single market and move towards EU membership. The Commission also noted that a **strategic approach to strengthening supply chain resilience** could involve investing in partner countries and redefining industrial collaborations to create a more sustainable and resilient steel production sector. The EU bioeconomy strategy also called for integrating enlargement countries and immediate neighbours into EU bio-based value chains, with a view to establish regional bioeconomy hubs, diminish reliance on external raw materials, and enhance EU's strategic autonomy.

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<sup>56</sup> COM (2025) 125.

## **3.2 Research and innovation**

Research and Innovation (R&I) is one of the key drivers of competitiveness. Enlargement countries are fully associated with the EU's Framework Programmes for Research and Innovation. Some of these countries have been associated for over a decade, enabling them to develop their R&I capacity to participate in the EU's Framework programmes for research and innovation. Over the years, EU R&I policies have influenced and guided national and regional research ecosystems in these countries, helping to bridge the policy gap between these countries and the EU. Different support and guidance instruments are available to them under the current Framework Programme for R&I - Horizon Europe, such as the European Research Area, Widening, Innovation, and the Policy Support Facility or the Global Service Facility for International cooperation to further strengthen regional cooperation. The EU already supports the participation of Moldova and Ukraine through dedicated financial support to the Horizon Europe Offices in the respective countries. Organisations from the enlargement countries are also participating in several EU Missions in Horizon Europe, including the Mission 'Climate Neutral and Smart Cities', the Mission 'Restore our ocean and waters', the Mission for 'Adaptation to Climate Change' as well as the Mission on 'Cancer'.

The participation of the enlargement countries located in the Black Sea region and in the Western Balkans in Horizon Europe is increasing. Initiatives like the Danube and Black Sea lighthouse of the EU Mission 'Restore our Ocean and Waters' supports freshwater and marine research and innovation, bringing together community and sectoral stakeholders from the Black Sea region. There are additional new calls targeted at the Black Sea under the Horizon Europe Work Programme 2026-27.

In addition, several enlargement countries are also participating in some EU Partnerships, such as Biodiversa+, the European High-Performance Computing Joint Undertaking and the Sustainable Blue Economy Partnership.

The Black Sea also features among the targeted sea-basins of the Sustainable Blue Economy partnership. Four additional calls for proposals planned under this partnership, provide additional possibilities for cooperation for enlargement countries in the region. Cooperation opportunities will also grow under the BIOEAST initiative (Central and Eastern European initiative for knowledge-based agriculture, aquaculture and forestry in the bioeconomy) which currently covers eleven EU widening countries. There are plans to expand activities towards Ukraine, Moldova and the Western Balkans in knowledge-based agriculture, forestry and aquaculture in the bioeconomy.

Enlargement countries are also increasing efforts to cooperate in the area of Research Infrastructures by participating in different European Research Infrastructures Consortia (ERIC) such as the CESSDA-ERIC, the DARIAH-ERIC, the ESS-ERIC, the DANUBIUS-ERIC and the ELI-ERIC.

### **3.2.1 Impact of enlargement on research and innovation policy**

Enlargement would strengthen the European Research Area by broaden the talent pool for innovation. New Member States will bring skilled professionals, researchers, and entrepreneurs in sectors such as IT, engineering, agri-food and environmental sciences, which will increase scientific capacity and collaboration potentials. The free movement of talent within the EU, in line with the ambitions of the Letta report on the Future of the Single Market on the promotion of the fifth freedom (the free movement of research, innovation, knowledge, and education), will enhance the exchange of knowledge and expertise, fostering cross-border collaborations and accelerating innovation uptake across the Union. Moreover, enlargement would also

support the alignment of research policy, ethical standards, and open sciences practices across the European continent. Cooperation with Ukraine on fission research is vital for bringing the EU's research excellence and nuclear safety culture to the Ukrainian nuclear sector. Enlargement would be expected to bring the same excellence and safety culture to the sectors using ionising radiation for non-power purposes in the other countries as well.

When it comes to challenges to be addressed, enlargement would bring increased diversity in the R&I landscape, with different needs and capacities<sup>57</sup>. Enlargement countries have earmarked below 1% of GDP for R&D. In some enlargement countries the respect of academic freedom and freedom of scientific research as well as the autonomy of research institutes, is in decline. The disparity of R&D capacity and level in enlargement countries compared to the EU will require further efforts to reduce research and innovation disparities and divide within the EU, while upholding the non-negotiable EU standards in this area, including as regards academic freedom and the independence of research institutes.

Enlargement would have a greater impact on R&I policies and investment in the enlargement countries, rather than on the EU policies. This is because enlargement countries already participate in EU policies and programmes as follows: (i) they participate to the ERA governance bodies as observers; (ii) they are participating on equal footing in Horizon Europe through their association to Horizon Europe (iii) they are anchored in the European Innovation Ecosystems and (iv) they participate in research and technology infrastructures and open science initiatives, with different level of advancement. To meet the objectives of the 'widening policy', new Member States may increase their participation in Horizon Europe and in widening projects in particular. From an institutional viewpoint, enlargement increases the challenges in reaching unanimity in Council on nuclear research matters governed by the Euratom treaty, due to a larger number of Member States.

#### *Budgetary aspects*

Boosting the national R&I ecosystems of new Member States to reach the EU average would require mobilising public and private investments and instituting reforms that support stronger levels of scientific excellence, more science-business linkages and better innovation performance.

Enlargement would require investing in enlargement countries in research technology and infrastructure and capacity. This includes notably Ukraine funding needs to rebuild research infrastructures and facilities damaged during Russia's war of aggression (e.g. the research facility in Kharkiv).

With the change of status of enlargement countries as EU Member States in the governance bodies of the EU Framework Programme for R&I, specific needs may emerge. For example, specific scientific research may be needed on new issues (e.g. war-caused environmental damage). Moreover, there is a need to envisage capacity building measures for new Member

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<sup>57</sup> According to the 2025 [European Innovation Scoreboard \(EIS\)](#), enlargement countries perform below 70% of the EU average, despite some improvements notably in terms of 'Attractive Research System and Linkages' and 'Investments in information technologies' over the period 2018-2025. On three other dimensions, 'Finance and support', 'Firm investments', and 'Trade impacts', the EU neighbouring countries continue to face difficulties, struggling to mobilise sufficient funding and financial support for innovation activities, while the challenging global context adds to the constraints in trade of innovative products. Regarding open science policy, monitoring data shows that enlargement countries are lagging significantly behind developments in EU Member States. For example, of the enlargement countries providing data to the EOSC Open Science Observatory, only one has reported that they have a national policy for open science in place.

States to improve their R&I capacity and their levels of participation in the Framework Programme for R&I Horizon Europe.

While Ukraine already participates actively in the Euratom Research and Training Programme, enlargement can be expected to result in a further increase in beneficiaries interested in nuclear research collaboration, particularly in novel areas such as non-electrical applications of nuclear energy (district heating, industrial heat, propulsion) and in medical applications of ionising radiation. Support in the area of nuclear security, safeguards and chemical, biological, radiological and nuclear materials (CBRN), which already extend to some enlargement countries, would need to be reinforced to address the increased demand stemming from enlargement. Alongside these areas, the EU should also ensure that enlargement would support its strategic focus on accelerating nuclear fusion development, given its long-term importance for the decarbonisation objectives of an expanded Union.

### 3.2.2 Policy gaps and delivery risks

Enlargement countries are fully associated to and actively participating in Horizon Europe. They are closely involved in its implementation. However, they face challenges in developing robust innovation ecosystems, particularly in terms of instruments and resources available for R&D, including for research and infrastructure, and access to and retention of skilled talent. The countries also have a poor level of performance in terms of intellectual assets, including patents, trademarks, and design applications. These gaps in national policies may hinder them from increasing their participation in the EU R&I programme and policy and may hinder their sustainable growth and competitiveness.

### 3.2.3 Reform orientations

To further prepare for enlargement, the EU could increase its **support for targeted investment and capacity building** initiatives in research and innovation in enlargement countries. This will help them to harmonise their national policies with EU policies, mainly as regards adapting to the ERA and regulatory alignment to reduce barriers to innovation. This would be in line with existing efforts by the European Commission, such as the Policy Support Facility under Horizon Europe, which already provides tailored support for policy reform and capacity building in research and innovation systems, i.e. support will be provided to Moldova in 2026. Under the Global Support Facility for international cooperation, enlargement countries receive tailored support in different fields such as Science-business cooperations or training for Innovation Hubs and innovative SMEs.

In addition, Horizon Europe's 2025 work programme included a topic on 'Support for R&I policy making in the EU enlargement countries' for the further integration of these countries into the European Research Area and into the European Innovation Area, highlighting the strategic importance of the enlargement countries and facilitating actions aiming to support the region's EU integration process. The project Policy ENLARGE has successfully launched its activities in April 2026. Besides others, it will support the structured R&I policy dialogue with enlargement countries and will offer tailored capacity building support for R&I reforms, digitalisation, technology transfer, and evidence-based decision-making.

Under the European Innovation Council (EIC) Pre-Accelerator call under the EIC Work Programme 2025, entities from enlargement countries successfully participated. Projects with startups from Serbia, Moldova, Georgia and Ukraine will launch in 2026.

Smart Specialisation supports regions in their innovation strategies, boosting growth and prosperity, promoting knowledge-based economic development and targeted R&I policies

building on territorial specificities, unique potentials and emerging niches. Following the success of Smart Specialisation in the EU, many enlargement countries have developed Smart Specialisation Strategies to strengthen their innovation ecosystems and prepare for the integration into the European Research Area. Further support could be provided to ensure the successful implementation and renewal of Smart Specialisation in enlargement countries.

Further support could also focus on increasing the participation of enlargement countries in widening projects under Horizon Europe, to strengthen their R&I research and innovation capacity and foster deeper integration into the European Research Area. The EU could also consider providing capacity-building support to strengthen innovation ecosystems in new Member States for example by increasing their involvement in the Regional Innovation Scheme of the European Institute for Technology and in the Regional Innovation Valleys initiative. The EU could also help to promote knowledge valorisation through stronger collaboration between industry and academia, the development of legal and policy frameworks to manage intellectual assets including IP management, and by better connecting research with standardisation.

The EU can further assist enlargement countries in the development of their long-term national and regional research and innovation agendas to support participation in R&I partnerships and networks as highlighted in the Draghi report on the Future of European competitiveness and in the recent expert report on research, technology and innovation to boost European competitiveness<sup>58</sup>.

The EU could also consider introducing targeted actions for enlargement countries to **support early-stage startups and scaleups** to close the innovation gap, particularly in country-specific smart specialisation domains and, overall, in emerging sectors such as digital transformation, clean energy, and AI<sup>59</sup>. The Commission Startups and Scaleup Strategy<sup>60</sup> emphasises the importance of **gradual integration** of enlargement countries in the EU's startups and scaleups ecosystem, to boost our autonomy and resilience. Namely it points out that the Commission will leverage and reinforce existing instruments and develop new instruments to invest in European security and defence startups and scaleups, in line with the White Paper on Defence and based on the Omnibus Defence Simplification Package. These instruments could include more flexible and adaptive funding approaches for emerging defence innovators, including also from Ukraine, such as targeted support to single entities. Already today, Ukraine is eligible to participate in the EIC STEP Scale Up Defence Scheme.

Public-private partnerships can also be further encouraged to **facilitate access to finance** and create more investment opportunities for startups in every region. There is also an opportunity to strengthen further local investors networks and better connect them to the EU markets, including by giving them opportunity to join the EIC Trusted Investors Network, which was set up to support investment by the EIC.

To improve the **use of innovation procurement** in new Member States, the EU could provide further capacity building resources to public authorities, helping them better understand and use innovation procurement tools and strengthen the governance of innovation ecosystems via smart specialisation processes. Creating a more transparent and accessible procurement process in line with the EU regulatory framework on public procurement will ensure that startups and scaleups in new regions can tap into public markets and grow their businesses.

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<sup>58</sup> <https://op.europa.eu/en/publication-detail/-/publication/2f9fc221-86bb-11ef-a67d-01aa75ed71a1/language-en>

<sup>59</sup> For instance, the European Innovation Council Work Programme 2025, under Horizon Europe, included a call for the support of Ukrainian tech innovators.

<sup>60</sup> COM (2025) 270.

### 3.3 Education, youth, sport and culture policies

The Political Guidelines of President von der Leyen for 2024-2029 call for reinforced cooperation with the EU's international partners. Support to enlargement countries remains a top priority, also in the areas of education, youth, sport and culture policies, that are very closely linked to enlargement. Enlargement countries are reforming their policies to approximate to EU standards and targets, particularly those set by the European Education Area (EEA). In particular, alignment is necessary to make sure that upon accession, enlargement countries can benefit effectively, and contribute to, EU programmes designed to foster cooperation. Additionally, these policies promote EU values and the EU identity, human rights, and the rule of law, supporting the EU's goal of creating an integrated, democratic and larger EU. Erasmus+, the EU's flagship programme for education, training, youth and sport, is a crucial instrument in supporting policy development and bringing enlargement countries closer to the EU, as is the Creative Europe programme in the field of culture.

Currently, the international dimension of the Erasmus+ programme supports capacity building for the benefit of enlargement countries in the fields of higher education, vocational education and training, youth and sport. In addition, a dedicated capacity building scheme has been underway since late 2025 to prepare enlargement countries for their association to the Erasmus+ programme. Two TAIEX workshops were organised in November 2025 and March 2026 for participants from appointed ministries that will become Erasmus+ national authorities responsible for designating and supervising the future Erasmus+ national agencies. The workshops aimed at building their capacities to monitor and supervise the future agencies with knowledge of the programme's indirect management rules. Further assistance is ongoing to help them identify and set up their Erasmus+ agencies. From 2027 onwards, additional events and support measures will be organised to engage potential beneficiaries and stakeholders, and to assist the newly established Erasmus+ national agencies in taking up their roles.

#### 3.3.1 Impact of enlargement on education, youth, sport and culture policies

Whilst EU policies already broadly apply to enlargement countries, and these countries are parties to relevant international conventions, enlargement would further diversify the **education, youth, sport and culture** landscape, bringing a range of more profound needs, capacities (e.g., in terms of affordability of learning mobility), and opportunities.

On **education**, enlargement countries, except Kosovo, have been invited to join the working groups under the EEA Strategic Framework and have appointed representatives. The EU cooperation in education and training is based on the open method of coordination; enlargement countries are partially participating in it already for example, as part of the EEA Strategic framework working groups. Therefore, no major adjustments to the functioning of the Strategic Framework are expected to be necessary in anticipation of enlargement. Moreover, most enlargement countries participate in eTwinning and have joined the networks for Eurydice and the European Qualifications Framework, Europass and Euroguidance networks. Other networks, such as the one for adult learning coordinators, are progressively opening to enlargement countries. In addition, all enlargement countries, besides Kosovo, are part of the European Higher Education Area under the Bologna Process, ensuring that their higher education policies are aligned and compatible with EU initiatives. North Macedonia, Serbia and Türkiye are associated to Erasmus+, while all other enlargement countries benefit from the international dimension of the programme. As of 2023, higher education institutions from the Western Balkans can take part as full partners in European Universities alliances. Higher education institutions from other enlargement countries can take part as associated members to

alliances (more than 30 Ukrainian higher education institutions are currently associated). In addition, Western Balkans Ministerial-level dialogues on education have been held regularly and will now be extended to cover all enlargement countries.

On **youth**, through the Youth action plan in EU external action for 2022-2027, the EU works to build partnerships with young people outside the EU, including in Eastern Neighbourhood and Western Balkan countries. The priorities of the action plan mirror those of the EU Youth Strategy (i.e., engage, empower, connect) and are funded through the NDICI-Global Europe Instrument and the Instrument for Pre-Accession Assistance (IPA), including their contribution to the Erasmus+ programme.

The European Commission is increasingly involving young people from enlargement countries in EU initiatives aiming at strengthening youth participation. In the context of the EU Youth Dialogue, the EU's largest consultation mechanism for young people, National Youth Councils from enlargement countries are now able to participate in webinars, contribute with expert statements to the consultation reports and are invited to the EU Youth conferences. Furthermore, youth-led organisations from eight enlargement partners<sup>61</sup> are observers in the President's Youth Advisory Board, which advises the Commission President on issues that are relevant for young people.

The Youth Wiki, the encyclopaedia of national youth policies, is gradually opening to enlargement countries. The Western Balkans countries not associated to Erasmus+ (Albania, Bosnia and Herzegovina, Kosovo\* and Montenegro) are eligible for mobility projects for youth workers, youth exchanges and youth participation activities under Erasmus+ 'Key Action 1', while all enlargement countries are eligible for capacity building in the field of youth projects under Erasmus+ 'Key Action 2'.

As regards the European Solidarity Corps, North Macedonia and Türkiye are associated while the other enlargement countries are not.

Furthermore, all Western Balkans economies except Kosovo are State Parties to the United Nations Convention on the Rights of the Child and take part in the Joint Council on Youth of the Council of Europe (CoE). The EU CoE Youth Partnership supports youth development in the Western Balkans, promoting European integration, and fostering a more inclusive, democratic, and active generation of young people in the region.

On **sport**, enlargement countries participate actively in EU initiatives, in particular the European Week of Sport. Moreover, all enlargement countries except Moldova are members of the CoE's Enlarged Partial Agreement on Sport and have joined the CoE's Anti-Doping Convention. Inclusion is one of the key objectives of EU sport policy, and all enlargement countries are parties to the UN Convention on the Rights of Persons with Disabilities. Moreover, all nine enlargement countries are eligible for capacity building projects in the field of sport under Erasmus+.

On **culture**, all enlargement countries except Türkiye participate in the Creative Europe Programme, the EU's flagship programme supporting the cultural and creative sectors<sup>62</sup>.

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<sup>61</sup> Albania, Bosnia and Herzegovina, Kosovo\*, Moldova, Montenegro, North Macedonia, Serbia, and Ukraine.

<sup>62</sup> Six enlargement countries (Albania, Bosnia and Herzegovina, Montenegro, North Macedonia, Serbia and Ukraine) fully participate in the programme, while another two participate partially in the programme (Georgia in the Culture and Cross-Sectorial strands and partially in the MEDIA strand; Kosovo only the Culture strand). After deciding not to renew its participation in the programme in 2021, Moldova officially expressed its interest to join the current programme on 4 February 2025, thus entering the first step of association which is envisaged as of 1 January 2026 (for the Culture strand; participation in the Media and Cross-Sectorial strand will be contingent

Consequently, these countries have taken part in several projects and flagship initiatives, such as the European Capital of Culture action and other prizes and awards supported by the Programme<sup>63</sup>. Eastern Partnership enlargement countries benefit from the EU4Culture II - Sustainable Creative Ecosystems programme. The Western Balkans benefit from the Culture and Creativity for the Western Balkans programme (CC4WBs). Enlargement countries are also associated to the European Heritage Hub initiative<sup>64</sup>. Furthermore, a Western Balkans Ministerial-level dialogue on culture took place in 2022 and 2024. So far, exchanges have shown good alignment of policy priorities, while pointing to a need for further support in terms of capacity building and professionalisation of administrations and cultural professionals in the region. Moreover, almost all enlargement countries are parties<sup>65</sup> to a key international instrument, the UNESCO 2005 Convention on the Protection and Promotion of the Diversity of Cultural Expressions, to which the EU is also a party in its own right, alongside the Member States.

### *Budgetary aspects*

As regards the programmes Erasmus+, Creative Europe and the European Solidarity Corps, enlargement is expected to have a mechanical impact, in the sense of a higher number of potential beneficiaries, in the order of tens of thousands of potential new beneficiaries per year.

Considering the nature of the Erasmus+ and European Solidarity Corps programmes in terms of implementation mode (with 80% of the budget being disbursed through indirect management, association to the programme requires the setting up of a national agency in the country concerned), there is a need for investment in guidance, assistance and resources, to ensure compliance with the key principle of sound financial management and respect of EU values. This investment, which started with the TAIEX workshops mentioned above, and that will continue with additional capacity building measures, is also aimed at ensuring proper financial management of EU funds.

A larger community of countries will mean more national agencies (and national authorities) to coordinate and more funds to be disbursed in indirect management. Overall, the support work by the Commission will gradually increase, demanding as well increases in financial and technical resources.

The next Erasmus+ programme (2028-2034) will contribute to preparedness of enlargement countries in education, training, youth and sport. It will allow to bring enlargement countries closer to EU Member States and as such reinforce the EU's education, youth and sport policies implementation. Capacity building is one of the two pillars of the Commission proposal for the new Erasmus+, the other one being learning opportunities for all. In the future programme,

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upon written confirmation from the Union, that according to the elements submitted to the Union, Moldova meets the conditions set out in Directive 2010/13/EU as referred to in Article 9(2) of the Creative Europe Regulation). The agreement associating Moldova to Creative Europe was signed on 2 September 2025.

<sup>63</sup> For instance, the title of European Capital of Culture is open to a city in an EFTA/EEA country and (potential) candidate country every three years since 2020. In 2022 Novi Sad, in Serbia, was the first European Capital of Culture taking place in the Western Balkans. Skopje 2028 will be the second city holding the title in the region. The ongoing competition for the 2030 title has the cities of Lviv (Ukraine) and Nikšić (Montenegro) running for the title, whose final selection will take place in October 2025.

<sup>64</sup> All Western Balkan partners were associated to the European Year of Cultural Heritage 2018 and are currently invited to the Cultural Heritage Expert Group (multi-stakeholder forum for policy exchange created as a legacy of the Year). However, their level of participation remains rather limited for now. Partners from the Western Balkans as well as Ukraine, Moldova and Georgia are also covered by the European Heritage Hub initiative, an EU-funded pilot project bringing together cultural heritage stakeholders from across Europe.

<sup>65</sup> Currently, most enlargement partners have either acceded (Albania, Türkiye) or ratified (Bosnia and Herzegovina, Montenegro, North Macedonia, Moldova, Serbia, Ukraine) the Convention. However, a few, such as Georgia (approval pending) and Kosovo (not a Party), remain exceptions.

capacity building activities will support partnerships for cooperation, including international partnerships (funded by the Global Europe instrument), as well as partnerships for excellence and innovation. Capacity building will also contribute to policy development, including experimentation, preparation and implementation of the Union's policy agendas and tools covering skills, education and training, youth and sport. Enlargement countries will benefit from all the opportunities of the new programme, for capacity building as well as for learning opportunities, once associated to Erasmus+. Before becoming associated, enlargement countries will receive support to improve their education, training, youth and sport systems thanks to the programme's international dimension.

### 3.3.2 Policy gaps and delivery risks

Gaps in this policy area may relate to potentially lower levels of preparedness by enlargement countries. On the other hand, EU policies as such are, overall, fit for enlargement.

Most of the **education** systems in enlargement countries are not yet as effective and inclusive as those in the EU-27. While challenges also exist in current Member States, key gaps in enlargement countries relate to early childhood education and care, foundational skills, basic and advanced digital skills and competences, education equality, inclusivity of education, higher education, including challenges to academic freedom, risks of brain drain in the light of demographic trends and war-related issues. There is also a need to evaluate the capacity of enlargement countries to deliver quality data education statistics and data, including on EEA targets.

On **sports**, ethnic divisions and historical conflicts might create barriers to social cohesion, women and girls face additional barriers to participation in sports due to cultural norms and gender stereotypes, and their facilities might be inadequate.

On **culture**, there are particular needs concerning protection and restoration of cultural heritage in Ukraine; and medieval monuments in danger in Kosovo.

Overall, the **capacity of administrations** is key as relevant programmes require compliance with the principle of sound financial management, and in the case of association to Erasmus+ specifically the setting up of a national agency to manage funds under indirect management.

### 3.3.3 Reform orientations

In view of enlargement, the EU can further **strengthen initiatives for integration in existing programmes and capacity building support**.

On **education**, enlargement may have to be taken into account when setting new EU level targets. Also, the integration of new Member States could shine more light on different issues in education policy. These issues would accordingly be higher on the EU agenda and may require tailored policy measures and targeted interventions to uphold EU standards, using (after accession) the instruments available in the EEA Strategic framework such as peer counselling or the Learning Lab on Investing in Quality Education and Training. Enlargement countries can already now make use of their membership of the EEA strategic framework working groups to address these issues, including through participation in peer-learning activities or technical assistance (via TAIEX for example). The EU Action Plan on Basic Skills, the Science, Technology, Engineering, Mathematics (STEM) Education Strategic Plan and the EU Teachers Agenda support national reforms in enlargement countries by providing common goals, tackling shared challenges and contributing to increasing skill levels.

On **youth** policy, increased action might be required to address (the risks of) brain drain in new Member States. Solutions could include initiatives to increase the engagement of young people in society and democratic processes, providing more opportunities for young people to experience exchanges, cooperation, cultural and civic activities in a European context and further empowering youth, especially via youth work opportunities. Also, considering post-war issues for Ukrainian citizens, the EU may need to put an added focus on managing, for instance, issues such as post-traumatic stress disorder among young people, and a higher proportion of persons with disabilities in the population, which may affect education and employability. As long as Russia's war of aggression continues, there is also a need for continuing support regarding young Ukrainians now living in the EU.

For **culture**, enlargement countries may draw inspiration from the strategic framework for culture, the Culture Compass for Europe, for their policy making and reform.

In the area of **sport**, the European Sports Model can serve as an inspiration to drive policy making and reforms in line with EU values.

Aiming to have all enlargement countries associated to Erasmus+, additional assistance in the set-up of national agencies and engagement of potential beneficiaries is required. There is also a need to step up capacity building to higher education institutions, in line with the STEM action plan.

### 3.4 Digital policies

Digital transformation has proven to be a gamechanger for society's ability to tackle major challenges, from productivity and economic growth, to fighting climate change and improving public services. Digital technologies and infrastructure, along with local and regional enablers such as the European Digital Innovation Hubs, are at the heart of the EU's progress and ambitions. At the same time, to realise the untapped potential of the digital transformation, the EU must address new challenges to its democracies, economies and societies. The EU must strive to shape a competitive, resilient and inclusive digital future, exploiting its strengths to maintain or attain leadership in strategic technologies, to establish essential assets for technological sovereignty and resilience, and to foster the commercialisation of deep tech innovation. The EU must also further strengthen its cyber-resilience to protect its industries, citizens and public administrations against internal and external threats. At the same time, the EU is taking steps to optimise the application of the digital rulebook. A proposal for a Digital omnibus<sup>66</sup> was presented by the Commission in November 2025 with the AI part of the proposal having been fast-tracked and entered into force in July 2026<sup>67</sup>. The immediate objective is to ensure that compliance with the rules comes at a lower cost, delivers on the same objectives, and brings in itself a competitive advantage to responsible businesses.

The **International Digital Strategy** for the EU, published in June 2025, sets out the EU's vision for strengthening its international digital cooperation<sup>68</sup>. The Strategy proposes to advance the international harmonisation of key digital transformation policies. Investing in secure digital connectivity and boosting innovation are also at the heart of the EU's cooperation with enlargement and neighbourhood countries, via instruments such as Deep and Comprehensive Free Trade Agreements and Stabilisation and Association Agreements. These trade agreements

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<sup>66</sup> COM (2025) 837.

<sup>67</sup> Regulation (EU) 2026/1744 of the European Parliament and of the Council of 8 July 2026 amending Regulations (EU) 2024/1689, (EU) 2018/1139 and (EU) 2023/1230 as regards the simplification of the implementation of harmonised rules on artificial intelligence (Digital Omnibus on AI).

<sup>68</sup> JOIN (2025) 140.

and other related instruments such as the Growth Plans for the Western Balkans, the Reform and Growth Facility for Moldova and the Ukraine Facility set a strategic **basis for the gradual integration of enlargement countries into the digital single market**.

Actions under the International Digital Strategy include promoting **secure connectivity** in enlargement countries, notably the alignment with the EU 5G Cybersecurity Toolbox and support to adopting legislative frameworks that would allow for the imposition of exclusions and/or restrictions on high-risk suppliers. The Commission has proposed such restrictions at EU level as part of the proposal for a revised Cybersecurity act in January 2026<sup>69</sup>.

As regards **artificial intelligence**, the Strategy promotes cooperation on AI safety with EU international partners including the Western Balkans, Ukraine and Moldova. The EU also supports scientific cooperation and development of AI-based local digital twins underpinning urban reconstruction in Ukraine. Under the GovTech4all framework partnership agreement, enlargement countries can benefit from the development and piloting of AI solutions in the public sector to enhance decision making, service delivery and internal administrative tasks.

In October 2025, the EuroHPC Joint Undertaking has selected for funding the first Moldovan **AI Factory Antenna** (FAIMA) linking the country's innovation ecosystem to PIAST AI Factory in Poland. FAIMA will provide local stakeholders in Moldova with seamless access to AI-optimised supercomputing resources, trusted data facilities, and advanced AI services. It will focus mainly on agriculture and viticulture, healthcare and medical imaging, public administration/e-government services, and cybersecurity/ICT, together with cross-cutting activities supporting AI adoption by SMEs and startups. Similarly, in the Western Balkans two AI Factory Antennas have been announced, one in North Macedonia (VEZILKA) and one in Serbia (SAIFA), connected to the Pharos and IT4LIA AI Factories in Greece and Italy.

The EU aims to advance cooperation on **cybersecurity** with partner countries, including the Western Balkans, Ukraine and Moldova. Cybersecurity is already part of the Digital Dialogue with the Western Balkans. Amendments to the Association Agreements related to the participation of Ukraine and Moldova in the Digital Europe Programme will also pave the way to extend the EU Cybersecurity Reserve to both countries. In July 2025, Council has authorised the use of the EU Cybersecurity reserve for Moldova and in June 2026 it has authorised the use of the EU Cybersecurity reserve for Ukraine. Based on the rules in the EU Cyber Solidarity Act, the Western Balkans also have the possibility to take part in the EU Cybersecurity Reserve<sup>70</sup>.

When it comes to **digital public services**, the Strategy aims to advance towards mutual recognition of electronic signatures and other trust services with third countries, including Ukraine, Moldova and the Western Balkans. This includes developing a set of tools and services implementing trust anchors for the global recognition of trust services and digital identities and removing digital barriers by reusing and replicating the European Trust Services infrastructure in their territory. In July 2025, Moldova has joined the EU Third Countries' Trusted List for the validation of electronic signatures from non-EU countries. This allows the easy validation of signatures and seals from organisations and individuals in the EU, making it easier for EU and Moldovan companies and people to do business together. The process of joining the EU Third Countries Trusted List has also started for Albania, Montenegro, North Macedonia and Serbia.

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<sup>69</sup> COM (2026) 11.

<sup>70</sup> The EU Cybersecurity Reserve is designed to support Member States and EU institutions, bodies and agencies (EUIBAs), as well as under certain conditions Digital Europe Programme (DEP) associated countries in responding to large-scale equivalent or significant cybersecurity incidents.

The EU also aims to cooperate with Ukraine, Moldova and the Western Balkans to prepare the onboarding and development of interoperable solutions for online administrative procedures and the Once-Only Technical System within the scope of the Single Digital Gateway. These services make it easier for companies and individuals to do business, work and live in EU countries.

The Strategy also aims to support the alignment of EU enlargement countries with the key EU rules on **online platforms**, the Digital Services Act and the Digital Markets Act.

On **data**, the Data Union Strategy calls for promoting EU approaches and mutually beneficial collaboration with enlargement countries and closest neighbors<sup>71</sup>.

### 3.4.1 Impact of enlargement on digital markets and policies

#### *Impact on the EU's digital market*

Enlargement would create a larger single market, which will in turn provide companies with further opportunities to scale up and allow consumers to benefit from more competition. Expanded cross-border **interoperability** of electronic identities and Trust services would benefit citizens, governments and businesses alike. It will create opportunities for more resilient networks and safe and secure data flows across an enlarged EU. This covers also interoperability of digital Wallets between EU Member States and Western Balkan partners, in line with the gradual integration objective under the Growth Plan. The precondition is for the Western Balkan countries to have their own Wallets and be aligned with the EU methodology. Initiatives that can be considered of preparedness for enlargement have been announced or are already underway. One such initiatives aims to strengthen digital links in the Black Sea region via secure, high-capacity Internet connections.

The **roaming** policy will be extended to millions more people and give users the possibility to benefit from roaming travelling on a much larger territory. The elimination of roaming surcharges is expected to generate a much greater increase in roaming traffic from EU consumers in the third country joining the 'Roam Like At Home' area and vice versa. A similar effect was observed within the EU when, between 2016 and 2019, EEA data roaming consumption grew 17 times. Expanding the roaming policy poses challenges in terms of revenue adjustments for operators, infrastructure investments, and regulatory compliance which requires the renegotiation of wholesale agreements between EU and third country (candidate country) operators, the modification of billing systems, compliance with transparency requirements for consumers, the introduction of regulated fair use policies mechanisms and participation in market monitoring exercises. For each country that joins the 'roam like at home' area, the operators concerned will need to make new adjustments. An increase in roaming traffic may also translate into increased infrastructure investment needs. EU operators may need to upgrade infrastructure to handle increased data and call volumes, especially in popular travel destinations. Seasonality plays a significant role in this dynamic, including for enlargement countries that are tourism destinations.

Importantly, the roaming policy can be extended to the association partners before enlargement, subject to incorporation of the EU roaming *acquis* into their national legislation and Council endorsement. This has already been achieved for Ukraine and Moldova who joined the 'roam like at home area' as of 1 January 2026<sup>72</sup>. Ukraine and Moldova have far-reaching Association

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<sup>71</sup> COM (2025) 835.

<sup>72</sup> Decision No 2/2025 of the EU-Ukraine Association Committee in Trade Configuration of 16 July 2025 on the European Union and Ukraine granting each other internal market treatment with respect to the sector of roaming

Agreements in place with the EU **enabling gradual integration for roaming**, in the wider telecommunications sector, as well as in other sectors<sup>73</sup>. The process to extend ‘roam like at home’ to the Western Balkans countries is ongoing, with Council having approved the opening of negotiations with Albania, Bosnia and Herzegovina, Kosovo\*, Montenegro, North Macedonia and Serbia in June 2026.

A larger EU would impact **cybersecurity** policies and more widely the cyber posture of the EU, as this is a domain with many cross-border dependencies and potential spillovers in case of incidents. Enlargement would also mean that the new Member States would have access to the EU cybersecurity cooperation platforms (e.g. NIS Cooperation Group, EU CyCLONE and the CSIRTs Network), where effective cooperation depends on the level of trust towards Member States, which will take time to build. Many enlargement countries have faced major cyber threats over the past years and can provide valuable insights. The effective implementation of the EU 5G Cybersecurity Toolbox and the revised Cybersecurity Act by enlargement countries, a requirement to fulfil as part of the accession process, would enhance the overall level of cybersecurity of the EU’s 5G networks. Moreover, the future Member States will have access to cybersecurity funding opportunities that currently are only accessible to Member States<sup>74</sup>.

#### *Impact on EU digital policies*

Most EU policies and legislation can be considered fit for enlargement. The operational readiness of new Member States to adopt and implement the Digital Services Act (DSA) and the Digital Markets Act (DMA), and to address the challenges related to the independence of media regulators, the rule of law, civic space and the protection of fundamental rights is closely linked to the fundamentals of the accession process and is assisted via TAIEX support.

Some specific impacts on the policy itself might be observed in the area of **roaming**. More national market dynamics will need to be considered when defining wholesale roaming caps and while possibly redefining the safeguard mechanisms that ensure sustainability of roaming policies for operators. One impact of enlargement could be that market dynamics do not improve, and that further regulation is needed in the future (beyond 2032), putting at risk the proportionality of the intervention<sup>75</sup>. Based on the experience of the EEA, no special arrangements/safeguards were needed. For some countries the impact will have already been anticipated before enlargement, through the **gradual market integration** process.

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on public mobile communications networks [2025/1742] (OJ L, 2025/1742, 18.8.2025, ELI: <http://data.europa.eu/eli/dec/2025/1742/oj>).

Decision No 1/2025 of the EU-Republic of Moldova Association Council of 4 August 2025 as regards the further market opening with respect to the sector of roaming on public mobile communications networks and amending Annex XXVIII-B (Rules applicable to telecommunication services) to the Association Agreement between the European Union and the European Atomic Energy Community and their Member States, of the one part, and Moldova, of the other part (decision to be published soon in the Official Journal of the European Union, part L).

<sup>73</sup> These are the sectors available for regulatory approximation for Ukraine in view of gradual integration ahead of accession to the EU. For Moldova, there is no limited list of sectors available for regulatory approximation.

<sup>74</sup> Third countries are currently excluded from projects funded under the Digital Europe programme specific objective 3 (Cybersecurity), while third countries that have a DEP-association agreement, can benefit from the other specific objectives of the programme.

<sup>75</sup> It must be noted that the RLAH policy is based on an intrusive form of market intervention. In short: “the EU” is price regulating roaming services both at retail and wholesale level, an intervention uncommon to a market economy. As established by the Court of Justice in the landmark decision on roaming (C-58/08), the intervention is proportionate as it serves the wider benefit of consumers protection, and subsidiarity is ensured in view of the smooth functioning of the internal market, but to ensure proportionality the Court concluded that the intervention has to be limited in time. The roaming rules are in place until 2032, subject to further reviews.

### *Budgetary aspects*

On the budgetary side, increased number of Member States would entail increased budgetary needs to cover potential geographical gaps and ensure access to digital infrastructure across the Union. Potential benefits would be reflected in investments in priorities such as European supercomputers, AI factories and Gigafactories, data spaces and cloud, testing and experimentation facilities, Digital Innovation Hubs, semiconductor pilot lines and advanced digital skills across the Union. These investments help support EU's efforts to prevent strategic dependencies from third countries that are not part of the EU's international strategic partners. It would also imply increased needs for cybersecurity support. EU funding for digital policies overall would be in the future available via the European Competitiveness Fund.

Budgetary resources would be required to address the **digital connectivity infrastructure** needs in the new Member States, such as those linked to the Ukrainian reconstruction. Currently, except for cross-border links, infrastructure on the territory of third countries is not eligible for Connecting Europe Facility (CEF) funding, even for countries associated to the programme.

For a set of policies, enlargement would not trigger impacts on the policy but on the investment needs in the new Member States. For **radio spectrum**, introducing changes in the spectrum use may entail significant investments in new communications networks and in transferring certain services to new bands, which may require replacement of expensive equipment.

EU support may be needed for new Member States to modify and modernise their communications infrastructure. Similarly, adequate resources and infrastructure may be needed to support new Member States<sup>76</sup> **digital identities and trust services** and to ensure that they have measures in place for the **common level of cybersecurity and for implementing the cybersecurity acquis**, prior to joining the EU (a cybersecurity governance mechanism including the necessary national-level bodies and structures, security requirements and incident reporting obligations for entities from critical sectors, measures for exclusions or restrictions on high-risk suppliers in 5G Networks and product security requirements). It would also be important to maintain the principles, set out in the Commission Communication from 15 June 2023 providing the baseline for EU funding for 5G Networks, also included in the Reform Agendas of the enlargement countries, which refer to the necessary steps for the implementation of the 5G toolbox and in particular, the adoption of legal frameworks and enforcement of measures of the EU 5G Cybersecurity Toolbox.

Enlargement would overall trigger the need for additional resources in the Commission to handle the additional enforcement work and a larger participation in existing networks and groups.

### **3.4.2 Policy gaps and delivery risks**

Gaps mainly relate to a potential lower level of national preparedness (in terms of infrastructure, digital-readiness and administrative capacity) to align fully to EU policies, including when it comes to media freedom and pluralism.

