POSITION OF THE EUREGIONS4COHESION COALITION
ahead of the interinstitutional negotiations on the MFF 2028-2034

INVESTING IN REGIONS WITH COHESION POLICY FOR A MORE COMPETITIVE EUROPE

BRUSSELS, SEPTEMBER 2026

We, the Regions, are at the heart of Europe and the "face" of Europe on the ground. We have consistently demonstrated our capacity to invest resources in an effective and targeted way, translating European priorities into concrete results for citizens and territories, advancing the European integration project and contributing to Europe's competitiveness, cohesion, social fairness, resilience, green transition and strategic autonomy.

We, the **144 Regions of the *EUregions4cohesion*** alliance, already set out two clear positions: the first one in September 2024 ahead of the European Commission's proposal on the Multiannual Financial Framework (MFF), and the second one in November 2025, in response to the published proposals.

Since then, the **European Parliament** (EP) has adopted its "interim report" on the MFF in May 2026 and advanced the work on the specific cohesion policy regulations. We welcome the fact that the European Parliament has taken on board many of the priorities and proposals put forwards by the regions.

Under the **Cypriot Presidency**, the Council has adopted a partial general approach on the NRPP, ERDF/Interreg and ESF regulations, and taken note of a 26th of June Negotiating Box on the MFF including specific figures. The current **Irish Presidency** is fully engaged in driving the negotiations forward.

The negotiations have brought cohesion policy closer to a stronger territorial dimension. However, the proposed shift towards a more centralised and predominantly national delivery model for cohesion policy has not yet been sufficiently reversed. This choice creates new risks of territorial and political disparities, weakening the European project itself.

This **position paper** sets out the *EUregions4cohesion* coalition's vision on the modifications that should be taken up in the ongoing legislative negotiations for better alignment with the founding principles of subsidiarity, partnership and multilevel governance and to ensure a future framework that is genuinely tailored to regions and their ecosystems.

We are pleased that the European Parliament position stands for:

- a clear, distinct and ring-fenced European budget for cohesion policy;
- a European budget safeguarded to support rural development;
- the recognition of the urban dimension and the special role of urban areas as well as the focus on the specific needs of territories with structural disadvantages or located along the EU's external borders;
- the reinforcement of the role of regions and local authorities in the design, implementation, monitoring and evaluation of programmes;
- the strengthening of partnership and a strong territorial focus, with regions acting as managing authorities, including through direct negotiations with the EC.

Despite this positive framework from the EP, the EUregions4cohesion coalition calls on the co-legislators to pay a specific attention to the following challenges at stake:

1. An adequate budget for cohesion policy and for all regions

The new architecture of the MFF creates competition among different policies and puts into question clear and predictable funding for all regions.
Cohesion policy must remain a policy for all European regions, while ensuring that the support reflects their specific territorial challenges and development needs. Cohesion Policy plays a key role in enhancing convergence, connectivity and competitiveness fostering a more integrated and efficient Single Market.

<u>The Regions therefore request:</u>

- to ensure a **dedicated budget for cohesion policy** and for each category of regions not lower in real terms than the overall 2021-2027 allocation, excluding temporary crisis instruments and taking full account of inflation;
- a "**mandatory safety net**" with an allocation of resources to all categories of regions of at least 75% of the resources made available for these categories of regions under the 2021-2027 MFF, to be defined as soon as possible, and at the latest in parallel with the approval of the MFF regulation. Such a safety net shall be compatible with the minimum allocation for less developed regions laid down in the Regulation, that should be ring-fenced for cohesion policy interventions and not be used for other policy areas of the NRPP;
- the **same level of EU co-financing rates** as in the current funding period;
- the compliance of all MFF instruments, flexibility mechanisms, crisis-response measures and reprogramming decisions with a binding **'do no harm to cohesion'** principle. Resources of regional chapters must not be transferred to other policies, national chapters or centrally managed instruments without the prior formal agreement of the regions concerned.

2. Regional chapters and stronger safeguards on multilevel governance and partnership

National governments should ensure a multilevel governance model and effective cooperation with regional authorities, through structured and regular coordination mechanisms, enabling their meaningful involvement in the design, implementation, monitoring and evaluation of the NRPPs.

