

Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL
establishing the European Fund for economic, social and territorial cohesion, agriculture and
rural, fisheries and maritime, prosperity and security for the period 2028-2034 and
amending Regulation (EU) 2023/955 and Regulation (EU, Euratom)2024/2509

{SWD(2025) 565 final}

Proposal for Amendments by Clean Air Action Group (Levegő Munkacsoport)

Amendment 1

Levegő Munkacsoport

<DocAmend>Proposal for a regulation</DocAmend>

<Article>Article 1– Paragraph 1 – Point (iv) </Article>

Text proposed by the Commission

(iv) instruments funded from the auctioning of allowances in the framework of the emission trading systems set up under Directive 2003/87/EC to address the social impacts of the introduction of an emission trading system for buildings and road transport on vulnerable households, vulnerable micro-enterprises and vulnerable transport users;

Amendment

(iv) instruments funded from the auctioning of allowances in the framework of the emission trading systems set up under Directive 2003/87/EC to address the social impacts of the introduction of an emission trading system for buildings and road transport on ~~vulnerable~~ households, ~~vulnerable~~ micro-enterprises and ~~vulnerable~~ transport users;

Justification: The social impacts of the new emissions trading system will burden low- and middle-income households. Therefore, there might be widespread discontent among the population. Moreover, many households might be tempted to turn to the burning of biomass, which will have a detrimental effect on the climate.

Amendment 2

Levegő Munkacsoport

Proposal for a regulation

Article 2– Paragraph 1 General objectives of the Fund

Text proposed by the Commission

1.With the overall aim of promoting economic, social and territorial cohesion, the sustainable development and competitiveness of the Union, its security and its preparedness, the Fund shall support the following general objectives:

Amendment

1.With the overall aim of promoting economic, social and territorial cohesion, the sustainable development and competitiveness of the Union, its security and its preparedness, the Fund shall support the following general objectives:

...
(b) to support quality employment, education and skills and social inclusion in accordance with Part Three, Title XI and Title XVIII of Part Three of the TFEU ('European Social Fund') and to contribute to a socially fair transition towards climate neutrality in accordance with Article 91(1), point (d), Article 192(1) and Article 194(2) TFEU;

...
(b) to support quality employment, education and skills and social inclusion in accordance with Part Three, Title XI and Title XVIII of Part Three of the TFEU ('European Social Fund') and to contribute to a socially fair transition towards climate neutrality in accordance with Article 91(1), point (d), Article 192(1) and Article 194(2) TFEU **while ensuring the protection, restoration, and enhancement of biodiversity, ecosystems, and the environment;**

Justification: Elevating biodiversity and environmental protection to a General Objective provides the Commission with the necessary legal leverage during the plan-approval stage. It ensures that 'Do No Significant Harm' is not just a passive box-ticking exercise, but a proactive barrier that prevents Member States from allocating EU funds to projects that achieve carbon neutrality at the expense of local ecosystems and biodiversity.

Amendment 3

Levego Munkacsoport

<DocAmend>Proposal for a regulation</DocAmend>

<Article>Article 3– Paragraph 1 (a) – Point (ix) </Article>

Text proposed by the Commission

(ix) support for tourism, including sustainability;

Amendment

(ix) ~~support for tourism, including~~
sustainability;

Justification: Stimulating this sector with public money would distort competition and have negative environmental impacts, among others, overtourism.

Amendment 4

Levego Munkacsoport

<DocAmend>Proposal for a regulation</DocAmend>

<Article>Article 3– Paragraph 1 (a) – Point (viii) </Article>

Text proposed by the Commission

(viii) enhancing Union transport infrastructure and contributing to the completion of the trans-European network for transport, in particular on the core and extended core network, while decarbonising

Amendment

(viii) enhancing Union transport infrastructure and contributing to the completion of the trans-European network for transport, in particular on the core and extended core network, while decarbonising

and improving connectivity, security and accessibility for remote, peripheral and less connected areas; support the green and digital transition of transport

and improving connectivity, security and accessibility for remote, peripheral and less connected areas; support the green and digital transition of transport; **Union financial support under this point shall not be allocated to road and aviation infrastructures.**

Justification: Further road and aviation transport infrastructure subsidies would be contrary to the EU's climate objectives of reducing GHG emissions effectively. Public funds must be shifted away from high-carbon modes to actively curb traffic volume while supporting the completion of the trans-European network for rail transport. The external costs of road transport and aviation are already enormous, which means that higher taxes should be levied on these transport modes and by no means, subsidised with public money.