For **roaming** specifically, currently, Commission services lack a legal basis for collecting the extensive data on roaming with third countries (enlargement countries) necessary to conduct a

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<sup>76</sup> Pursuant to the EU digital identity framework, current and new Member States would need to have interoperable digital identity schemes. New Member States will need to ensure that their digital identities and trust services provide the required levels of security and trust.

proper assessment of the impact of enlargement, making it difficult to predict the possible impact on the definition of wholesale caps.

On **cybersecurity**, due to legal restrictions, it is at present not possible to involve experts from the enlargement countries in the EU cooperation platforms, nor has been possible so far for them to benefit from EU funding programmes specific to cybersecurity.

### 3.4.3 Reform orientations

On **electronic communications**, the Review of the electronic communications framework and its possible consolidation into a single instrument (the Commission proposal for a Digital Networks Act<sup>77</sup> was presented in January 2026) would reduce administrative burden and facilitate alignment with the EU *acquis* for enlargement countries.

The Roaming Regulation is a temporary intervention, subject to several reviews. Any impacts of the **extension of the EU roaming regime to enlargement countries** would need to be considered in the review. However, it would require extensive data collection. To collect relevant data from enlargement countries before accession, the EU would need a specific legal basis.

On **cybersecurity**, early involvement of enlargement countries in activities increasing the EU's **cybersecurity capacities**, including via **closer partnership with the EU Cybersecurity Agency** (ENISA), would help foster the necessary trust. Cooperation in this field hinges significantly on the trust established between experts, which goes beyond the broader political relationships between participating countries. The **Cyber Solidarity Act** envisages the possibility of granting access to the EU **Cybersecurity Reserve** to third countries associated with the Digital Europe Programme, if their association agreements provide for it. This access is subject to the following conditions: i) the enlargement countries must be associated with this part of the programme; ii) the European Commission must assess the measures for cyber resilience and cyber crisis management of the third country; and iii) a subsequent implementing decision by the Council is required. The Reserve provides these countries with an opportunity to leverage the EU's resources for incident response and partial access to the relevant funding mechanism for cybersecurity.

Ensuring full alignment with **DSA** and **DMA** remains of the essence. Support measures do exist already, and enlargement countries can be encouraged to make best use of them. Namely, an enhanced utilisation of TAIEX will be beneficial for alignment with EU legislation on online platforms and media (Audiovisual Media Services Directive, European Media Freedom Act and the Recommendation on safety of journalists) which has an increasingly important digital component. Countries in the Eastern Partnership can make use of EU4Digital<sup>78</sup>. Support from the EU side helps align with the whole-of-society approach underpinned at EU level for detecting, raising awareness and building resilience against foreign information manipulation and interference (FIMI) and disinformation via a multistakeholder approach that involves civil society and fact-checking organisations, media literacy practitioners and researchers.

The EU is also supporting the establishment of new **European Digital Innovation Hubs** (EDIHs) in enlargement countries via targeted calls as fully-fledged members of the EDIH network, helping to drive the digital transformation of SMEs, mid-caps, and public entities based on local needs. These hubs will make full use of the AI infrastructure set out in the AI Continent Action Plan to serve clients in both the private and public sectors.

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<sup>77</sup> COM (2026) 16.

<sup>78</sup> Armenia, Azerbaijan, Georgia, Republic of Moldova, Ukraine.

### 3.5 Customs Union

A well-functioning Customs Union is essential to the EU's competitiveness, sustainability, safety and resilience. The EU customs authorities are the guardian of the EU's external borders for goods, playing a major role in the security of the supply chains and the level playing field with the single market. Customs protect the financial interests of the EU and its Member States by collecting customs duties and other taxes (excise duties and VAT). Customs implement trade measures that protect the EU against unfair trade practices. Customs authorities also uphold and enforce, together with other authorities, EU rules and regulatory requirements on product compliance including health and safety, environmental protection, intellectual property rights, fisheries and agriculture.

Given recent developments, such as in e-commerce, the fight against smuggling of drugs and cigarettes, the circumvention of EU sanctions and increased use of tariffs as a trade weapon, the role of customs in protecting and controlling the EU external borders for goods and in combating customs fraud has become increasingly important.

The EU Customs Union will be strengthened over the next decade, thanks to the Customs Reform which entered into force in September 2026<sup>79</sup>.

The Customs Reform includes the withdrawal of the duty exemption on low-value consignments — de minimis — and the upcoming gradual implementation of the reformed Union Customs Code, which aims to reinforce the integrity of the single market and boost border security, including in the context of e-commerce. The Customs reform also provides for more harmonisation in the implementation of customs risk management and controls to ensure effective EU-wide protection, irrespective of where the goods cross the external borders, as well as the establishment of a new EU Customs Authority and an EU Customs Data Hub, providing a single digital system for economic operators and better possibilities for sharing customs data between competent authorities.

#### 3.5.1 Impact of enlargement on Customs policy

*Customs Union, EU customs territory and the protection of the external borders for goods*

Enlargement would change the external borders of the EU customs territory<sup>80</sup>. The current external land border between the EU and enlargement countries will become an internal land border through which goods can move without customs procedures.

New Member States will be responsible for customs controls and procedures at the land, air, or maritime external borders on their national territory. Therefore, it is important that the new Member States are fully ready, as from day one of their accession, to apply all the EU rules and procedures on customs controls, duty collection and supervision of goods crossing the EU external borders and to take measures to combat customs fraud effectively, according to high standards of integrity and performance. Potential deficiencies in new Member States' capacity to supervise and control their part of the external border could, due to the free movement of goods within the Customs Union, directly impact the integrity of the single market, the financial interests of the EU and its Member States, and the security and safety of EU citizens.

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<sup>79</sup> Regulation (EU) No 2026/2108 of the European Parliament and of the Council of 16 September 2026 establishing the Union Customs Code and the European Union Customs Authority and Regulation (EU) No 952/2013

<sup>80</sup> There will be an impact on the land borders. The current external land borders between the EU and third countries will become internal borders, while new external land borders will be created (for example, between Ukraine and Russia). The international airports and ports of the new Member States (for example Odessa in Ukraine, Durrës in Albania or Bar in Montenegro) will become the EU's new external maritime and air borders.

The geopolitical situation of some enlargement countries may require a reflection on how to protect the EU Customs Union in relation to parts of the national territory where the national authorities do not exercise control.

#### *Digital customs procedures*

The EU customs policy is the most digitalised EU policy. It involves many digital systems, high volumes, and critical real-time operations<sup>81</sup>. Enlargement would impact the effectiveness of EU policies if future Member States do not have the necessary capacity and resources and could create ‘weak links’ if (cyber) security is not ensured.

#### *EU Customs Reform*

The EU Customs Reform could facilitate the integration of new Member States into the Customs Union by providing them with the opportunity to operate with the new tools (in particular, the central EU Customs Data Hub) and with the support of the new EU Customs Authority as from the date of accession (see further under “Reform Orientation”).

#### *Traditional Own Resources (customs duties)*

Enlargement countries rely heavily on the EU for both imports and exports, whereas the EU's trade with these countries is relatively small compared to other partners. In absolute terms, the EU exports more to these enlargement countries than it imports from them. Consequently, the effect of enlargement on the EU's traditional own resources (customs duties) is likely to be minimal when considering the trade between the EU and enlargement countries. However, individual Member States, particularly those bordering enlargement countries, could be more affected.

At the same time, without the necessary administrative capacity and capability to enforce tariff measures, enlargement countries may encounter challenges in safeguarding the EU's own resources, as they could be exploited as entry points for evading duty payments.

#### *Budgetary aspects*

Under the current multiannual financial framework (MFF), all enlargement countries<sup>82</sup> participate in the Customs programme<sup>83</sup>. The programme allows these countries to cooperate with Member States’ customs authorities and get acquainted with EU legislation and good practices including on the measurement of performance. Enlargement countries already at

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<sup>81</sup> The EU has built and manages 111 fully interoperable Customs digital systems complemented by national systems interconnecting all 27 Member States. In 2025 an average of 212 items were declared per second, with an estimated annual total of around 5.9 billion of e-commerce items (goods bought online and directly delivered to the consumer in EU), around 630.9 million imported items and 580 million items exported from the EU. [https://taxation-customs.ec.europa.eu/customs/eu-customs-union-facts-and-figures\\_en](https://taxation-customs.ec.europa.eu/customs/eu-customs-union-facts-and-figures_en)

<sup>82</sup> Albania, Bosnia and Herzegovina, Georgia, Kosovo, Moldova, Montenegro, North Macedonia, Serbia, Türkiye, Ukraine.

<sup>83</sup> The Customs programme is a cooperation programme for customs authorities, which supports the development and operation of central digital customs systems and cooperation between customs authorities, as well as between those authorities and the European Commission, by means of collaborative and training activities aimed at reinforcing the harmonised functioning of a modern Customs Union. Under the current MFF and its previous iterations, the programme automatically includes all EU Member States contributing indirectly through their national contributions to the EU budget. In line with the approach established at corporate level for EU funding programmes, in return for their participation in the programme, enlargement countries must pay a financial contribution. Assuming that in the future MFF the financial contribution related modalities linked with the participation in an EU programme would remain unchanged, in case of enlargement, the revenues associated to the payment of this financial contribution would no longer exist in the current format. Enlargement countries would be full members of the programme as a Member State, where participation to the programme is covered by their national contribution to the EU budget.

present have access to training courses in customs policy and procedures (including in some cases in their national language). They are not invited to all collaborative activities organised under the programme, as some programme aspects relate to elements that cannot be shared with non-EU countries, even in a pre-accession stage.

Most of the budget under the current Customs programme is dedicated to the development, operation, and maintenance of central and decentralised digital customs systems managed by the Commission, including the common communication network/common system interface (CCN/CSI) to the national systems. Most of these central and decentralised EU customs systems are not yet used by enlargement countries<sup>84</sup>.

The impact of enlargement on budgetary needs under the current scope of the Customs programme will already occur before EU accession, both on collaborative activities (additional trainings, project group meetings, and activities) and for digital systems. This is because sufficient time will be needed before accession for customs services and traders to implement the customs procedures and digital tools needed as part of the EU Customs Union.

In this respect, there will be a need for resources both before and after accession, stemming from the participation of additional Member States in the EU digital customs systems. These include:

- Support and technical assistance: resources for guiding the enlargement countries in various workshops and missions, as well as developing a comprehensive plan of actions;
- Resources for connecting additional countries to the EU customs infrastructure e.g. connectivity to the CCN/CSI;
- Costs for preparing the access to the central and decentralised customs systems (including adapting environments, documentation, configurations, training, testing, etc.);
- Operational costs: budget needed for the operation and maintenance of the EU central and decentralised systems for additional countries.

Also, the development by enlargement countries of national components or systems based on EU requirements, including migrating their existing data to the new/adapted systems, will require funding. These national developments are not included in the scope the current Customs programme and are to be covered by the national budget.

The major upcoming internal EU development envisaged under the customs reform, notably the transition towards the new EU Customs Data Hub, will have an impact on enlargement countries. The budgetary needs to support enlargement would depend on the timeline of both EU accession and the implementation of the EU Customs Reform. The impact and needs may vary on whether countries will join in the current environment and will then transition to the new environment or can directly join the EU Customs Data Hub (see under ‘Reform orientations’).

Resources will also be needed to assess the enlargement countries’ capacity to effectively protect the EU external borders for goods already before accession, for example through monitoring visits (see under ‘Reform orientations’). The work providing a monitoring mechanism has already started under the current Customs programme, allowing for a coordinated support, efficiently covering customs policy and its implementation. This support is expected to continue also under the future Single Market and Customs Programme<sup>85</sup> proposed for the new MFF for the period 2028-2034.

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<sup>84</sup> Except for New Computerised Transit System (NCTS) and the digital system for mutual recognition with the EU AEO programme, as well as the connection to the CCN/CSI.

<sup>85</sup> COM (2025) 590.

The proposed Single Market and Customs Programme should continue supporting digitalisation, human competency building, collaborative activities including for enlargement countries. It is expected to provide funding for the deployment of reliable and state-of-the-art customs control equipment for enlargement countries and to address crisis situations in the EU, an action to be implemented by the EU Customs Authority.

### 3.5.2. Policy gaps and delivery risks

Two major gaps in the current customs legislation that already affect the existing EU-27 countries, would – if not remedied – make the integration of new Member States in the Customs Union more complex. These gaps, largely addressed by the EU Customs Reform, relate to: (i) the complexity of the Union Customs Code’s digitalisation model, and (ii) the divergent implementation of the customs legislation by Member States<sup>86</sup>.

The impact of these gaps on the EU’s capacity to cope with enlargement is that in addition to connecting to the central digital systems, each candidate country is required to develop and maintain its own national components for decentralised systems as well as fully national systems in line with EU requirements. This is a significant investment for countries with limited budgetary resources and administrative capacity. The lack of harmonised implementation and enforcement capacity within the EU will make integration more complex as it would not provide a conducive environment for new Member States who will be directly responsible for protecting the EU external borders for goods.

Furthermore, the experience of the Member States that have joined the EU starting from 2004 has shown that customs administrations needed extensive legal, human competency and capacity and IT preparation prior to accession. Enlargement countries face major financial, personnel and technical support needs for collaborative activities, trainings, customs control equipment and connection to the customs IT environment, to prepare their integration in the Customs Union.

### 3.5.3. Reform orientations

**Prior to accession**, the Commission, with the support of the Member States and the EU Customs Authority, will step up its activities, using the Customs programme, to ensure that enlargement countries have the necessary capacity and capability to manage and oversee their section of the new external border for goods, as well as to implement and enforce tariff measures and EU rules on prohibitions and restrictions. The purpose is to ensure smooth integration of new Member States in the Customs Union and its **reformed legal framework and digital tools**.

The timely and effective **implementation of the EU Customs Reform** is a crucial contribution for the enlargement process. The reform is aimed at transforming the way customs work through an EU Customs Authority managing a central Data Hub, with a revised set of rules on customs processes and common risk and data management. The **EU Customs Authority** will be a new, operational EU actor, supporting and coordinating the activities of national customs authorities, including in areas like training or performance measurement. It will also issue operational guidance and develop common standards. This will contribute to a more uniform application of customs legislation as well as non-financial measures such as prohibitions and restrictions, and enlargement countries could benefit from this as well.

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<sup>86</sup> See also the Impact Assessment Report accompanying the customs reform proposal: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52023SC0140>

Furthermore, the reform can provide an opportunity for enlargement countries to operate with the new central **EU Customs Data Hub** and with the support of the new EU Customs Authority from the date of accession. This could make integration and enlargement easier and less costly. Enlargement countries will be able to make use of the functionalities of the EU Customs Data Hub, starting with the Data Hub for e-Commerce, from the date of their accession. However, as the timeline for accession may precede the full operation of the EU Customs Data Hub for all customs procedures, some enlargement countries may need to join the Customs Union during the transition to the new environment, together with the current Member States.

Three scenarios for enlargement countries could be envisaged, depending on the date of accession:

- Full adherence to the current EU customs systems and the way they are implemented (decentralised, centralised, national) under the current Union Customs Code and the EU Single Window Environment for Customs, except for the e-commerce transactions which will be handled through the Data Hub for e-commerce from July 2028;
- For countries acceding to the EU before the EU Customs Data Hub has become fully operational and the current EU digital customs architecture is sunset: mix of adherence to current EU customs systems and, in parallel, for some customs procedures moving together with the current Member States to the new central EU Customs Data Hub under the Customs reform, though allowing for a customised approach depending on the country and the timeline for accession;
- For countries acceding to the EU after the EU Customs Data Hub has become fully operational: full transition to the central EU Customs Data Hub allowing less progressed countries, considering also the timeline for accession, to proceed at their own pace and avoid unnecessary highly costly developments at national level for only a limited period.

The EU Customs Reform will also strengthen the Customs Union Performance (CUP) tool<sup>87</sup> currently managed by the Commission in close cooperation with Member States, by providing it with a legal basis. Some enlargement countries<sup>88</sup> already contribute to the CUP activities. Their contribution is currently voluntary, like the contributions from the Member States. A **reinforced monitoring mechanism** based on the CUP tool could support and complement the EU accession preparations and be supplemented with other evaluations tools such as questionnaires and monitoring activities carried out under the Customs programme. The EU Customs Authority could play a role in the implementation of this mechanism.

Furthermore, as a strategic approach and long-term planning for the **gradual integration of enlargement countries into the Customs Union**, a gradual approach could be considered. Each progressive step should contribute to achieving the final objective, which should be EU

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<sup>87</sup> The CUP tool is used by the Commission (and in national customs administrations) for assessing the functioning of customs in terms of effectiveness, efficiency, and uniformity (aiming at equivalent outcome from the national implementation of customs legislation). The CUP mechanism is an evolving performance framework, and it can be used for mapping performance at national level and comparing among countries with similar trade, risks, and external borders (land, air, maritime). In the enlargement context, the CUP data could be used to compare indicators provided by enlargement countries with those of similar Member States to identify performance gaps, strengths, and weaknesses, and to set recommendations and targets for improvement. A first indicator could be the ability to participate to the CUP expert group and provide at least 85% of the requested indicators (assessing the readiness of their data systems). Digging deeper, visualisations could be developed to map the performance of enlargement countries within the existing Member States' range of performance.

<sup>88</sup> Albania, Kosovo\*, Moldova, Montenegro, North Macedonia, Serbia, and Türkiye. Moldova joined the CUP network in 2024 and submitted data for the first time in 2026 (2025 data). Montenegro also sent 2025 data, after rejoining in 2024. Kosovo is submitting data since 2023. Ukraine is an observing member since 2024. Bosnia Herzegovina is not a CUP member anymore because they were not able to send in data.

accession. Creating legal frameworks aimed at improving connectivity or “Green Lanes” between the EU and enlargement countries, enabling EU Member States to share customs data with enlargement countries without compromising security, could reduce waiting times at borders for legitimate trade and accelerate the enlargement countries’ integration into EU supply chains. The European Commission, the EU Customs Authority, and the EU Member States will be able to share customs data with enlargement countries under strict conditions set out in EU legislation, as set out in the recently agreed in the Customs Union reform. This will strengthen the enlargement countries’ capacity to prevent and detect illicit trade flows as well as to control goods covered by prohibitions and restriction regulations.

**Gradual integration in customs** could also be achieved, for example, through agreements on mutual recognition of customs controls, including security measures; agreements on providing advanced access to certain EU customs-related databases and systems; or agreements on removing specific controls at borders on certain types of goods based on equivalence with EU standards on goods. Setting up systems for mutual recognition of authorised economic operators, as already in place with Moldova, facilitates customs procedures for trusted operators. North Macedonia, Serbia, Türkiye, Ukraine, Georgia, Moldova and Montenegro have already joined the **Common Transit Convention**, which simplifies customs transit procedures for goods moving between the EU and several third countries. The EU should step up its support for other enlargement countries to accede to the Convention.

### 3.6 Taxation policy

Taxation is a key policy area for enlargement countries. Properly designed, well-functioning, non-discriminatory tax systems in Member States are fundamental for ensuring a level playing field for business and for citizens’ mobility in the internal market. Domestic resource mobilisation will be essential for new Member States to finance a variety of competing public policy goals in a context in which these countries will be part of the parameters set under the EU’s fiscal governance framework while being confronted with a set of megatrends (such as an ageing population, climate change, decarbonisation of the economy, security challenges).

#### 3.6.1 Impact of enlargement on taxation policy, policy gaps and delivery risks

Enlargement would extend the scope of application of the cross-border administrative cooperation mechanisms laid down in the EU tax legislation. This will trigger additional exchanges and cooperation between EU tax administrations and international partners. For example, if new Member States’ tax and revenue administrations initially have more limited administrative and IT capacities, it will be essential to put in place the necessary IT tools and ensure their interoperability with the EU IT systems, to preserve the integrity and performance of the single market. Strengthening administrative capacities will be crucial to administer and enforce national tax laws and curb tax fraud and avoidance, thus preventing a widening of the tax compliance gap. New Member States will need to step up their administrative and enforcement capacity in order to control external borders for taxation (VAT and excise duties) and customs purposes; to control intra-EU transactions in the context of indirect taxation; and to abolish tax barriers to uphold the fundamental freedoms related to intra-EU movements towards individuals and businesses (taxpayers). Although enlargement should bring additional resources to the EU budget from new Member States, a lack of adequate preparedness could also mean that higher risks of tax fraud and tax avoidance increase in proportion with the additional taxpayers and the volume of cross-border trade.

At EU level, it will be essential to carefully assess any VAT related derogation requests, in particular those that would potentially impact fiscal neutrality and competition in intra-EU

trade given that VAT is a harmonised indirect tax, a prerequisite for the proper functioning of the single market. It is also key to ensure the minimum effective taxation of multinational and large domestic groups.

In addition, the decision-making process might be slower, and more complex given the unanimity rule required for taxation policy.

#### *Direct taxation policies*

The impact of enlargement on direct taxation is assessed as being none to small for certain aspects, and more significant for other parts of the *acquis*. For a large part of the policy field, i.e. **cross-border administrative cooperation**, dispute settlement and refund of excess withholding taxes, vigilance is needed to ensure operational and IT capacity for the policy to function in practice<sup>89</sup>.

Regarding **minimum effective taxation** (so-called Pillar 2), enlargement countries are member of the OECD/G20 Inclusive Framework on Base Erosion and Profit Shifting and have an interest to prepare for Pillar 2 implementation to fulfil their international obligations and ensure compliance with the OECD monitoring mechanism.

Regarding the **Code of Conduct Group, for issues of harmful tax regimes** (soft law), potentially harmful tax regimes in most of the enlargement countries have been screened as part of the EU listing process (list of non-cooperative jurisdictions for tax purposes) and are addressed as part of the accession process. Moreover, the EU enlargement countries are part of the regular monitoring under the OECD Global Forum on transparency and exchange of information for tax purposes, the forum on harmful tax practices and the inclusive framework on base erosion and profit shifting (BEPS).

#### *Indirect taxation policies*

Enlargement may pose challenges to the effectiveness of the regulatory framework, if not addressed properly. Regarding

- **VAT:** there could be risks of further fragmentation within the single market, potentially causing distortions of competition and legal uncertainty in important sectors. More Member States could mean over time the potential for a rise in derogation requests, where countries seek deviations from standard VAT rules, or from inconsistencies in how existing exemptions or other general provisions are interpreted and applied. Both trends could undermine the uniformity of application essential for the single market. Inconsistent transposition of these provisions might affect fiscal neutrality and own resources, complicating intra-EU trade.

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<sup>89</sup> For cross-border administrative cooperation between tax authorities, enlargement implies that more taxpayers and natural or legal persons with a reporting duty would fall within the scope of the cooperation mechanism and that tax authorities of new Member States become involved in the relevant cooperation mechanism. The volume of exchanges is substantial and based on requirements for national IT systems and national administrative capacity. As regards settlement of tax disputes between tax authorities on double taxation stemming from double taxation treaties, tax authorities of new Member States need to be sufficiently prepared to provide tax (legal) certainty for economic operators active in cross-border operations across the EU. On faster and safer tax relief of excess withholding taxes paid by investors cross-border, the FASTER directive will make withholding tax procedures in the EU more efficient and secure so that investors get their excess withholding taxes paid back swifter. At the same time, FASTER will also ensure that the possibility of committing fraud with withholding taxes is tackled. Enlargement would therefore have a positive impact on this direct taxation policy field, as it will extend its scope of application. Its operationalisation is underway and financial intermediaries have in place the necessary automated procedures and tax authorities need to be able to issue digital tax residence certificates and verify information on compliance.

- **Excise duties:** there could be increased risks of distortion of competition in the single market including increase of smuggling of excisable products, and of revenue loss for those Member States which apply high excise duties.
- **Energy taxation:** there could also be a risk of discrepancies among Member States (e.g. lower taxation of mineral oils for transport and, to a lesser extent, heating fuels for industrial purposes) leading to so-called ‘tank tourism’. The revision of the Energy Taxation Directive (ETD) is being negotiated in Council. Due to the unanimity voting in Council on taxation matters, further policy developments in an enlarged EU could also be affected by the state of energy systems and energy transition in new Member States.
- **IT systems’ compatibility and digitalisation:** integrating the IT systems of new Member States into existing EU systems can be complex due to differences in technology and data management practices.

At the same time, if enlargement is properly managed, the combined tax bases of Member States would grow and diversify, which could strengthen the EU’s own-resources revenue. A broader cumulative tax base across Member States would also improve fiscal resilience, helping absorb economic shocks more effectively and stabilising the overall system.

#### *Budgetary aspects*

Under the current MFF, the (potential) enlargement countries<sup>90</sup> participate in the **Fiscalis** programme (2021 – 2027)<sup>91</sup>. The programme offers to these countries the possibility to cooperate with EU Member States’ tax authorities and to get acquainted with the sector-specific EU legislation and operational good practices.

Tax administrations of enlargement countries already participate in the programme’s collaborative activities and have access to tax training courses funded by the programme.

There is potential for an increased use of the available training courses by enlargement countries and, consequently, an increasing need to translate the existing eLearning modules in the languages of the enlargement countries<sup>92</sup> which will require dedicated translation resources as well as new face-to-face training events to be organised to cover their training needs. In addition, increase in expenditure could be expected to develop EU-level training products (eLearning modules or similar) specifically targeting enlargement countries’ needs either in relation to transposing the EU tax legislation or acquiring practices related to EU digital systems and other operational aspects.

The financial impact would be important when it comes to ensuring access to and extending the application of the central components of the **European Electronic Systems** in the area of taxation, because of the integration and participation of new Member States in these systems. This entails changes to existing systems at EU level that are supposed to be developed before the accession, and at Member States level and coordination with both Member States and Enlargement countries with the need of testing those systems. DG TAXUD has estimated amounts for preparation, configuration, connectivity, conformance and deployment to operations.

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<sup>90</sup> Albania, Bosnia and Herzegovina, Georgia, Kosovo, Moldova, Montenegro, North Macedonia, Serbia, Ukraine. Türkiye does not participate in the programme.

<sup>91</sup> Regulation (EU) 2021/847 of 20 May 2021 establishing the ‘Fiscalis’ programme for cooperation in the field of taxation and repealing Regulation (EU) No 1286/2013 (Article 5).

<sup>92</sup> Currently, some of the EU eLearning modules are only translated into Macedonian, Serbian and Turkish. Moldova is using the modules translated in Romanian.

The Fiscalis programme is the sole source of funding for these EU systems (for EU Member States only, and not for enlargement countries). The number of tax European electronic systems to be designed, developed, and operated supporting the operation of taxation policy at EU level is continuously increasing. Currently, there are around 30 operational EU digital tax systems of which the common EU level components are managed through the Fiscalis programme. Integrating the national IT systems of enlargement countries with these existing EU systems can be complex and would require increased financial resources.

The tools used under the programme (collaborative activities (grants), procurement contracts) are flexible enough to allow the Commission and participating countries to come forward with initiatives, should a new policy priority emerge.

Overall, the Commission and Member States would likely need to invest in technical support through the Fiscalis programme or future external action-related instruments to ensure that EU enlargement countries have developed adequate capacities and tools to effectively fight against tax avoidance, tax evasion, and tax fraud in line with the EU rules.

Finally, as part of the transition process for all enlargement countries towards fully functioning market economies, the new single market and customs programme proposed for the 2028-2034 MFF is expected to boost the approximation of legislation in the enlargement countries, provide capacity building, including improving operational capacities and digital integration as well as provide targeted awareness raising.

### 3.6.2. Reform orientations

On **indirect taxation**, introducing new derogations should be avoided, as these could have an impact on fiscal neutrality and competition in intra-EU trade and help new EU countries to ensure their preparedness for implementing digital and simplified tax compliance. <sup>[OOB]</sup>New performance indicators may be needed to monitor adequately the effectiveness of tax collection and to support closing loopholes in the fight against tax avoidance, evasion and fraud<sup>[OOB]</sup>. On **VAT**, a more detailed timeline and roadmaps for the gradual approximation to the EU *acquis* is being developed with enlargement countries. Also, in the area of **excise duties**, it could be helpful to identify the areas where existing national legislation falls short of harmonised EU rules and then develop with the enlargement countries concerned an **action plan** with a timetable for the implementation of the EU *acquis*, with progress assessed at regular intervals.

To help prevent tax evasion and ensure proper collection of VAT and excise duties at EU level, the Commission could **consider proposing enhanced anti-fraud measures in VAT and excise duties legislation**. The enlargement countries are for the first time being included in the annual 2025 EU VAT Gap report of the Commission<sup>93</sup>.

The enlargement countries can be further encouraged and supported to participate in customs and taxation trainings currently available as e-learning modules, training events and learning materials.

Exploring governance options to facilitate decision-making at EU level in all the taxation fields, including by removing the unanimity rule would afford more flexibility to the taxation policy development and could provide additional pathways for harmonisation<sup>94</sup>.

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<sup>93</sup> <https://op.europa.eu/en/publication-detail/-/publication/b5c7403b-d67f-11f0-8da2-01aa75ed71a1/language-en>.

<sup>94</sup> See Chapter II.1 on governance in the Communication.

### 3.7 Economic policies

The **European Semester** is the overarching framework for economic and fiscal policy coordination within the EU. It is an annual cycle designed to ensure that national economic, social, and budgetary policies are analysed and assessed collectively. It encompasses the macroeconomic imbalance procedure, created to prevent and correct risks to macroeconomic developments.

Since the spring of 2024, **EU fiscal policies have been coordinated under the new economic governance framework**, which aims to strengthen Member States's debt sustainability and promote sustainable and inclusive growth in all Member States through growth-enhancing reforms and priority investments.

EU Member States, except Denmark, are legally committed to adopting the **single currency**. For all new Member States as well as for the other Member States that have not yet adopted the euro and have committed themselves to do so, the Commission submits a convergence report to the Council at least every two years, on the progress made.

#### 3.7.1 Impact of enlargement on EU economic policies

With enlargement, there would be **greater economic diversity across the EU** and regarding the macroeconomic imbalance procedure (MIP). New Member States would require close supervision as they will have lower per capita GDP and may face risks of high inflation linked to the economic catching up process. If these risks are not well managed, they could lead to unsustainable dynamics and abrupt adjustments. It is possible that some new Member States are placed under the excessive deficit procedure. In the context of the European Semester, the inclusion of new Member States will introduce a greater diversity of economic structures, fiscal capacities, and reform priorities, potentially adding complexity to EU level policy coordination.

In enlargement countries, the European Semester is reflected in the **annual submission of economic reform programmes** and the subsequent multilateral economic policy discussions between the EU and enlargement countries which adopts policy recommendations. In the case of the Western Balkans and Moldova, the Economic Reform Programmes focus on the medium-term macro-fiscal framework and are supplemented by the Reform Agendas related to the new Western Balkans and Moldova Plans respectively. The Reform Agendas identify a set of priority reforms, broken down into measurable steps which will serve as payment conditions. In the case of Ukraine, the Ukraine Plan, the main tool for delivering the Facility, sets out the government's priorities, the sequencing of key reforms and investment priority areas, which will bring about economic growth and resilience, foster its integration into the single market, and ensure that Ukraine gradually align its legislation with the EU *acquis*.

Enlargement would have an impact on international relations and on participation in fora such as the IMF, World Bank, G7, and G20. Nevertheless, **close economic cooperation** with new Member States would be an opportunity for the EU to strengthen its voice in international settings. Specifically, as regards the IMF, coordination will be done with more countries, and the EU voting share within the Fund in absolute terms will become slightly larger. However, many of the enlargement countries are IMF debtors, which might make EU coordination on IMF policy items more challenging.

Article 140 (1) TFEU establishes a set of four **criteria for adopting the euro**, which are further developed in Protocol No 13 on the convergence criteria annexed to the Treaties:

- (i) the 12-month average inflation rate not exceeding the reference value calculated in accordance with the Treaty (inflation criteria);
- (ii) the country not being subject to an excessive deficit procedure under Article 126(6) (fiscal criteria);
- (iii) participation in the exchange rate mechanism of the European Monetary System (ERM II) for a minimum period of two years, during which the country must maintain the value of its currency against the euro close to a central rate, without severe tensions (exchange rate criteria); and
- (iv) the long-term interest rate not exceeding the reference value calculated in accordance with the Treaty (interest rate criteria).

Article 140 (1) TFEU also requires an examination of the compatibility of a Member State's national legislation with Articles 130 and 131 of the Treaty and with the Statute of the European System of Central Banks and of the European Central Bank. It also calls for an examination of other factors relevant for economic integration and convergence.

As it was the case with past enlargements, enlargement would not require a change in the criteria for adopting the euro established in Article 140 (1) TFEU. However, the fact that two enlargement partners (Kosovo and Montenegro) have unilaterally adopted the euro as their sole legal tender, as a matter of national law, before the formal euro adoption process, pursuant to Article 140 TFEU, raises issues for the interpretation of the exchange rate and long-term interest rate criteria for these countries. The exchange rate criterion can be regarded as a market test for both the central rate and for the extent of convergence in general. Complementing this, the long-term interest rate convergence criterion also reflects a positive view of the markets regarding the sustainability of convergence in terms of low currency and default risk premia. If the enlargement country in question does not have its own currency the two tests cannot be applied and/or interpreted in the usual way. Absent these market-based tests, **alternative solutions will need to be found** to ensure that the 'euroised' country has achieved a high degree of sustainable convergence before joining the euro area<sup>95</sup>.

#### *Budgetary aspects*

Whilst enlargement countries have access to guarantees through the European Fund for Sustainable Development Plus (EFSD+), as new Member States they would have access to the **Invest EU Programme** (or its successor in the **Competitiveness Fund** under the next MFF), the internal investment programme of Member States, and this may affect the availability of this funding (or its successor).

New Member States would also become **shareholders of the EIB**, which would entail rights and obligations in line with the statute of the EIB.

Following their accession to the EU, new EU Member States that have not yet joined the euro-area and face difficulties regarding their balance of payments would become eligible for financial assistance through the **Balance of Payments Facility** currently operating with a ceiling of EUR 50bn. If the number of potential beneficiaries increases, there would be a

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<sup>95</sup> The Commission developed a solution to address the exceptional situation of Montenegro in order to ensure that the convergence assessment applied to Montenegro is equivalent in economic terms to that applied to other Member States and duly allows to assess Montenegro's compliance with the high degree of sustainable convergence required by Article 140 TFEU. The Commission has proposed an in-depth examination of 'other factors' relevant to economic integration and convergence, as mentioned in the last subparagraph of Article 140(1) TFEU. The Council's Eurogroup Working Group (EWG) expressed its support for the Commission's proposal for an adjusted convergence assessment framework for Montenegro.

potential decrease in available amounts for the seven non-euro area Member States that currently have access to financial assistance from this Facility<sup>96</sup>.

In a baseline scenario, the accession of new Member States would increase demand on the **Pericles programme** – the instrument for combating euro counterfeiting, both in terms of Commission procured actions and in terms of possible applications from authorities of new EU Member States. Inadequate support to competent authorities in these countries would undermine the homogeneous level of protection of the euro in the EU and create opportunities for organised crime.

The Commission provides support to enlargement countries through the **Macro-Financial Assistance** (MFA), a mechanism that provides financial aid (loans and grants) to partner countries experiencing a balance of payment crisis. Enlargement would reduce the number of members benefiting from this support, as new Member States will no longer be eligible. At the end of 2024, close to 80% of the outstanding amounts of MFA loans belonged to enlargement countries.<sup>97</sup>

Enlargement would also trigger the need for adequate resources within the Commission, to among other things handle a larger number of Member States as part of the European Semester, close supervision of new Member States as part of the macroeconomic imbalance procedure, as well as continuous engagement and possibly technical assistance in view of the reformed fiscal framework.

### 3.7.2 Policy gaps, delivery risks and reform orientations

The main gaps are not related to policies but to preparedness in the enlargement countries.

Continued **technical support** remains of the essence (notably for alignment with the recently reformed fiscal framework), but **no major changes to the policies seem needed**. The Commission could also, in line with its overarching priorities, explore **policy simplification** options, including the option of ensuring greater consistency in regulations as a follow up to the revision of the economic governance framework. Simpler rules will facilitate their effective application in both current and future Member States.

As explained above, for the assessment of the exchange rate and the long-term interest rate in the case of Montenegro that has unilaterally adopted the euro as its sole legal tender, as a matter of national law, before EU accession, the Commission has designed an adjusted convergence assessment framework that is economically equivalent to that applied to other Member States.

## 4. A DECARBONISED ECONOMY AND SUSTAINABLE CONNECTIVITY

### 4.1 Climate and emission reduction policy

The **European Green Deal** sets out how to make Europe the first climate-neutral continent by 2050, boosting the economy, improving people's health and quality of life, caring for nature,

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<sup>96</sup> This amount is currently available for seven Member States, representing approximately 2% of these MS' combined GDP in 2023. The accession scenario could increase the number of potential beneficiaries to 16, albeit adding mostly smaller economies. This would in turn reduce the proportion of BoP Facility funding in relation to potential beneficiaries' combined GDPs. Nonetheless, given both the backstop nature of the BoP Facility (i.e. it is only there for times of crisis) and the generally small size of the economies of the potential countries joining the EU, there does not appear to be any imminent need to increase the size of the ceiling.

<sup>97</sup> This excludes the exceptional MFA+ assistance to Ukraine, which is treated separately given its specific nature and scale.

and leaving no one behind<sup>98</sup>. To stay course on the goals set out in the European Green Deal, decarbonise our economy and bring down energy prices, as part of its 2024-2029 priorities, the Commission presented a **Clean Industrial Deal**<sup>99</sup> to make our industry competitive and create quality jobs. The Clean Industrial Deal brings together climate action and competitiveness under one overarching growth strategy, with a commitment to accelerating decarbonisation, reindustrialisation and innovation, thereby reinforcing Europe's resilience. It outlines specific measures to turn decarbonisation into a growth driver for European industries by focusing on energy-intensive industries and clean tech.

Enlargement of the EU would boost its leadership in decarbonisation and amplify the EU's voice on the global stage, strengthening the EU's global contribution to reducing greenhouse gas emissions. The EU framework also includes instruments that distribute EU-wide efforts and between Member States to allow the Union to meet its binding emission reduction objectives – in areas such as energy efficiency and renewable energy, power sector and energy intensive industries, land use-change and forestry. Integrating countries which are at an earlier stage of decarbonisation compared to the EU comes with the need to ensure fair and balanced impact and support across current and future Member States but also brings benefits to drive investment and growth in employment in the new Member States.

#### **4.1.1 Impact of enlargement on the climate and emission reduction policy**

Enlargement could have a significant impact on the achievement of EU's legally binding climate targets and on the Emissions Trading System, the 'cap and trade' mechanisms for emissions that support the transformation of the EU economy in line with its climate ambitions.

##### *EU's climate targets and the European Climate Law*

Regulation (EU) 2021/1119 establishing the framework for achieving climate neutrality (the **European Climate Law**) sets into law the objective for the EU to become climate-neutral at the latest by 2050. It also sets the intermediate target of reducing net greenhouse gas (GHG) emissions by at least 55% by 2030 compared to 1990 levels and provides for the setting of a climate target for 2040.