The Regions therefore request:

- **regional chapters**, as an integral part of the NRPPs, with at least one chapter per region, with dedicated financial allocation~~s~~, based on identified and evidence-based territorial needs and development potential, with the possibility to intervene on all specific objectives without restrictions. Regional authorities should have full responsibility for the planning, definition of investment priorities at regional level, selection of operations, financial management and implementation of their regional/territorial chapters;
- a regional chapter, its priorities or its allocation cannot be amended, merged, suspended or reallocated by the Member State without the prior formal agreement of the responsible regional authority and the European Commission;
- a **direct negotiation** of their regional/territorial chapters with the European Commission and the possibility to amend them autonomously, without being contingent on amendments to the national plans.

3. A simplified performance-based cohesion policy and less administrative burden

The proposed performance system with the related indicators needs to be adapted to cohesion policy as well as to regional specificities and the administrative burden should not be transferred from the European level to the national and regional ones. Contradicting the simplification objective, the proposed system risks creating a double layer of monitoring of milestones and targets, on the one side, and of tracking of expenditures and costs, on the other with unnecessary administrative burden for beneficiaries and authorities.

The Regions therefore request:

- relevant **qualitative milestones and quantitative targets**, their corresponding indicative completion dates, as well as the output indicators, to be set by the Managing Authority at regional level, based on identified territorial needs and reflecting regional specificities; in cases where such managing authority is not in place at regional level, this should be carried out jointly by regional authorities and the responsible Managing Authority;
- Regions to be responsible for submitting payment applications to the Commission, when acting as managing authorities;
- in case of achieved and verified milestones and targets, the **underlying costs should not be checked** by either the managing authorities or the national and European audit bodies;
- financial corrections, suspensions and recoveries related to a regional chapter should apply only where the failure is attributable to the authority responsible for that chapter and falls within its legal and operational control. No collective liability or cross-liability between the Member State and the regions, or among different regional chapters;
- a realistic deadline payment to the beneficiary to be set at **90 days** from the date of submission of the payment claim.

4. Policies, investments and reforms with local and regional authorities at the centre

The European Semester should have a genuine territorial dimension and nationally defined reforms should not affect regional chapters.

The Regions therefore request:

- a modernised European Semester by further **reinforcing the subnational dimension of country reports** and country-specific recommendations;
- payments related to a regional/territorial chapter should not be suspended, reduced or delayed as a consequence of the non-fulfilment of nationally defined reforms or investments falling outside the responsibility or control of the regional and local authority;
- a European Semester having a multiannual strategic approach.

5. Financial and managing rules need to ensure both accountability and realistic conditions for implementation

The Regions' direct experience on the ground offers a clear perspective on the needs for realistic and implementable financial and managing rules.

The Regions therefore request:

- maintaining the **N+3 decommitment system**;
- easing the transition between the two programming periods;
- increasing the amount of **pre-financing** from 10% to 13%;
- limiting the flexibility amount to 10%;
- increasing the amount of funds allocated to **technical assistance to at least 5%** both in the national plan and in the regional chapters;
- simplifying the framework concerning the implementation of financial instruments.

6. Coordination, consistency and synergies between cohesion and other Union programmes and instruments, especially on competitiveness and climate transition

Complementing cohesion policy, a broader regional involvement should be envisaged in the implementation of programmes directly managed by the European Commission, especially for the European Competitiveness Fund (ECF).
In reference to competitiveness, Smart specialisation has been recognized by both the European Parliament and the Council as a fundamental instrument for supporting research innovation and growth. This strategic approach is missing a clear connection with funding opportunities that could directly emerge from the ECF.

The Regions therefore request that:

- the legal and strategic role of **smart specialisation strategies** be continued in the future programming period and their implementation remains place-based and embedded in regional innovation ecosystems;
- stronger and more operational links are made with the European Competitiveness Fund, to facilitate access for the regional innovation ecosystem, in line with state aid rules.

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Açores

Balears

ADR Centru

Basilicata

ADR Nord-Est

Berlin

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Bolzano - South Tyrol

Andalucía

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Aragon

Brandenburg

Asturias

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