Amendment 5

Levego Munkacsoport

<DocAmend>Proposal for a regulation</DocAmend>

<Article>Article 6– Paragraph 3 </Article>

Text proposed by the Commission

(3) The organisation and implementation of the partnership shall be carried out in accordance with the European code of conduct on partnership established by Commission Delegated Regulation (EU) No 240/2014.

Amendment

(3) The organisation and implementation of the partnership shall be carried out in accordance with the European code of conduct on partnership established by Commission Delegated Regulation (EU) No 240/2014. **In order to ensure the implementation, Member States shall, where relevant, allocate an appropriate percentage of Fund resources for capacity building of social partners and civil society organisations.**

Justification: In order for the partnership to be effective, there should be guarantees that the relevant experts and members of the partnership processes will be able to provide valuable insights, meaningful input, feedback, and expertise. Allocating financial means is an efficient way to cover the partners' participation costs and ensure they can provide unbiased expertise free from the influence of other actors in the process. The text of the amendment is taken from 2021 Common Provisions Regulation, which contained a stricter wording than the current proposal.

Amendment 6

Levego Munkacsoport

<DocAmend>Proposal for a regulation</DocAmend>

<Article>Article 7– Paragraph 2 </Article>

Text proposed by the Commission

(2) The Member States and the Commission shall take appropriate steps to prevent any discrimination based on gender, racial or ethnic origin, religion or belief, disability, age or sexual orientation during the preparation, implementation, monitoring, reporting and evaluation of the Plans. In particular, accessibility for persons with disabilities shall be taken into account throughout the preparation and implementation of the Plans.

Amendment

(2) The Member States and the Commission shall take appropriate steps to prevent any discrimination based on gender, racial or ethnic origin, religion or belief, **political or any other opinion**, disability, age or sexual orientation during the preparation, implementation, monitoring, reporting and evaluation of the Plans. In particular, accessibility for persons with disabilities shall be taken into account throughout the preparation and implementation of the Plans.

Justification: According to Article 21 of the Charter of Fundamental Rights of the European Union, when a Member State is implementing Union law, it should respect the fundamental rights, including the prohibition of discrimination on the grounds of political opinions. Indeed, in some Member States, such discriminatory practices have been noticed during various phases of the previous and current plans.

Amendment 7

Levego Munkacsoport

<DocAmend>Proposal for a regulation</DocAmend>

<Article>Article 7– Paragraph 4 </Article>

Text proposed by the Commission

4. Support from the Fund shall be additional to national public funding.

Amendment

4. Support from the Fund shall be additional to national public funding. **The Commission shall provide for this purpose a methodology to verify compliance with the principle of additionality at each stage of the plan's design, implementation and evaluation.**

Justification : While the principle of additionality is clearly stated, the regulation lacks a concrete, transparent methodology for monitoring and verifying compliance throughout the plan's lifecycle. To prevent EU funds from merely substituting national budgets, a methodology should be provided, specifying the baseline financial indicators Member States must report on annually to prove genuine additionality.

Amendment 8

Levego Munkacsoport

<DocAmend>Proposal for a regulation</DocAmend>

<Article>Article 8 – Paragraph 1 </Article>

Text proposed by the Commission

1. Member States shall put in place and maintain effective mechanisms to ensure compliance of the measures supported by their Plans and their implementation with the relevant provisions of the Charter of Fundamental Rights of the European Union throughout the implementation of the Fund ('Charter horizontal condition').

Amendment

1. Member States shall put in place and maintain effective mechanisms to ensure compliance of the measures supported by their Plans and their implementation with the relevant provisions of the Charter of Fundamental Rights of the European Union throughout the implementation of the Fund ('Charter horizontal condition'). **Member States shall unequivocally ensure the principle of non-regression. Any legal or institutional setback in the level of social rights or environmental protection shall be assessed by the Commission as a non-fulfillment of the Charter horizontal condition, initiating the formal non-compliance and fund suspension procedures provided for under this Regulation.**

Justification:

If a government reduces the level of social and environmental protection provided by existing legislation or institutional system, it should not be eligible for EU support. Namely, the aim of EU funding is to improve the social and environmental conditions of the Member States, and if a Member State takes measures that contradict these aims, then the sense of EU funding is put into question. Furthermore, such measures by the Member States might contradict the provisions of the Charter of Fundamental Rights of the European Union.