In February 2024, the Commission presented its detailed assessment for a 2040 climate target for the EU<sup>100</sup>. In March 2026, the EU adopted an amendment<sup>101</sup> to the European Climate Law, setting a legally binding 2040 target of 90% reduction in net GHG emissions compared to 1990 levels. From 2036 onwards, high-quality international credits may be used up to a limit of 5% of 1990 EU net emissions to make an adequate contribution towards the EU 2040 target in a way that is both ambitious and cost-efficient. The reaching of the different, overarching targets of the EU will be affected by future enlargement. If more countries join the European Union, more GHG emissions and removals would be covered by the EU's climate targets. Overall, this could have a positive impact on global climate ambition, as more countries would apply ambitious climate legislation that results in significant domestic GHG emissions reduction and more removals. The Commission has published detailed assessments of the impacts of the EU's

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<sup>98</sup> COM (2019) 640.

<sup>99</sup> COM (2025) 85.

<sup>100</sup> COM (2024) and SWD (2024) 63.

<sup>101</sup> Regulation (EU) 2026/667 of the European Parliament and of the Council of 11 March 2026 amending Regulation (EU) 2021/1119 as regards the setting of a Union intermediate climate target for 2040.

climate targets<sup>102</sup>. At the time of assessment, it was not yet possible to assess the impact of future accession.

Enlargement countries have higher carbon intensities than the current EU average. For example, over 60% of primary energy production in Bosnia and Herzegovina and in Serbia comes from coal<sup>103</sup>, compared to the EU average of around 16% of primary energy production coming from solid fossil fuels in 2022. Integrating enlargement countries could reduce their emissions significantly, provided they invest in clean energy and modernisation of their infrastructure to meet EU requirements. Moreover, such investment efforts will need to continue also once they become EU Member States.

Based on current emissions and projections of enlargement countries, the **EU target for 2030** (-55% compared to 1990 levels) remains achievable. Due to significant deindustrialisation after 1990, enlargement countries have substantially decreased their total emissions. At the same time, climate policy instruments with 2030 national targets<sup>104</sup> may require adaptations to reflect the inclusion of new countries.

Reaching the **EU targets for 2040** (90%) and **2050** (climate neutrality) might require a change in distribution of effort by current and/or new Member States, to ensure that the overall EU goal is achieved. Accession may lead to a redistribution of the ambition effort based on Member States' respective capacities, as is the current approach in the climate policy instruments with national targets from the Fit-for-55 package. The magnitude of the impact on existing Member States' efforts will depend on the GDP of the enlargement country in question and on its emission size and opportunities for abatement and their costs.

With the 2040 target now legally binding, the Commission is preparing the policy proposals for the post-2030 policy framework<sup>105</sup> needed to reach the 2040 target considering, among other things, fairness, technological neutrality and cost-efficiency, strengthening EU competitiveness, ensuring a just transition and improving environmental sustainability. The impacts on policymaking are significant but appear manageable, if enlargement is appropriately considered in the design phase of the climate policy framework, including in terms of timing and sequencing of enlargement. Synergies with other policy areas are also important in this context – e.g. with energy, transport, industry and agriculture.

The European Climate Law also requires the relevant EU institutions and Member States to ensure continuous progress in enhancing adaptive capacity, strengthening resilience and reducing vulnerability to climate change. Member States are to implement national adaptation strategies and plans, regularly update them and include related updated information in reports. The Commission has adopted a Union strategy on adaptation to climate change in any review of which an enlarged EU would need to be considered. The Commission is developing a new integrated framework for European climate resilience and risk management, expected to be adopted during the second half of 2026.

### *EU Emissions Trading System*

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<sup>102</sup> The 2050 climate-neutrality objective (in-depth analysis in support of the Clean Planet for all Communication, COM (2018) 773; 2030 climate target (2030 Climate Target Plan impact assessment, SWD (2020) 176); the recommended climate target for 2040 (impact assessment on a 2040 Climate Target, SWD (2024) 63).

<sup>103</sup> See IEA country pages (e.g. [Serbia](#)).

<sup>104</sup> Namely the Effort Sharing Regulation – Regulation (EU) 2018/842 and the Regulation on land use, land use change, and forestry, LULUCF – Regulation (EU) 2018/841.

<sup>105</sup> The Commission has proposed updates to the EU ETS directive in July 2026. A revision of national targets and flexibilities in the EU climate policy framework is due in Q4 2026.

The overall impact of future enlargement on the **EU Emissions Trading System** (EU ETS - Directive 2003/87/EC) is expected to be considerable, with new countries having to join the system once they are EU Member States. The EU ETS is the cornerstone of the EU's policy to tackle climate change, by cost-effectively reducing GHG emissions. It is based on the cap-and-trade principle. The system allows trading emission allowances, so that the total emissions of the covered activities remain within the cap and the least-cost measures can be used to reduce emissions. The current (fourth) phase of the EU ETS runs from 2021 to 2030. For this period, the EU has set a target to decrease GHG emissions by 62%, compared to 2005 levels. The system applies to power plants, a wide range of energy-intensive industrial sectors, flights within the EU and the European Economic Area and departing flights to Switzerland and the United Kingdom, and maritime transport. In July 2026, the Commission proposed an amendment<sup>106</sup> to the ETS directive, to make the system the innovation and investment engine for EU competitiveness, while continuing to support the delivery of the EU's 2040 climate target.

A new separate, stand-alone ETS (named 'ETS2') has been set up to cover from 2028 the CO<sub>2</sub> emissions from fuel combustion in buildings, road transport and additional sectors that correspond to industrial activities not covered by the existing ETS ('ETS1').

The inclusion of new countries in the EU ETS would result in a larger carbon market, with both increased supply and increased demand of allowances. In 2020, the GHG emissions of the equivalent sectors covered by ETS1 (stationary installations) in the Energy Community Contracting Parties<sup>107</sup> represented approximately 19% of the EU ETS1 stationary installations emissions. Including new EU countries in the EU ETS would increase the size of the market in a non-negligible way, even though such increase depends on the countries joining the EU (Ukraine representing a high share of those emissions) and timing of accession.

The effects of extending the EU ETS to countries at a less advanced stage of economic development and decarbonisation needs to be carefully assessed, both in terms of impacts on new Member States and in terms of impacts on the EU ETS. This includes impact on market functioning, ambition and carbon price, given that the initial abatement costs are expected to be lower in new EU countries than in the rest of the EU. Such impacts have not been analysed so far and require both qualitative and quantitative assessment. The impacts would also vary depending on which countries join the EU – with higher impacts expected from the integration of larger countries and from countries whose economies are very carbon intensive. Moreover, timing is important: the later the integration to the EU ETS, the greater the risks of a decarbonisation gap with the current EU ETS participants.

Enlargement requires a revision of the cap to cover the emissions from the activities subject to EU ETS in the new Member States, and linked to that, changes to the Market Stability Reserve and other key ETS building blocks, such as carbon leakage protection and market oversight measures. In addition, the distribution of ETS revenues as well as existing solidarity mechanisms under the EU ETS would need to be reviewed. This is expected to be a key aspect, affecting both new and current Member States.

In the new EU countries, strong administrative capacity will be needed to set up, implement and properly enforce the EU ETS legislation, and in particular the rules on monitoring, reporting, verification of GHG emissions and accreditation of verifiers, ensure the surrendering

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<sup>106</sup> COM (2026) 616.

<sup>107</sup> The Energy Community is an international organisation bringing together the EU and nine neighbouring enlargement countries or potential candidates, to create an integrated regional energy market based on a legally binding framework. The 9 Energy Community contracting parties are Albania, Bosnia and Herzegovina, North Macedonia, Kosovo, Montenegro, and Serbia, Georgia, Moldova and Ukraine.

of allowances, manage the accounts in the Union registry as well as the free allocations rules. Also, implementation and enforcement of the relevant financial services legislation (EU ETS allowances being financial instruments) is a pre-requisite to prevent market abuse, money laundering and other forms of malpractice in an enlarged EU ETS.

The impact of enlargement on the EU ETS for the maritime sector would be multifaceted. Environmentally, it would contribute to emission reductions and to the shift towards greener maritime practices. Economically, it could spur investments in energy-efficient technologies and towards more sustainable practices, helping modernise the fleet, and the maritime sector in general, and improve the competitiveness of the industry. Politically, it would signal a wider commitment to reaching the EU's climate goals and further aligning with EU regulations. Enlargement would likely have a significant impact for both the EU ETS Directive and MRV regulations in the maritime sector. Increased coverage of emissions from ships, more comprehensive data collection (linked to the need for administrative capacity), and more stringent compliance measures are expected.

For ETS aviation, as for the general EU ETS, enlargement would have a positive impact on global climate ambition and reduce risk of carbon leakage/competitive distortion, but it may require a redesign of the EU's climate policy<sup>108</sup>.

#### *F-gas and ODS Regulations*

The impacts of future enlargement on the **fluorinated greenhouse gases** (F-gases) Regulation (Regulation (EU) 2024/573) and on the **Ozone Depleting Substances** (ODS) Regulation (Regulation (EU) 2024/590) are expected to be small, requiring technical adjustments (recalculating the EU baseline; a limited number of additional undertakings that would need to be registered) but no policy changes. Enlargement would positively impact global ambition. Enhanced cooperation with customs would be needed and would be of benefit, to ensure effective controls at the borders.

#### *CO<sub>2</sub> standards for vehicles, fuel quality, car labelling*

Rules on CO<sub>2</sub> standards for vehicles (Regulation (EU) 2019/631 and Regulation (EU) 2019/1242), Fuel Quality Directive (Directive 98/70/EC) and Car Labelling Directive (Directive 1999/94) aim to contribute to the decarbonisation of the road transport sector, to reach the EU's GHG targets for 2030 and beyond and help reach the goals of the Paris Agreement. The CO<sub>2</sub> standards and Car Labelling rules are currently being revised as part of the Automotive package initiative with a view to supporting the industry in the transition to zero-emission mobility, while maintaining the climate targets and offering more flexibility to the EU industry. Enlargement would positively impact ambition. From a climate perspective, wider implementation of the vehicle CO<sub>2</sub> standards could bring further reductions in CO<sub>2</sub> emissions in the road transport sector and accelerate the shift towards zero-emission mobility in new Member States. Economically, enlargement could drive investments in zero-emission mobility technologies including infrastructure, help modernise the vehicle fleet and make their automotive industries more competitive.

The impacts of enlargement on the policies setting CO<sub>2</sub> standards for vehicles are expected to be small. Enlargement would not require changes to the vehicle CO<sub>2</sub> standards, but there will be impacts on implementation, with more reporting authorities, more vehicles in the EU fleet and more vehicle manufacturers to which the standards would apply. This would translate into

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<sup>108</sup> For example, the support contract for the impact assessment looks at international partners in general, and prospective enlargement countries will receive special attention, including exploring how to facilitate these countries' process of joining the ETS.

a slight increase in administrative burden for the Commission and the European Environment Agency (EEA). Similarly, the accession of the new Member States countries is expected to have small impact on the Fuel Quality Directive and the Car Labelling Directive, limited to implementation, including extended monitoring and reporting coverage, implying additional resources in the Commission and the EEA.

Climate resilience and risk management are vital for a competitive, secure and prosperous EU. In light of impacts of climate change, the EU and Member States need to build capacity to adapt, strengthen just resilience and reduce vulnerability, and this is even more crucial for enlargement countries, which are among the most vulnerable in Europe to the effects of biodiversity loss, pollution and climate change.

#### *The EU's international commitments*

The EU's objective of achieving climate neutrality by 2050 as enshrined in the European Climate Law is in line with the objectives of the Paris Agreement, to which the EU and its Member States individually are parties. All enlargement countries are parties to the **United Nations Framework Convention on Climate Change (UNFCCC)** and the **Paris Agreement**, except Kosovo and have nationally determined contributions in place. Enlargement would impact the EU international climate commitments in relation to, for example, the UNFCCC, the Paris Agreement, and the Montreal Protocol, with a positive impact on global climate ambition. Nevertheless, the risks described above in relation to the EU targets would also apply in the context of meeting EU's contributions under these agreements – e.g. achieving the nationally determined contributions under the Paris Agreement.

As new Member States join the EU, their status in international/UN contexts would change. The EU and its Member States are all considered developed countries under the UNFCCC and Paris Agreement obligations, whereas most enlargement countries are considered developing countries. For the purposes of the UNFCCC and the Paris Agreement, new EU Member States would no longer be considered recipients of climate finance and would be expected to contribute to climate finance as donors, including to the collective quantified goals agreed under the Paris Agreement.

Enlargement would have positive impacts on EU's stance in climate negotiations as the EU would speak on behalf of a larger number of countries. Enlarging the EU would also have an impact on its influence in UN geographic groups – especially when only four<sup>109</sup> out of the 23 members of the UN Eastern European Group would not be EU Member States.

EU enlargement would have positive impacts on the role of the EU in international organisations, by increasing the diversity of voices, strengthening the EU's collective position and voting power, and expanding EU's ability to advocate for higher sustainable regulatory standards. An enlarged Union may have even greater leverage to push for ambitious global standards in the **International Maritime Organization (IMO)** and at the **International Civil Aviation Organization (ICAO)**, in relation to decarbonisation and climate change.

#### *Budgetary aspects*

Under the next MFF 2028-2034, it will be important to ensure sufficient funding for EU climate priorities in new Member States, to ensure emissions reductions across all sectors of the economy and increased resilience and adaptation to the negative effects of climate change. This funding would inter alia support development of renewable generation, energy efficiency improvement actions, including resilient grid development, in particular for the decommissioning of thermal power plants, mine closures, modernisation and decarbonisation

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<sup>109</sup> Armenia, Azerbaijan, Belarus, and Russian Federation.

of the industry, decarbonisation of transport, and early warnings, just transition measures and measures to adapt and enhance resilience to climate-related hazards, such as among others floods, heatwaves and wildfires. While these budgetary implications are further described in other sections of this SWD, the budgetary aspects presented below refer to specific funds under the EU Emissions Trading System.

The Innovation Fund, the Modernisation Fund, the Social Climate Fund (SCF) and in the future the Industrial Decarbonisation Bank as proposed in the ETS review in July 2026 will also have an important role to play. These instruments are fully funded by EU ETS 1 and, as regards SCF, mostly by EU ETS 2 revenues. The financing of the Innovation and Social Climate Fund from external assigned revenue to the EU budget is not changed under the Commission's MFF proposal. In 2028, the SCF would however be incorporated in the National and Regional Partnership Plans.

The **Innovation Fund**, established by Directive 2003/87/EC, aims to support innovation in low-carbon technologies and processes across all Member States. Applying the ETS Directive to new Member States would result in more countries becoming eligible for the Innovation Fund, as projects in these new Member States would become eligible. The impact on the size of the Innovation Fund would be proportional, since its resources are defined in the ETS Directive based on allowances. However, specific figures regarding the impact of enlargement on the fund are unavailable. Estimating this impact is challenging due to the need to rely on assumptions about market developments, such as carbon price and other policy factors, like the volume of the Carbon Border Adjustment Mechanism (CBAM) allowances transferred to the Innovation Fund.

The **Modernisation Fund** was also established in the ETS Directive, to support the modernisation of energy systems and the improvement of energy efficiency in 13 lower-income EU Member States<sup>110</sup>. The beneficiary Member States and the distribution of funds among them are set in the ETS Directive. Thus, whether and to what extent any of the new Member States should benefit from it would have to be decided. There are currently no estimates of the impact of enlargement on the fund.

The new Member States will participate in the new ETS covering buildings, road transport and additional sectors (ETS2) that will be in place in the EU as of 2028 and thus will also participate in the **Social Climate Fund** (SCF), contributing to and benefiting from its funding. The timing of accession is relevant because the SCF is established for the period 2026 to 2032. Hence, any enlargement taking place after 2032 will not impact the SCF. However, the end date in 2032 could make SCF implementation challenging in the case of new Member States acceding to the EU before the end of this decade as they need to ramp up the domestic systems to be able to access the fund.

All EU Member States participate in the SCF. Hence, applying the same principle, enlargement would increase the number of countries participating in the SCF. Since the SCF is financed by pooling revenues from the auctioning of ETS2 allowances, which the new Member States will also implement, the resources that they will receive will partly be generated by revenues raised in those same countries. However, the SCF allocation methodology ensures that resources are redistributed in favour of lower-income Member States with larger energy, transport, poverty and population exposure challenges (based on energy and transport poverty indicators and GNI adjustment, see methodology in Annex II of the SCF Regulation).

Finally, it is to be noted that the SCF Regulation contains a commitment for budgetisation of

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<sup>110</sup> Bulgaria, Czechia, Estonia, Greece, Croatia, Latvia, Lithuania, Hungary, Poland, Portugal, Romania, Slovenia and Slovakia.

the SCF in the post-2027 multiannual financial framework (MFF), in the event an ETS-based own resource is agreed (SCF Regulation, Article 27(4)). Under the 2025 proposal of the Commission on the new MFF for 2028-2034, it is proposed that the SCF financing will remain as external assigned revenues from the ETS2, while the SCF will be included in a separate chapter in the proposed National Regional and Partnership Plans. The allocation of SCF resources to the Member States would not change.

#### **4.1.2 Policy gaps and delivery risks**

In general, EU climate policies can be extended to the new Member States without the need to fill considerable gaps in EU legislation. This is in particular the case for EU climate legislation that links with single market provisions, in relation to which enlargement would extend the coverage of the applicable rules, standards and targets – CO<sub>2</sub> standards for cars and vans and for heavy duty vehicles, F-gas Regulation, ODS regulation, or the Fuel Quality Directive.

Nevertheless, considerable governance, administrative and technical expertise needs to be built in the enlargement countries to implement and monitor the EU systems. These gaps in implementation and enforcement are currently significant in enlargement countries and need to be filled in. As national authorities of enlargement countries will play an essential role in the implementation of certain decarbonisation policies, the development, modernisation and safe digitalisation of their national systems is necessary for them to duly comply with regulatory requirements.

Costs for administration are also expected to be significant and need to be taken into consideration in the accession process for the individual enlargement countries. This is particularly relevant for the increased monitoring and compliance costs for both EU and enlargement countries, and the costs of joining the necessary infrastructure and permit systems, organisations and agencies, including at international level. Enlargement countries can already benefit from the expertise and network of the EEA, as the six Western Balkans partners, Moldova and Ukraine are among the EEA cooperating countries. Accessing the networks and expertise available to EEA members would greatly increase the ability of enlargement countries to benefit from the work of the EEA and be closely linked with the EU systems.

For policies that define targets and obligations at Member State level and the EU ETS, any gaps related to defining respective targets and obligations for new Member States will need to be addressed at the time of accession.

Regarding EU ETS, although carbon pricing is expected to result in an increase in investments and net employment gains in the new Member States, it will entail social and economic repercussions for countries at an earlier stage of decarbonisation. This may require tailor-made solutions to ensure their smooth integration upon accession and soften the impacts of the EU high carbon price on their economy while ensuring fair distribution of benefits, opportunities and burdens of the clean transition throughout the EU. The EU ETS solidarity mechanisms might have to be revisited. Further, insufficient administrative capacity to implement and enforce EU-ETS legislation in new Member States may pose an important risk for the EU carbon market integrity.

#### **4.1.3 Reform orientations**

In view of the policy gaps and risks identified above, a set of reform orientations may be considered. Several revisions of key EU climate legislation (and implementing legislation) are needed to reflect the accession of new Member States.

**ETS Directive:** Several changes to the ETS Directive would likely be needed. The cap (an essential element which determines ambition and the carbon price) should be revised to cover emissions in the new Member States. Linked to that, changes might need to be made to the Market Stability Reserve and carbon leakage measures. Market oversight is an important aspect to ensure the integrity of the system (i.e. anti-money laundering safeguards, and the avoidance of market manipulation among other things). The solidarity mechanisms may need to be reviewed, e.g. expansion of volumes available and changes to Modernisation Fund and Social Climate Fund.

**Effort Sharing Regulation (ESR):** Achieving the Union's 2030 ESR target is the result of the sum of all national efforts, which is relevant to pre-2030 accessions. To avoid changing the EU-wide target and renegotiating the targets of the current 27 Member States,<sup>111</sup> a pragmatic approach could be to exempt new Member States from joining the ESR pre-2030, and set individual ad hoc 2030 targets for them, making it unnecessary to change the existing ESR framework, yet ensuring that the new Member State has its own tailor-made and separate share of effort to be made, so as to contribute towards the EU ambition.

**LULUCF Regulation:** As for ESR, the impact of a pre-2030 accession could be significant as it would require setting targets for new Member States, contributing to the EU land-based net carbon removals target. The same approach as for ESR above could be considered, that is, setting parallel and ad hoc 2030 targets for new Member States that join the EU before 2030.

**Governance Regulation:** As Contracting Parties to the Energy Community, enlargement countries already implement an adapted version of the regulation. For the purposes of the 2030 framework, to ensure compliance with EU planning and reporting obligations, the provisions of the Governance Regulation may have to be temporarily modulated in a tailor-made manner for new Member States through the Accession Treaty (e.g. by setting an *ad hoc* deadline by which the new Member State will have to submit its integrated National energy and climate plan following accession). This is particularly important due to the interlinkage of the Governance Regulation with other EU Regulations, notably LULUCF, ESR, the Renewable Energy Directive and the Energy Efficiency Directive.

**Fluorinated greenhouse gases Regulation:** Recalculation of the EU baseline and registration of a limited number of undertakings will be required (a technical procedure that does not entail policy changes). Enhanced cooperation with customs would be needed to ensure effective controls at the borders.

As the details of **post-2030 EU climate policy framework** are yet to be determined for EU-27, with a review of key building blocks of climate legislation due in 2026, climate policy in the Union should strive to consider, to the extent possible, the perspective of an enlarged Union and the resulting re-distribution of efforts. The 2024-2029 priorities of the Commission announced a **new Clean Industrial Deal**, with concrete actions to turn decarbonisation into a driver of growth for European industries. The Clean Industrial Deal focuses mainly on two closely linked sectors: energy-intensive industries and clean tech, with circularity a key element. It states that the gradual integration of enlargement countries in the single market is one horizontal enabler necessary for a competitive economy. The enlargement aspects will need to be considered in detail in the analytical preparatory work for the several strands of policies announced as part of the Clean Industrial Deal.

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<sup>111</sup> Also, the inclusion of a new Member State would require identification which installations would be subject to the ETS1 in such countries, determining their new Member States ESR emissions in the ESR sectors in 2005, and setting the annual emission allocations of the new Member States for the years up to 2030.

## 4.2 Energy policy

The European Union's energy policy is centred around ensuring a secure, affordable, efficient and clean sustainable energy supply for people and businesses, as stressed in the recent **Action Plan for Affordable Energy**.<sup>112</sup> Key priorities include investing in clean energy, improving energy efficiency, enhancing system flexibility, reducing dependency on fossil fuels and diversifying energy sources to reduce one-sided dependency on specific suppliers, notably Russian fossil fuels and nuclear fuels. These objectives align with the EU's objective to achieve **climate neutrality by 2050**. Nuclear power will continue providing low-carbon energy in the EU in the Member States that choose to use it, complementing renewable energy. As regards renewables, the revised Renewable Energy Directive raises the EU's binding renewable target for 2030 to a minimum of 42.5% share of renewables in the energy mix, with the aspiration to reach 45%. In the nuclear sector, in line with the **REPowerEU Plan**, the EU Member States are diversifying their nuclear fuel value chains to avoid dependences on any single supplier. Ukraine has diversified its nuclear fuel value chain away from Russia and is receiving its nuclear fuel from an alternative supplier. Development of domestic value chains is key also for the EU and is ongoing for advanced nuclear technologies such as small modular reactors, for example through the Strategy for the development and deployment of Small Modular Reactors (SMRs) in Europe<sup>113</sup> and the European Industrial Alliance on Small Modular Reactors.

The European Union has also identified faster electrification as a priority, as set out in the **Electrification Action Plan**.<sup>114</sup> It includes an indicative target to raise electrification to 46% by 2040, which will be assessed in the context of the post-2030 Energy Union package. Following up on the Action Plan for Affordable Energy, work on EU-level tripartite agreements has also started. These agreements bring relevant actors of a specific energy sector around a set of non-binding commitments to create an investment climate that supports cost-effective energy production, reliable energy supply, and long-term economic growth for stakeholders involved. The first one was signed in June 2026 to support the development of energy storage in the long-term<sup>115</sup>.

For countries aspiring to join the EU, aligning with EU energy policies is crucial for integration, decarbonisation and energy security. The **Energy Community** plays a pivotal role in this process. By adopting EU energy legislation, contracting parties of the Energy Community commit to creating a stable regulatory framework, attracting investment, enhancing energy security and accelerating decarbonisation. This framework also gives them the **opportunity to join the EU electricity markets before accession** (e.g. the Electricity Integration Package enables market coupling with the EU). In addition, the Contracting Parties of the Energy Community also progressively apply the EU *acquis* on **security of supply**. This helps ensure a comparable level of preparedness, risk assessment and crisis response to that of EU Member States, thereby reducing security-of-supply risks in the enlargement region and lowering the likelihood of spillover or domino effects on the EU's own security of supply. Additionally, alignment of enlargement countries' legislation with the **Euratom acquis** has started under the respective Stabilisation and/or Association Agreements and is advancing in the framework of accession negotiations. This facilitates the accession process and contributes to a more integrated and resilient European energy market.

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<sup>112</sup> COM (2025) 79.

<sup>113</sup> COM (2026) 117.

<sup>114</sup> COM (2026) 595.

<sup>115</sup> [https://energy.ec.europa.eu/strategy/affordable-energy/eu-level-tripartite-agreements\\_en](https://energy.ec.europa.eu/strategy/affordable-energy/eu-level-tripartite-agreements_en)

Enlargement is an opportunity for the internal energy market. A larger and integrated energy system holds benefits for all including improved systemic energy efficiency, increased competitive generation capacity and cost-effective flexibility in the system. Moreover, a larger EU can improve the functioning of the single market and reduce dependence on external energy sources, given the renewable energy potential of the enlargement countries. Enlargement also promotes cross-border infrastructure trade and energy flows, strengthening European energy security through increased interconnectivity and sustainability across a wider geographical area. The EU energy system would benefit from increased availability of low-carbon and low-marginal-cost energy, contributing both to affordability, decarbonisation and resilience of the EU energy system. As a result of increased scale, an enlarged EU could bring increased opportunities to manufacture, within the single market, net-zero technologies and their components, reducing dependencies.

The natural resources in enlargement countries, skilled workforce and academic systems can help the clean energy transition and, in the long run, also strengthen the EU's economic resilience and the competitiveness of EU companies in the supply chains. Moreover, with enlargement, the EU will gain in size and influence with new members fully benefiting from opportunities of demand aggregation and joint purchasing of natural gas and the mechanism to support the market development of hydrogen. At the same time, with enlargement, new challenges would arise related to the phase-out of dependencies on fossil fuels, particularly coal, as well as Russian gas.

Preparedness in enlargement countries will be key for ensuring the necessary level playing field in the EU single market and to making progress towards the decarbonisation of the EU energy sector, via:

- adequate implementation and effective enforcement of legislation,
- independence and efficiency of regulatory authorities, and
- good governance of and cooperation between all relevant authorities to prevent fraud and corruption in line with the EU energy, climate and competition policy and legislation.

Improved governance of the energy sector and the development of competitive energy markets in enlargement countries are necessary for improving liquidity of energy markets. This will enable new market entrants, clean technologies and know-how and attract the necessary investments.

#### **4.2.1 Impact of enlargement on EU energy policy and policy gaps**

##### *Energy-related emission reduction targets policies*

Enlargement is expected to have a considerable impact on the achievement of energy targets related to the 2030 and 2040 climate targets<sup>116</sup>. The enlargement countries (their renewables share and potential, and their energy efficiency share) are not currently included in the EU's **2030 targets**. However, within the Energy Community framework they have set their own national 2030 targets for renewables and energy efficiency. The enlargement countries have largely implemented the 'Clean energy package' from 2018. The European Commission did not take enlargement countries into account in its impact assessment on the 2040 climate targets.

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<sup>116</sup> For the 2030 emission reduction targets related to energy, the current EU goal is to achieve a 42.5% share of renewable energy in final energy consumption, supported by national contributions of varying ambition levels. For the energy efficiency target, it is binding for EU countries to collectively ensure an 11.7% reduction in energy consumption by 2030.

For **energy efficiency**, the latest recast of the Energy Efficiency Directive (Directive (EU) 2023/1791) has not yet been incorporated into the Energy Community *acquis* (it will ideally be included in the Energy Community framework as of 2026/2027) nor into the enlargement countries' legislative frameworks. A legislative proposal for a **new post-2030 energy efficiency framework** is currently being prepared. Depending on the progress of enlargement, possible 2040 EU energy efficiency targets could potentially encompass new Member States.

For **renewable energy**, the EU target is underpinned by national contributions, set at varying levels. If the new Member States were to contribute to the overall EU target, this would, depending on the ambition of the contribution, require of them either more or less efforts in terms of market reforms, creating a conducive environment for renewable investment, and speeding up of permitting procedures and grid extension and modernisation. This is also valid for the energy efficiency targets. A proposal for the **post-2030 renewable energy framework** is currently being prepared. Depending on the progress of enlargement, potential 2040 EU renewable energy targets could potentially encompass new Member States.

#### *Impacts on the internal market for electricity and gas*

The impact of enlargement on electricity and gas market policies is projected to be significant.

On **electricity markets**, enlargement would necessitate changes of the operational systems, such as the market coupling algorithm and allocation, requiring further developments to handle the additional complexity. It also necessitates a thorough upfront check on transposition and implementation of EU laws and a strong governance framework, as any issue arising within one Nominated Electricity Market Operator or a Transmission System Operator (TSO) could impact significantly the outcome of the market coupling for the EU as a whole. The ability of enlargement countries to cooperate between each other will also be key, as being part of the EU integrated electricity market requires TSOs to cooperate with each other to ensure the safety of operations. In addition, the Commission would need to assess whether State aid support, including capacity mechanisms of enlargement countries, complies with the EU's *acquis*, do not result in market distortions and constitute undue State aid. Physical electricity flows and electricity trades might change because of enlargement, whilst key principles such as no discrimination between internal and external flows would remain.

On the **security of electricity and gas supply**, there could be impact on regional and cross-border cooperation, and on new or enlarged risk groups also in light of decarbonisation and EU efforts to phase out Russian fossil fuels, which some enlargement countries still rely on. The Commission plans to revise the **EU energy security framework** considering gas, electricity and oil security of supply, including the gas storage measures. Therefore, in the event of a revision, a new assessment of the related impact of the future legislative framework will need to be made in due course.

#### *Euratom acquis*

The Euratom *acquis* will apply to new Member States irrespective of their energy mix (with a graded approach applied depending on country's nuclear energy profile). Of all enlargement countries, the most important impact on Euratom is expected from the accession of Ukraine, a country with a large civil nuclear industry (145 operating reactors, with plans to build additional ones). The main challenges stemming from the accession of Ukraine are:

- Ensuring the highest levels of **nuclear safety** and protection from radiations during and after the war, including at the currently Russian occupied Zaporizhzhia Nuclear Power

Plant ('NPP' and the New Safe Confinement at the Chornobyl NPP<sup>117</sup>. It still needs to be assessed if and how the existing financial support to enlargement countries' nuclear sector (such as Euratom loans, Instrument for Nuclear Safety Cooperation, Foreign Policy Instruments) will be continued upon their accession.

- Existing assistance programmes for **decommissioning** are not fit to address the legacy of the Chornobyl disaster and war consequences<sup>118</sup>.
- The accession of Ukraine would result in a substantial increase in volume and number of activities required under the Euratom Treaty (Chapter 7 "Safeguards") for the Commission to be able to monitor that nuclear materials are not diverted from their intended (civil) uses and that provisions relating to supply and safeguarding obligations stemming from international agreements are complied with. Amongst others, this would imply an increase in the number of safeguard activities, such as nuclear accountancy verifications, safeguards inspections, installation and maintenance of safeguards-specific equipment and operational technologies and reporting activities *vis-à-vis* the International Atomic Energy Agency as well as third countries in the remit of nuclear cooperation agreements with third countries<sup>119</sup>.
- Ukraine has in place nuclear cooperation agreements with certain third countries. In line with the **Euratom Treaty**, Ukraine will be required to undertake jointly with the Commission the necessary negotiations with these countries in order to ensure that the rights and obligations stemming from the latter's bilateral nuclear cooperation agreements shall as far as possible be assumed by the Community. This might involve extensive additional legal checks and negotiations with the third countries involved.

Furthermore, Ukraine will have to comply with the Euratom Treaty **supply** requirements set out in Chapter 6. In addition to acceding to the Euratom Supply Agency (ESA) - which will involve the transfer of a capital share and the appointment of members to ESA's Advisory Committee - Ukraine must also adhere to the contractual provisions and the security-of-supply policy and diversification measures including of any future new-build projects, such as the proposed new units at the Khmelnytskyi nuclear power plant, also in accordance with the European Energy Security Strategy<sup>120</sup>.

In addition, in accordance with the Euratom Treaty, all enlargement countries' agreements or contracts with third parties notified before the prescribed deadline will have to be assessed for

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<sup>117</sup> Numerous events continue to occur with the Russian military aggression, such as shelling, air attacks, difficulties with staffing levels and working conditions and losses of off-site power supply, which have impacted nuclear safety at the various NPPs in the country. At the end of the hostilities, the EU contribution to restore safe conditions for Ukraine's power generation, including nuclear, needed for the country's recovery should be highly visible. Priority should be given to the full restoration of offsite power and cooling water at the ZNPP as a safety-critical requirement. The limits imposed by these issues alone could mean that (re-)commissioning and operation remain unlikely for several years, whilst restoration and refurbishment are undertaken, alongside demilitarisation, demining and the preparation of a comprehensive safety assessment, ideally subject to international peer review. Due to a Russian drone attack, the New Safe Confinement (NSC) was damaged. A structured and timely repair programme is required to restore the NSC main functions, which are to protect the environment from release of radiation and allow for the safe dismantling and decommissioning of the destroyed Chornobyl reactor.

<sup>118</sup> Currently funding is provided via the European Instrument for International Nuclear Safety Cooperation (INSC).

<sup>119</sup> Sufficient Euratom Safeguards as well as respective technology will be needed and this should be taken into consideration in the discussions on resources and budget allocations.

<sup>120</sup> COM (2014) 330.

possible grandfathering. Trilateral negotiations<sup>121</sup> will be also needed, as appropriate, to ensure the accession of the new Member States to the Comprehensive Safeguards Agreement INFCIRC/193<sup>122</sup> and the Additional Protocol (INFCIRC/193/Add.8). The impact on EU policy of the accession of enlargement countries other than Ukraine would be significantly smaller, since they are non-nuclear power countries (except for Türkiye, which is expected to start operating an NPP – a 99.2% investment by Russia’s Rosatom – on its territory in the near future and has announced plans to expand its nuclear fleet) and mostly generate smaller amounts of radioactive waste from industry, medicine and research activities (Serbia has two old research reactors). The European Commission should be ready to assist the countries with such small inventories in addressing the issues related to the lack of trained staff and financial resources.

### *Trans-European Networks, Infrastructure*

The current geopolitical situation has heightened the need for strengthening cross-border energy infrastructure. As the EU is moving away from Russian gas, and fossil fuels in general, and has set itself ambitious decarbonisation targets, significant investments are needed in energy infrastructure to integrate growing amounts of renewable energy, support electrification and enable energy to flow efficiently.

Europe’s energy networks are confronted with insufficient grid capacity, as well as challenges linked to infrastructure planning, delays in project implementation, and security. In response, the Commission presented the **European Grids Package**<sup>123</sup> on 10 December 2025, consisting of a proposal to revise the Regulation on guidelines for trans-European energy infrastructure (TEN-E Regulation) and a proposal to accelerate and streamline permit granting procedures for grids, renewables, storage and recharging stations projects, by amending the Renewable Energy Directive, the Electricity Market Design and the Gas Directive.

With enlargement, additional capacities will be needed for the implementation of TEN-E and the (current) Connecting Europe Facility, energy strand.

**Cross-border energy interconnections** are crucial to developing a resilient, interconnected and secure energy system and an integrated energy market within the EU and beyond and to achieve climate neutrality by 2050.

The accession of new countries will likely require the assessment of a significant increase in cross border needs across all infrastructure categories under the TEN-E process<sup>124</sup>. Currently, certain projects with candidate countries are already eligible under TEN-E, however, they are limited to certain infrastructure categories and mainly assessed taking into consideration the

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<sup>121</sup> Between the European Commission (on behalf of Euratom), Ukraine and the International Atomic Energy Agency (IAEA).

<sup>122</sup> OJ L 51, 22.2.1978, p.1.

<sup>123</sup> COM (2025) 1005.

<sup>124</sup> Concerning hydrogen, infrastructure needs of candidate countries are particularly difficult to assess given the early stage of the hydrogen market development across Europe. However, in Ukraine, Moldova, Bosnia and Herzegovina, Serbia and North Macedonia, hydrogen could play a role in the decarbonisation and phase out of Russian fossil energy imports. To enable the flow of hydrogen from production areas abundant with renewable energy sources towards consumption centres, cross-border infrastructure will be needed, including storage. Given its renewable potential and existing natural gas infrastructure that carries potential for repurposing, Ukraine is expected to become one of the major hydrogen suppliers to the EU, as identified inter alia by the second PCI/PMI list.

benefits to the EU solely<sup>125</sup>. Data availability from enlargement countries will be critical in ensuring smooth implementation of the TEN-E.

In addition to the need for additional support, there is currently a gap in the qualifying criteria for Cross-Border Renewable Energy projects. The Renewable Energy Directive ('RED') laid down requirements to cooperation with third countries, such as the presence of a physical link between the participating countries and a scope limited to electricity projects.

#### *Budgetary aspects*

Overall, financial support needs in the energy sector due to enlargement are expected to increase significantly. This is largely attributable to the remaining gaps in the legislative and regulatory frameworks of enlargement countries – despite significant progress in alignment thanks notably to the Energy Community - as well as insufficiently developed infrastructure, coupled with their limited administrative capacity to implement and enforce EU energy legislation, the state of development of renewable generation and their level of energy efficiency improvement actions. Upon accession, enlargement countries would become eligible for NRPP funding as Member States, with their allocations determined according to the applicable allocation methodology and parameters, including those relating to economic, social and territorial cohesion and less-developed regions. Support could also be provided by dedicated financial instruments for cross-border infrastructure projects. Funding energy in the context of future EU enlargement may present certain challenges.

It is expected that once the enlargement countries join the EU, significantly larger financial resources could be required to adequately address all energy infrastructure needs identified within the TEN-E process, supporting the development and integration of the energy market across the expanding EU. Higher number of projects applying for EU financial support under the energy strand of the Connecting Europe Facility (CEF-E) would have a strong budgetary impact on the instrument.

The **transposition** and **implementation** of the large EU body of energy and Euratom rules would require significant resources and administrative capacity in the enlargement countries, including for example for market surveillance in the implementation of ecodesign and energy labelling rules. However, even for legislation that is already ambitious for the EU-27 (e.g. the Energy Performance of Buildings Directive) **enlargement would not trigger the need to revise EU rules and policies**. Support by the EU level (and the Commission in particular) might be needed in the implementation phase not least due to the limited overall level of consumer empowerment and the insufficient development and transparency of the retail market.

Resource needs within the Commission would be triggered by the larger number of Member States, the need for extended monitoring and enforcement and increased participation in existing networks and groups. Regulatory agencies will face increased workloads, risking delays or suspension of core tasks if further rationalisation is not realistic. In particular, the impact on the resources of the EU Agency for the Cooperation of Energy Regulators (ACER) could be significant for areas such as REMIT Regulation on Wholesale Energy Market Integrity

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<sup>125</sup> Given the economic and strategic importance of the integration of the energy markets between the EU and countries of the EEA and the Energy Community, the proposal for a revised TEN-E Regulation (COM/2025/1006) presented under the Grids Package proposed to take into account the benefits and costs brought about by a cross-border infrastructure to the third country if it concerns the Energy Community or the EEA during the assessment of PMI candidate projects. This means that benefits of cross-border projects accruing to the Union as well as to the EEA country or Energy Community Contracting Party are proposed to be taken into account.

and Transparency and other tasks, including some currently performed by the Energy Community.

It is important to note that enlargement energy projects, be it infrastructure, energy efficiency or energy performance of buildings or energy security-related upgrades, often involve high upfront costs, customised solutions and a lack of standardisation. Thus, traditional financing models may fall short, requiring more complex approaches to be developed such as public-private partnerships (PPPs) and crowdfunding. Investors' risk aversion and regulatory uncertainties, coupled with monetary risks such as currency volatility and inflation, further complicate financing.

#### 4.2.2. Reform orientations

In view of the delivery gaps and risks identified above, a set of reform orientations can be considered:

- **Energy-related climate targets**

To facilitate the accession of candidate countries before 2030 while preserving the Union's collective targets renewable energy and energy efficiency targets for the remainder of the 2030 framework new Member States could be exempted from contributing to it while compelled to achieve *ad hoc* national targets that would be provided for in the Accession Treaty on the basis of the levels already committed into their NECP and in line with the 2030 Energy Community framework. Such *ad hoc* targets would strive to prepare the new Member State's integration into the Union's post 2030-framework.

On the 2040 horizon, as part of the reflections on the 2040 net greenhouse gas emission reduction framework and as a result of having amended the European Climate Law to set a legally binding 2040 target of 90% reduction in net GHG emissions compared to 1990 levels, preparatory modelling and if relevant the underpinning Impact Assessment should encompass the impact of the possible accession of enlargement countries. In addition, the accession of new Member States will require the Commission to include those countries to the estimates on investment needs to reach the headline targets, on both the supply and demand side. The investment gap will also have to be updated accordingly.

Recalibrating the targets upon accession might also be needed. New Member States will have to reflect this in their NECPs, to be submitted in due time pursuant to the Governance Regulation.

- **Security of supply**

The EU may need to **provide technical assistance** to the enlargement countries to help them to integrate the EU *acquis*. In particular, this would entail supporting the countries with their Gas Risk Assessments, Preventive Action Plans and Emergency Plans. Such assistance has already started with Ukraine and Moldova, where the Commission has helped these countries with the modelling of their Gas Risk Assessment.

The EU, supported by the Energy Community and in collaboration with the competent authorities of the enlargement countries will have to monitor the security of supply situation in these countries. Such monitoring is already in place, to some extent, for countries such as Moldova and Ukraine. As enlargement could increase pressure on imports and transit infrastructure, it might be necessary to ensure that these countries' gas infrastructure is sufficiently interconnected to the EU gas system not to create bottlenecks.

- **Electricity and gas markets**

The EU would need to **ensure robust monitoring even before enlargement**, under the Energy Community framework. The Commission, supported by the Energy Community Secretariat will need to assess the implementation of the existing legal framework and the progress in fulfilling regulatory and competition conditions. After enlargement, given the importance of the internal energy market, the Commission will need to ensure close monitoring of compliance with EU *acquis* by the new Member States and address any issues, if need be and as applicable, through pre-infringement administrative dialogue and infringement action. This may require additional resources in the Commission.

It will also be essential to **provide technical assistance** to new Member States to develop and implement the relevant regulatory framework and ensure their active participation in the internal market, including mainstreaming of private operators into the existing structures of the gas and electricity markets and, in the future, for hydrogen. This will entail the participation of enlargement countries as observers in the existing platforms and protocols for the cross-border operation of the electricity and gas infrastructure. On electricity, the market coupling algorithm providing the day-ahead and intraday trading schedules might need to be strengthened to handle this additional complexity.

- **Trans-European Networks**

**Technical assistance and capacity building** for implementing the TEN-E Regulation throughout the accession process and after, would enable enlargement countries in implementing the TEN-E Regulation. This will help bridge the existing gaps in data availability, quality, skills and exchange and ensure that cross-sectoral infrastructure planning across future EU Member States (both current and new ones) can take place on an equal footing. Regarding the scope and governance of the TEN-E process, the accession of new countries to the EU may require adaptations to the **TEN-E Regulation**, such as adjustments to the composition of energy infrastructure priority corridors and their memberships.

- **Euratom and nuclear energy**

In some areas such as radioactive waste and spent fuel management, and for specific countries, a **transitional period** may be necessary. The EU might need to assist Ukraine with **funding** for its post-war recovery. It may also need to assist other enlargement countries (not producing nuclear energy) in addressing skills gap the nuclear sector, as concerns nuclear safety/ security/ safeguards, and in establishing adequate infrastructure to effectively address issues related to radioactive waste and its management and comply with requirements in this field.

## **4.3 Mobility and transport**

Reliable transport infrastructure links will help bring economic benefits for both the EU and enlargement countries, even before accession. These benefits will stem from facilitating stronger and smoother economic exchanges. As already demonstrated in response to Russia's war of aggression against Ukraine, well-functioning transport links are critical to ensure increased economic exchanges benefiting both the EU and enlargement countries, and their gradual integration in the EU single market<sup>126</sup>. In the context of enlargement, the future Member States will bring new and diverse realities, such as in relation to the organisation, capacity and operation of mobility systems.

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<sup>126</sup> More information: [https://transport.ec.europa.eu/ukraine/eu-ukraine-solidarity-lanes\\_en](https://transport.ec.europa.eu/ukraine/eu-ukraine-solidarity-lanes_en).

#### 4.3.1 Impact of enlargement on mobility and transport policy

The EU *acquis* on mobility and transport does not need to be modified substantially to be enlargement-ready, as the policies would apply automatically to new Member States and/or additional transport operators. Therefore, overall, the **EU mobility and transport policy framework is considered fit for enlargement**. However, enlargement is expected to have a **significant impact on the support mechanisms to implement these policies**, such as funding streams for building and upgrading infrastructure and for administrative capacity. Special attention needs to be paid to coordinated implementation of cross-border sections between EU Member States and enlargement countries, like it has been ensured through the Connecting Europe Facility (CEF) to date.

Beyond the regulatory framework, the main impact can be expected on EU market operations and operators in the road and rail transport sectors, where current EU operators might be challenged by new entrants from new Member States. These new entrants might continue to benefit from a more preferential treatment in their home markets, especially if transition periods are negotiated as part of the accession process.

##### *TEN-T policy and transport infrastructure*

The EU's transport infrastructure planning policy is based on Regulation (EU) 2024/1679 (the 'TEN-T Regulation'), setting out the network and the **European Transport Corridors**, and the requirements that the infrastructure needs to meet by 2030, 2040, and 2050. Several European Transport Corridors were extended to the Western Balkans, Moldova and Ukraine, thus they are already part of the governance system of the trans-European Transport Network (TEN-T).

By signing high-level agreements, Ukraine, Moldova and Western Balkans committed themselves to implementing indicative TEN-T network on their territories. However, even in case of full and timely implementation of ongoing and mature projects supported through Connecting Europe Facility, it is estimated that full compliance with the 2030 deadline for completing the 'Core Network'<sup>127</sup> will not be achieved, given the current state of several infrastructure components and the substantial investments needed to reach EU standards.

Overall, implementation of TEN-T requirements differs between countries. For example, Moldova's and Albania's rail electrification rates are at 0%, while in Bosnia and Herzegovina and Montenegro they are at 70-90%. As Ukraine and Moldova use the wide gauge for their rail network, it would require massive investment to change it to the standard European gauge and to ensure interoperability with the EU, estimated at around EUR 15 billion<sup>128</sup> in total, including approximately EUR 3,5 billion for priority cross-border corridors in the next financial period. The road network in the enlargement countries faces maintenance challenges and requires fundamental upgrades and redesign of the network.

In its EU Black Sea Strategy, the Commission has announced that **transport corridors will be part of the future Connectivity Agenda** linking Europe with Central Asia through the South Caucasus. This Agenda will be implemented in line with the EU's trans-European transport network Regulation, and through partnerships with participating countries and regions.

##### *Military mobility*

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<sup>127</sup> The TEN-T core network includes the most important connections between major cities and nodes and must be completed by 2030. The extended core network needs to be completed ten years later, in 2040. The comprehensive network connects all regions of the EU to the core network and needs to be completed by 2050.

<sup>128</sup> [Strategy for the EU integration of the Ukrainian and Moldovan rail systems](#), July 2023.

Enlargement can significantly influence the military mobility plans of the EU, considering the current geo-political situation. The EU military network and priority military mobility corridors spans across the EU territory, the relevant Council Decisions would have to be revised to cover new Member States upon enlargement. As opposed to the TEN-T network and European Transport Corridors, there is no indicative military network or priority military mobility corridors in the enlargement countries. The EU has already identified improving military mobility and dual use infrastructure in the Black Sea region as a key priority for the EU's security and for the security and reconstruction of Ukraine. To this end, the European Transport Corridors expanding to neighbouring third countries shall also ideally be developed and upgraded for a dual use, i.e. for a civilian and military use. The Black Sea Strategy points to the need to urgently upgrade the dual use transport infrastructure along the existing military mobility network and to the importance of EU Black Sea and EU Danube ports of embarkation and debarkation, as well as the connecting rail and road infrastructure.

The Commission has presented in November 2025 a **military mobility package** aiming to create an EU-wide military mobility area by 2027 bringing the EU one step closer towards a 'Military Schengen'. Part of the package is a proposal for a Regulation on military mobility introducing EU level harmonised rules and clear procedures for cross-border military movements. In the interest of smooth military movements towards and from their territories, enlargement countries should prepare to align their legislation to these upcoming EU rules<sup>129</sup>.

**Early operational cooperation** should be envisaged to ensure that national legislative frameworks and dual-use transport infrastructure planning are fully aligned with upcoming EU standards, particularly along critical corridors in the Black Sea region. A crucial element of security of the eastern border regions is the integration of the railway systems of Ukraine and Moldova into the EU network by deploying the European standard gauge, which is an important enabler of military mobility and economic resilience.

#### *Sustainable, smart and inclusive mobility*

Overall, enlargement would have limited potential impact on the EU's **sustainable and smart mobility legal framework** (Alternative Fuels Infrastructure Regulation (AFIR), Clean Vehicles Directive, Intelligent Transport Systems Directive)<sup>130</sup>. However, implementation of the legislation in the new Member States can be challenging considering the relatively low current level of implementation of sustainable and smart mobility and their limited capacity and resources, triggering also the need for extensive and accurate monitoring by the Commission.

The provisions on **transport decarbonisation** in the European Green Deal, specifically in the Fit for 55 legislative package, are considered fit for enlargement, as they apply directly to economic operators. This is relevant to the targets set in ReFuelEU Aviation and FuelEU Maritime Regulations (e.g. share of sustainable aviation fuels that each operator needs to use in 2030 and beyond; the greenhouse gas intensity of the marine fuels used in shipping). It will generally benefit existing EU operators when their competitors from new Member States apply EU rules as this will ensure a fully level playing field.

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<sup>129</sup> The proposal for a Regulation on Military Mobility provides that the Military Mobility Transport Group may invite, where relevant, in accordance with its rules of procedure and with due respect to the security and defence interests of the Union and its Member States, Ukraine, Moldova and countries of European Economic Area to attend meetings as observers.

<sup>130</sup> In particular, the requirements for refuelling and recharging infrastructure under AFIR can be applied directly. While new Member States could negotiate the implementation pace of AFIR as part of accession negotiations, no impact is expected either on existing EU legislation including EU targets, nor for current Member States in terms of alternative fuels recharging and refuelling infrastructure that they would need to deploy on their territory.

In **multimodal transport**, the new CountEmissions EU Regulation<sup>131</sup> provides a harmonised framework to help transport and hub entities quantify GHG emissions of passenger and freight operations. Early uptake in enlargement countries will help build interoperable reporting capacity in transport chains ahead of accession.

More substantial impacts could be felt in the availability of resources to meet additional demand (e.g. for alternative fuels and associated infrastructure). The aviation and maritime fleets of the enlargement countries are relatively small compared to the fleets already operating in the EU. Some already need to comply with existing EU rules in so far as they operate to/from EU ports/airports. Enlargement would extend the geographical scope of the rules, and thus requirements will potentially affect more operators/routes. When it comes to alternative fuels recharging and refueling infrastructure, the massive need for investments in enlargement countries could create further opportunities for European companies. At the same time, infrastructure being a critical asset for the EU, careful considerations should be given to investments by third country operators, in line with applicable EU rules.

The enlargement would also extend the area of application of the EU passenger rights *acquis*, in all modes of transport, including for persons with reduced mobility and persons with disabilities, benefiting both EU and accession countries' citizens.

#### *EU policies on land transport*

Expected impact on the **land transport *acquis***<sup>132</sup> is limited because overall, the existing legal framework is sufficiently robust to accommodate new Member States without specific adjustments. However, effects would be felt in terms of financial and human resources at EU level (Commission and European Railway Agency, ERA) to support implementation of the EU rules and for supporting national administrations and enforcement follow-up actions (cfr. budgetary impacts). Potential competitive pressure from new market entrants from new countries could occur in the road and, to a lesser extent, in the rail markets. To ensure a smooth transition, the design of time-bound specific transitional arrangements for market access may be considered, balancing needs for progressive market integration, reciprocity and the stability of the internal transport market.

For road and rail transport, the Western Balkan countries have committed to adopting the EU *acquis* in full within the **Transport Community Treaty** (except for road market access rules). As a result, these rules are directly applicable in new Member States, with no specific needs for adaptation.

This includes the recently adopted Regulation on the use of railway infrastructure capacity<sup>133</sup> and, once adopted, the Passenger Package proposed by the Commission, encompassing initiatives on rail ticketing and on multimodal booking, as well as the amendment of the rail passenger rights Regulation.

On road transport, many enlargement countries already apply some EU rules, by virtue of their participation in international agreements, such as the AETR (European Agreement concerning the work of crews of vehicles engaged in international road transport). At the same time, enlargement could increase the need for enforcement efforts by existing Member States

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<sup>131</sup> Regulation (EU) 2026/1030 of the European Parliament and of the Council of 29 April 2026 on the greenhouse gas emissions accounting of transport services.

<sup>132</sup> Rules on rail market organisations (and future rules on railway infrastructure capacity); rail safety; road transport (rules for market access for freight and passenger transport, social rules, road charging, etc).

<sup>133</sup> Regulation (EU) 2026/1184 of the European Parliament and of the Council of 20 May 2026 on the use of railway infrastructure capacity in the single European railway area, amending Directive 2012/34/EU and repealing Regulation (EU) No 913/2010.

(checking compliance with applicable rules by individual new operators) and by the Commission (e.g. management of the posting portal handling notifications on posting of drivers). Notably, the EU concluded Road Transport Agreements with Ukraine and Moldova, which have been renewed, and which have significantly facilitated freight transport by road between the parties to the agreement.

All enlargement countries closely cooperate with the EU on **road safety**. However, they are significantly lagging compared to the EU standards and do not have fully comparable organisational capacities in place. EU support, starting with the European and Eastern Partnership and Western Balkans Road Safety Observatories, will be required to help these countries improve road safety, as they generally record higher road fatalities per million inhabitants than all current EU Member States. Updated EU rules on driving licences<sup>134</sup> were formally adopted in October 2025. This major update introduces several key changes to road safety and licensing, including digital licences and accompanied driving, and must be fully applied by November 2029.

#### *Aviation policy*

To a very large extent, the current policy framework is considered fit for enlargement. However, enlargement would have a significant impact on the resources necessary both within the Commission, the European Union Aviation Safety Agency (EASA) and support mechanisms for new Member States, which will need to properly apply and enforce the legal framework. Some of the enlargement countries have already observer status at EASA, and additional resources will be required for EASA to carry out periodic inspections in new Member States to ensure the full implementation of the EU aviation safety *acquis* under its competence and by national authorities. In 2024, the reformed Single European Sky regulation introduced ownership and control rules to entities providing air navigation services that have to be carefully assessed in the view of enlargement. The economic performance and charging scheme also requires additional resources as the Commission must approve a new performance plan for each Member State.

Market integration based on EU or EU-inspired rules has started pursuant to existing EU air services agreements with all countries concerned. In particular, the European Common Aviation Area Agreement, which covers six western Balkan countries, provides for regulatory convergence of those countries with the EU aviation legislation in all areas and this process has already been underway for many years. Similar regulatory convergence processes are ongoing under the Common Aviation Area Agreements between the EU and Moldova and Ukraine. Some minor adaptations will be required on market organisation and oversight, and in international aviation agreements. New Member States will have to become parties to the existing EU-level agreements with third countries.

#### *Maritime and inland waterways transport policy*

In terms of **safety**, almost all the maritime enlargement countries (except Albania and Moldova) are already part of the institutional structures, such as the International Maritime Organization and the Paris and Black Sea Memoranda of Understanding (MoU) for port State control and therefore apply global-level safety rules, which form the basis of the EU maritime safety *acquis*.

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<sup>134</sup> Directive (EU) 2025/2205 of the European Parliament and of the Council of 22 October 2025 on driving licenses, amending Regulation (EU) 2018/1724 of the European Parliament and of the Council and Directive (EU) 2022/2561 of the European Parliament and of the Council, and repealing Directive 2006/126/EC of the European Parliament and of the Council and Commission Regulation (EU) No 383/2012.

The legal framework is considered largely fit for enlargement.

While ships under the Ukrainian and Moldovan flag have recently been removed from the so-called ‘blacklist’ of the Paris MoU, significant further action will have to be taken by both maritime administrations to build on this progress. This will entail significant additional efforts from Commission and the European Maritime Safety Agency (EMSA) to support these administrations in their task of improving capacity and safety standards. Minimal changes would be needed on **maritime transport** policies. In relation to **inland waterways**, some enlargement countries are members of the International River Commissions (Serbia, Bosnia and Herzegovina) and are already participating (Serbia, Ukraine) as observers to CESNI working groups. Alignment with the EU *acquis* (technical standards for barges/ships and certificates for boat masters and crew) could be done without major adaptations.

#### *Institutional aspects*

Enlargement could impact the speed of coordination of the EU positions in international organisations (e.g. International Civil Aviation Organization, International Maritime Organization, Intergovernmental Organisation for International Carriage by Rail), where in some cases consensus is required in Council (and unanimity in case of Article 218(9) procedures). Sometimes this is already difficult to achieve among the current Member States due to different interests. The process could become more complex with a larger number of Member States. In addition, Council decision-making on military mobility and dual use of infrastructure aspects can fall under unanimity requirements and enlargement could slow down decision-making.

#### *Budgetary aspects*

Enlargement is expected to significantly impact EU support for infrastructure funding. Continued EU level financing for key transport infrastructure projects (along the TEN-T) would be beneficial to the current and future Member States. Through the **Connecting Europe Facility** (CEF) - **Transport**, the EU already supports projects that contribute to the development of the trans-European transport network, i.e. border crossing areas between the Member States and enlargement countries, mainly in Ukraine and Moldova, as well as integration of their rail networks with the one of the EU. Such support is complemented by the Ukraine Facility and the Reform and Growth Facility for the Republic of Moldova. In the Western Balkans, significant EU funding for transport infrastructure has been allocated through the Western Balkans Investment Framework, most recently with additional funds from the Reform and Growth Facility.

Given the state of infrastructure in enlargement countries, significant resources – by means of grants and loans – beyond what is currently available, would be necessary to meet EU infrastructure standards. While rail and road cross-border connectivity should remain a priority, a gradual deployment of European track gauge railways in Ukraine and Moldova would require considerable investment (currently estimated at EUR 3,5 billion on parts of corridors in Ukraine to Lviv, Kovel and preparatory phases to Kyiv as well as to Chisinau in Moldova). For Ukraine, there will be funding and workforce needs for the reconstruction of the obsolete, damaged and destroyed transport infrastructure located on TEN-T and beyond. In addition, and due to the war in Ukraine some EU Member States changed their prioritisation in the development of the TEN-T network, focusing on east-west connectivity and military mobility. This re-prioritisation of infrastructure investments has created an additional investment gap which has been factored in the proposal for the next MFF, to ensure continued EU-level support and management of coordinated infrastructure projects between two or more countries as

signalled already in the Competitiveness Compass, combined with sufficient national support to meet EU required standards across Member States.

Considering these challenges, strengthened CEF resources will be necessary to address the cross-border gaps and in particular the integration of the railway systems, essential for economic resilience and security of the EU.

Funding reflections would also need to factor in the needs for upgrading transport infrastructure and building new facilities (such as alternative fuels infrastructure for roads, rail, ports and airports, including refuelling and recharging stations), digitalisation efforts (introduction of the European Rail Traffic Management System ERTMS, and the European Electronic Toll Service EETS), and improving working conditions (e.g. safe and secure parking areas).

The realisation of enlarged transport corridors will also depend on actions to ensure safety and security. The Black Sea Strategy has announced that the EU will work towards Black Sea shores and the region becoming mine-free, building on and coordinating with the existing trilateral demining initiative by Bulgaria, Romania and Türkiye.

Investments in greening and digitalisation of transport and the related infrastructure are supported under the next MFF proposals. The EU budget could also be used to help bringing the national/regional/local transport infrastructure to EU standards. In preparation for enlargement, it will be important to mobilise financing instruments to address the substantial needs in the transport sector including external instruments (under the current MFF this includes the Instrument for Pre-accession Assistance (IPA III), the Reform and Growth Facilities for Moldova and the Western Balkans, the Ukraine Facility and the Europe Pillar of the Global Europe instrument under the next MFF). Given the limited capacity of the countries to absorb these substantial network investments through increased tariffs, traditional financing models may need to be supplemented. The post-2027 funding framework should look to leverage a combined mix of centralised instruments, dedicated recovery reserves and public-private partnerships (PPPs) to de-risk and accelerate these strategic gauge-conversion projects.

For transport decarbonisation, it may be necessary to reassess policies that support implementation, primarily targeted at support for infrastructure development and support for industrial operators to meet legal requirements (e.g. purchasing alternative fuels). Potential changes could affect available resources and flexibility under the Innovation Fund, the Alternative Fuel Infrastructure Facility under the Connecting Europe Facility, the European Climate Social Fund, or Invest EU, among others.

On **military mobility**, considerations would need to be made for funding for dual-use transport infrastructure and mobile assets to put in place a connected and secure military mobility network and reinforce the EU's capabilities, as proposed by the Commission in the 2028-2034 MFF package. Given the trans-national importance of such projects, centrally managed EU funding, should be mobilised.

Enlargement would also require considering the administrative capacity needs in the new Member States, as the potential new beneficiaries have limited experience in managing EU funds and grant agreements and could benefit from additional support for the implementation of projects and related monitoring, both at EU and national level. This could include support for the synchronised implementation of strategic projects for the development of seamless and interoperable TEN-T corridors, as well as for developing electronic Freight Transport Information (eFTI) hubs and European Maritime Single Windows.

In the Commission and in the relevant EU agencies (ERA, EASA, EMSA), needs for increased resources will stem from a larger pool of regulated entities and the efforts required to ensure

proper implementation and enforcement of the rules and support capacity building in the new Member States, including for setting up relevant IT systems.

#### 4.3.2 Policy gaps and delivery risks

While **most of the EU transport *acquis* is considered fit for enlargement**, the main gaps relate to the **support policy framework** and to ensure that **infrastructure meets the required standards** (see Budgetary aspects). Other gaps, minor in magnitude, can be identified in a limited number of legal acts, where some adaptations will be needed.

In **aviation policy**, there would be a need to further clarify provisions on the independence of the Independent Supervisory Authorities under the Airport Charges Directive and the functioning and decision-making process of slot coordinators, under the Slots Regulation. The Commission would also need to seek authorisations to re-negotiate some existing air transport agreements to include the new Member States. For new Member States to comply with the ownership and control rules recently introduced under the Single European Sky Regulation in 2024, transitional periods may be considered. Transitional arrangements may also be put in place to avoid the revision of the EU-wide performance targets for the remainder of reference periods and facilitate the integration of new Member States' in the Union's performance scheme for air navigation services and network functions (the performance and charging scheme), depending on new Member States' date of accession. The need to ensure sufficient resources to cope with the implementation of the performance and charging scheme should be also carefully addressed. The availability of sufficient resources for EASA is a risk factor in terms of effective implementation of the EU *acquis* in future new Member States, in particular where enlargement countries have a substantial aviation industry.

In **maritime policy**, no specific regulatory gaps have been identified, while for **inland waterway** transport these seem to be limited to the need to update the list of EU waterways divided geographically into zones.

In relation to **logistics** and the **digitalisation of transport documents**, changes might be needed, primarily for the Commission to adapt the electronic Freight Transport Information (eFTI) and European Maritime Single Window environment datasets.

In **land transport policy**, while no specific regulatory gaps have been identified, new market entrants coming from new Member States could add competitive pressure. Transitional periods and/or safeguard mechanisms, such as transitional measures on cabotage, may need to be designed in Accession Treaties to manage competitive pressure on incumbent operators while ensuring the progressive integration of operators from new Member States into the single market.

More significant gaps are linked to the availability of resources in national administrations.

#### 4.3.3 Reform orientations

No major reforms seem needed, but rather the regulatory adaptations listed in the above section on gaps.

### 4.4 Environment policies

The EU's environmental legislation has been crafted to address both global challenges and the diverse needs of its Member States. As a global leader in addressing environmental

degradation, the EU develops policies underpinned by science and aligned with multilateral environmental agreements, ensuring its policies help achieve global sustainability goals.

Simultaneously, the EU recognises the varied environmental conditions across Member States, allowing for tailored implementation. Flexible frameworks such as the European Green Deal, the LIFE programme - the EU's funding instrument for the environment and climate action - and cohesion policy funds support Member States within their different economic and environmental contexts. This approach balances ambitious goals with policies that respect the unique needs of each Member States and the EU as a whole.

#### **4.4.1 Impacts of enlargement on environment policy**

##### *Policy impacts*

The EU relies on uniform environmental standards to ensure an equal standard of life and wellbeing to its citizens and at the same time a level playing field within the single market and its policies. Upon accession, there may be a gap between the levels of environmental protection in current and new Member States. This could pose challenges to effective policy enforcement and market integration. It could also bring competitive disadvantages for existing EU businesses facing higher compliance costs (e.g., investments in cleaner technology, pollution control, waste management, and compliance monitoring). Weaker environmental regulations or enforcement in one or more Member States may lead to the production of goods that do not meet EU sustainability standards (due to, for example, higher emissions, pollution-intensive production processes). If these goods enter the single market at lower prices, it can distort competition and discourage businesses in the EU from making green investments. Last, environmental degradation (e.g. air or water pollution) in one or more Member States could have effects on the single market. For example, lax regulations in one country might lead to cross-border pollution affecting neighbouring EU countries, which could also disrupt trade relations and increase regulatory disputes.

At the same time, enlargement countries possess vast areas of untouched nature which would contribute considerably to biological diversity in the EU. To keep these assets and, at the same time, develop and manage an economically and environmentally sustainable transition, is a major challenge ahead. As regards environmental protection under the common agricultural policy (CAP), enlargement also presents opportunities to further reduce the environmental footprint of the agricultural sector in the enlargement countries. Among other factors, this is due to notable differences between some enlargement countries and the EU in areas such as pesticide and fertiliser use as well as phytosanitary standards for fruits and vegetables.

**EU environmental legislation is overall ‘fit for enlargement’.** Yet, enlargement would bring greater heterogeneity to the EU.

On **waste and circular economy**, enlargement offers an opportunity to increase and strengthen the single market for circular and secondary raw materials. At the same time, the EU targets for the re-use and recycling of municipal waste, the recycling of packaging waste, and the reduction of the landfilling of municipal waste may not be met by current enlargement countries at the time of their accession to the EU.

On **industrial pollution**, it will require significant investments and time for enlargement countries to ensure that their industrial plants comply with the relevant EU requirements, e.g. by installing abatement technologies or modernising installations.

The same is valid for **urban wastewater treatment**, water and air quality monitoring and water and air quality improvement measures, which rely heavily on investments in infrastructure combined with the capacity to maintain the economic viability and operation of these plants.

Further, because of new Member States becoming subject to the rules on intra-EU **shipments of waste**, it will become easier to ship waste - including hazardous and problematic waste<sup>135</sup> - to new Member States, as compared to old Member States, if the new Member States have lower treatment costs or if tools to discourage incineration or landfilling (such as taxes) are not in place or not as effective. A similar trend has been observed in the last few years, where significant volumes of waste (especially low-quality waste destined for cement kilns or waste-to-energy plants) have been shipped from western European Member States to central and eastern European Member States. In addition, it will also be essential to prevent the risk of an increase in illegal shipments of waste to future Member States, as there could be initially less control on their movements when those countries become part of the single market. Waste trafficking is one of the most serious forms of environmental organised crime and criminal networks are agile in exploiting new opportunities.

#### *Budgetary aspects*

Investments in the environment area are primarily supported through the **cohesion policy** (e.g. waste and circular economy, water and air) and the **Common Agricultural Policy** (biodiversity, soil and forests). As recognised in the section on cohesion policy, new Member States might require significant investments into basic services and infrastructure to close the compliance gap and speed-up convergence with EU environmental standards.

Further, as mentioned in the section on agriculture, enlargement would put pressure on CAP support, including for the transition to environmentally sustainable practices. At present, the CAP is the main contributor to environmental protection in agriculture.

The **LIFE programme** is currently the only key dedicated instrument to support the implementation of EU environmental, climate and energy policy and legislation. Ukraine, Moldova and North Macedonia are already associated to the LIFE programme and Montenegro and Serbia have expressed interest to join. Enlargement may generate additional financing and implementation needs in the area of nature and biodiversity. These may arise, inter alia, from the extension of the Natura 2000 network, related designation, management, restoration and monitoring requirements, and the need to strengthen administrative and implementation capacity in candidate countries. The transboundary character of many ecosystems in the Western Balkans may also require enhanced cross-border cooperation. These considerations could be taken into account in the future programming and implementation of relevant EU funding instruments.

In addition to the already mentioned needs in the areas of waste and circular economy, water and industrial pollution, new Member States are expected to face specific challenges in implementing relevant environmental policies and legislation, which may be due to limited governance capacity, lack of resources, and insufficient governmental capabilities for monitoring and enforcement. To mitigate these risks before accession, it is being envisaged to couple budget allocation with targeted technical assistance and capacity building to support the implementation of EU environmental and climate policies in new Member States. This

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<sup>135</sup> The current rules make a distinction between shipments within the EU and export to non-OECD countries. The rules for shipments of waste to non-OECD countries are much stricter: the export of hazardous and ‘problematic’ waste (like mixed household waste) to these countries is already banned. From 2026/2027, new rules will impose stricter requirements on the export of all other types of waste. All enlargement countries are non-OECD countries and therefore subject to these strict rules.

approach has proven successful in the past, such as in the case of Ukraine under the Phoenix initiative for capacity building to help rebuild cities in a high-quality, sustainable and inclusive way<sup>136</sup>.

For the Commission and the European Environment Agency (EEA), enlargement would trigger across all environment policy areas the need for resources to ensure effective monitoring, compliance promotion and enforcement functions.

#### 4.4.2 Policy gaps and delivery risks

The main gap in this policy area is the potentially insufficient preparedness of enlargement countries and pre-accession support.

These risks are real as at present those countries' environmental problems are far more severe than those faced by existing Member States. For example, some of the highest air pollution levels in Europe have been recorded across the Western Balkans due to coal-powered industrial installations and domestic heating. This can impair the actual compliance of operators and installations with the EU rules, beyond the mere alignment of national legislation with the EU *acquis*. Although the EU has already supported enlargement countries investing in their transition<sup>137</sup>, this support may need to continue and be scaled up as needed after accession to help these countries meet the costly needs for infrastructure in particular in the waste and water management sectors and power sector and ensure that they can quickly close any compliance gap with EU standards.

At the same time, current gaps in administrative capacity in enlargement countries, affecting also their capacity to absorb cohesion policy funding, can impact the ability to make the investment needed to ensure compliance.

#### 4.4.3 Reform orientations

Rather than making policy changes, the **EU should strengthen pre-accession support and ensure its continuity after accession**, for all enlargement countries and across all environmental sectors (cross-cutting legislation, air quality, water quality, waste management, chemical, industrial pollution and risk management, noise, etc.). Below are some examples of **systems of support** already in place:

- On **waste and circular economy**, preparing institutional, administrative and policy frameworks and a solid strategic foundation complemented by costed action plans/project pipelines will be vital for the EU to maintain its level of ambition.
- On **industrial pollution**, pre-accession instruments should support enlargement countries in their preparations to meet requirements related to de-pollution/industrial pollution, in particular the revised Industrial and Livestock Rearing Emissions Directive, the Medium Combustion Plant Directive (MCPD) and the Seveso-III Directive - so that industrial plants in new Member States meet the emission limit values and requirements of the best available techniques, the MCPD limit values and the industrial safety standards, e.g. by installing the

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<sup>136</sup> In 2023, the New European Bauhaus (NEB) community together with Ukrainian partners (Covenant of Mayors East, Ro3kvit, ReThink) launched a capacity-building programme for Ukrainian municipalities to prepare for post-war reconstruction. These and other NEB activities in Ukraine were boosted through the 'Phoenix' initiative which developed and put at the disposal of Ukrainian cities cutting-edge expertise from the NEB community in affordable and sustainable reconstruction. It also connects Ukrainian cities with like-minded ones in the EU to exchange experiences on their way to climate neutrality and more energy efficiency. It combines funding from the Horizon Europe Mission for Climate-Neutral and Smart Cities and from the LIFE programme.

<sup>137</sup> E.g. 'Economic and Investment Plan for the Western Balkans'.

necessary abatement technologies or modernising the installations. Similarly, the pre-accession process is an opportunity for enlargement countries to put in place the appropriate national laws and institutional capacities to ensure that they meet the legislative requirements, ranging from well-equipped permitting authorities and appropriate monitoring frameworks to public participation, transparency, enforcement and compensation requirements.

- On the **Nitrates Directive**, in some cases, the system of monitoring and protection of waters will need significant further development to be brought up to EU standards entailing increased oversight by the Commission.

Finally, transitional measures, granting new Member States additional time to comply with obligations in certain areas of the EU environmental *acquis*, may need to be included in the accession treaties, based on enlargement countries' requests and/or following the Commission's assessment.

## 5. COHESION, AGRICULTURE AND RURAL DEVELOPMENT, FOOD AND FISHERIES

### 5.1 Regional and cohesion policy

As with previous enlargement rounds, the next round will significantly affect cohesion policy. With this comes the need for a comprehensive reflection on the future role and functioning of cohesion policy within a larger EU. In an expanded EU, cohesion policy<sup>138</sup> will play a key role in the Commission's broader convergence, investment and reform agenda, with regions at the centre. For 2028-2034, Member States will develop national and regional partnership plans with key reforms and investments, focusing on joint priorities, including promoting economic, social and territorial cohesion. This will help build administrative capacity, well-functioning institutions and trust. Cohesion policy will be needed to facilitate a smooth integration of the new Member States in the single market. This is important not only to ensure their ability to effectively benefit from cohesion policy funds after EU accession, but even more so to ensure that the overall benefits that enlargement can bring for both new and current Member States can fully materialise.

#### 5.1.1 Impact of enlargement on cohesion policy

The accession of some or all enlargement countries to the EU will affect the EU's average GDP per capita and may thus have a significant impact on the allocation of cohesion policy<sup>139</sup>. As pointed out in the 9th Cohesion Report, the disparities between the existing Member States and the set of enlargement countries included in the simulation<sup>140</sup> are not very different from those observed in relation to the 2004 enlargement, when 10 new countries joined the EU (see Figures

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<sup>138</sup> For the 2021-2027 MFF: European Regional Development Fund, the Cohesion Fund, as well as the Just Transition Fund and the Public Sector Loan Facility under the Just Transition Mechanism.

<sup>139</sup> For the purposes of these calculations, Eurostat data were used for EU-27 countries and for those enlargement countries for which regional data were available. National data sources were used for regional GDP and population figures for Bosnia and Herzegovina, Georgia, Moldova and Ukraine. GDP for these countries was converted into EU purchasing power standards (PPS) using World Bank figures in purchasing power parity terms (current international dollars) and the regional share of GDP in each country. All data refer to 2021 and are regularly subject to revisions.

<sup>140</sup> Countries included in the simulation: Albania, Bosnia and Herzegovina, Georgia, Kosovo, Moldova, Montenegro, North Macedonia, Serbia, and Ukraine.

1 and 2 below)<sup>141</sup>.

|                                  | Increase in area | Increase in population | Increase in total GDP (PPS) | Change in per capita GDP (PPS) | Average per capita GDP |
|----------------------------------|------------------|------------------------|-----------------------------|--------------------------------|------------------------|
| EU25/EU15 (2004 data - EU15=100) | 22.2%            | 19.2%                  | 9.7%                        | -8.0%                          | 92.0                   |
| EU27/EU25 (2007 data - EU25=100) | 8.6%             | 6.1%                   | 2.5%                        | -3.4%                          | 96.6                   |
| EU36/EU27 (2021 data - EU27=100) | 21.8%            | 15.1%                  | 4.8%                        | -8.9%                          | 91.1                   |

Note: the EU aggregates in the first two rows include the UK, while the EU36/EU27 aggregates in the last row do not include the UK.