Amendment 9

Levego Munkacsoport

<DocAmend>Proposal for a regulation</DocAmend>

<Article>Article 8 – Paragraph 3 </Article>

Text proposed by the Commission

3. The Member State concerned may present its observations and eventual remedial measures, including changes to the NRP Plan, within two months following the notification of the assessment pursuant to paragraph 2.

Amendment

3. The Member State concerned **and its competent regional and local authorities affected by the measures** may present ~~its~~**their** observations and eventual remedial measures, including changes to the NRP Plan, within two months following the notification of the assessment pursuant to paragraph.

Justification : In order to ensure the meaningful involvement of regional and local authorities at all stages of the planning and implementation of NRPPs, there should be guarantees that they may express their

concerns considering their local stakes, in accordance with the subsidiarity principle and the partnership principle.

Amendment 10

Levego Munkacsoport

<DocAmend>Proposal for a regulation</DocAmend>
<Article>Article 8 – Paragraph 7 </Article>

7. The Commission shall reduce proportionately the Union financial contribution of the Member State as regards the specific measures concerned or, in respect of loan support, take any measure available under the loan agreement, where the decision referred to in paragraph 4 has not been repealed within one year of its adoption.

7. The Commission shall reduce proportionately the Union financial contribution of the Member State as regards the specific measures concerned or, in respect of loan support, take any measure available under the loan agreement, where the decision referred to in paragraph 4 has not been repealed within one year of its adoption.
The Commission shall also proportionally reduce the Union financial contribution to local and regional authorities.

Justification: In case of national level systemic breaches of rights, freedoms and principles of the Charter of Fundamental Rights, it is very likely that similar breaches exist at regional and local authorities, since the discrepancies in the national legislation affect them too. This will also provide an incentive for local and regional authorities to advocate for the prevention and elimination of these breaches.

Amendment 11

Levego Munkacsoport

<DocAmend>Proposal for a regulation</DocAmend>
<Article>Article 12 – Paragraph 1 </Article>

Text proposed by the Commission

1. At the initiative of the Commission, the Fund may support technical and administrative assistance for the implementation of the Plan and the Interreg Plan, such as preparatory, monitoring, control, audit and evaluation activities, corporate information technology systems and platforms, information and communication activities, including through the set-up of EU-wide networks of Member States' authorities and other relevant stakeholders, corporate communication on the political priorities of the Union, and all other technical and administrative assistance or staff-related expenses incurred by the Commission

Amendment

1. At the initiative of the Commission, the Fund may support technical and administrative assistance for the implementation of the Plan and the Interreg Plan, such as preparatory, monitoring, control, audit and evaluation activities, **including independent monitoring and oversight activities carried out by civil society organizations**, corporate information technology systems and platforms, information and communication activities, including through the set-up of EU-wide networks of Member States' authorities and other relevant stakeholders, corporate communication on the political priorities of the Union,

for the management of the Fund, and where appropriate with third countries.

and all other technical and administrative assistance or staff-related expenses incurred by the Commission for the management of the Fund, and where appropriate with third countries.

Justification: Including independent civil society organizations monitoring under the Commission's technical assistance is a highly practical mechanism to ensure transparency and robust oversight. Across the EU, civil society organizations are already performing this vital watchdog function. However, because their financing is currently volatile and heavily reliant on short-term, project-based grants, their capacity for long-term oversight is constantly vulnerable. To ensure the continuity and quality of this independent oversight, it is essential to utilize technical assistance to provide them with stable, predictable financial support for their related expenses. Grounding civil society monitoring directly in Article 12 provides the Commission with an independent, objective layer of verification, particularly vital for tracking environmental indicators, biodiversity protections, and Charter compliance, while fully honoring the partnership principle.