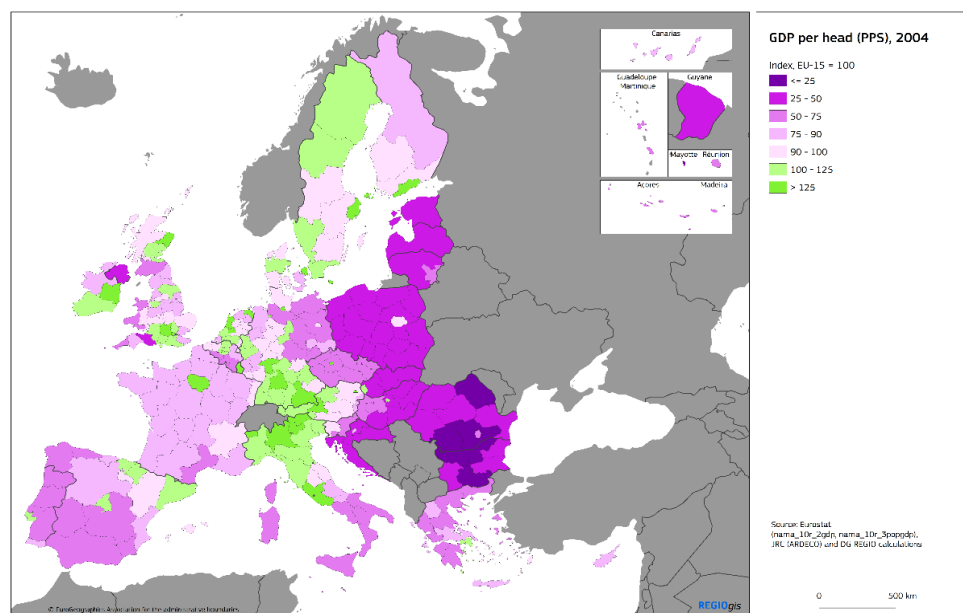


Figure 1 – GDP per head in regions in the EU and enlargement countries in 2004

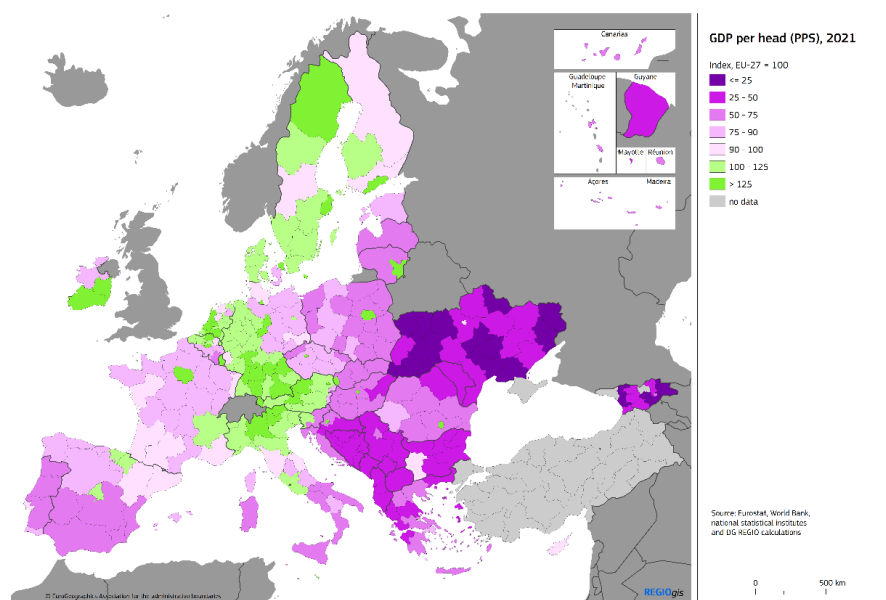


Figure 2 – GDP per head in regions in the EU and candidate partners in 2021

<sup>141</sup> See 9th Cohesion Report, COM (2024) 149 and SWD (2024) 79.

However, there would likely be an impact on less developed EU regions that are close to the current 75% threshold. With a new, lower EU average GDP per person, their GDP per head will be higher in relative terms. This would have an impact on the population in less developed regions in some Member States, and potentially on the level of resources earmarked for them.

**Socio-economic disparities** are likely to widen both between Member States upon accession and within countries. Previous enlargement experience suggests that within acceding countries, large cities, notably capital cities, grow more quickly than the EU average, while more peripheral or rural territories generally grow more slowly, leading to increasing disparities at national level. Therefore, cohesion policy remains much needed, as the main instrument to reduce such disparities.

The enlargement countries are highly reliant on coal and other carbon-intensive energy sources, which poses a significant challenge as they work to align their national legislation with the EU *acquis* and the climate objectives. Achieving compliance will require a fundamental transformation of their energy systems and industrial sectors. This transition will be particularly demanding for regions that are already economically and socially vulnerable and **ensuring a just transition** will be essential to maintain social cohesion and build public support for the broader reform process.

Already at present, the EU actively supports **cross-border, transnational and inter-regional cooperation** between Member States and bordering enlargement countries, through Interreg programmes. The nature of some of these programmes, and their financing, will change upon accession (cross-border programmes will become ‘internal’ to the EU and the funding will come exclusively from internal EU budget lines).

#### *The link to reforms*

Over the past two programming periods, the EU has focused on making cohesion policy more effective, most notably through stronger and more structural links between investments and reforms. These links and mechanisms have provided solid ground for cohesion policy investments to be fully embedded in national and regional policy frameworks and legislation. The financial sustainability of projects has also been strengthened, for example through comprehensive transport planning and multiannual plans for the budgeting and prioritisation of investments in research and innovation infrastructure. These mechanisms have triggered policy reforms - for example in the health sector and public procurement - and the delivery of relevant country-specific recommendations. They ensured a direct link between cohesion policy investments and EU level policies. They contributed to the transposition and implementation of EU legislation and helped to tackle barriers to investment in the EU.

In addition, cohesion policy investments have been programmed jointly by the Commission and Member States based on robust socio-economic analyses within the European Semester. The national and regional partnership plans for 2028-2034 will continue to be programmed to respond to the challenges identified in the European Semester process and country-specific recommendations as well as in other key policy documents adopted by the Commission, while also reflecting the unique needs of individual countries and regions.

#### *Administrative capacity*

Most enlargement countries have limited experience of regional development and need to develop their administrative capacity to manage structural funding. The quality of institutions – including respect for the rule of law, and administrative capacity – is crucial for the return on public and private investment. There is a strong correlation between the quality of governance and the impact of Cohesion Policy investments. Improving the quality of governance at national, regional and local level can increase the effectiveness of national and European

policies and investments. The main gap identified in relation to the implementation of cohesion policy in an expanded EU is linked to the (lack of) capacity to manage substantial amounts of cohesion policy funding, with the required level of legal assurance. Experience has shown that acquiring the capacity to effectively manage funds takes time.

Some enlargement countries (Montenegro, Albania, North Macedonia, Moldova), do not have regional administrative units. In these countries, the management of cohesion policy is expected to primarily involve the national level and will require substantial strengthening of government functions across all aspects of fund management. Serbia and Bosnia and Herzegovina are larger and have clear regional divisions. Ukraine is by far the largest and is currently developing a regional development legal framework, albeit with very limited implementation experience and reduced capacity.

There are weaknesses (performance on rule of law, transparency, and corruption risks) in the national systems critical for ensuring the regularity of public expenditure and the required level of assurance and compliance (procurement, State aid, sound financial management). These gaps, if not addressed properly, affect both implementing authorities and beneficiaries but would also affect the EU more broadly upon enlargement. Therefore, it is particularly important to take measures to strengthen public administration and build capacity in order to improve governance at all levels. This is one of the key objectives of the proposals under the 2028-2034 MFF package.

#### *Territorial and interregional cooperation challenges*

Upon accession, there will be **new external borders**. Some of those will pose new challenges in terms of cooperation. Borders with Russia and Belarus will continue to cause difficulties, and this over a much larger territory. Additional external programmes would need to be set up along the external borders of new Member States. For borders between Western Balkans countries, the scope of Interreg might need to be adjusted to maximally support reconciliation in territories recently affected by tensions and conflicts.

The current **Interreg** cooperation partnerships will need to undergo significant changes. In particular, the need will arise to set up new programmes with new Member States (circa 10 new programmes). At the same time, some of the existing Interreg programmes will transition from being external border cooperation to internal border cooperation programmes – a transition with broad budgetary, operational and geo-political implications.

#### **5.1.2. Policy gaps and delivery risks**

Enlargement countries may face different development challenges compared to the current Member States. Over successive programming periods, funding under cohesion policy has gradually moved away from basic infrastructure investments and is now more closely aligned with the EU objectives. While the priority policy areas (such as competitiveness, decarbonisation, environmental protection, digitalisation and social cohesion) that will drive the investments and reforms in the next programming period pertain to both current Member States and enlargement countries, new Member States may also require investments into basic services and infrastructure to speed-up convergence and the integration process. Finding the right balance between necessary reforms and investments is likely to be challenging.

The main gap identified in relation to the implementation of cohesion policy in an expanded EU is linked to the **lack of administrative capacity** in enlargement countries to programme and implement a plan per country, covering key reforms and investments, in full partnership with national, regional and local authorities. The **capacity to implement sectoral policy reforms** on a wide range of topics will also prove challenging. There is also uncertainty

whether all new Member States would have the fiscal capacity to mobilise the amounts necessary to **co-finance EU-supported investments**.

Due to its specific nature, current **pre-accession support** is not aligned with the founding principles of shared management and cohesion policy – e.g. territoriality and place-based support and the application of the partnership principle in the implementation of the funds. In its proposal for the 2028-2034 framework, the Commission integrates pre-accession support into the Global Europe Instrument, applying the partnership principle. It will provide a single comprehensive toolbox allowing to build tailor-made support for each enlargement partner while allowing to better respond to changing political realities. The Global Europe regulation also allows for greater alignment of pre-accession support with sectoral policies through an implementing regulation, which will detail further rules related to the implementation of pre-accession assistance in a way that credibly prepares candidate countries and potential candidates for EU membership and management of EU funds. Through this, it will also strengthen complementarity with internal policies, including Interreg, ensuring that enlargement assistance aligns with the cohesion logic and is anchored in joint ownership.

### 5.1.3. Reform orientations

The MFF proposals for 2028-2034, will further improve the effectiveness and efficiency of cohesion policy via comprehensive national and regional partnership plans supporting key investments and reforms. This enables the application of tailor-made requirements taking into account Member States and regions' specific difficulties, needs and challenges as they change over time.

There is a need to explore means to adapt the EU's pre-accession assistance to bring it closer to the needs of a 'strengthened cohesion and growth policy with regions at its centre [...] designed and implemented in partnership with national, regional and local authorities'<sup>142</sup>. The recently created Ukraine Facility and the Reform and Growth Plans and Facilities for the Western Balkans and Moldova are useful in helping enlargement countries align with the concept of developing individualised plans for each country, with key reforms and investments clearly identified. The main adjustments could consist in ensuring a stronger link between the pre-accession assistance currently available to enlargement countries, and the obligations that will stem from implementing cohesion policy under shared management upon accession.

The Global Europe proposal stipulates the adoption of an implementing regulation to lay down uniform conditions for the implementation of the regulation in enlargement countries - in relation to the design and content of the performance-based plans, performance, structures and control systems to be set up in preparation of accession, also as part of the management of structural, agricultural and cross-border cooperation funds. This approach will play a crucial role in ensuring consistency between pre-accession support and post-accession implementation structures. This follows previous practice as implementing regulations have also been used previously, under both IPA II and IPA III.

Given the significant needs in terms of capacity building at all government levels and in civil society in enlargement countries, a major effort is needed to **strengthen institutions and administrations**, in particular on rule of law, transparency and the fight against corruption. While financing reforms are a positive step towards building better societies, investing in general administrative capacity to improve public administration at all levels is also an

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<sup>142</sup> COM (2025) 46.

important factor in line with the OECD/SIGMA principles of public administration<sup>143</sup>. These principles were designed by the OECD and the Commission to guide the enlargement countries in their reform efforts to address the shortcomings in their public administrations and meet the EU requirements on one of the fundamentals aspects of the accession process. Moreover, pre accession assistance that helps close the gaps and meet the needs is essential. It should be considered to allow enlargement countries – at an early stage – to become associated participants in existing **technical assistance platforms** as well as those under the 2028-2034 MFF that help current Member States with implementation challenges.

Overall, it is important to continue working with enlargement countries to align public investments with appropriate policies. Effective past practices could be replicated, such as **twinning between public administrations**. For the 2004 enlargement, part of the pre-accession assistance was implemented using a model that resembled shared management as closely as possible, which was the main management mode for structural and agricultural funds at the time. This could be considered as an option again, aligning implementation modalities between internal and external funds to the extent possible, to prepare enlargement countries for managing structural and agricultural funds going forward.

**Peer-based capacity building** is already taking place as part of the implementation of the **Interreg programmes** between Member States and enlargement countries. Although the final responsibility for programme implementation lies with the Member States, the partner countries fulfil their functions on an equal footing and take part equally in all steps of the implementation cycle, including financial control and audit. This could be preserved until accession.

## 5.2 Agriculture and rural development

An expanded EU has the potential to be a stronger global agri-food actor. At the same time, EU farmers will experience increased pressure within the single market. Enlargement would significantly increase the EU's surface area of agricultural land. Adding farms that range in size from less than one hectare to several hundred thousand hectares, presents significant challenges for the common agricultural policy, which currently is designed to deliver for an EU of 27 Member States.

As underlined in the Commission's **Vision for Agriculture and Food**, preparing for and effectively addressing the challenges for EU farmers will be essential to reap the opportunities offered by enlargement<sup>144</sup>.

### 5.2.1. Impact of enlargement on agriculture and rural development policy

#### *Impacts on the EU agricultural sector*

An expanded EU will likely have a **strengthened strategic autonomy** in food and feed compared to the EU-27. It will be a bigger player on the global agricultural commodity market - with an **increased EU agri-food production and export capacity** - and a larger contributor to global food security.

Such increase in production is expected to come primarily from the **increase in the EU's agricultural area**. Adding the current Ukrainian production of soybeans and sunflower seeds

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<sup>143</sup> OECD/SIGMA principles of public administration can be found on [https://www.sigmaweb.org/en/publications/the-principles-of-public-administration\\_7f5ec453-en.html](https://www.sigmaweb.org/en/publications/the-principles-of-public-administration_7f5ec453-en.html)

<sup>144</sup> COM (2025) 75.

would increase the respective EU-27 production levels by up to 150%. A sharp increase in the production of maize (+50%) and wheat (+28%) could also be expected.

This would contribute to increasing the supply and use of EU-grown protein and oilseeds, reducing the EU dependency, and contributing to a stronger, more resilient and more autonomous European agri-food system. This would be in line with the objectives of the Protein Action Plan<sup>145</sup> adopted on 7 July 2026 that emphasised that the accession of Ukraine alone could reduce the EU's trade deficit in plant-based protein from 13.9 million tonnes to 4.7 million tonnes and increase the EU's self-sufficiency in plant-based protein from 76% to 86%.

Improving agricultural productivity in the enlargement countries after accession could gradually reduce the yield gap with the EU-27, thanks to better access to advice, technologies, genetics, and investment. Overall, EU production would increase strongly compared to the EU-27, in the arable crop, poultry, fruits and vegetables sectors. For beef and dairy, the increase would be more limited, as enlargement countries are expected to reduce their production after accession. This reduction might be only partially offset by an increase in production in the EU-27.

By improving their logistics through better infrastructure, the enlargement countries, and particularly Ukraine, could boost their exports to the EU-27 countries and to the rest of the world after accession. They could also increase their imports. Exports from EU-27 countries to markets of all enlargement countries are also expected to increase. Overall, the expanded EU would **export more key commodities** compared to the EU-27, becoming the leading global exporter of wheat, barley and sunflower oil. This would allow the expanded EU to increase its contribution to global food security compared to the EU-27.

Enlargement would impact the single market for agricultural products, primarily considering the production and export capacity of Ukraine. Most EU farmers will face an increased competition in the single market. Some production might shift from one Member State to another, as it has happened after previous enlargement rounds. For cereals, sugar, poultry and eggs, and fruit and vegetables, the impact would initially be felt throughout the EU-27, particularly in regions neighbouring Ukraine, as already experienced after the adoption of autonomous trade measures with Ukraine. As an illustration, in 2021 (before Russia's war of aggression against Ukraine), the production capacity of Ukraine for soft wheat was 32 million tonnes compared to the overall EU-27 production of 130 million tonnes. During the 2023-2024 campaign Ukraine exported 6.5 million tonnes of soft wheat to the EU-27, out of total exports of 18 million tonnes, corresponding to two thirds of the EU's total imports of soft wheat (9.6 million tonnes). Although the Russian war of aggression severely disrupted Ukraine's traditional export routes, which partly explains the substantial EU import volumes for 2023-2024, this reflects the large export capacity of Ukraine. At the same time, this could have a positive impact on livestock production in the EU, contributing to lower feed costs.

Small farms in the Western Balkans countries that have a low competitiveness level would also be impacted. For beef and dairy, the impact would be felt primarily in the enlargement countries after accession.

In the short term, enlargement might impact agri-food prices due to the competition from specialised, export-oriented farms in enlargement countries that benefit from economies of scale and lower input costs. However, many current EU farms can be expected to adjust to the new market environment.

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<sup>145</sup> COM (2026) 355.

Enlargement is expected to lead to a **structural adjustment** of farms across the expanded EU, which could accelerate the on-going decrease in the number of farms, particularly in the enlargement countries after accession. The impact could be particularly strong in less competitive areas such as in the Western Balkans where – except for Serbia – most farms are in mountainous areas. This could have a positive impact on the modernisation of farms but would create issues related to land abandonment and further depopulation in rural areas across the EU. As a result of this structural adjustment, the share of the rural population working in agriculture-related jobs in the enlargement countries (e.g. in Ukraine, 20% of the working population is currently employed in agriculture) is expected to slowly decrease.

Nevertheless, the expanded EU would have a significantly **higher number of farms** compared to the EU-27. The vast majority would be very small, (semi-)subsistence, household farms that would struggle to comply with EU standards and to adapt to climate change; a few tens of thousands would be medium sized to big family farms, with 10 to a few thousand hectares. Several thousand will be very big, competitive, export-oriented corporate farms, essentially located in Ukraine, some belonging to agro-holdings.

EU **rural areas** will also significantly increase in an expanded EU, and so will the rural population (the share of the rural population in the enlargement countries ranges from 30% in Ukraine to 57% in Moldova). In enlargement countries, particularly in the Western Balkans, rural areas are expected to continue facing **depopulation, a lack of skilled and trained labour**, as well as an **ageing population**. Lack of public and digital services hinders the attractiveness of these regions. This contributes to the rapid decline in young people's interest in agriculture.

In an expanded EU, all Member States will continue to face the negative **impacts from climate change**. More EU farmers, both in the EU-27 and in enlargement countries, will be impacted by droughts, floods, hailstorms and other adverse weather events throughout any year, as well as by animal diseases. This will weigh on their capacity to invest and adapt to transition to a more sustainable farm system. Land abandonment in less competitive regions may lead to a reduction of biodiversity, while ploughing pastures due to a reduction in livestock numbers in the enlargement countries after accession would liberate carbon dioxide in the atmosphere. Ukraine's extensive soil surface means that the EU would have greater potential for **carbon storage**. Enlargement represents an opportunity to modernise livestock production in enlargement countries, to reduce greenhouse gas emissions and meet EU animal welfare standards.

### *Impacts on the Common Agricultural Policy*

The current Common Agricultural Policy (CAP) is designed to address a large array of challenges, with the support of a comprehensive policy toolbox, including: (i) direct payments; (ii) the possibility to introduce capping, degressivity and targeting of those payments; (iii) agri-environmental and climate measures; (iv) support for investment and to areas with natural constraints; and (v) additional rural development measures. The CAP requires Member States to choose and further tailor policy measures based on a strategic, performance-focused approach that builds on the national strengths and weaknesses identified after a thorough analysis. CAP strategic plans are tailor-made to the Member States' needs and are approved by the Commission. In this sense, the CAP is an agile and flexible policy, able to adapt to current and future challenges, if sufficient resources are available for its implementation, along with appropriate transition measures, similar to those taken in previous enlargement rounds (such as the phasing-in of CAP support in enlargement countries over a certain period of time after accession or effective safeguard mechanisms for sensitive products).

If several countries were to join the EU under current rules, this would significantly increase the CAP's funding needs, driven primarily by two key factors: the number of **farmers** and the **agricultural area** to be covered. However, the current CAP is designed and financed for an EU of 27 Member States, based primarily on a family farm model.

Within the current policy framework, a significant share of CAP support would be granted to thousands of large (above 1000 hectares) competitive farms, notably in Ukraine (where they cover more than 15 million hectares, more than the size of the utilised agricultural area of Poland). This would put additional pressure on the CAP budget and in particular on **family farms**, which are at the core of the EU agricultural model, leading to a reduction in the diversity of farms in the EU and impacting existing EU-27 farms. This could also undermine the **long-term resilience of the EU food system**, if production and food sovereignty are centralised in a few Member States.

With **increased competition in the single market**, enlargement could impact the effectiveness and the efficiency of existing policy tools supporting the competitiveness, resilience and sustainability of the agricultural sector – from direct payments to agri-environmental and climate measures, sectoral support, measures supporting areas with natural constraints, young farmers schemes and crisis management measures.

With the number and scale of risks expected to increase in an expanded EU (adverse climate events, disease outbreaks), the pressure on the current **agricultural reserve** is likely to increase further. The increase in export-oriented farms, primarily in Ukraine, would also make the current tools less effective in case of trade tensions as volumes destined for third markets would put pressure on the EU domestic market.

Other tools provided by the common market organisation and the Unfair Trading Practices Directive aim to improve the functioning of the food chain to address the shortcomings of the single market, would remain essential in an enlarged single market.

In an expanded EU support for young farmers will become even more critical and certain sectors will need targeted support.

Incentives would also be needed to transition to more sustainable practices, and to promote various practices such as organic farming, agro-ecological practices, precision farming, agro-forestry or carbon farming, as well as animal welfare improvements.

Current **rural development tools** would be less effective in view of the massive challenges faced by the rural areas in enlargement countries such as migration to cities, an ageing population and lack of public services. Very large farms, particularly in Ukraine, could also benefit disproportionately from rural development funds, including investment aids.

The **administration of the CAP** as well as **market monitoring** and **shared management** in an expanded EU would require appropriate resources, both for the Commission and the enlargement countries after accession. New Member States will have to put in place a variety of administrative structures and strengthen their administrative capacity with appropriate structures and staff ahead of accession.

### *Budgetary aspects*

Under the current MFF the CAP is jointly funded by the European Agricultural Guarantee Fund (EAGF) and the European Agricultural Fund for Rural Development (EAFRD), with the major share of funds being subject to strategic planning in each Member State for the three main policy instruments, namely direct payments interventions (EAGF), sectoral interventions (EAGF) and rural development interventions (EAFRD). Outside of the CAP strategic plans, the EAGF also finances exceptional measures, public intervention and private storage, school

schemes, promotion and the Programme of Options Specifically Relating to Remoteness and Insularity (POSEI).

If several countries were to join the EU, this would significantly increase the number of farmers and the agricultural area to be covered by the CAP, these two factors being the main immediate drivers of CAP funding needs (see above).

Currently, enlargement countries provide investment support, support for the purchase of inputs, e.g. diesel or fertilisers, as well as direct payments to their farmers, mostly livestock producers, in the form of coupled support. The total level of support cannot be compared to the levels of support in the EU: Ukraine's national budget for agriculture was EUR 150 million in 2024 (broadly the same as in 2021, before the war), comparable to North Macedonia's agricultural budget. Moldova increased its annual agricultural budget to EUR 98 million in 2024.

The following elements are deemed important when considering enlargement related funding needs:

- The proposed NRP methodology for the calculation of the Union financial contribution for each Member State, that considers a series of socio-economic variables.
- Crisis management support. As enlargement would increase significantly the EU's agricultural area, pressure on the use of what is currently the agricultural reserve, and the Unity Safety Net in the future, would inevitably increase.
- Need for technical assistance. Enlargement countries funding needs after accession, will relate to ensuring proper administration, implementation and monitoring in relation to the CAP; and access to advisory services, networks and capacity building. Enlargement countries will need to be able to contribute properly to the common collection of EU agricultural data after accession. In this context, adequate funding for CAP technical assistance on the Commission's own initiative would need to be ensured in view of enlargement.

As highlighted above, depending on the final modalities and if no specific arrangements or transitional measures are envisaged, enlargement might have a substantial impact on the CAP. This policy area is likely to be one of the most impacted by enlargement, given the considerable expansion of the agricultural area, and the addition of a high number of farms with a wide variety of needs from generational renewal, innovation, training and advice to investment for modernisation to deal with challenges such as complying with high phytosanitary standards.

In view of this expected impact, a CAP that is fit for purpose must provide targeted support to farmers who need it most, promote positive environmental and social outcomes through rewards and incentives for ecosystem services and support the right enabling conditions for thriving rural areas. It must become simpler, targeted and find the right balance between incentives, investment and regulations, and ensure that farmers have a fair and sufficient income.

## **5.2.2 Policy gaps and delivery risks**

In light of the impacts described above, the main policy gaps linked to enlargement identified are in line with the policy gaps related to the current CAP as identified in the Strategic Dialogue on the Future of EU Agriculture<sup>146</sup> and in the Vision for Agriculture and Food.

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<sup>146</sup> [European Commission \(2024\) Strategic Dialogue on the Future of EU Agriculture.](#)

Enlargement would require adjustments, as well as gradual transition to ensure preparedness. The CAP proposal under the 2028-2034 MFF gives the direction. It provides a significant contribution by proposing mandatory degressivity and capping, introducing the minimum and maximum aid per hectare, extending the support for small farmers and offering the possibility to create synergies with cohesion policy through the national and regional partnerships plans, to better target the support towards farmers who need it the most, and by giving more leeway to Member States in designing the details of the CAP measures. It also gives further incentives for farmers and rural communities to adopt sustainable practices.

Appropriate transitional periods should be considered, as in previous enlargement rounds, such as the phasing-in of CAP support in enlargement countries after accession or effective safeguard mechanisms for sensitive products. The specific situation of Ukraine with respect to the ongoing war and the resulting needs for reconstruction as well as the specific scale and situation of Ukraine's agricultural sector will require specific treatment.

In addition, the current CAP tools may not be able to address all the needs of the many farms in enlargement countries that may not manage to adapt to the EU requirements in terms of production standards and marketing requirements among others.

With most enlargement countries having farm structures characterised by a significant number of farms with low yields, low-income levels, limited management skills and an ageing farming population, support to promote viable farm incomes and resilience of the agricultural sector will be crucial.

Special attention will likely need to be given to supporting the large number of very small farms in the enlargement countries. Similarly, additional support under rural development will be relevant to promoting generational renewal, innovation, training and advice, as well as offering investment support for modernisation and dealing with, for example, the challenge of complying with high phytosanitary standards. Enlargement countries with, for instance, agricultural production in mountainous areas will need rural development support for natural or other area-specific constraints after accession.

As a result of geopolitical tensions, the EU's Eastern border regions most affected by Russia's war of aggression against Ukraine are rural areas of particular vulnerability and concern and need particular support. Socio-economic decline and increasing depopulation will have additional security implications here, while these mostly rural areas are of strategic importance for the EU's security.

In an expanded EU, farmers may also have to be supported to generate additional sources of income (i.a. bioeconomy, carbon farming, renewable energy production, nature credits). This would be particularly true for some farm types (e.g. livestock production) or in certain regions (mountains). Equally, the balance between regulation, investments and incentives may need to be reviewed.

To help achieve the European Green Deal targets, with the objective to contribute to the broader goal of a climate-neutral and resilient EU by 2050, farmers in enlargement countries would need funding under direct payments and rural development after accession. This would enable them to commit to and ensure a transition to sustainable agricultural practices beneficial for the climate and the environment. Incentives would be needed to promote various practices such as organic farming, agro-ecological practices, precision farming, agro-forestry or carbon farming, as well as animal welfare improvements, depending on the climatic and environmental situation and current agricultural practices in each enlargement country.

Considering the challenge of attracting young farmers, in particular in rural areas of enlargement countries where depopulation is a big challenge, and the vital need to ensure the

EU's future food sovereignty, more measures could be needed to address the multifaceted challenge of generational renewal. The Commission Communication on the generational renewal in agriculture adopted on 21 October 2025 is an important contribution to the debate in that context<sup>147</sup>.

On sectoral support, it must be thoroughly analysed whether the current public storage mechanism is apt to handle future interventions. Also, as of 2023, all public intervention and private storage measures are financed under the agricultural reserve, which accommodates also funding for exceptional measures and is limited (at least EUR 450 million per year).

In view of increased risks, in a world marked by geopolitical and geoeconomic tensions, existing risk and crisis management tools may not be fit for purpose during crises unless more is done at farm level to anticipate and mitigate the impacts of market crises, weather events and climate change in general. The capacity of those tools should be commensurate to the challenges. The adoption of the Fertiliser Action Plan<sup>148</sup> is an important step in strengthening EU's food security in times of geopolitical shocks and supply disruptions.

Currently there is a lack of tools to ensure the proper functioning of the single market in view of the expected surge in intra-EU-trade in agri-food products. This is particularly the case for Member States or regions neighbouring Ukraine, as shown by the experience of the autonomous trade measures.

Against the background of enlargement, simplifying the CAP will be crucial for future Member States to implement it and for farmers to comply with all its requirements.

### **5.2.3 Reform orientations**

To address the policy gaps identified above, the below policy options have been identified to make the CAP fit for enlargement:

- Simplifying CAP support and better target those farmers who need it most, finding the appropriate balance between regulation, investments, incentives and additional sources of financing and strengthening the use of measures such as degressivity and capping, taking into account different structural and sectoral realities of Member States as proposed in the 2028-2034 MFF package.
- Considering appropriate transitional arrangements as in the previous enlargement rounds, such as the phasing-in of CAP support in enlargement countries after accession or effective safeguard mechanisms for sensitive products.
- Developing dedicated tools to address the challenges of the (very) small/subsistence farms, in particular in the enlargement countries, and to facilitate access to diversified and new complementary sources of income, for all farms, in addition to direct payments and payments for ecosystem services.
- Ensuring that all farmers have sufficient resources and investment capacity to finance and de-risk the sustainability transition, and that policies reward good practices and approaches tailored to specific needs.
- Enacting measures related to sectoral support.
- Reviewing and strengthening the toolbox to better manage risks and crisis, as well as reducing strategic dependencies and derisking supply chains.
- Continuing the simplification of the policy, notably via digitalisation, to contribute to the competitiveness of EU farmers while preserving the contribution to societal objectives.

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<sup>147</sup> COM (2025) 872.

<sup>148</sup> COM (2026) 310.

- Promoting gradual integration of enlargement countries into the single market, particularly through their adoption of EU product and production standards, to prepare for and effectively address the challenges and reap the opportunities of enlargement.
- Continuing targeted pre-accession assistance for agriculture and rural development, such as under the current Instrument for Pre-accession Assistance for Rural Development programmes, in the post-2027 period, and extending the list of beneficiary countries to cover all enlargement countries and target the support to those farmers, rural food processors and other eligible beneficiaries who need it the most.
- Providing capacity-building and pre-accession technical assistance to the enlargement countries.

The proposals for the 2028-2034 MFF package already address several of the above orientations such as the transition payments, the new cascading mechanism for crisis measures, the doubling of the agricultural reserve now named “Unity Safety Net”, the streamlining of sectoral support covering more sectors.

### 5.3 Food safety, veterinary and phytosanitary policy

The EU is globally recognised for maintaining the highest standards on food safety and producing high-quality food. Enlargement of the EU offers significant benefits for both current and future Member States. However, to safeguard and strengthen these standards and protect our way of life, coordinated actions, common investments and joint reforms are necessary in enlargement countries to accelerate progress in this field.

A well-structured and sustainable system of official controls must be in place to safeguard the implementation of the EU *acquis* in the areas of food and feed safety, animal health and welfare, plant health and protection, genetically modified organisms (GMOs) and the protection of consumers’ rights. Appropriate resources are needed for a network of public authorities operating in all relevant sectors, staffed with competent and trained personnel to perform the official controls and supported by the necessary infrastructure including official laboratories and border control posts that complying with the EU requirements.

#### 5.3.1 Impact of enlargement on the level of protection, food safety, veterinary and phytosanitary policy

The EU stands to benefit from upholding its **food safety, veterinary, and phytosanitary policies** in an expanded EU. Enlargement countries represent significant imports of agricultural commodities into the EU (EUR 16 billion in 2022). In 2022, these imports were primarily plant-based (95% of the total value). Ukraine is also a notable exporter of poultry meat and eggs. Overall, the significant size of Ukraine’s agricultural sectors will present distinct challenges in the context of enlargement.

For the expanded Single Market to function properly, trust between and in national authorities, their official control systems, including at the new external borders and the effective enforcement of EU policies on food safety, animal and plant health is essential to ensure continued food and feed product safety as well as free movement of animals, plants, and related products.

To ensure the current level of protection, it is vital for new Member States to ensure a strong and sustainable capacity within the competent authorities managing the authorisation of regulated products that are used in the agri-food sector, such as veterinary medicines, pesticides or biocides. The same applies to the control of foodborne zoonoses and to the implementation

of the EU's One Health policy actions that ensure prudent use of antimicrobials in animals and addressing antimicrobial resistance.

Additionally, the animal health status in the EU might be affected by diseases as rabies, highly pathogenic avian influenza and African swine fever, particularly among large livestock populations. This is critical as most EU trading partners do not recognise or properly implement regionalisation. New Member States need to elevate their standards to avoid posing public and animal health, environmental, trade and reputational risks to the EU.

New Member States must put in place an efficient system of official controls related to the protection of animals at farm, during transport and at the time of slaughter and killing. In this regard, certain farming sectors would need to consider investment costs for modernisation to comply with the EU *acquis* on animal welfare (e.g. protection of laying hens, broilers, calves and pigs).

Participation of enlargement countries as observers in expert groups, such as the Animal Welfare Expert Group and the EU Animal Welfare Platform, has started to foster effective policy implementation, and to avoid potential future distortion of competition and fragmentation of the internal market due to different animal welfare practices.

#### *Budgetary aspects*

Overall, there are areas in which the effective implementation of the EU *acquis* by new Member States would depend partly on adequate support from the EU level. These areas are listed below:

- **Plant health**, to ensure the same level of protection and standards as the EU-27 for the protection of crops, fruits, vegetables, flowers, ornamentals and forest from quarantine pests.
- **Plant and forest reproductive material** to deliver the quality standards required by EU legislation.
- **Plant protection products**, to ensure effective protection and fair competition via competent authorities that have sufficient human and technical capacities; maximum residue levels, to ensure the same level of protection and effective control at the EU's external borders.
- Ensuring a high level of **protection for animal health** via adequately staffed and competent authorities.
- Infrastructure upgrades to ensure the **modernisation of the agri-food sector**, particularly establishments producing food and feed and the **strengthening of official controls**.
- **Infrastructure upgrades** to comply with EU legislation and ensure compatibility with Europe-wide IT systems and databases, e.g. rapid alert systems. Building or improving the border controls posts in the EU's future borders. Improving the official laboratory network to cover the EU requirements on analysis and to reach the necessary quality of laboratory results (e.g. for accreditation of labs, selection and characterisation of methods).
- **Surveys** to prevent and manage outbreaks of pests, certification, infrastructure for food safety and high sustainability standards.

Currently the Food Chain strand of the Single Market Programme supports the surveillance, eradication or containment of animal diseases, zoonoses and plant pests, actions for fighting antimicrobial resistance and reduction of food waste, IT system developments, updates and

integration, and expert trainings through Better Training for Safer Food Programme<sup>149</sup>. In addition, almost all enlargement countries are associated to the Food Chain strand of the Single Market Programme through veterinary programmes on highly pathogenic avian influenza, African swine fever and rabies.

Under the current funding rules, the budgetary impact and needs, would not be linear, as new Member States may initially have a lower sanitary status than the EU-27 (e.g. for veterinary matters and knowing that none of the enlargement countries has eradicated *Mycobacterium tuberculosis* complex or brucellosis, and only few have been officially declared free of rabies in their territories). For plant health, there would be increased risks due to the increased size of the agricultural sector. Enlargement would therefore require an adequate budget for food safety, veterinary and phytosanitary policies.

Funding needs exist also regarding support to the improving capacity of competent authorities, upgrading laboratories (implementation/development of national reference laboratories and other official laboratories) and setting up or completing the system of safe collection and disposal / processing of animal by products. EU reference laboratories and their networks will also have an increase in budgetary requirements, as regards operational expenditure and human resources.

Decentralised agencies, (the European Medicines Agency (EMA), the European Centre for Disease Prevention and Control (ECDC), the European Food Safety Authority (EFSA), the European Chemicals Agency (ECHA) for Biocides and the Community Plant Variety Office (CVPO)) would need to provide services to a larger number of countries, which would imply higher operational and operating costs.

There is also a need to increase the Commission's own capacity to perform controls (including audits, fact-finding missions and other assessment activities) to evaluate the implementation of Union legislation. The intensity of controls required in new Member States will increase the demand profile significantly and require an upward adjustment of allocated resources. The instruments proposed under the new MFF targeting health and food safety are designed to accommodate the association and appropriate participation of enlargement countries, as is currently the case. These instruments are, in particular the proposed regulations on a European Competitiveness Fund, on a European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security (National and Regional Partnership Plans), on a new Horizon Europe programme, on the Union Civil Protection Mechanism and Union support for health emergency preparedness and response).

### 5.3.2 Policy gaps, delivery risks and reform orientations

The main gaps relate to the **potential lack of capacity** of new Member States to implement the EU *acquis* effectively.

Enlargement might impact the reflections on the **review of the governance of the World Organisation for Animal Health**, of which only the Member States, not the EU itself, are members.

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<sup>149</sup> [https://health.ec.europa.eu/funding/eu4health-programme-2021-2027-vision-healthier-european-union/association-agreement-ukraine\\_en](https://health.ec.europa.eu/funding/eu4health-programme-2021-2027-vision-healthier-european-union/association-agreement-ukraine_en)  
[https://health.ec.europa.eu/funding/eu4health-programme-2021-2027-vision-healthier-european-union/association-agreement-moldova\\_en](https://health.ec.europa.eu/funding/eu4health-programme-2021-2027-vision-healthier-european-union/association-agreement-moldova_en)  
[https://health.ec.europa.eu/funding/eu4health-programme-2021-2027-vision-healthier-european-union/association-agreement-montenegro\\_en](https://health.ec.europa.eu/funding/eu4health-programme-2021-2027-vision-healthier-european-union/association-agreement-montenegro_en)  
[https://health.ec.europa.eu/funding/eu4health-programme-2021-2027-vision-healthier-european-union/association-agreement-bosnia-and-herzegovina\\_en](https://health.ec.europa.eu/funding/eu4health-programme-2021-2027-vision-healthier-european-union/association-agreement-bosnia-and-herzegovina_en)

As regards **food safety** and **sustainability**, enlargement would make it more complex to adopt common approaches, including in legislative processes, and could lead to less overall support for certain EU policies, primarily on GMOs (as some future Member States have very restrictive GMO policies in place) and pesticides.

To address the gaps, the EU should provide appropriate **technical and administrative capacity-building support** to enlargement countries/new Member States.

The planned **modernisation of the EU legislation for on-farm animal welfare** should allow to assess its fitness for enlargement.

## 5.4 Fisheries and maritime policy

The **common fisheries policy** (CFP) governs EU fishing and aquaculture by setting catch limits and conservation measures to ensure long-term sustainability. It aims to maintain fish stocks, minimise ecological impacts and support fishing communities. Central to the CFP is the principle of maximum sustainable yield, ensuring healthy fish populations and economic viability. Annual fishing opportunities are based on scientific advice and multiannual management plans, addressing ecosystem needs and regional cooperation. Some management plans are also agreed upon and implemented by **regional fisheries management organisation** (RFMOs). For stocks shared with third countries, such as those in the Mediterranean and Black Sea, this is done by the General Fisheries Commission for the Mediterranean (GFCM), whereas the International Commission for the Conservation of Atlantic Tunas is responsible for managing tuna and tuna-like species in the Atlantic Ocean and the Mediterranean Sea. The CFP also emphasises effective regional cooperation among Member States. Effective monitoring and enforcement are crucial for CFP implementation.

### 5.4.1 Impact of enlargement on the EU's fisheries and maritime policy

Regarding **fisheries management**, after the accession of Albania and Montenegro, the entire Adriatic Sea region would be considered exclusively as EU waters. This would make the process smoother and the approach more holistic. Also, the role of the EU in the Black Sea would be significantly strengthened with the accession of new Member States bordering the Black Sea. Relevant enlargement countries already collaborate, including with the EU, in RFMOs<sup>150</sup>.

The inclusion of new Member States could **alter market dynamics** within the EU, potentially affecting supply chains and competition whilst creating opportunities for market access for fishery and aquaculture products. However, this would not impact the principles, measures and functioning of the common market organisation policy, which would remain fit for purpose, regardless of the size of the EU market and the number of operators.

**Expanded external maritime borders** would bring both benefits and challenges, necessitating a careful evaluation of risks and opportunities on a country-by-country and sea basin basis. Key considerations will include energy security, hybrid and cyber threats, migration, border control, coastguard cooperation, marine pollution, threats to critical maritime infrastructure and freedom of navigation. Looking particularly at the Black Sea, enlargement could have a significant impact on maritime security. Enlargement may also create the need to

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<sup>150</sup> In the Mediterranean Sea basin, Albania and Montenegro are already full contracting parties of GFCM and are actively working in close cooperation with the EU for the sustainable management of fisheries stocks. Similarly, in the Black Sea basin two countries (Ukraine and Georgia) have fishing fleets registered and operating actively and cooperating with the GFCM.

negotiate new or more fishing opportunities with third countries under sustainable fisheries partnership agreements. Ukraine could be interested in fishing in the Atlantic Ocean and Montenegro has expressed interest in fishing activities in non-EU waters, although currently it does not have an external fleet.

With more Member States, the **EU's collective bargaining power in international negotiations and agreements could increase**. This would contribute to more ambitious international fisheries governance agenda with stronger conservation measures and stronger control policies being adopted globally. The EU would also have more weight in **maritime regional cooperation**, where collaboration already occurs with enlargement countries under the EU Strategy for the Adriatic and Ionian Region and the Common Maritime Agenda for the Black Sea.

Finally, enlargement could bring **new opportunities for research and innovation** in maritime affairs, fisheries and aquaculture, to advance sustainable practices and technologies.

Overall, **enlargement is anticipated to have a minimal impact on the CFP**. The CFP can be seamlessly extended to cover new Member States **without significant policy adaptations**. Notably, some enlargement countries (Albania, Montenegro, Türkiye, Ukraine) are already members of some RFMOs and adhere to relevant recommendations, which are also applicable to Member States. These enlargement countries are thus in the process of aligning their legislation with EU rules, because of the EU's efforts to uphold a level playing field internationally and in RFMOs.

Enlargement is expected to **impact specific technical aspects of the CFP**, necessitating **targeted modifications** in respect to:

- **Access to waters**, where new access arrangements will need to be made for the new Member States, detailing the geographical zones and species. This process is complex and necessitates extensive consultations with the countries concerned.
- **Capacity ceilings**, where appropriate fishing capacity ceilings will need to be determined for new Member States to prevent overfishing and ensure sustainable practices. This process may require significant data collection and analysis, and an agreement on fair and equitable quotas.

#### *Budgetary aspects*

The main impacts on financing and funding needs relate to:

- **Maritime regional cooperation**: An enlarged EU is likely to have increased funding needs for projects that are aligned with the objectives of these regional cooperation strategies.
- **Maritime spatial planning**: In the past, the Commission has supported regional processes through the European Maritime, Fisheries and Aquaculture Fund (EMFAF) or Interreg direct expenditure-funded projects (EUR 41 million of EMFF-EMFAF in 2014-2023). For regional cooperation to work well, such projects should also involve new Member States.

The Commission's ongoing evaluation of the current EMFAF funding and the CFP (concerning Member States only) will help determine the best use of the budget available in the next programming period. The results of the CFP evaluation were published in April 2026<sup>151</sup>. Enlargement countries cannot use EMFAF support running until 2027.

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<sup>151</sup> SWD (2026) 120.

In the Commission proposal for the 2028-2034 MFF, the CFP would be implemented under National and Regional Partnership Plans, allowing for a more flexible, ambitious and impactful approach to reach the EU's policy priorities, including for new Member States.

New Member States will also be responsible for **implementing the EU Maritime Security Strategy** (EUMSS), specifically through the actions listed in the EUMSS Action Plan. Under the EMFAF (heading on maritime surveillance) Member States were able to request support to reinforce maritime surveillance, including via establishing connections to the Common Information Sharing Environment for the maritime domain (CISE). In the new MFF, maritime security and surveillance as well as regional cooperation can be financed through the National and Regional Partnership plans, as well as via the European Competitiveness Fund.

#### 5.4.2 Policy gaps and delivery risks

In principle the CFP is expected to continue delivering results after enlargement, **without the need for major policy changes**. The main gap in this policy area might be the potential lack of preparedness by enlargement countries to align their legislation to EU rules and to join the fight against illegal, unreported and unregulated fishing, a key strand of the CFP.

#### 5.4.3 Reform orientations

Considering the **potential preparedness gaps** in new Member States, efforts by the Commission will be especially needed in: (i) the control, monitoring and inspection of fishing activities; (ii) the enforcement of fisheries legislation; and (iii) the fight against illegal, unreported and unregulated fishing. Additionally, specific support from the Commission appears necessary, particularly in aquaculture, to ensure that its growth in new Member States aligns with EU policy objectives, coordination and planning. Support can also cover market surveillance, phytosanitary controls and maritime cybersecurity. Future Member States will need guidance to implement the EUMSS, including for their integration into the Common Information Sharing Environment for the maritime domain (CISE). For the moment CISE is open only to Member States.

The future **Black Sea maritime security hub** will leverage the contributions of EU and Black Sea countries, thus delivering strengthened maritime security and safety, and protection of critical maritime infrastructure and of the marine environment, in an expanded EU. A roadmap is being prepared, in collaboration with relevant services, and with the involvement of Member States. The hub will promote maritime situational awareness and information sharing on the Black Sea, real-time monitoring from space to seabed, and early warning of potential threats and malicious activities. It will aim, among other things, to: (i) broaden coast guard cooperation; (ii) gives Ukraine and like-minded littoral states access to EU information-sharing platforms and services by EU agencies whenever possible; and (iii) monitor critical maritime infrastructure, including submarine cables, offshore installations, gas and wind energy operations off the Romanian and Bulgarian shores, and related maritime capabilities.

Rather than major policy changes, **technical modifications to the CFP** are needed to include capacity ceiling for new Member States and adopt transitional rules (ordinary regulatory procedure). Additionally, introducing permanent cessation, where appropriate, can serve as a measure for new Member States to adjust and reduce their capacities in line with the existing CFP.

## 6. EXTERNAL RELATIONS - A STRONGER EU IN WORLD AFFAIRS

### 6.1 Common foreign and security policy

The European Union's Common Foreign and Security Policy (CFSP) forms an integral part of its external action<sup>152</sup>. The CFSP seeks to preserve peace, reinforce international security, uphold international law, promote multilateralism, as well as boost international cooperation. It aims to promote democracy, the rule of law and human rights and fundamental freedoms. Based on the principles and objectives set out in the Treaty, the European Council identifies the strategic interests and objectives of the EU. UN Security Council Resolutions, notably the authorisations providing for executive actions, are also an important legal basis for CFSP actions.

#### 6.1.1 Impact of enlargement on common foreign and security policy

Enlargement is likely to have a significant impact on the future of EU foreign policy, security and defence. It will also impact economic and trade relations.

An enlarged EU would mean:

- a bigger, stronger and more influential EU in the world;
- new external borders and a new immediate neighbourhood;
- Member States with recent experience in fighting back foreign aggression and managing post-conflict challenges;
- potentially new and more diverse strategic and geopolitical interests among Member States;
- new capabilities for the Common Security and Defence Policy (CSDP), increasing the military, industrial and capability basis, but also new security needs and commitments (see dedicated section); and
- if current practices are maintained, reaching unanimity would become more challenging, notably on the main CFSP tools, consisting of restrictive measures, CSDP operations and missions and military assistance measures, due to increased diversity of Member States' positions.

There are also **areas where adaptations of current practices and procedures are needed** to ensure capacity to handle a new geopolitical reality. This will include extended external borders and migratory pressure, as well as unresolved conflicts.

Mixed agreements<sup>153</sup> require the practice of common accord within the Council as well as ratification in accordance with the constitutional legal orders of Member States. With an EU membership of over 30 countries, difficulties in concluding such agreements may become more pronounced. Crucially, this would make the need to move away from unanimous decision-making in Council even more relevant to ensure the EU positioning as a strong foreign policy actor.

It will also become more challenging for the EU to rely on the common position of its Member States in the field of external representation, particularly in cases where Member States are required to act in the interest of the Union in areas falling under EU competences (e.g. when

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<sup>152</sup> Defined in Title V of the Treaty on the European Union (TEU) and Part Five of the Treaty on the Functioning of the European Union (TFEU).

<sup>153</sup> As regards international agreements, in areas of external competence that are shared between the Union and the Member States (such as the areas of environment, consumer protection and energy), the Council's predominant practice has been to conclude such agreements as 'mixed', whereby Member States are separate contracting parties alongside the EU.

rules of international organisations do not allow the EU to be a party or to be represented in a body of the organisation).

#### a) Overall CFSP alignment

Alignment with the common foreign and security policy is a **strong signal of enlargement countries' strategic choice**. Enlargement countries' alignment reinforces the EU's global influence and security already during the accession process, as it adds to the scale, reach and effectiveness of EU CFSP. At the same time, it has the potential to positively influence the countries' own security. Alignment is especially important for restrictive measures, not only as a political signal, but also because they are more effective if applied widely.

Alignment, including by becoming a Party to the Rome Statute remains insufficient among certain enlargement countries. Albania, Bosnia and Herzegovina, Montenegro and North Macedonia maintain full alignment with the CFSP<sup>154</sup>, while Moldova and Ukraine have an advanced level of alignment. Kosovo continues to fully align voluntarily. Georgia and Serbia still have significant progress to make. Georgia and Türkiye's alignment rates remain low. Substantial policy alignment issues need to be addressed as part of the enlargement process, and not after. Cooperation should be underpinned by EU values, mutual trust and constructive relations, while fully respecting the strategic and security interests of the Union and its Member States.

#### b) EU borders and neighbourhood

##### *New and extended borders*

An enlarged EU would see significant **extension of the external border with Russia and Belarus** – roughly doubling in length. There would be new borders with Armenia and Azerbaijan, thus expanding the EU's neighbourhood towards Central Asia.

Such extension of the external borders would provide new opportunities to improve the control of goods and people. It would also come with new challenges including in the areas of organised and cross-border crime, drug trafficking, prevention of irregular migration, migrant smuggling and trafficking in human beings.

A longer border with or exposure to Russia – in Ukraine, Moldova, Georgia – could also significantly increase the **EU's exposure to Russian influence and interference**. This would intensify security threats and strategic challenges. Russia already deploys different forms of traditional and hybrid campaigns such as the instrumentalisation of migrants against the EU border<sup>155</sup>, cyberattacks targeting critical infrastructures and FIMI and disinformation to polarise societies, attack EU values and undermine democratic institutions. At the same time Ukraine's and Moldova's unique experience in countering Russian aggression and relentless hybrid, including cyber and FIMI, attacks could also benefit the enlarged Union and contribute to its security. Ukraine's lessons could directly inform the EU's policy- and law-making in respective areas and help the EU boost its longer-term resilience.

The EU enlargement to include Ukraine, Moldova and Georgia may raise the need for new **cross-border cooperation mechanisms**, with countries becoming immediate EU neighbours

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<sup>154</sup> Statements by the High Representative on behalf of the EU and Council decisions on restrictive measures.

<sup>155</sup> Member States bordering Belarus reported over 8.000 irregular border crossings last year, with over 28.000 irregular border crossing attempts prevented.

with e.g. Armenia and Azerbaijan, offering new opportunities, such as the completion of the Trans-Caspian Trade Corridor (see below).

In addition, the EU's policy towards Russia could be affected by **more pronounced views among the future Member States**. This could notably concern those that have been suffering under Russia's war of aggression (Ukraine) or intensified hybrid campaign (Moldova, Ukraine). On the other side, there are countries that still maintain close economic and political relations with Russia (particularly Serbia).

Russia's war of aggression against Ukraine has a **geopolitical impact on the region and reshaped Europe's security architecture**. In this context, Ukraine's EU accession has become a shared geostrategic priority, both for Ukraine and for the EU.

Finally, EU enlargement has the potential to hold significant strategic implications for the **unification of the EU's geopolitical space from the Baltic Sea to the Black Sea and to the Eastern Mediterranean**. It would not only deepen European integration but also strengthen the EU's collective security, economic resilience, and political influence in regions marked by geostrategic competition. For enlargement to contribute effectively to this objective, it must remain firmly anchored in the Union's shared values and principles, while fostering commitment to advancing the Union's and its Member States' collective interest. It can create a more cohesive and contiguous strategic space, enhancing its ability to address shared challenges such as energy security, migration, and cross-border cooperation. A unified strategic space would reinforce the EU's role as a global actor, ensuring stability and prosperity, while countering external pressures and fostering long-term peace and development.

#### *New neighbourhood priorities*

Significant effects will only materialise in the long term, as new Member States will **transition to the status of 'development partners'**. It is unlikely that new Member States will be able to devote significant budgets or national development policies during the initial years after accession. Finally, since development cooperation is a shared competence, no changes in the regulatory framework are in principle to be expected<sup>156</sup>.

However, **neighbourhood policy and priorities evolve continuously** and may in any case be subject to further revision by the time the new Member States will join. Unresolved conflicts, and bilateral disputes as well as ethnic issues that could complicate relations among (current and new) Member States and between Member States and new neighbouring countries must be factored in our policy and to the extent possible addressed timely. Regional integration and cooperation would need to be rethought to reflect a new broader scope. This means further strengthening EU's partnerships with Central Asia and the South Caucasus.

**Regional cooperation programmes** could be adapted for the new neighbourhood reality, notably in Central Asia. In line with the Global Gateway strategy, infrastructure projects in the areas of energy and transport, such as the Trans-Caspian Trade Corridor, could receive further support and funding from the EU Member States for example. With a target of 13 days of transit time and over 850 000 containers shipped annually by 2040<sup>157</sup>, the corridor could significantly boost Europe-Asia trade and the economies of the transit countries.

This would opportunely complement the EU global efforts on the matter, at a time where the European Union strengthens its partnerships with the countries in North Africa, the Middle East and the Gulf, including through triangular cooperation through Global Gateway projects

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<sup>156</sup> In accordance with Article 4(3) and (4) TFEU, the exercise of the EU's parallel competence must not prevent Member States from exercising their own competences.

<sup>157</sup> Data from the EBRD study.

for the Mediterranean or the India-Middle-East-Europe corridor. The future EU Member States, which will be directly or indirectly connected to these corridors, notably through the TEN-T networks or under the Black Sea Strategy, will increase the potential and opportunities of all these projects.

At the same time, the EU's enlargement towards the East could be perceived by Russia as a further weakening of its own position, in what used to be a traditional Russian zone of influence.<sup>158</sup> Given its influence in the South Caucasus and Central Asia, notably through the Russia-led Eurasian Economic Union and the Collective Security Treaty Organisation, Russia could increase its pressure and (mis)use its leverage to discourage any further EU enlargement and/or deepening of partnerships. China's growing alignment with Russia further strengthens this dynamic, alongside Russia's ambitions to create a new Eurasian security architecture.

The presence of small groups of ethnic minorities of Central Asian populations in some enlargement countries, as well as minority groups from enlargement countries living in Central Asian countries add a new potential dimension to future relations, and thus to the EU policy towards the region.

### **c) External influence**

#### *Russian influence/presence in the enlargement countries and immediate neighbourhood*

Enlargement would directly challenge Russia's influence, as the accession negotiations would require countries like Georgia and Serbia to fully align with CFSP and to the EU *acquis* (for example, on sanctions, energy, trade, foreign investments, visa policy) and to end a series of agreements with Russia (i.e. gas supply with Gazprom in Serbia).

Russia historically maintained influence particularly in parts of Eastern Europe and in the Western Balkans and South Caucasus. Russia has used a 'targeted investment/high gain' approach to influence these countries, leveraging energy dependence, trade<sup>159</sup>, military presence<sup>160</sup> and foreign information manipulation and interference. Russia is expected to continue trying to exert influence on a large scale, particularly in Ukraine and Moldova and in

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<sup>158</sup> In the Caucasus, Armenia remains heavily vulnerable to Russia's influence due to its dependency on Russia's energy (Gazprom Armenia owns Armenia's entire gas distribution infrastructure), the presence of Russian military and due to the Armenian diaspora in Russia (3 million). Russia is also Azerbaijan's third largest trading partners and first country for Azerbaijan's imports (18.3% of all Azeri imports).

<sup>159</sup> In 2024 Russia was the 4th largest world trade partner for the WB6, with 2.2% of total trade exchanges (EU – 1st place with 65.3%, China – 2nd place with 9.8%, Türkiye – 3rd place with 6%), Eurostat figures, [https://webgate.ec.europa.eu/isdb\\_results/factsheets/region/details\\_western-balkans-6\\_en.pdf](https://webgate.ec.europa.eu/isdb_results/factsheets/region/details_western-balkans-6_en.pdf).

Russia represented the 5th largest world trade partner for Moldova with, 3.7% of total trade exchanges (EU – 1st place with 53.7%, Ukraine – 2nd place with 13.1%, China – 3rd place with 8.1%, Türkiye – 4th place with 6.9%), Eurostat figures, [https://webgate.ec.europa.eu/isdb\\_results/factsheets/country/details\\_moldova\\_en.pdf](https://webgate.ec.europa.eu/isdb_results/factsheets/country/details_moldova_en.pdf)

Russia represented the 3rd world partner for Georgia with 11.1% of total trade exchanges (EU – 1ST place with 20.9%, Türkiye – 2nd – place with 11.1%). Eurostat figures, [https://webgate.ec.europa.eu/isdb\\_results/factsheets/country/details\\_georgia\\_en.pdf](https://webgate.ec.europa.eu/isdb_results/factsheets/country/details_georgia_en.pdf)

Russia represented the 10th largest world trade partner for Ukraine with 1.8% of total trade exchanges (USA – 1st place with 16.7%, China – 2nd place with 14.6%, UK – 3rd place with 10.1%, Switzerland – 4th place with 6.4%, Türkiye – 5th place with 4.1%, Norway – 6th place with 3.6%, Japan – 7th place with 2.6%, South Korea – 8th place with 2.6%, India – 9th place with 2.2%). Eurostat figures, [https://webgate.ec.europa.eu/isdb\\_results/factsheets/country/details\\_ukraine\\_en.pdf](https://webgate.ec.europa.eu/isdb_results/factsheets/country/details_ukraine_en.pdf)

<sup>160</sup> E.g. remnants of the 14th Guards Army stationed in the territory of the break-away region of Transnistria (Moldova) and military bases (unknown number) in Abkhazia and South Ossetia (Georgia).

some parts of Western Balkans. This influence will among others consist of information manipulation and interference.

In terms of presence of the Russian citizens in enlargement countries, Serbia, Montenegro and Georgia have witnessed surges after the start of Russia's full-scale invasion of Ukraine in 2022. In Serbia, Interior Ministry figures from January 2025 refer to more than 48 000 Russians holding temporary residence permits. The fast-track acquisition of visa-free travel rights to the EU for nationals of Russia by granting them Serbian citizenship poses potential security risks.

While Moldova has taken important steps to free itself from the energy dependency on Russia, the region of Transnistria remains highly dependent on Russian-paid gas supplies.

In the Western Balkans, **Russia's energy influence is greatest in Serbia, North Macedonia and Bosnia and Herzegovina**, where in 2024 it supplied from 76% (Serbia) to almost 100 % (Bosnia and Herzegovina, North Macedonia) of gas needs and owns several commercial assets. Türkiye also continues to import significant amounts of oil and gas from Russia and cooperates with Russia on the development of nuclear energy.

The disinformation spread by the Russian-sponsored media outlets in Serbia is affecting public opinion also in neighbouring countries. Russia is likely to continue using **hybrid tactics** including FIMI, including by engineering new issues of difference between the EU and the countries in question. These efforts might seek to foment distrust towards the EU among different population groups, potentially leading to increased regional tensions and further attempts to obstruct enlargement. Russia's attempts to manipulate the public debate in enlargement countries so far show the likelihood of further foreign information manipulation and interference incidents.

The European External Action Service's **strategic communication task forces** dedicated to Eastern Europe and Central Asia and the Western Balkans have been actively working since 2015/2017 to monitor, analyse and respond to FIMI attempts targeting the EU interests and policies in the two regions. The task forces have been also engaging in strengthening the EU's strategic communication towards the regions and in communicating the benefits of EU enlargement to EU-based audiences. As the enlargement process advances, there will be a need for scaling up and deepening this line of work.

In the Black Sea region, the establishment of a **network for joint response mechanisms** could be considered to reduce the space for FIMI and disinformation campaigns, including in rural and border areas. This could draw inspiration from the EU Rapid Alert System the network where EU Member States and EU institutions share information and coordinate responses to FIMI.

#### *China's influence/presence in the enlargement countries and immediate neighbourhood*

Enlargement may have a considerable impact on EU-China relations and on the implementation of the EU's China policy. The EU is seeking to de-risk and strengthen economic security, tackle the heavily imbalanced economic relationship with China and unfair Chinese trade practices and address China's continuous and growing support to Russia's war of aggression against Ukraine. Currently, only Serbia maintains a comprehensive strategic partnership with China, spanning economic, political and security domains<sup>161</sup>.

China is a **major trading and investment partner** for most of the enlargement countries (who are in most cases running substantial trade deficits). China has invested heavily in several of

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<sup>161</sup> Serbia is the only country in Europe that is purchasing advanced weapons systems from China and China has overall become Serbia's main arms supplier.

these countries, notably in costly infrastructure projects through its Belt and Road Initiative<sup>162</sup>. Many enlargement countries have accrued substantial public debt to China. This creates **economic dependencies**.

China has been building its presence in the information environment, including in the EU's enlargement and neighbourhood regions, through increased media presence, elite capture, economic incentives (positive and negative and including leveraging on trade and business relations), information suppression and use of overseas Chinese communities.

China continues expanding its state-controlled media footprint including through an increasing number of social media channels or soft power instruments (among which the Confucius Institutes).

The enlargement process is and will remain a target of information manipulation and interference campaigns by Russia, China and their local proxies.

#### **d) Sanctions**

EU enlargement is likely to have a significant impact on the related decision making on CFSP, including on restrictive measures (sanctions). As a general principle, EU unanimity is required for the adoption of EU sanctions and for their periodical renewal.

New Member States would need to adopt and implement all existing EU sanctions (including trade sanctions and around 6 000 listings, some of which concern citizens of the current enlargement countries) upon accession. Enlargement countries are required to align with prior EU sanctions by the time of accession.

As the EU expands, it is likely to become increasingly heterogeneous, with new Member States bringing their own foreign policy orientations, economic/industrial interests, historical relationships, and political priorities to the table. On the one hand, when it comes to trade sanctions, this diversity may lead to more complex and nuanced process of arriving at unanimous decisions. An enlarged EU may therefore struggle to achieve consensus on sanctions, potentially weakening their overall ambition and effectiveness as a CFSP tool. On the other hand, if the EU can overcome these challenges, their impact could be amplified by the increased economic weight and global reach of a larger EU.

A larger EU would also have a beneficial effect on reducing jurisdictions available to malign actors to circumvent trade sanctions via non-EU countries. As part of the EU's *acquis*, new Member States would be bound to implement EU sanctions, thereby closing potential loopholes that could be exploited to undermine also the EU's sanctions effectiveness.

New Member States would also be entitled to propose new measures, including those currently adopted only at national level. Note that Ukraine currently has over 23 000 national listings in place<sup>163</sup>. New Member States would bring along expertise and knowledge of certain geographic areas which is often an asset in preparation of new measures.

Furthermore, the EU maintains five sanctions regimes<sup>164</sup> in support of Ukraine, two in support of Moldova, and one in view of the situation in Bosnia and Herzegovina and one in response

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<sup>162</sup> For example, the Bar–Boljare Highway - Section Smokovac-Uvač-Mateševo in Montenegro. The first 41-kilometer-long phase was built by China Road and Bridge Corporation with a loan from China's Exim Bank. Or the Belgrade Centre–Stara Pazova railway and the Novi Sad–Subotica-Kelebija (state border) railway (both sections of Belgrade-Budapest railway) both financed through a loan by Chinese Exim Bank. For more information: <https://www.geodata.it/en/sectors/portfolio-road/item/barboliare.html>.

<sup>163</sup> <https://drs.nsdc.gov.ua/>

<sup>164</sup> As of March 2025.

to Türkiye's unauthorised drilling activities in the Eastern Mediterranean. Some of these regimes would need to be closed, revised, or 'transferred' under a different sanctions framework (e.g. the Russia's destabilising actions regime or EU Global Human Rights Sanctions regime), possibly still before accession.

#### **e) Multilateral and human rights**

In certain contexts, the EU might benefit from representing a larger membership in negotiations/decisions in international fora, provided there is a united EU position. In many multi-lateral contexts, every vote counts. Most enlargement countries already fully align with the EU statements and voting positions in multilateral fora including in the UN General Assembly (UNGA), UN Human Rights Council, Council of Europe or the Organization for Security and Cooperation in Europe (OSCE). EU enlargement would hence not significantly change the support for EU initiatives or priorities. At the same time, the EU's internal position-making is likely to become more complex.

The enlarged EU would however benefit from wider participation of EU Member States in two different regional groups, with an impact on the selection of members of the governing bodies in UN fora. There might also be an opportunity to have increased representation for EU Member States in the governing bodies or office holder functions, which could translate into an increased influence/information flow. The enlarged EU would increase its geopolitical weight and would benefit from expanded diplomatic networks of newly acceding Member States.

The potential additional difficulties to reach the required EU consensus in the Council and locally in EU coordination led by the EU Delegations on conclusions, statements and EU positions for negotiations in international organisations would need to be addressed, given the persistent lack of alignment by some enlargement countries with important foreign policy and human rights topics.

#### **f) EU diplomatic presence in enlargement countries**

On accession, the nature and function of the EU presence in enlargement countries will change. The EU Delegations will be turned into Commission Representations. This would affect the number of staff as well as their status (they would no longer be diplomatic staff in a non-EU country), institutional origin (Commission rather than EEAS staff) and function (communication, promotion of internal policies, etc. rather than diplomatic or assistance activities). However, the diplomatic presence in the new neighbouring countries could be scaled up to address the evolving political/geographical challenges and the policy priorities of the EU external action.

The overall review of the EU network of representations, in terms of presence, function and numbers and categories of staff involved will also have budgetary consequences, including in relation to infrastructure and security requirements. This would have to be carefully assessed with a view to generate possible efficiency gains. For example, there can be opportunities to identify further synergies where there is an EU Special Representative office.

*Budgetary aspects of external action*<sup>165</sup>

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<sup>165</sup> To avoid repetitions this budgetary section includes also other external policies such as economic security and trade policy, the policy aspects of which will be discussed in separate chapters further below.

In the MFF 2028-2034, **Global Europe**, the proposed new external action financing instrument will allow the EU to offer targeted support to our partners, combining all available instruments in the EU's financial toolbox into a comprehensive package, adaptable to the specific needs of each partner and our mutual interests<sup>124</sup>. Enlargement countries will benefit from technical assistance and financial support for delivery of reforms, and support to strategic investments to help them progress on their path to join the Union and accelerate economic convergence even before joining the Union.

The proposed Global Europe instrument consolidates the EU's external action financing, into a single instrument, with enlargement countries, as well as Neighbourhood East partners covered under one pillar (the Europe pillar). This will allow the Union to better react to changing geopolitical realities (such as enlargement countries backsliding on democratic reforms) than under the current MFF, where these countries are covered by two distinct instruments (IPA III and NDICI). Within the Europe pillar, Global Europe incorporates performance-based orientations for all enlargement countries and Eastern Neighbourhood countries, in its design, which avoids the need for creating ad hoc facilities'. It is based on a mix of financial and policy tools, which would allow for a stronger performance orientation, including financial support for the delivery of reforms and investments (through non-repayable support and loans), gradual integration into the single market and capacity building and alignment with the EU's body of law. Stronger conditionality for EU funds is proposed to be provided by linking payments to meeting conditions set out in the national performance-based plans developed by the enlargement countries, which are agreed with the EU. This approach can help establish a clear link between disbursing EU funds and reform and investment efforts aligned to the objectives of the Europe Pillar.

In its proposal of Multiannual Financial Framework (MFF) for 2028-2034, the Commission has proposed a dedicated Ukraine Reserve which will be established over and above the MFF ceilings and may be mobilised for the sole purpose of support to Ukraine. This support will be implemented according to the rules of the Global Europe instrument, but the funding will come on top of the envelope for the Europe pillar.

The instrument for nuclear safety cooperation and decommissioning (INSC-D), merging the current INSC (external component) and Decommissioning Programme (internal component), will continue the EU's commitment to contribute to nuclear and radiation safety in partner countries. Its aim is to promote high levels of nuclear safety, radiation protection, safe management of spent nuclear fuel and radioactive waste and the application of efficient and effective safeguards. This objective will be achieved by transferring EU related expertise and best practice to the key stakeholders in partner countries, including by building partnerships with nuclear regulatory authorities and their technical support organisations. The enlargement countries may benefit from funding under the instrument. The indicative financial envelope for the implementation of the Instrument for the period from 1 January 2028 to 31 December 2034 is proposed to be EUR 966 000 000 in current prices, while support to Ukraine may be provided through the Ukraine Reserve.

The upcoming MFF will need to ensure that future Member states are able to take up responsibilities and be able to implement EU funding as of day 1. Therefore, the toolbox included in Global Europe should be used to its full extent by the candidates, adapting to the different needs of the enlargement process<sup>166</sup>. This is particularly relevant for the performance-based plans, which will serve as an important preparatory tool for the management of internal

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<sup>166</sup> Structures for the management of pre-accession assistance will be defined in line with the implementation modalities used for internal funds to credibly prepare enlargement countries and potential candidates for accession. These elements will be included in an implementing regulation adopted under Global Europe.

funds under the NRPPs. The recently adopted Communication on the financial package for Montenegro outlines the transition from a Global Europe Plan towards an NRPP, ensuring a smooth transition and continuity of funding and ongoing reform and investment efforts.

### **6.1.2 Reform orientations**

To continue delivering on its global ambitions, the **EU needs to be able to take decisions in a faster and more efficient way**. While enlargement would reinforce the need to find avenues for more flexibility in CFSP decision-making, the need to reform decision-making in CFSP away from the general requirement for unanimity goes beyond EU enlargement. The collective aim would be to ensure the credibility, consistency and effectiveness of the EU's external action, while ensuring continued Member States' ownership. In this sense, a debate on a more efficient CFSP decision-making needs to be held before the future possible enlargements take place, not after.

To maintain the enlargement momentum and allow for smooth transition of new Member States into the EU, candidates and potential candidates should be involved in further CFSP/CSDP cooperation and gradually participate in relevant cooperation frameworks and initiatives. Work towards this goal is already ongoing in particular with Western Balkans partners.

In particular on foreign information manipulation and interference, a more targeted and robust response is needed, entailing commensurate resource allocation for information resilience, including institution building, government-civil society cooperation, media development, media literacy, bilateral and multilateral cooperation (among enlargement countries and between them and the EU and its Member States).

In view of enlargement, the High representative in cooperation with the Commission would need to take steps as regards closing EU Delegations in the new Member States, ending CSDP missions and operations and the mandates of the EU Special Representatives, analysing the resources and assets to be transferred to the future Commission Representation Offices, closing residual contracts of local staff and other services and infrastructure and relocating EEAS and Commission expatriate staff as necessary, among others. The preparation of the Union's administrative capacity should also take account of the implications of enlargement for the remaining EU Delegations, including the additional coordination and external representation demands arising from a larger Union.

## **6.2 Common security and defence policy**

The Common Security and Defence Policy (CSDP) is an integral part of the CFSP. It includes the progressive framing of a common EU defence policy and aims at allowing the EU to enhance its military capacities and deploy missions and operations outside the EU. These missions concern peacekeeping, conflict prevention and to strengthen international security in accordance with the principles of the UN Charter.

### **6.2.1 Impact of enlargement on the common security and defence policy and European Peace Facility**

Enlargement would further strengthen the CSDP through better integration of new Member States in the EU common security and defence policy, structures and instruments. The new Member States will bring their own experience, resources and capabilities, further reinforcing EU security and defence. Four of the candidates are NATO allies (Albania, Montenegro, North Macedonia and Türkiye). At the 2008 Bucharest summit, NATO welcomed Ukraine's and

Georgia's Euro-Atlantic aspirations for membership in NATO. Georgian authorities do not currently actively pursue the membership to the EU and NATO, while Ukraine is transitioning towards full interoperability with NATO.

Accession of Ukraine to the EU should be perceived as a **boost for the collective military capacity** of EU Member States. Ukraine has spent EUR 53.7 billion, or about 26% of its GDP in 2025, on defence. The estimated strength of Ukraine's military is 980 000 soldiers - though of course the current circumstances are exceptional. Ukraine is also bringing its experience of fighting an enemy availing itself of the most advanced equipment, arms and ammunition.

Ukraine has a unique battlefield experience and has generated advanced capabilities in conventional warfare, drones, electronic warfare, in countering hybrid, cyber and FIMI threats, Ukraine has also strong capacities in developing, testing and scaling innovative defence technologies. EU-Ukraine security and defence cooperation is deepening, in line with the EU-Ukraine Joint Security Commitments signed in June 2024. The integration of Ukraine's and the EU's defence industrial sectors is advancing, contributing to strengthening both Ukraine's defence capabilities and the EU's defensive technological and industrial base, underpinning European security. There is also a big potential of engaging the Ukrainian military and veterans in the EU's military training programmes and civilian and military CSDP missions.

New Member States will have to be fully integrated in the relevant structures (e.g. European External Action Service/European Union Military Staff (EUMS)/ Military Planning and Conduct Capability (MPCC)/ Civilian Planning and Conduct Capability (CPCC). Like the overall CFSP, the most important implications will be on **decision-making**, which is currently governed by unanimity. In that regard, it would seem **useful to move as much as possible towards QMV for decisions in the Council**. The appointment of EU Special Representatives legally requires only QMV, although unanimity has traditionally been preferred, with very few exceptions. For civilian CSDP missions, under Article 48(7) TEU, the European Council might adopt a decision authorising the Council to act by QMV. For military operations of missions or the European Peace Facility, no departure from unanimity is possible under the current Treaty.

In **operational terms**, future enlargement would affect engagement with some of the new Member States. The ongoing CSDP missions and operations deployed in the territory of some of the enlargement countries will have to be terminated, as well as the EU Special Representatives Offices. While some of the actions could be continued under different EU instruments, CSDP missions and operations can be conducted only outside the EU. This will be the case for the European Union Force (EUFOR) Operation ALTHEA in Bosnia and Herzegovina, EU Rule of Law Mission in Kosovo<sup>167</sup>, EU Monitoring Mission in Georgia, EU Advisory Mission for Civilian Security Sector Reform in Ukraine, EU Military Assistance Mission Ukraine, and EU Partnership Mission in Moldova.

Enlargement countries have contributed to **CFSP** and **CSDP missions**. Further to their operational support, new Member States' experience in countering FIMI will contribute to the EU's efforts to strengthen CSDP missions and operations' resilience. Ukraine and Moldova's expertise addressing FIMI for years could be beneficial to support the monitoring and analytical capabilities of CSDP missions and operations. Furthermore, their experience addressing FIMI in conflict-affected environments can also contribute to develop training capacity for information environment analysis and crisis communication in high-risk area of operation.

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<sup>167</sup> The discontinuation of the European Union Rule of Law Mission in Kosovo entails a specific difficulty, as the mission is used as a conduit to support financially the judicial proceedings of the Kosovo Specialist Chambers (KSC) and Specialist Prosecutor's Office (SPO) located in a Member State. A different form of funding would very likely need to be provided in the case of Kosovo's accession.

As regards **cyber threats and hybrid attacks**, the Western Balkans region, as well as Ukraine and Moldova, are increasingly being target by malicious cyber and hybrid activities, with a risk of spill-over to the EU. To prevent, deter and respond to such activities, the EU is supporting enlargement countries in strengthening their resilience (e.g. through capacity building and supporting legislative and policy developments) and engaging to strengthen their and our collective posture. The EU holds regular dedicated dialogues (e.g. with Ukraine) and ensures cyber and hybrid issues are sufficiently reflected in the agenda of broader security dialogues. Such investment as well as the regular participation of enlargement countries in relevant Council Working Parties and Cyber Ambassadors meetings will enable new Member States to be swiftly integrated into the EU's cyber ecosystem. The EU and its Member States benefit from the enlargement countries' experiences in countering hybrid threats (e.g. Ukraine and Moldova).

The future enlargement may have a positive impact on the **EU's partnerships with international and regional organisations**, as well as on the EU's engagement in multilateral fora. For instance, the EU's enlargement with existing NATO allies will increase the number of common members of both organisations and will further strengthen EU-NATO cooperation by improving mutual understanding and increasing the weight of the EU allies in NATO, thus positively influencing the dynamics of EU-NATO cooperation.

#### *Budgetary aspects*

Following enlargement, the termination/transformation of some ongoing CSDP missions and operations (and some EU Special Representatives) might free parts of the CFSP budget. At the same time, the enlarged EU, with new security needs, might also require new CFSP actions to be launched. New members will contribute to the CFSP budget, as part of the EU budget, and in line with their overall national contributions in the framework of the EU Own Resources Decision.

Enlargement could translate in higher availability in financial resources in the Global Europe instrument due mostly to a reduction in the number of missions and operations and of military assistance measures funded through the European Peace Facility. Ministries, agencies, and other entities of new Member States could become implementing actors for assistance measures in countries outside the EU. In particular, the contribution of the Ukrainian Armed Forces and other state services into the CSDP mission and operation may be substantial. The new Member States will also have to contribute to the budget of the European Peace Facility.

### **6.2.2 Reform orientations**

As part of a reinforced EU perspective to the enlargement countries, the candidates and potential candidates should gradually participate in relevant EU structures and programmes ahead of EU membership. This could include:

- **ramping up support for security and resilience** in the region (i.e. Security and Defence Partnerships, European Centre for Democratic Resilience, EPF assistance measures based on the orientations set by EU Member States, contribution to CSDP missions);
- **increased cooperation to** counter the threat of military invasion or aggression;
- **tackle destabilising factors** such as hybrid threats, including malign third-party influence, malicious cyber activities, FIMI and disinformation and instrumentalisation of migration and other types of threats, notably using the Hybrid Toolbox, for instance sanctions, restrictive measures or the deployment of Hybrid Rapid Response Teams;

- **support for enlargement countries to aligning their legislative and policy frameworks to counter hybrid threats** including FIMI and cyber threats (FIMI Toolbox, Hybrid Toolbox, and the Cyber Diplomacy Toolbox). This notably includes encouraging partners to partner around sanctions and statements along the Cyber Diplomacy Toolbox, as well as restrictive measures in response to Russia's destabilizing activities, and to further align with the EU on the ongoing work around norms going on in international fora such as the newly established permanent UN Global Mechanism housing multilateral discussions on responsible state behaviour in cyberspace;
- **leverage the SAFE instrument and European Defence Industry Programme (EDIP)** including Ukraine Support Instrument (USI) for collaborative opportunities to invest into new defence technologies;
- **prevent the carry-over of unresolved bilateral issues** and mitigating its effects in an enlarged EU.
- **strengthen the modernisation, capacity development and geopolitical alignment of the armed forces of enlargement partners** including through the strategic use of European Peace Facility assistance measures based on the strategic orientations set by EU Member States, as is already the case for Moldova, Albania, Bosnia and Herzegovina, Montenegro and North Macedonia, as well as the Balkan Medical Task Force. This may also increase to enhancing operational effectiveness and regional integration.