Amendment 12

Levego Munkacsoport

<DocAmend>Proposal for a regulation</DocAmend>
<Article>Article 22 – Paragraph 2 - Point b (I) </Article>

Text proposed by the Commission

I. in the context of the European Semester, in particular in the relevant country-specific recommendations addressed to the Member State, including those related to the European Pillar of Social Rights;

Amendment

I. in the context of the European Semester, **ensuring full alignment with and comprehensive coverage of** the relevant country-specific recommendations addressed to the Member State, **with priority given to the recommendations linked to the green transition, and** the European Pillar of Social Rights;

Justification: There should be binding obligations to comply with the provisions of the European Semester. This should not be flexible. It should be clearly stated that all challenges and priorities need to be addressed, especially considering the emergency to invest and implement a just transition and sustainable development.

Amendment 13

Levego Munkacsoport

<DocAmend>Proposal for a regulation</DocAmend>
<Article>Article 26 - Paragraph 3 </Article>

Text proposed by the Commission

3. The Facility may provide funding in any form in accordance with Regulation (EU, Euratom) 2024/2509. It may take the form of grants awarded directly to bodies under Article 70 of Regulation (EU, Euratom) 2024/2509. Grants implemented under direct management shall be awarded and managed in accordance with Title VIII of that Regulation. The Facility may also provide funding in the form of budgetary guarantees and financial instruments, including when combined with grants or with other forms of non-repayable support in blending operations of financial instruments within blending operations.

Amendment

3. The Facility may provide funding in any form in accordance with Regulation (EU, Euratom) 2024/2509. It may take the form of grants awarded directly to bodies under Article 70 of Regulation (EU, Euratom) 2024/2509. Grants implemented under direct management shall be awarded and managed in accordance with Title VIII of that Regulation. The Facility may also provide funding in the form of budgetary guarantees and financial instruments, including when combined with grants or with other forms of non-repayable support in blending operations of financial instruments within blending operations. **No non-repayable discretionary funding or discretionary budgetary guarantee shall be awarded to for-profit enterprises.**

Justification: Subsidising for-profit enterprises in practically all cases has led to undesirable market distortions. As practice has proven, in such cases, the enterprises are often competing for public money instead of improving their services. Such subsidies may even result in the bankruptcy of companies because they cannot compete with other companies that received public money. For example, the Hungarian Hotel Association criticised the EU funding of new hotel constructions, saying that they create unwanted competition to already existing hotels, which are struggling for survival. A French company went bankrupt because of unbearable competition against subsidised energy production companies (<https://environmentalpaper.org/2026/06/fibre-excellence-bioenergy-subsidies-have-pushed-the-largest-french-pulp-company-to-bankruptcy/>). According to a Hungarian study (in the book 20 év az Európai Unióban – Magyarország uniós tagságának közpolitikai mérlege”), The results of [EU] subsidies granted directly to companies ... for the period 2010-2021 were very disappointing – the subsidised firms grew more slowly than their non-subsidised counterparts and there were no positive effects in other areas either, be it exports, employment or efficiency gains. The conclusion was that the owners took out the EU funds allocated to these companies in the form of dividends in the following years.”

This amendment, naturally, is not relevant for public procurement.

Amendment 14

Levego Munkacsoport

<DocAmend>Proposal for a regulation</DocAmend>

<Article>Article 54– Paragraph 5 </Article>

Text proposed by the Commission

Amendment

(5)The monitoring committee shall meet at least once a year and shall review the implementation of the chapter or chapters of the NRP Plan under its responsibility, including all issues that affect the progress towards achieving their objectives.

(5) The monitoring committee shall meet at least ~~once~~ **twice** a year and shall review the implementation of the chapter or chapters of the NRP Plan under its responsibility, including all issues that affect the progress towards achieving their objectives.

Justification : To enhance transparency and effective oversight of the plans, there should be more than one review per year of the implementation of the NRP Plans. This will ensure early identification and swift correction of the potential issues of the implantation process, such as implementation delays and discriminatory processes.

Amendment 15

Levego Munkacsoport

<DocAmend>Proposal for a regulation</DocAmend>

<Article>Article 55 </Article>

Text proposed by the Commission

1. Each Member State shall determine in a public procedure and based on objective and transparent criteria, the composition and the size of the monitoring committee, ensuring a balanced representation of the relevant Member State authorities and intermediate bodies and of representatives of the partners referred to in Article 6 [partnership]. The number of such partners shall be equal or superior to members belonging to authorities or intermediate bodies.