## 6.3 European defence readiness

### 6.3.1 Impact of enlargement on European defence readiness policies

Enlargement countries, in particular Ukraine, have rich experience with their defence being challenged with full scale war and invasion by Russia which has provided them with valuable insights and expertise that can be shared within the EU. However, to seamlessly integrate into the EU's defence structures, markets and supply chain, these countries would need to adapt their industrial bases to a certain degree as their defence industries are affected by the specific gaps and dependencies. This process would have considerable implications for the development and implementation of defence policies, including defence industrial policies, at both the national and EU levels.

The full integration of enlargement countries' defence markets into the **EU internal market for defence** is likely to be complex and challenging as developing EU internal market for defence and accession negotiations will be two parallel processes. However, the EU already undertook several steps and measures bringing in particular Ukraine defence technological and industrial base (DTIB) closer to EU's.

The 2024 **European Defence Industrial Strategy (EDIS)** proposed a range of measures to encourage Member States to invest more, better, together and European. It aims to create the conditions for the EU's defence industry to meet Member States' demands over time and at sufficient scale.

The 2025 White Paper for **European Defence Readiness 2030** builds on this approach and offers solutions to strengthen the defence industry by closing important gaps and ensuring long-term readiness. It also suggests ways for Member States to invest heavily in defence, buy necessary equipment, and support the industry's growth over time.

The strategy aims to not only support European defence industrial readiness, but also to strengthen Ukraine and Ukrainian DTIB by associating Ukraine to EU defence industry initiatives and tools, aiming at full membership in the future.

To ensure matchmaking between the Union's start-ups and innovators and Ukraine's industry and armed forces, an **EU Defence Innovation Office** (which will transition into European Defence Industry Office) was set up in Kyiv. This office is already delivering and could be scaled up to provide additional support and profit from Ukraine's war experience and to further expand defence industrial cooperation. To stimulate cooperation between the Ukrainian and the European industry and to foster dedicated information exchange on standards and on respective lessons learned, the EU also organises EU-Ukraine Defence Industry Forums.

The **European Defence Industry Programme** (EDIP) is a dedicated instrument which supports and reinforces our defence industry's ability to meet the demand of national armed forces over the next ten years. EDIP and its **Ukraine Support Instrument** (USI) will provide the possibility for Ukraine to participate in joint procurement alongside Member States and for the Ukrainian defence industry to be supported in its industrial ramp-up and in rapid defence innovation through **BraveTech EU** initiative which is partly financed by **European Defence Fund** (EDF) – BraveTech EU (EDF) and USI BraveTech EU (USI). This will support the integration of the Ukrainian defence industry to the European DTIB. The EDIP Regulation entered into force in December 2025 and the EDIP working programme was adopted on 30 March 2026, making available a budget of EUR 1.5 billion for the period 2026-2027 (with 300 mln EUR envelope for USI). This integration will also be increased through Ukraine's association to the EDF, allowing for besides support for BraveTech EU to fully participate in EDF calls for Ukraine entities. It will also help building European Defence Projects of Common Interest (EDPCIs) with Ukraine, and contribute to the acceleration of work on Ukraine-inspired industrial collaboration projects, such as Freyja or BliksemEXO, to reinforce EU's defence technological and industrial base.

On 27 May 2025, the Council adopted Regulation (EU) 2025/1106 establishing the **Security and Action for Europe** (SAFE) through the reinforcement of the European Defence Industry Instrument. SAFE provides loans up to 150 billion to Member States to support common procurements of defence products for their own armed forces and for Ukraine. Through specific bilateral agreements, SAFE could be opened for the DTIB of other enlargement countries. All enlargement countries, including Ukraine are eligible to participate in common procurement.

19 Member States have requested SAFE loans. Ukraine was invited to join Member States and place contracts with EU and Ukrainian defence industry. Ukraine is therefore fully involved in the SAFE instrument and benefits from it, bringing the Ukrainian DTIB closer to the European DTIB. This is in line with Commission commitment to treat Ukraine as much as possible as a Member State in Union programmes supporting defence industry. The EU may conclude bilateral or multilateral agreements with like-minded countries, namely acceding countries, enlargement countries other than Ukraine and potential candidates to facilitate common procurement under the SAFE instrument.

The **Preserving Peace - Defence Readiness Roadmap 2030** puts forward specific objectives and milestones on how to strengthen Europe's defence capacities by 2030, in particular through Member States engaging in capability coalitions, launching European Readiness Flagships and further strengthening the EDTIB. Progress will be measured annually based on indicators. The roadmap outlines continued support and strengthened cooperation with Ukraine, which remains Europe's first line of defence and is key for Europe's defence effort. Other candidates, not least because of their geographic position, will also play an important role for Europe's

security. Therefore, it is important to consider ways to link them early on with defence readiness actions.

To boost innovation and the development of new technologies for defence, the European Commission has adopted the **EU Defence Transformation Roadmap**, which includes strands on strong cooperation with the Ukrainian DTIB.

As mentioned above, in 2025 the Commission, in partnership with Ukraine, launched the **BraveTechEU** initiative to accelerate defence innovation by building on battlefield-proven technologies and strengthening cooperation between EU and Ukrainian defence tech start-ups, scale-ups and SMEs. It provides a new framework for joint development, testing, and deployment of cutting-edge defence solutions.

In February 2026, Regulation (EU) 2026/467 of the European Parliament and of the Council of 24 February 2026 implementing enhanced cooperation on the establishment of the **Ukraine Support Loan** for 2026 and 2027 (UASL) was adopted, dedicating EUR 90 billion to address both Ukraine's immediate macroeconomic needs and its urgent security requirements, with an indicative split of EUR 30 billion for budgetary assistance and EUR 60 billion for defence procurement. The conditions for acceding and enlargement countries to participate in UASL are similar with the ones for participation in SAFE.

#### *Budgetary aspects*

There has been a strong growth in industry participation in the **European Defence Fund (EDF)** over the past years. This growth, coupled with the increased focus on defence and security in Europe, has led to an increase in the number of EDF applications, beneficiaries, and participating regions. This, in turn, will likely result in a growing competition for available funds. As the EDF Programme Committee holds annual discussion about EDF's prioritisation of topics and the allocation of resources, these discussions are expected to be more extensive due to the enlargement.

The intervention logic of both the **Ammunition Production Regulation (ASAP)** and the **European Defence Industry Reinforcement through common Procurement Act (EDIRPA)** ceased to exist in 2025 and are being replaced by the **European Defence Industry Programme (EDIP)** for 2025-2027. In the MFF 2028-2034, these activities will be financed under the European Competitiveness Fund. The Commission proposal provides the possibility to associate enlargement countries under strict conditions.

### **6.3.2 Reform orientations**

The EU could seek to:

- Continue the **integration of the Ukrainian defence technological and industrial base into the EU's base**, while benefiting from the unique Ukrainian experience and innovative edge.
- Strengthen **defence innovation**, including rapid innovation, in close cooperation with Ukrainian partners and as outlined in the EU Defence Transformation Roadmap.
- **Develop mutually beneficial engagement, cooperation and know how transfer** in the field of security and defence with enlargement countries to promote peace, security and stability on our continent and beyond, as outlined in the White Paper for European Defence Readiness 2030 and the European Defence Readiness Roadmap 2030. Provide support to Ukrainian military's and veterans' involvement in relevant EU-level activities.

- Once the proposed **Regulation on Military Mobility** is in place it is key that its provisions will be effectively applied in the accession countries. As outlined in the Joint White Paper, Ukrainian military mobility corridors shall be effectively connected to the European military mobility corridors.

## 6.4 Space capabilities

### 6.4.1 Impact of enlargement on EU's space policy

An enlarged EU territory offers strategic geographic positions (e.g. for tracking stations). Enlargement would give the EU possibility to **expand ground infrastructure** for global satellite navigation (Galileo, EGNOS), for the Copernicus Earth observation programme and for Space Situational Awareness infrastructure<sup>168</sup>. Expanded territorial coverage would improve the operational integrity of the services and potentially facilitate new international partnerships.

Enlargement would also enable more efficient use of satellite resources (via pooling and sharing) and enhance **national sovereignty** and **independence** in satellite communications. The accession of Ukraine could bring added value thanks to the country's long-term experience in the space industry, allowing it to develop expertise also evidenced in remote sensing and in Earth observation satellites.

With enlargement, the EU's space policy will cover more Member States and increase the number of companies involved through the procurement process, including for security-sensitive technologies. This could bolster EU competitiveness in that area.

Enlargement would trigger the need for **enhanced external border and maritime surveillance**, as well as **internal security monitoring**. A longer border with Russia will trigger also extended use of the Copernicus Security Service. Some of the Copernicus services will have to cover enlarged service areas. More customers for secure connectivity and the Galileo Public Regulated Service (PRS) will require additional screening of eligibility of new participants in procurement. Regarding Govsatcom and IRIS<sup>2</sup>, additional participants would also reduce the available capacity for other Member States.

Secure access to **critical space-relevant raw materials** is important for the resilience of EU space value chains. This aspect has been acknowledged in the Critical Raw Materials Act. Few of the countries negotiating accession to the EU, such as Ukraine or Serbia, are resource-rich and have mineral deposits or mining of space-relevant critical raw materials.

The generated data and services and the benefits of the current EU Space Programme mostly have no geographical boundaries and are generally freely accessible to users worldwide (the Galileo Open Service, Copernicus data etc.). While some restrictions apply to sensitive data or services due to security concerns, enlargement is unlikely to have a significant influence on the programme in the short term. Some exceptions exist however, such as the EGNOS services or the Galileo High Accuracy Service which provide improved services to EU Member States plus EGNOS / Galileo Participating States; for such services enlargement may require the deployment of more stations in the new EU territories. Enlargement would also increase the geographical area to be covered by Copernicus with localised and specific services for Member States. In the long term, future enlargement could lead to a **larger number of institutional**

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<sup>168</sup> The Space Situational Awareness (SSA) Programme is a critical component of the EU Space Programme, providing a comprehensive understanding of space hazards that could benefit in several areas from future enlargement.

**and civil users of space data**, particularly in case when space data and services are used to fulfil requirements set by sectorial legislation.

#### *Budgetary aspects*

The accession of new Member States will unlock participation in the current EU Space Programme and Union Secure Connectivity Programme, and in particular in the future European Competitiveness Fund opening new avenues for collaboration, including for global partnerships and innovation. Furthermore, the involvement of additional companies through the procurement process, including for security-sensitive technologies, could bolster EU competitiveness.

In line with the EU Space Strategy for Security and Defence and the Niinistö's report, the Commission's proposal for the European Competitiveness Fund includes as an additional component in the next MFF an EU Earth Observation governmental service for enhanced situational awareness in support of preparedness, decision-making and the action of the EU and Member States in the fields of security and defence, as well as a service for radio frequencies interferences and activities for an autonomous and competitive access to space.

It's worth mentioning that on 9 March 2026 the Council authorised the opening of negotiations for Ukraine accession to Govsatcom.

#### **6.4.2 Policy gaps, delivery risks and reform orientations**

The main impact of enlargement on EU space policies relates to **increased user needs** and the **need for enhanced security** in this domain. In addition, enlargement would require the potential deployment of new EGNOS or Galileo stations to provide the same services in all the EU territories. There is likely a need to **strengthen the expertise** of administrations in enlargement countries to effectively participate to the governance of the EU Space Programme (Space Programme Committee, EUSPA Administrative Board).

Considering the current geopolitical shifts, the prospective of enlargements call for a strong emphasis on **strengthening the security of the EU**. The 2023 Space Strategy for Security and Defence already identified the urgent need to devise a revised framework adapted to the challenges prompted by recent geopolitical changes and which collectively enhances the resilience of space systems and services in the EU.

Acting on this need, the resilience pillar of the legislative proposal on the EU Space Act<sup>169</sup> aims to create a baseline for resilience applicable to all space segments. A higher level of cybersecurity of satellites and more resilient space missions will allow space infrastructure to better withstand cyberattacks and enable space operators to be more prepared and agile when handling security incidents. With enlargement expanding the size of the internal market, higher amounts of space-based data will be generated by potentially more spacecraft and space systems. The resilience rules in the EU Space Act proposal contribute to fine-tuning the EU's stance towards preparedness and awareness and allow an adjustment to the dynamics of an enlarged single market of space activities.

As part of the overall **EU policy on critical raw materials**, the potential of critical raw materials for space (and defence) could be further leveraged by the pre-enlargement policies. Enlargement countries like Ukraine have space (and defence) critical raw materials deposits such as rare-earths or titanium. Triggering respective import diversification and investments in mining, space (and defence) grade refining, metalworking and alloying will be considered in

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<sup>169</sup> Proposal for a Regulation of the European Parliament and of the Council on the safety, resilience and sustainability of space activities in the Union Brussels, 25.6.2025 COM (2025) 335 final 2025/0335 (COD).

enlargement discussions. In addition, the Commission proposal for the European Competitiveness Fund introduces new services and components to enhance the security and resilience of the EU and Member States as the EU Earth Observation governmental service, a service for radio frequencies interferences and activities for an autonomous and competitive access to space.

## 6.5 Trade policy and economic security

### 6.5.1 Impact of enlargement on trade policy and economic security and policy gaps

#### a) Trade policy

Trade policy both projects and contributes to the EU's economic and geopolitical strength. With its important economic and geopolitical implications, enlargement would have a significant impact on trade policy and on relations with trade partners across the world. This would take place in the current challenging context of rising global tensions and risk of fragmentation of the global economy. This context makes it even more imperative to safeguard the stability of the rules-based global trading system with a reformed World Trade Organization (WTO) at the core and build new and stronger trade and investment partnerships with third countries.

A larger EU could be a stronger actor in the world and a more attractive trade partner and thus have more bargaining power when negotiating trade agreements and dealing with trade partners.

The EU has exclusive competence over its trade policy, which will continue to apply also across the enlarged EU. However, enlargement may impact that policy in several important ways. Acceding countries will become part of the EU's existing trade agreements, which will require certain adjustments.

EU regulations in the area of trade have direct effect and will hence apply directly in acceding countries and do not require any transposition.

#### *Impact on the EU's position in the WTO*

The EU itself and all 27 EU Member States are members of the World Trade Organization (WTO). The EU represents the EU Member States at the WTO<sup>170</sup> and holds 27 votes there.

Two considerations stand out. First, some of the enlargement partners are not yet members of the WTO, which might cause some challenges; and second, certain steps will have to be taken to ensure consistency between enlargement countries and the EU as a whole.

Regarding **enlargement countries who are members of the WTO** (most of them), on enlargement, the EU would not only be expanding its geographic territory but also the number of votes in the WTO, as the EU holds exclusive competence on common commercial policy

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<sup>170</sup> The Council common position on Chapter 30 states the following: "The EU is a customs union within the meaning of WTO provisions. The EU and all its Member States are members of the WTO. In view of the EU *acquis* on its common commercial policy, [country] will need to become a WTO member before joining the EU. Moreover, once a member of the WTO, [country] needs to ensure that its national positions are progressively aligned with the EU positions, to facilitate the transition to the additional EU membership in the WTO and to obtain the capacity to implement EU commitments on the day of the accession to the EU. The EU encourages [country] to step up its negotiations and adopt necessary legislative reforms needed to join the WTO". The common position however stipulates *that* "in case [country] encounters unreasonable blockings in its WTO membership bid, the EU will return to this chapter, as appropriate".

and speaks with one voice in the WTO. EU Member States do retain competences in some areas, notably relating to the WTO's budget.

In case of an accession to the EU, the existing tariff schedule of the acceding country that is already WTO member will be withdrawn, and the EU will have to initiate the relevant General Agreement on Tariffs and Trade (GATT) procedure for establishing the adapted tariff schedule of the enlarged customs union. Regarding trade in services and government procurement, the national commitments and reservations of the enlargement countries under the General Agreement on Trade in Services (GATS) and the Agreement on government Procurement (GPA), respectively, will have to be integrated in the EU schedules.

Regarding **enlargement partners who are not yet WTO members** (Serbia, Kosovo and Bosnia and Herzegovina), prior to their accession to the EU, the EU should be associated to and make all efforts to support their WTO accession negotiations, to ensure that the outcome and the commitments these partners have to make towards the WTO are compatible with EU law and policy. This is already the case for Serbia as well as Bosnia and Herzegovina, whereas Kosovo has not applied for WTO membership yet (mainly due to status issues).

The scenario of a possible accession to the EU prior to WTO accession remains untested but cannot be excluded (in case of possible unreasonable blockings of WTO accession).

#### *Impact on the EU's bilateral engagement – FTAs and other forms of engagement*

For agreements under the EU's exclusive competence, the acceding Member States will be covered as of the date of entry into force of the accession treaty, given that **EU free trade agreements** (FTAs) apply to the territories where EU Treaties apply. This means that the other party to the agreement will immediately have access to the market of the new Member State(s) under the conditions set out in the EU's trade agreement with that country. Therefore, it is important to conclude all necessary adjustments in advance. For mixed agreements, the new Member State will need to accede to the agreements.

Any impacts on, and adjustments to, **bilateral FTAs** would in particular concern specific parts of FTAs, including: i) schedules for services/investment; ii) procurement commitments which include member-specific commitments; iii) list of geographical indications; iv) authentic languages.

**Sustainable Investment Facilitation Agreements** will also apply to new Member States. These agreements cover commitments across the EU on transparency and administrative procedures applicable to foreign direct investment and will not need renegotiation with the accession of new Member States. Regarding **digital trade rules**, they are not directly tied to market access negotiations, as they fall under a purely regulatory title in the EU's FTAs. Since no market access or market opening is involved, the focus will be on acceding countries' acceptance of the EU's regulatory requirements.

**Investment agreements** between the acceding countries and specific EU Member States must be terminated no later than at the date of accession (including the effects of any sunset clause provision). Agreements between acceding countries and non-EU countries, however, would need to be grandfathered. One notable multilateral investment agreement is the Energy Charter Treaty (ECT), to which the Western Balkans and Ukraine are members. It will be necessary to ensure that, similar to their bilateral investment treaties (BITs) with EU Member States, these countries terminate the effects of investment protection provisions under the ECT with EU Member States to avoid intra-EU disputes.

#### *Trade defence instruments*

As from the date of accession, existing EU trade defence measures will automatically apply to the new Member States, while all trade defence measures applied individually by the acceding countries will automatically lapse. This approach has been consistently followed in all previous enlargements and follows from the fact that the EU is a Customs Union with common external tariffs. If an acceding country applies additional instruments such as surveillance concerning imports from outside the EU, which are not applied by the EU, these instruments will also cease to apply as from the date of accession.

The Commission usually publishes a notice in the Official Journal informing stakeholders of this fact shortly before the accession date. Stakeholders have the possibility to request a review of such measures under defined circumstances, as was the case during the enlargements in 2004 (OJ 2004/C 91/02) and 2006 (OJ 2006/C 297/04).

Regarding the expired steel safeguard, there was no issue because enlargement did not occur before the expiry of the measure on 30 June 2026. However, Regulation (EU) 2026/1384 of the European Parliament and of the Council of 17 June 2026 addressing the negative trade-related effects of global overcapacity on the Union steel market and amending Regulation (EU) 2020/2170 which started applying on 1 July 2026 has a potential impact on enlargement as it applies to all third countries. The impact of this new measure is nevertheless more limited for preferential partners of the EU such as enlargement countries, as these partners have access to additional quantities of tariff-rate quotas compared to non-preferential partners (see in particular Commission Implementing Regulation (EU) 2026/1457 of 29 June 2026 on the distribution of tariff quotas opened under Regulation (EU) 2026/1384 of the European Parliament and of the Council addressing the negative trade-related effects of global overcapacity on the Union steel market and amending Regulation (EU) 2020/2170).

As for trade defence investigations, these are conducted by the Commission under the applicable EU Regulations. It is difficult to assess the position that these countries will take regarding individual consultations on trade defence cases (e.g., supportive, neutral, or not supportive), which could influence the overall outcome of TDC/SFGC votes.

### *Dispute settlement*

Certain acceding countries have ongoing disputes at the WTO, e.g. Ukraine currently has 16 active cases: 12 as a complainant (including three against EU Member States) and four as a respondent. Ukraine must abandon all its WTO disputes against other Member States before joining the EU, as pursuing those disputes at the WTO level after accession to the EU would be incompatible with the Treaties. Regarding Ukraine's disputes against other countries, it should be ascertained first whether it is in the interest of the EU to pursue those disputes. It may well be that Ukraine has taken legal position the EU does not agree with or that go against EU's policy. If necessary, Ukraine should be asked to abandon them. In addition, where the disputes are worth pursuing, the Commission should assume the representation of Ukraine or, at the very least, be closely associated.

### **b) Economic security**

The 2023 **European Economic Security Strategy** (ESS) is built upon three pillars. First, promoting EU competitiveness; second, protecting the EU from disruption triggered by non-EU actors; and third, partnering with the broadest range of countries, allowing EU businesses to diversify and to access centres of growth. The ESS focuses also economic security risk assessments and mitigation on four initial risk areas: supply chain resilience and energy security; critical infrastructure, technology leakage and security; weaponisation of economic dependencies and economic coercion. Building on the ESS, the 2025 Communication on **Strengthening EU Economic Security** indicates six initial priority high risk areas where the

Commission will concentrate its efforts in immediate to short term, in close cooperation with Member States, industry and trusted partners, which includes also candidate countries<sup>171</sup>. The Communication also calls for integrating risks and opportunities for the EU's economic security in the Commission's implementation of policies and programmes with EU's neighbourhood and enlargement countries and regions. Notably, candidate countries are on a path to become future EU Member States, therefore their alignment on economic security policy as well as gradual integration into the single market, is essential to ensure their successful accession, while enhancing the EU's ability to address both existing and new risks.

On the one hand, expanding to new economies will increase the size of the internal market expand the options for EU companies to produce of certain critical products in new Member States and less dependent on extra-EU supplies, and will make the EU more attractive to suppliers and investors from abroad. It will also enhance the resilience of supply chains across various sectors and open further opportunities for EU businesses, thanks to the resources of critical materials in the future Member States.

On the other hand, it remains to be seen to what extent the economies that would join the EU distinguish themselves with research centres and tech leaders in edge technologies that are relevant for our economic security in advanced technologies (e.g. AI, semiconductors, quantum, biotech) or in areas that are relevant for our security of supply or resilient supply chains (e.g. in raw materials, food supplies, in energy sources, etc.). Also, if the enlargement allows the EU to attract such assets and reinforce our resilience or indispensability in key supply chains or technologies, certain measures would need to be ensured in these countries in line with the applicable EU measures, rules and policies, also the TFDI Screening Regulation (as applicable at the time), in particular research security, protection of technologies and infrastructure, enforcement of export control, screening of foreign direct investment (FDI) or other economic security relevant tools.

#### *Economic security risk assessments and mitigation; incorporation of new Member States*

The European Economic Security Strategy has established a risk assessment process to identify vulnerabilities and analyse the impact and likelihood of them materialising. Risks are assessed across four risk categories referred to above. On this basis, acceding Member States would have to contribute to the joint risk assessment and adapt targeted and proportionate mitigation measures in a way that is coherent with the European Economic Security Strategy.

Both risk assessment measures and risk mitigation measures are based on an analysis taking into account data and economy environment of the 27 EU Member States. Enlargement could have significant impacts on the nature of EU vulnerabilities and could help to reduce some of them through strengthening the EU's capacities. It could, however, also exacerbate some of the EU's vulnerabilities if the acceding countries suffer from strategic dependencies in critical sectors or challenges to resilience of their supply chains, if their critical infrastructure are vulnerable to physical or cyber-attacks or if their critical technologies are not sufficiently protected from technology leakage.

Therefore, adaptation of the risk assessments and design of mitigation measures will be needed to reflect the nature of an enlarged economy its vulnerabilities, and the optimal approach to risk mitigation. Dynamic alignment will be needed as regards the measures the EU takes as

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<sup>171</sup> These are: i) strengthening supply chain resilience and counteracting high-risk dependencies in critical goods, services and technologies, including raw materials and energy security, ii) attracting value-added inbound investment iii) supporting a vibrant defence and space industrial base and other high-risk industrial sectors, iv) developing and maintaining leadership across critical technologies v) preventing access to sensitive information and data, vi) preventing and mitigating disruptions to EU critical infrastructure.

regards economic security, including on coordinated deployment of tools of relevance for economic security (such as trade and competition tools, resilience and cybersecurity, security and public order tools, funding and restrictions or sectorial initiatives as per 2025 Communication on Strengthening EU Economic Security).

In this context, the 2025 Communication pledges that the Commission will explore ways to align and integrate candidate countries with our economic security approach, especially in those areas where their economic security vulnerabilities can pose a security risk to the EU. Also, the Communication calls for the EU funding programmes and tools including those applicable to candidate countries to strengthen the EU's economic security or, as a minimum, not weaken it, in line with the programmes' rules. Notably, implementing partners should refrain from supporting projects that contradict the above, including in operations at own risk.

#### *Selected protect tools under the European Economic Security Strategy*

Regulation (EU) 2026/1386 on the **screening of foreign direct investments** (FDI), which replaced Regulation (EU) 2019/452, is one of the Union's key instruments for addressing risks to security and public order arising from foreign investment. The new Regulation entered into force in July 2026 and will apply from January 2028. The revised framework requires all Member States to establish and maintain national FDI screening mechanisms. It also strengthens and further harmonises FDI screening across the EU by introducing a common minimum scope for screening, setting minimum requirements for national screening systems, and reinforcing cooperation and information exchange between Member States and the Commission. All 27 Member States now have a national FDI screening mechanism in place. As foreign investment screening in the EU has become an important tool for the Member States and the Union to ensure that the risks posed by foreign investment are screened and where relevant mitigated, it is important that the enlargement countries develop screening mechanisms as soon as possible, in line with the new Regulation.

Regarding **export controls of dual use goods**, on joining the future Member States will need to apply the EU legal framework for such export controls<sup>172</sup> to prevent any security loophole undermining the single market and to ensure that legitimate trade upholds international security. The Commission is helping enlargement countries develop and implement effectively their export control systems in line with the EU's and to jointly enhance security. EU support includes examining and advising them on their export control framework and extending the possibility of using the EU e-licencing platform to ensure the efficient administration of export controls.

### **6.5.2 Reform orientations**

**In the area of trade policy, no policy changes seem needed.** At the same time, some challenges would need to be addressed – not through changes of our policies, but rather through negotiated solutions. The biggest challenges identified are 1) a risk that Serbia, Bosnia and Herzegovina and Kosovo will not be members of the WTO by the time they are ready to accede to the EU, and 2) certain parts of bilateral FTAs will need to be renegotiated; and 3) possible implications on trade in the area of agriculture and other potentially sensitive sectors.

**In the area of economic security, specifically,** the Joint Communication on 'strengthening EU Economic Security highlighted the relevance of, and impact on, the EU's neighbourhood

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<sup>172</sup> Dual use Regulation (EU) 2021/821 of the European Parliament and of the Council of 20 May 2021 setting up a Union regime for the control of exports, brokering, technical assistance, transit and transfer of dual-use items (recast).

and enlargement policy<sup>173</sup>. Risks and opportunities for the EU's economic security will be integrated in the Commission's implementation of policies and programmes with these regions, in line with the action item from the aforementioned Joint Communication to "explore ways to align and integrate candidate countries with our economic security approach, especially in those areas where their economic security vulnerabilities can pose a security risk to the EU". The alignment of enlargement countries to the EU's economic security policy as well as gradual integration into the single market, is essential to ensure their successful accession, while enhancing the EU's ability to address both existing and new risks.

It will be necessary for candidate countries to align quickly and dynamically with measures that the EU takes to strengthen its economic security and where relevant they engage in coordinated deployment of tools, including funding. Increased vigilance will be needed as regards the measures of certain third countries designed to circumvent EU controls and benefit from the accession process.

## 6.6 Civil protection and humanitarian policy

The civil protection policy primarily focuses on the operation of the **Union Civil Protection Mechanism (UCPM)** and the **Emergency Response Coordination Centre (ERCC)**. The Centre also manages global-scale emergencies.

The UCPM enhances **coordination** between EU Member States and participating states **to prevent, prepare for and respond to natural and human induced disasters**. ERCC is a key component of the UCPM as it is tasked with monitoring and coordinating disaster response efforts. While its primary function is to support situational awareness and coordinate assistance to emergencies within the EU, the ERCC also extends its support to large-scale global crises. It thereby ensures a swift and efficient European response to disasters worldwide.

Humanitarian aid is considered an **external instrument of need-based assistance**, targeted at people hit by human-induced disasters and natural hazards in non-EU countries. EU humanitarian aid is based on international humanitarian principles and is channeled impartially to the affected populations, regardless of their race, ethnic group, religion, gender, age, nationality or political affiliation.

### 6.6.1 Impact of enlargement on the EU's Civil protection policy

Future EU enlargement is not expected to significantly impact civil protection. The UCPM is already open to participation from enlargement countries and potential candidates as well as other European countries (under specific conditions). As all the enlargement partners (except Kosovo and Georgia) are already participating states in the UCPM and are members of its associated committees and expert groups, they enjoy the same rights as Member States. In addition, to support their capacity building and improve their crisis management, Kosovo and Georgia are eligible to several funding opportunities under the UCPM (such as the Technical Assistance for Disaster Risk Management, Technical Assistance Financing Facility and Knowledge for Action in Prevention and Preparedness).

Due to the rapidly evolving risk and threat landscape, the Commission has put forward a proposal<sup>174</sup> to revise the basic act for the UCPM (the Decision)<sup>175</sup> to ensure that it remains fit for implementation and to tackle new crisis management challenges. This reflects in particular

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<sup>173</sup> JOIN (2025) 977.

<sup>174</sup> COM (2025) 548.

<sup>175</sup> Commission Decision 1313/2013.

the context of the recently adopted Union Preparedness Strategy and its all-hazard, whole-of-government and whole-of-society approach<sup>176</sup>. Despite the planned changes, the proposal of the new Regulation and the Union Preparedness Strategy are not expected to be directly impacted by EU enlargement process.

Also, civil protection is a supporting competence of the EU, meaning that EU action in this area is targeted at coordinating preparedness and prevention actions and supporting Member States and coordinating their civil protection response to countries requesting assistance to the UCPM. This also includes donations and deployment of civil protection capacities to Member States and non-EU countries. For this reason, the civil protection framework sets out rules facilitating effective collaboration, interoperability, prevention, and preparedness. Action in these areas, on the other hand, remains in the remit of the Member States and participating states themselves. This means that the civil protection framework is fit to welcome new participating states without the need for adaption.

Similarly, humanitarian aid policy is not expected to be significantly impacted by enlargement. It is established practice of most enlargement countries (Montenegro, Serbia, Albania, Ukraine, Moldova, Bosnia and Herzegovina and Georgia) to regularly align with the EU-27 statements on humanitarian issues delivered at the United Nations. Also, the Commission currently finances large-scale humanitarian operations in Ukraine and Moldova. However, upon their accession to the EU, the Commission could no longer provide support for such operations in Ukraine or Moldova, as the rules restrict humanitarian aid funding to non-EU countries.

#### *Budgetary aspects*

Under the current set-up, participating states pay a financial contribution to UCPM and EU funding provides co-financing support to prevention, preparedness and response actions under the UCPM.

Several participating states currently take part in the UCPM under a privileged financial arrangement, namely the ‘annual participation ticket’. This arrangement would no longer be applicable once these countries become EU members. Those countries would then be subject to the standard financial obligations attached to full Union membership.

Ukraine and Moldova (unlike the Western Balkans), as participating states, benefit from an exemption. For example, they can receive support from the UCPM but are exempted from contributing financially. Georgia is not a participating state but would be eligible under the enlargement framework.

The impact of enlargement on the current EU budget dedicated to civil protection is therefore expected to be limited. Potentially acceding countries would not introduce significant additional financial burdens for the EU, as they are already integrated into the mechanism’s operations.

### **6.6.2 Reform orientations**

As for this policy domain no enlargement triggered gaps are identified and it thus is broadly fit for enlargement, no major reform is envisaged at present.

Any potential adjustment to the UCPM policy and legislative framework before enlargement would most likely be driven by factors which make emergencies more frequent, complex or intense, rather than by enlargement. Such factors would for example include the impact of

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<sup>176</sup> JOIN (2025) 130.

climate change and of the changing international security environment, as well as increased demand for international assistance.

## 7. ADMINISTRATIVE POLICIES

The enlargement of the EU will enrich its multilingualism, diversify its workforce, and open extended opportunities for digital government collaboration and for communicating about the EU. EU administrative preparedness necessitates that the EU institutions and bodies continue to perform effectively in an enlarged EU. Adequate human and financial resources, linguistic capabilities, and IT tools will be essential.

### 7.1 EU's language regime and capacity

**Multilingualism** is at the heart of the European project. The Union is committed to the respect of linguistic diversity as one of its fundamental values, as reflected in the Treaties and in the Charter of Fundamental Rights and reaffirmed in EU law and case-law. EU law prohibits discrimination on account of language and provides for the citizen's right to communicate with the institutions in any official language of the EU.

The legal basis for the **EU's language regime** is Article 342 of the Treaty on the Functioning of the European Union, according to which the rules governing the languages of the institutions of the Union are to be determined by the Council, acting unanimously by means of regulations.

Those rules were laid down in the very first Regulation adopted in 1958 by the Council of the then European Economic Community. Council Regulation No 1/1958 177, as amended after each enlargement, determines the languages in which legislation must be drafted, published, and transmitted between the institutions and Member States or the public. This means that the EU's language regime is an inherent and integral part of the EU decision-making process.

The principle of legal certainty implies that EU legislation must be accessible to citizens and businesses in their official language, so that they can keep abreast with the precise extent of the obligations imposed upon them. Because of the strong political dimension attached to it, any decision concerning the EU's language regime is taken by the Council acting by unanimity, with implications for Member States, citizens and businesses as well as for all of the EU's institutions, who will have to implement it.

#### 7.1.1 Impact of enlargement on the EU's language, legal and publication services

Enlargement is expected to introduce new EU official languages, if requested by the negotiating countries and unless Member States raise objections.

Adding a new language means amending both Article 55(1) TEU (by the Accession Treaty), to include the new language as a Treaty language, and Regulation No. 1/1958, to include the new language as an official EU language. Currently, all Treaty languages are also EU official languages pursuant to Regulation No. 1/1958.

For the EU's language, legal and publication services, enlargement requires a significant amount of preparatory work to be able to carry out legal revision and publish the *acquis* in the new languages at the latest by the accession date and ensure interpretation and translation from and into the new EU official language as from the date of accession. The Commission already

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<sup>177</sup> Council Regulation (EEC) No 1/58 of 15 April 1958 determining the languages to be used by the European Economic Community (OJ 17, 6.10.1958, p. 385, ELI: [http://data.europa.eu/eli/reg/1958/1\(1\)/oj](http://data.europa.eu/eli/reg/1958/1(1)/oj))

provides interpretation for these languages during accession negotiations and is preparing the ground for more complex meetings with larger language regimes upon accession.

When accession negotiations start, the negotiating framework includes a requirement for the negotiating country to translate the EU *acquis* ‘in good time before accession’ and to ‘train a sufficient number of translators and interpreters required for the proper functioning of the EU’s institutions on its accession’<sup>178</sup>.

However, some negotiating countries have languages that have a limited number of native speakers and very small local markets for language professionals, and/or may lack dedicated training programmes for interpreters and translators or legal revisers/lawyer linguists.

For the EU’s institutions, this means a potential shortage of language professionals for recruitment or outsourcing, which on accession may have direct and serious consequences on their ability to meet the obligations established by Regulation No 1/1958 (see below under ‘Policy gaps and delivery risks’).

While it is the Council that decides on the EU’s language regime, the functioning of all the EU’s institutions is impacted whenever an official language is added.

Once a language has become an EU official language, the adoption, publication and, therefore, the entry into force of all new legal acts depend on the availability of all the language versions, including in the newly added EU official language.

#### *Budgetary aspects*

The addition of new EU official languages is expected to have an important impact on the EU’s administrative budget. The extent of the impact will depend on the scope of the enlargement and the number of languages to be added to the EU language regime, as well as the envisaged timeline. Resource needs include staffing, organising selection panels/ competitions/ accreditation tests, outsourcing, training, office space, conference and meeting infrastructure, technical equipment, adaptation of IT tools, production of the Official Journal (OJ L, C and S series) as well as production of case-law and language resources/linguistic data/data acquisition. Costs would have to be calculated at an

interinstitutional level. In addition, technical capacity-building activities and awareness raising campaigns are needed to support the enlargement countries in their linguistic preparations (see below, under ‘Reform orientations’), which might require a dedicated budget.

### **7.1.2 Policy gaps and delivery risks**

Any shortage of capacity for any newly added EU official language may impinge on the EU decision-making process. Since all language versions of legal acts must be available for adoption at the same time, a lack of translation and legal revision capacity in one language could have an impact on the legislative activity and on the entry into force of new legislation of the EU. A lack of interpretation capacity in one language could also have an impact on the running of meetings in the Parliament, the Council and the Commission, as well as on the Court of Justice’s functioning.

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<sup>178</sup> Some of the negotiating frameworks already specify the languages into which the EU *acquis* should be translated, namely Albanian, Serbian, Macedonian and Ukrainian. The negotiating framework for Montenegro refers to the official language of the country, while the one for Moldova contains a more general part which does not refer to the official language of the country (as Romanian is already an EU official language). The wording in the negotiating frameworks is similar to the one in the relevant Association Agreements, with the objective not to prejudge future decisions to be taken at political level.

Since the 2013 enlargement, the advent of AI-based multilingual services has brought technical advances, supporting the translation work (e.g. eTranslation) and/or enhancing the operational efficiency of the EU institutions in other ways (e.g. eBriefing)<sup>179</sup>. Upon enlargement, the language coverage of AI-based multilingual services would need to include the new EU official languages. While efficient and useful, these tools cannot however replace language professionals. Moreover, many languages from the Western Balkans are low-resource languages, for which limited linguistic data is available, in particular the data sets needed to train machine translation and AI models.

The situation is compounded by the fact that most enlargement countries are lagging in the translation of the *acquis*. Translating the *acquis* is a responsibility of the candidate country, and so it is addressed in the context of the accession negotiations and is not part of this exercise. However, any delays in the availability of the translated *acquis* would affect the preparations of the EU's institutions (e.g. extracting terminology, preparing translation memories, templates etc.).

Failure to find enough professionals at the time of accession would imply the need for special arrangements. In the past, special arrangements have been used for languages which counted a lower number of native speakers (Maltese, Irish). However, in accordance with the principle of the rule of law, such arrangements could only be made because English - an official EU language - was one of these countries' official languages. For all the enlargement countries, language plays a key role in national identity and is an important topic. Thus, the Council would have to analyse the impact of any special arrangements – including budgetary impacts – thoroughly and well ahead of accession.

### **7.1.3 Reform orientations**

To best prepare for the potential addition of new EU official languages, the EU could work on three strands, as follows:

#### **a) Continue to support the enlargement countries in their preparations**

It is essential to cooperate closely and promptly with the enlargement countries, considering their different situations and needs. This effort concerns in particular the Commission. It would be appropriate that the Commission continues its technical capacity-building activities on the ground, including for the Translation Coordination Units in the enlargement countries. It would be most useful that the Commission continues to raise awareness among political and academic authorities and the language industry in the enlargement countries of the importance of training enough linguists, as well as preparing lawyers with knowledge of EU law. Experience shows that preparations for setting-up dedicated courses need to start five to ten years before accession. Given that the accreditation process for a new academic course can take several years, awareness-raising needs to happen well in advance.

Further, it would be appropriate for the Commission to continue supporting negotiating countries on language data and technologies. Under the Digital Europe programme, work is already ongoing to gather data for adding the languages of the enlargement countries to eTranslation. The Commission can also provide support towards the adoption of interoperable

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<sup>179</sup> For a full list of services see <https://language-tools.ec.europa.eu>. Besides the EU institutions, these services are made available to public administrations, academia, EU freelance translators, small and medium-sized businesses, non-governmental organisations and projects funded by the Digital Europe programme, located in an EU Member State, or in countries associated to the programme.

solutions enabling data exchanges with legal portals and databases of the EU (ELI, AKN4EU) and the integration of legal databases in negotiating countries with EUR-Lex.

**b) Prepare the institutions to meet their obligations under Regulation No 1/1958**

For the EU to ensure **legal revision** and **publication** of the *acquis* (as translated by the acceding country) in the new language by the accession date:

- the Commission needs to recruit **language experts with proofreading skills**, proficient in the new language, for the Publications Office to proofread the *acquis* translated by the acceding country and carry out other operations, such as preparing the Interinstitutional Style Guide in the new language. Proofreaders work on the texts before and after the legal revision. The publication of the *acquis* (including proofreading) requires a lead period of around 2.5 years. The Publications Office must adapt its legal publishing systems and websites to ensure that documents in the new languages can be correctly processed, published and retrieved.
- the Commission, the Council and the Parliament need to recruit **legal revisers/lawyer-linguists** proficient in the new language to finalise the *acquis* translated by the acceding country and proofread by the Publications Office. Given that this finalisation usually starts some 2.5 years before the accession date, a sufficient corpus of proofread text would need to be available by then. Other institutions, in particular the Court of Justice, the Court of Auditors and the European Central Bank, will also need to recruit staff in advance.

For **interpretation**, staff recruitment starts about 18 months before accession. However, to ensure that enough freelance interpreters for these languages is available already during accession negotiations, the Commission needs to organise interinstitutional tests for conference interpreters well ahead of accession. Potential staff members can then be selected from this pool of freelance interpreters. In addition, to manage the increased complexity in meetings with larger language regimes upon accession, the EU's institutions will need to implement appropriate organisational and infrastructure solutions.

For **translation**, the institutions would need to take several steps to ensure resource needs are met in a timely manner, in terms of staffing, organisation of selections/competitions, office space, technical equipment, procurement (outsourcing of translation), training, and language resources (e.g. terminology databases, machine translation). Based on experience, preparations for the addition of new EU official languages need to start at least **five years before accession**, while the first recruitments start around two years in advance. Building translation capacity includes **recruitment** of translation and support staff, access to a **market of external translation providers** to cover for outsourcing needs, and sufficient **linguistic data** to allow the development of relevant IT support tools. In addition, the Commission needs to ensure to have one staff member who will be responsible for translation, localisation and promotion of multilingualism in the capital of the acceding country, hosted by the EU Delegation, to deal with accession preparations in the field of translation.

**c) Consider alternatives if linguistic capacity in the enlargement countries is insufficient**

Ideally, accession should take place when adequate linguistic capacity is available. However, considering the political pressure for enlargement, preparations should include reflections on how to handle circumstances where that is not the case. The following options, based on past experience, could be considered:

- (1) **Accession combined with language-specific options** (in the form of transitional measures to be included in the Accession Treaty). Following the rule of law principle, language-specific options **could only be explored where at least one of the official languages**

throughout the territory of the country is an EU official language and where national law envisages that legal acts can be published and be applicable to all citizens and operators in that country, even if they are published in only one of the official languages. The language-specific options arranged thus far have been the ‘Luxembourgish’ sub-option (the language is not granted any status at EU level), the ‘Irish’ sub-option (granting the language the status of Treaty language while the status of EU official language could be granted at a later stage, i.e. gradual phasing-in) and the ‘Maltese’ sub-option (granting the language the status of Treaty language and of EU official language with temporary derogation measures). However, none of these options would fit the situation of current enlargement countries.

- (2) **Accession combined with measures to ensure management of demand for translations of EU texts.** Under this option, the country would accede with its language(s) as EU official language(s) but the EU’s institutions could take measures to generally lower the translation burden **for all EU official languages** to take account of the limitations stemming from the language with the lowest capacity. In line with Article 6 of Regulation No 1/1958, the institutions could *‘stipulate in their rules of procedure, which of the languages are to be used in specific cases’*. At Commission level, this could involve amending the Rules of procedure<sup>180</sup>.

Given the high degree of sensitivity around languages, which are intrinsically linked to identity, culture and democratic values, and considering that the respect of linguistic diversity is a fundamental value of the EU, amending Regulation No 1/1958 to reduce for all languages the obligation to ensure the translation of EU legal acts does not appear to be a viable option. Providing that legal acts do not need to be drafted and published in all EU official languages would be **contrary to the principles of legal certainty and of equal treatment**, as confirmed by the Court of Justice of the European Union in the *Skoma-Lux* judgment. Without prejudice to specific arrangements provided for in Accession Treaties, decisions on this matter would have to be taken by the Council acting unanimously in accordance with Article 342 of TFEU.

## 7.2 European Statistical System

The availability of high-quality official statistics for policy design and monitoring purposes will remain key in an enlarged EU. High-quality official statistics are needed in a timely manner to support evidence-based policy making, including during the accession negotiations for measuring progress as well as after accession to monitor the impact of enlargement on EU policies, such as trade policy, macro-economic policy and public finances.

It is important that the established and well-operating European Statistical System (ESS) continues to be innovative and to use modern technology, thus being capable of responding to new and emerging statistical needs, tapping the statistical information value of fast evolving data ecosystems.

The ESS has pursued a longstanding approach to re-use data held by governmental bodies (i.e. access, use and integration of administrative data), and is further developing its capacity to obtain access to fast emerging data ecosystems, in particular privately held data. The ability of the ESS to integrate new Member States into its innovation agenda will be even more important

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<sup>180</sup> Commission Decision (EU) 2024/3080 of 4 December 2024 establishing the Rules of Procedure of the Commission and amending Decision C(2000) 3614 (OJ L, 2024/3080, 5.12.2024, ELI: <http://data.europa.eu/eli/dec/2024/3080/oj>).

in the future, to harness the information value of existing and future such ecosystems across the current and new Member States, while reducing the reporting burden on statistical respondents.

### **7.2.1 Impact of enlargement on the EU statistics policies**

#### *Impact on the European Statistical System*

From the perspective of producing and disseminating high-quality statistics, the success of future enlargement would largely depend on the capacity of enlargement countries to ensure preparedness to implement the EU *acquis* in statistics, and to use innovative methods and technology to produce high-quality official statistics validated and disseminated by the Commission (Eurostat). This is even more important to ensure that the new Member States comply with the key principles of statistics in the EU, in particular professional independence, impartiality and statistical confidentiality, which are the cornerstones of the ESS.

The Commission (Eurostat) has been cooperating with enlargement countries for many years and regularly assesses their level of preparedness. To accompany them on their path to accession, Western Balkan countries and Türkiye have been invited since many years to Eurostat expert groups meetings while Georgia, Moldova and Ukraine started to be invited as of 2023. Those meetings provide the relevant forum for national officials to comprehend the EU *acquis* on statistics so they can implement it, develop their statistical methodological capacities and network with Member States' experts.

Preparations for enlargement should be actively used as a catalyst for the modernisation of enlargement countries' statistical systems. In particular, these countries can reap the opportunities offered by Regulation (EC) 223/2009 on European statistics (as revised by Regulation 2024/3018), in particular regarding access to and use of administrative data, access to and use of privately held data, data exchange between producers of official statistics and innovation in statistics. The statistical offices of enlargement countries can also embrace the potential offered by new technologies, e.g. artificial intelligence, in support of the statistical production value chain.

#### *Impact of enlargement on EU statistics policy*

Enlargement would not per se impact the adequacy of the existing EU policy on statistics as statistics policy remains fit for purpose also in an enlarged EU. An impact can be expected on macro-economic policy and public finances based on statistics on excessive deficit procedure and on the collection of EU own resources (GNI, plastic and VAT own resources).

#### *Budgetary aspects*

Availability of human and financial resources at EU and enlargement country level, considering the ever-increasing user demand for statistics, the vast majority of which are enshrined in EU legislation, will be of the essence. Those resource needs exist both before and after accession, also in view of ensuring IT security given that the work of statistical authorities largely relies on IT systems.

EU financial support in statistics, as it is currently the case with the statistical component under the Instrument for Pre-accession Assistance (IPA), will remain indispensable. Resources may also be needed to cater for the possible acceleration of the cooperation with enlargement countries and with Ukraine in particular (see under "Reform orientations").

In addition to the robust quality assurance mechanisms in place to produce the whole portfolio of European statistics, which will also apply to new Member States, reinforced quality

assurance systems are established by EU regulations for the statistics underpinning the collection of EU own resources (GNI, plastic and VAT own resources) and statistics on the excessive deficit procedure. In these areas, official statistics are crucial for macro-economic policy, public finances and the monitoring of the EU *acquis*. These domains require in-depth scrutiny by Eurostat, with corresponding resource needs linked to the number and complexity of countries audited (assignment of country desk officers, organisation of country visits, setting of reservations).

After accession, the new Member States would be entitled to benefit fully from available EU level funding support for statistical policy<sup>181</sup>. Adequate resources would be needed for the future Single Market and Customs Programme (SMCP).

Regarding IT resources, Eurostat will have to scale up its IT capacity (with budgetary impact) needed to receive, host, process and disseminate the increased data volume from enlargement countries.

### 7.2.2 Policy gaps and delivery risks

The gaps identified at this stage relate to **preparedness in enlargement countries**, when it comes to their capacity to establish the necessary expert capabilities in particular to produce statistics undergoing reinforced quality assurance checks (GNI, own resources and excessive deficit procedure statistics); consolidate their National Statistical Systems and legal frameworks and align them with EU principles and rules; keep the pace with the innovation on-going in the European Statistical System, which includes obtaining access to fast evolving public and private data ecosystems.

Regarding Ukraine, the country needs to re-build its statistics infrastructure, including the revision of the law on statistics, provision of IT infrastructure and statistical expertise. Also, a specific challenge may arise regarding the production of statistics for territories or regions under occupation or not directly controlled by the central government.

### 7.2.3 Reform orientations

It will be important for the Commission (Eurostat) to **further accelerate cooperation** with enlargement countries in priority domains, linked to accelerated integration, aiming at further increasing the statistics available in Eurobase (Eurostat's dissemination database), also considering the timing and sequencing of future enlargement. Regarding specifically Ukraine, there is need for support in rebuilding its statistics infrastructure currently heavily impacted by the war, also considering that the statistical office needs to use innovative technologies to compensate for the limited data collection during the past years and to re-establish its production capacities.

To support enlargement countries in preparing their national statistical systems, as part of the accession process, the Commission will assess the adherence of the acceding countries to the fundamental statistical principles enshrined in EU legislation and further set out in the European statistics Code of Practice. Such assessments will be based on a well-established ESS mechanism, through which strengths and areas for further improvement are identified and related action plans implemented.

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<sup>181</sup> Under the current European Statistical programme, currently a component of the Single Market programme, around 40 % of the budget is dedicated to grants mainly for developing national statistical production systems to innovate and keep pace with new demands in statistics.

## 7.3. Communicating about the EU

### 7.3.1. Impact of enlargement on the Commission corporate communications policies

Enlargement would bring new opportunities to communicate about the EU and the benefits of EU membership.

Several communication actions on the benefits of past enlargements have been rolled out in cooperation with the Commission Representations in the Member States, including national and local campaigns, notably on the occasion of the 20<sup>th</sup> anniversary of the 2004 enlargement and the 30<sup>th</sup> anniversary of the 1995 enlargement and the 40<sup>th</sup> anniversary of the 1986 enlargement. Similar communication actions on the 20<sup>th</sup> anniversary of the 2007 enlargement are under preparation.

Following and understanding developments in public opinion is key for successful public communications on enlargement. A dedicated special Eurobarometer survey on “Attitudes towards Enlargement”<sup>182</sup> was conducted in February-March 2025. The main findings are summarised below:

- A majority (56%) of EU respondents would be in favour of further enlargement of the EU, while 38% would not. In particular, young Europeans strongly support EU enlargement: around two-thirds of respondents aged 15 to 39 share the view that (potential) candidates should join the EU, once they meet the necessary conditions. The highest rates in favour are seen in Sweden (79%), Denmark (75%) and Lithuania (74%). However, opposition to further enlargement exceeds support in Czechia (50% not in favour vs 43% in favour), Austria (48% vs 45% in favour) and France (48% vs 43% in favour).
- A majority (56%) also believe their own country would benefit from future enlargement. The most widely recognised advantages include stronger EU influence in the world (37%), a larger market for EU businesses (37%), more work opportunities (31%) and more solidarity between countries (30%).
- When it comes to concerns about the potential future enlargement of the EU, 40% say uncontrolled migration, 39% mention corruption, organised crime & terrorism, 37% answer the cost to European taxpayers and 36% say a complicated decision-making at EU level.
- When asked what would be needed to ensure the success of future EU enlargement, 44% respond measures to ensure enlargement countries uphold the rule of law, fight corruption, and protect fundamental rights, 38% say a clear commitment from enlargement countries to implement reforms and meet EU standards, 37% mention strengthening the EU membership criteria to ensure that enlargement countries meet the necessary standards before joining.
- 47% of respondents say they would like to know more about the costs and benefits of enlargement, 40% would like to know how enlargement affects peace and stability in the European Union, 38% how enlargement affects quality of life in the European Union and 35% would like to get information about the enlargement countries.

In addition, the latest results of other relevant Eurobarometer surveys<sup>183</sup> show overall approval in future enlargement, both in current EU Member States and in enlargement countries, as follows:

- The latest Standard Eurobarometer shows that 53% of Europeans are in favour of enlargement of the EU to include other countries in future years.
- 72% of Europeans think that their country has benefited from being a member of the EU. Europeans mention two main benefits: protecting peace and strengthening security (40%) and improving co-operation between Member States (34%). More than a quarter of respondents say their country has benefited because of the EU's contribution to economic growth (28%) and the EU bringing new work opportunities (24%).

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<sup>182</sup> Special EB survey 564 “Attitudes towards Enlargement”, 2025.

<sup>183</sup> Standard Eurobarometer 103 – Spring 2025, Standard Eurobarometer 102 – Autumn 2024 and the EP's Winter survey 2025 – Parlemeter (EB 103.1).

- The percentages of people reckoning that their country has benefited from being a Member State are consistently higher in the Member States that joined in 2004 now than at the moment of accession 20 years ago. The same trend is observed over the past 20 years also in terms of the level of life satisfaction.
- 29% of European respondents think that the primary consequences of a further EU enlargement would be complicated decision-making at EU level and increased instability and insecurity, followed by economic opportunities due to an enlarged market (27%) and cultural diversity (26%).
- In all the enlargement countries except for Serbia, majorities (absolute or relative) think that their country's membership of the EU would be a good thing.

Enlargement-relevant questions are asked regularly in the standard Eurobarometer surveys, carried out twice a year; they cover both Member States and enlargement countries. The latest such survey 105 was published in May 2026 and the special Eurobarometer 564 on “Attitudes towards Enlargement” was published in September 2025.

These surveys provide valuable insights into the perception of enlargement in individual Member States and candidate/enlargement countries and inform the development of a mid- to long-term comprehensive communication strategy. The strategy encompasses intensive communication in the enlargement countries and tailored communication actions developed in cooperation with the Representations to address audience in the Member States. The implementation of such actions also relies on the Commission's local networks, notably the Europe Direct centres, the EU local councillors and others. Dedicated communication actions and campaigns will be rolled out in 2026 and aiming at informing citizens and fostering general awareness about the enlargement countries. As the prospect of the next enlargement becomes more concrete, communication efforts need to encompass current Member States to explain and ensure public acceptance of the process. In recent years, relevant activities have been rather focused on enlargement countries. There is a need for a more comprehensive and geographically balanced approach on communication regarding enlargement.

The enlargement countries have been the target of FIMI activities in recent years. The enlargement process will most likely trigger various attempts to interfere with or to impact the enlargement process and domestic audiences in the EU and will seek to divide societies. The Commission's action is aimed at supporting the enlargement countries' democratic resilience. EEAS Task Forces responsible for the Eastern Partnership countries and Western Balkans will continue close cooperation with civil society and media as well as other strategic communication activities in those regions, notably in close coordination with EU Delegations and CSDP Missions, where relevant.

Enlargement is expected to have rather small impacts on several communications related activities including transition of EU Delegations into Commission Representations, political reporting, media monitoring, citizens' engagement<sup>184</sup> and networks in Member States.

#### *Budgetary aspects*

Enlargement would affect the budgetary needs in the Commission in communicating about the EU with respect to:

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<sup>184</sup> The new Citizens' Engagement ecosystem in the Commission is built on proposals from the Conference on the Future of Europe and rests on three pillars (1) an interservice Citizen Engagement Group; (2) European Citizens' Panels or other citizens' engagement activities (corporate Guidebook); (3) a Citizens' Engagement Platform as part of the Have Your Say Portal; and (4) citizen-centered communication strategies. Only the online dimension covered in pillar (3) will not be affected. Regarding the enlargement countries, two elements should be considered: the less developed citizens' engagement ecosystem on one hand, and, at the same time, the willingness and enthusiasm in most enlargement countries in participating in such exchanges, as illustrated by the high interest of the Western Balkan countries to be associated to the Conference on the Future of Europe.

- Corporate communications activities, including tools for media monitoring, reporting, opinion polling and social media, which would need to be scaled up to cover additional Member States.
- Extension of the Commission's communication networks to all new Member States.
- Extending citizens' engagement activities to new Member States (e.g. progressively including citizens from new Member States in citizens' panels, foster democratic resilience and digital and media literacy, strengthen the links between funding and resilience building and access to free media and information, support fact-checkers in new Member States).
- Diversification of activities, in particular on monitoring and countering FIMI.

### 7.3.2 Policy gaps, delivery risks and reform orientations

Successful preparation for future enlargements relies on strategic communication on the benefits of enlargement in a targeted way – in the current Member States and in the enlargement countries. While the **Commission's corporate communication activities would remain largely unchanged in nature**, there might be a need for specific adaptations to current policies:

- In terms of **narrative and strategic communication**, there is an opportunity to present the benefits of enlargement for both current and future Member States (for instance through landmark achievements), as it is already being done partially as part of the Commission's on-going outreach and engagement strategy on enlargement while after enlargement it would be most useful to focus on awareness raising about EU policies and instruments and strengthening resilience, notably in the new Member States. Proactive communication, based on a careful analysis of public opinion measured e.g. through (special) Eurobarometer and sensitive points in individual countries, will be of the essence.
- **Targeted initiatives** can strengthen resilience to help counter FIMI, based on vulnerability assessment; awareness raising campaigns, and other relevant resilience building measures. Having a good understanding of the information environment can help anticipate and counter such FIMI actions both inside the EU and in the enlargement countries.
- The European Centre for Democratic Resilience, which brings together institutions, Member States as well as enlargement countries and potential candidates, could focus on relevant exchanges on capacity building and best practice and lessons learnt in **strengthening democratic resilience**, including resilience to FIMI as well as strategic communication related to enlargement. The communication related to the Centre should also emphasise the ongoing onboarding of enlargement partners as associated members of the Centre, enabling them to actively contribute to shaping the Centre's priorities and implementing its projects. This involvement will also benefit Member States, as candidate countries and potential candidate gain practical, first-hand experience in strengthening and safeguarding democratic institutions and processes.

## 7.4 Human Resources Policy

### 7.4.1 Impact of enlargement on the EU's human resources and infrastructure policy

Enlargement would overall **increase human resources needs in the EU institutions** and might also, in the current geopolitical context, have significant repercussions on the **internal security of the Commission**.

As regards **human resources, infrastructure and security**, in most activities such as career management, learning and development, ethics, workforce planning, change management and

greening, a scaling-up of delivery mechanisms will be required to accommodate enlargement. Geographical balance, recruitment and security are the policy areas likely to have a comparably higher impact from enlargement. On **geographical balance and recruitment**, adaptations will be needed to prepare for the integration of nationals from the new Member States (e.g. guiding rates, competitions). Further, as nationals of the new Member States need to be appropriately represented in the Commission, enlargement would also impact the guiding rates for nationals from existing Member States, whether they are underrepresented or appropriately represented and the resulting corrective actions. Additionally, the **internal security** policy will need to ensure readiness for a potentially more volatile security landscape.

Some adaptations and coordination between the Commission and new Member States will be needed on **remuneration**, where the Commission will have to ensure coordination with new Member States in the implementation of the legal framework applying to EU staff, notably on transfers of **pension** rights and tax status<sup>185</sup>.

#### *Budgetary aspects*

When it comes to the overall **human resources** needs in the Commission, the budgetary impact will be assessed in due course and will depend on the number of staff recruited and their contract type and function group. The financial impact would consist of remuneration and pensions and accommodating infrastructure in the broadest sense (including for example increased costs from European Schools). The need for the Commission to boost its security posture could have consequences in terms of investment needs in its capabilities in the areas of physical security, counterintelligence and counter-extremism, information and cybersecurity, among other things.

### **7.4.2 Policy gaps and delivery risks**

Overall, there are no gaps in the fundamental design of policies in view of enlargement. However, the Commission needs to take steps to prepare for enlargement, also ahead of accession.

The necessary legal basis needs to be in place and **recruitment and selection** of nationals from the new Member States needs to be organised. In relation to geographical balance, there would be the need to account for the impact on the guiding rates of existing and new Member States, on the adequacy of the measures in place to address imbalances and on the monitoring and reporting systems.

Further, there is a gap in the current **capacity in terms of buildings, logistics, schooling** (e.g. to account for possible new languages) and **childcare services** to accommodate the impact of

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<sup>185</sup> Concerning the need to ensure an appropriate level of coordination and implementation of the legal framework applying to EU staff, the following should be considered. As regards pensions, new Member States - when incorporating the EU *acquis* - should ensure that their legislation enables the transfer of pension rights from their national systems to the Pension Scheme of Officials and Other Servants of the European Union and vice versa. As regards taxes, the new Member States would become bound by the Protocol on Privileges and Immunities (PPI). This means, inter alia, that staff assigned there will be immune from national taxation on their EU remuneration without the need for diplomatic accreditation. The same would apply to pensioners. The implementation of the PPI is not straightforward, and bilateral exchanges may be needed to clarify some technicalities attached to it (e.g. fictive fiscal residence based on the latest residence before the start of the service, etc). Another issue that needs to be addressed is the access of EU staff (and related JSIS beneficiaries) posted in the new Member States to their healthcare systems (especially for Member States having direct schemes where medical care is provided without invoicing the beneficiary). The matter arises from the fact that EU staff benefits from their proper healthcare system under Article 72 of the Staff Regulations and does not fall under the coordination system of Regulation 883/2004. The new Member States need to ensure EU staff have full access to their healthcare system at the same rates as their residents and other EU citizens.

enlargement. This in turn may present a discrepancy with the current budgetary and office space reduction planning.

The EU institutions need to be prepared for potentially **heightened security threats** resulting from enlargement, in the context of the deteriorating geopolitical environment and the threats posed by Russia.

EU staff should be able to benefit from their **tax status** with regards to new Member States and to transfer pension rights to and from these new Member States. **Correction coefficients applying to the remuneration of staff posted in the new Member States and healthcare** are also areas where changes are needed to prepare for enlargement to ensure staff posted in new Member States are remunerated appropriately and JSIS beneficiaries can access the healthcare systems of new Member States.

### 7.4.3 Reform orientations

For HR, infrastructure and security, several steps will need to be taken, as done in latest rounds of enlargement. **No major changes in the approach compared to latest enlargement** rounds will be needed and **the most important adjustments will concern geographical balance**.

Preparations could include a Commission staff working document on the administrative preparations for enlargement (Roadmap for the accession of the new Member State), summarising areas where planning is needed to ensure a smooth running of the process (e.g. human resources, especially for the EU's language, legal and publication services, language training, physical infrastructure, ICT, communication etc). For example, for Croatia, such a document was adopted one year prior to the accession date. It would be important to organise **pre-enlargement open competitions** (+/- 1 year from the accession date) **and contract staff selection procedures** to select suitable talent from the acceding countries. The emphasis for recruitment in the latest preparations exercise in 2012 was put on language services, traditionally the most challenging area for integrating new Member States.

Further, specific documents are needed concerning the **recruitment of staff** from the new Member States (Commission Communications on the needs of additional posts following enlargement; and on the representation of the new Member State in the Commission to ensure geographical balance - establishment of recruitment targets, adopted one year ahead of the accession date in the case of Croatia).

In relation to **geographical balance**, there will be the need to define the guiding rates of the new Member States and those of the existing Member States will need to be recalculated. It would be particularly useful to analyse the short- and longer-term impacts of enlargements on the underrepresentation or adequate representation of each Member State. The existing and upcoming measures in support of geographical balance will need to be re-assessed accordingly, as well as possibly the current framework for reporting and monitoring geographical balance.

On **infrastructure**, appropriate preparations for enlargement could entail a planning of possible yearly staff increases of the Commission DGs and Services, triggering in turn a possible revision of its real estate policy. Depending on the magnitude of the increase, adaptation can take place through a mix of measures: decreasing the ratio of workstations per staff; reassigning DGs that need to accommodate more staff to larger buildings and adjusting accordingly the target of 275 000m<sup>2</sup> office space reduction by 2030; and reviewing meeting and interpretation facilities, including in the new conference centre.

Further, the Commission could adopt, as it has in the past, a Communication on the transformation of the European Union Delegation in the new Member State into a representative office.

The Commission, in its role both as an employer of the parents concerned, and as the main financial contributor of the European Schools, will work with the European Schools to ensure appropriate conditions for educating the children of staff joining the institutions from future Member States.

For the EU to fulfil its obligations to protect our staff, information and assets from security threats, strong partnerships will need to be established with the security authorities in the new Member States, including their capacity for sharing intelligence, conducting security vetting of staff and setting up the processes and channels for secure communications.

## 7.5 Anti-fraud policy

EU work on anti-fraud ensures the correct delivery of Union programmes and is linked to financial management and rule of law aspects (better governance, building trust in institutions and fraud prevention, among the other things). The improper use of EU funds and the evasion of the taxes, duties and levies that fund the EU budget directly harms European citizens and prejudices the European project. Moreover, the policy is intended to assist the authorities responsible for managing EU funds to understand fraud types, trends, threats and risks; and to protect the EU's financial interests by preventing fraud of all kinds through national anti-fraud policies.

### 7.5.1 Impact of enlargement on EU Anti-fraud policy

Enlargement could potentially result in a **rise in in illegal activities affecting the EU's financial interests, such as fraud cases** due to the significantly greater access of new Member States to EU funds compared to when they were enlargement countries. Currently, enlargement countries are required to report irregularities to the Commission as beneficiaries of pre-accession financial assistance (IPA III)<sup>186</sup>. On accession, the acceding countries will become Member States with much broader access to EU funds, triggering an increase in the number of national public authorities involved in management and control (including the reporting of fraud and irregularities) and in the number of cases to be reported. This will present challenges, especially in case of lack of systemic preparedness and training of the new beneficiaries of Union funding.

In the area of **customs**, a higher number of cases and new points of entry into the customs union can be expected. The bulk of the cases will continue to concern imports from China, regardless of the (new) entry point in the EU. The increased responsibility for the protection of the EU customs borders against fraud will also require more intense capacity building for the national customs authorities.

The new Member States will already have set up national **Anti-Fraud Coordination Services** (AFCOS) as required by the Regulation (EU, Euratom) No 883/2013 concerning investigations conducted by the OLAF as well as they will already have aligned with the Directive (EU) 2017/1371 on the fight against fraud to the Union's financial interests by means of criminal law ("PIF Directive"). The new Member States will have likely to adapt to the new funding schemes their anti-fraud networks (comprising all national bodies competent for the protection

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<sup>186</sup> Enlargement countries must report to the Commission any irregularities, including (suspected and established) fraud, that have been the subject of a primary administrative or judicial finding.

of the EU's financial interests) around the AFCOS, which liaise with OLAF and that would be involved in drafting National Anti-Fraud Strategies. The new Member States will become members of COCOLAF (Advisory Committee for the Coordination of Fraud Prevention) and hence benefit from enhanced anti-fraud support from OLAF and more frequent exchange of best practices with other Member States.

As mentioned above, given that the EPPO Regulation ceased to be a measure under enhanced cooperation and has become part of the *acquis*, new Member States will be required to participate in the EPPO. New Member States will thus have to adapt their national systems to the EPPO Regulation and will need to report to the EPPO any criminal conduct in respect of which the EPPO could exercise its competence. As a consequence, enlargement would result in more cases for the EPPO and will require adequate financial and human resources.

#### *Budgetary aspects*

The **Union Anti-Fraud Programme** (UAFP) provides financial support to the Member States and associated countries to implement anti-fraud measures to protect the Union's budget. Ukraine has been so far the only candidate country to join the UAFP (in 2024) and is benefiting mainly from the first component of the programme which provides Member States and associated countries with targeted assistance in achieving their obligations to protect the EU's financial interests. This component finances the purchase of specialised anti-fraud equipment and tools, specific trainings as well as targeted conferences and studies. Ukraine's association to the UAFP can contribute to its ongoing efforts to upgrade its national anti-fraud operational capacity.

With enlargement, it is likely that the demand for financial support to implement anti-fraud measures will increase. New Member States are likely to need financial support for setting up their national anti-fraud capacities, including digitalisation/IT development.

It is also expected that enlargement would create more pressure in terms of human resources available within the Commission to provide the necessary support. An increase in the number of Member States may affect resource needs to (1) assist Member States in developing/maintaining their anti-fraud capacity, (2) manage the potential increase in fraud linked to the significant increase in access to EU funds on accession and (3) to provide guidance to the new Member States on the application of the EPPO Regulation. The expected increase in the number of users of the control system may require the Commission to allocate sufficient resources to training and assisting these countries. Depending on the speed and scale of enlargement, the Commission might be confronted with an increasing number of anti-fraud strategies, far more elaborate than those linked to pre-accession, for which the Commission is required to provide guidance and support. Fraud risk-analysis activities would need to be calibrated towards the situation in the new Member States and their specificities. Increased amount of funds and reported irregularities will require additional technical developments to the IT tool enabling reporting (IMS).

In the context of the next MFF (2028-2034), OLAF will continue to finance anti-fraud activities thorough the upcoming "Single Market and Customs Programme", to the benefit of Member States and associated countries. The anti-fraud component of the new programme will fund specialised equipment and tools, training, IT platforms used for analysis and reporting (such as the Anti-Fraud Information System – AFIS and the Irregularity Management System – IMS), conferences and workshops.

In response to the growing funding demands received in recent years, the Commission has presented a proposal for a programme regulation that features a financial envelope for anti-fraud activities twice the size of the current allocation under the UAFP, amounting to EUR 363

million under the new programme. By expanding the available financial resources, the programme will enhance the capacity of both long-standing and more recently acceded Member States to prevent, detect, and combat fraud. This strengthened financial support will contribute to greater alignment of anti-fraud capabilities across the EU, improving overall preparedness and ensuring a more cohesive and effective response to emerging fraud risks throughout the EU.

### **7.5.2 Policy gaps and delivery risks**

Accession as such will not affect the EU anti-fraud policy. However, it will constitute a major and sudden increase in Union funding for any new Member State, including through previously unknown management modes and involving national administrations which may have not been involved in the management of pre-accession funds. New Member States may not be adequately prepared to manage and report possible fraud and irregularities on such scale and will also need to adapt their national systems to the EPPO Regulation.

### **7.5.3 Reform orientations**

Practical assistance to develop a solid anti-fraud framework and to correctly apply the EPPO Regulation within the new Member States is essential. For example, in the 2004 enlargement, specific programmes oriented at training and support for the acceding countries were set up (multi-country PHARE programme), to provide the adequate framework and resources to prepare national administrations. Similar support measures should be considered for the current accession process.

## **7.6 Digital government policies**

### **7.6.1. Impact of enlargement on EU digital government policies**

Enlargement would foster the digital government ecosystem in the EU by means of deeper cooperation between new Member States and existing ones, and with EU institutions, agencies and bodies, thus promoting the exchange of best practices, knowledge, and expertise. It could lead to the development of more robust digital governance frameworks, including regulations, standards and enforcement mechanisms.

By strengthening their digital capacities, enlargement countries can make significant progress in the development and delivery of digital public services. This, in turn, contributes to a more cohesive and interoperable digital government landscape across Europe. Enhanced capabilities in these countries not only support their alignment with EU standards but also expand the overall potential for seamless cross-border digital interactions, reinforcing the EU's objective of an interconnected and inclusive digital single market. At the same time, the accession of new Member States, who might be less prepared than the EU-27, may exacerbate the digital divide in the EU, when it comes to digital infrastructure and capacities as well as connectivity, hampering collaboration in terms of interoperability and cybersecurity, among other things.

In the EU-27, the Commission is promoting the alignment of new or existing National Interoperability Frameworks with the **European Interoperability Framework** <sup>187</sup>. Additionally, following the adoption of the Interoperable Europe Act, enlargement countries

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<sup>187</sup> Regulation (EU) 2024/903 of the European Parliament and of the Council of 13 March 2024 laying down measures for a high level of public sector interoperability across the Union (Interoperable Europe Act).

are invited to seek alignment with the Regulation's provisions (e.g., interoperability assessments, sharing and reuse) to further enhance interoperability in their country.

The Commission is also driving the exchange of best practice, knowledge and expertise amongst Member States and other countries through a range of innovative initiatives. These efforts are centred around three key pillars: comprehensive information sharing, knowledge dissemination, and collaborative learning. These include the Interoperable Europe Portal featuring multiple collections including best practices, case studies, and success stories from Member States and other countries, providing valuable insights for enlargement countries.

The Commission Communication on Enhancing the European Administrative Space - ComPAct - committed to help EU enlargement countries on their path to building better public administrations by providing opportunities for them to increase their involvement in peer exchange and learning. This includes the participation of enlargement countries in specific Technical Support Instrument projects as observers. The Public Administration Cooperation Exchange offers another opportunity for peer-to-peer exchange for Member State public administrations, which could inspire also enlargement countries. Finally, the PAG Toolbox offers over 250 innovative examples to help Member States and Enlargement countries design and implement public administration reforms.

Moreover, public webinars, workshops, and conferences are regularly hosted by the Commission, providing a platform for knowledge sharing, networking, and collaboration amongst Member States and enlargement countries. With regards to digital skills, the Interoperable Europe Academy has launched a comprehensive training programme, comprising online courses designed to equip participants with the necessary skills and expertise to tackle the challenges of interoperability.

Moreover, enlargement could influence other corporate IT policies of the Commission, such as the activities of CERT-EU, as it could lead to an expanded scope of cybersecurity measures and enhanced coordination to address a wider range of digital threats and challenges within an enlarged member base, comprising new bodies/agencies.

#### *Budgetary aspects*

In the context of the next MFF (2028-2034), and in view of the European Competitiveness Fund draft regulation – Digital Leadership window, future actions on interoperability for public administrations would be covered across the EU. As per the proposal, the programme may be open to the participation of enlargement countries and potential candidates. Enlargement countries may benefit from actions targeting the development of reusable interoperability assets, which would be easily accessible and would not require major adjustments. At the same time, for an effective implementation of the interoperability policy, participation of enlargement countries may entail budget adjustments.

### **7.6.2 Policy gaps, delivery risks and reform orientations**

Future enlargement could significantly impact these initiatives and the implementation and adequacy of the Interoperable Europe Act. As new Member States join, there will be an increased need for harmonisation and alignment of digital practices.

The Commission could consider assessing the need for possible further development of the initiatives stemming from and linked to the Interoperable Europe Act, to accommodate a broader diversity of digital landscapes and needs. Going forward, cooperation with enlargement countries will continue to be strengthened through their observer participation in

the Interoperable Europe Board, providing a platform to foster dialogue and share guidance on the interoperability of public sector networks and information systems.

## 7.7 Simplification and Implementation

Efficient implementation of EU rules is a prerequisite for a well-functioning Union and relies heavily on well-equipped and skilled public administrations. The European Commission is fully engaged to simplify and improve EU policies and laws<sup>188</sup>. It seeks to make rules clearer and easier to understand, remove burdens and ensure they can be better implemented with effective support provided. Simplification and efficient implementation are also key to making business easier and faster in Europe, strengthening European competitiveness as a result. The renewed push for simplification and implementation will not only contribute to a more efficient functioning of EU policies, but it will also make it easier, clearer and faster for the enlargement countries to transpose and effectively apply the EU rules.

As part of this renewed effort, the Commission aims to step up implementation support in two ways. First, to help Member States anticipate implementation challenges, the Commission will develop implementation strategies to guide the transposition of legislation<sup>189</sup>. Second, to ensure smooth application of EU rules, the Commission will continue providing enhanced support in improving the capacity of public administration across the EU in better law-making. Developing a professional and well-performing public administration together with sound public financial management is also one of the fundamentals for EU accession<sup>190</sup>.

Specific tools to facilitate implementation such as the Technical Support Instrument (TSI), including technical assistance and information exchange (TAIEX), have helped Member States design and implement growth enhancing, resilience building reforms, and simplify their laws. Similarly, TAIEX and Twinning have been created as part of external action financing to support administrative capacity building and incentivise reforms to prepare for accession. Since their creation in 1996, they have a proven track record in facilitating the previous enlargement rounds. This support, linked to EU priorities such as the green and digital transitions, has significantly contributed to building the necessary administrative capacity in the Member States to design and implement reforms and improve the law-making process. In addition, it has allowed for strengthening the collaboration and sharing of practices among Member States in the implementation of urgent reforms.

Since 2021, in line with an accelerated integration, enlargement countries have been offered the possibility to participate in TSI projects as ‘observers’, which provides opportunities for them to increase their involvement in peer exchange and learning and observing the work of Member States in addressing common challenges together. It also offers them the possibility to better understand that reforms and capacity building are a continuous effort even after accession to perform better and get more benefits from EU membership.

Although enlargement countries currently do not fully participate in the Instrument, they do receive support under TAIEX to build the required administrative capacity and legal administrative alignment in preparation for accession. On accession, enlargement countries would be able to fully benefit from instruments such as the TSI (or any potential similar tool). This would be very beneficial, considering that the issue of weak administrative capacity across all enlargement countries is well identified in many of the sectoral policy reviews.

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<sup>188</sup> COM (2025) 47.

<sup>189</sup> COM (2025) 47.

<sup>190</sup> COM (2023) 667.

Similarly, future external action financing should aim to continue supporting administrative capacity building and incentivise reforms to prepare for accession, to ensure that EU *acquis* is implemented in a good and simple way. It will be essential that administrative capacity building and implementation support before and after accession will be managed in a coherent, consistent and non-disruptive manner.