Amendment

1. Each Member State shall determine in a public procedure and based on objective and transparent criteria, the composition and the size of the monitoring committee, ensuring a balanced representation of the relevant Member State authorities and intermediate bodies and of representatives of the partners referred to in Article 6 [partnership]. The number of such partners shall be **at least twice as large as the number of** ~~equal or superior to~~ members belonging to authorities or intermediate bodies.

Justification : The partnership principle implies safeguards regarding the monitoring committees. There shall be a balanced representation of the partners, which will ensure multi-level governance efficiency and enhance transparency and accountability of the resources' use during the plan's implementation and prevent law breaches. If the government representatives and partners close to the government have a majority, then the monitoring committees are very likely to always approve the position of the government.

Amendment 16

Levego Munkacsoport

Proposal for a regulation

<DocAmend>Proposal for a regulation</DocAmend>

<Article>Article 64 - Paragraph 1 </Article>

Text proposed by the Commission

1. The Member State shall, within six months of the adoption of the Council decision referred to in Article 23 [Commission proposal and Council implementing decision], ensure that a website is operational where information on support under this Regulation is available, covering the Plan's objectives, activities, available funding opportunities and achievements.

Amendment

1. The Member State shall [...] ~~ensure that a website is operational where information on support under this Regulation is available, covering the Plan's objectives, activities, available funding opportunities and achievements.~~ **ensure that the required information is systematically and directly fed into the European Single Access Point (ESAP) established under Regulation (EU) 2023/2859, creating a single, harmonized, and streamlined reporting channel that avoids duplication of regional and national structures.**

Justification : Using already existing databases will help reduce additional costs linked with information production and publication. These administrative tasks should be supported by the DG Budget of the European Commission.

Amendment 17

Levego Munkacsoport

<DocAmend>Proposal for a regulation</DocAmend>

<Article>Article 64 - Paragraph 4 </Article>

Text proposed by the Commission

4. The Commission shall publish the data as referred to in paragraph 2 of this Article on the centralised website referred to in Article 12 [Single Gateway] of the Regulation [Performance Regulation].

For the purposes of the first subparagraph, the Commission shall publish the share of the Union contribution in the amounts referred to in Article 63 [Data collection and recording]. The Union contribution shall be established by multiplying the amounts referred to in Article 63 [Data collection and recording] to the co-financing rate applicable to the associated Chapter of the Plan. Amounts in currency other than euro shall be converted to euro by using the monthly accounting exchange rate referred to in Article 19(3) of Regulation (EU, Euratom) 2024/2509.

Amendment

4. ~~The Commission shall publish the data as referred to in paragraph 2 of this Article on the centralised website referred to in Article 12 [Single Gateway] of the Regulation [Performance Regulation].~~

~~For the purposes of the first subparagraph, the Commission shall publish the share of the Union contribution in the amounts referred to in Article 63 [Data collection and recording]. The Union contribution shall be established by multiplying the amounts referred to in Article 63 [Data collection and recording] to the co-financing rate applicable to the associated Chapter of the Plan. Amounts in currency other than euro shall be converted to euro by using the monthly accounting exchange rate referred to in Article 19(3) of Regulation (EU, Euratom) 2024/2509.~~ **The Commission shall publish and maintain the centralized data directly within the ESAP framework. For the purposes of efficiency and**

administrative simplification, the ESAP shall serve as the unique Single Gateway, ensuring that regional and national reporting efforts are not duplicated

Justification : Using already existing databases will help reduce additional costs linked with information production and publication. These administrative tasks should be supported by the DG Budget of the European Commission.

Supported by:



Federal Ministry
for the Environment, Climate Action,
Nature Conservation and Nuclear Safety



European
Climate Initiative
EUKI

on the basis of a decision
by the German Bundestag

EUKI is a project financing instrument by the German Federal Ministry for the Environment, Climate Action, Nature Conservation and Nuclear Safety (BMUKN). The EUKI call for project ideas is implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH. It is the overarching goal of the EUKI to foster climate cooperation within the European Union (EU) in order to mitigate greenhouse gas emissions.



**Co-funded by
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