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Public consultation on the Performance of the EU budget

Fields marked with * are mandatory.	
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Introduction

The European budget is at the centre of the EU policy action. Over decades, it has helped improve the quality of life and livelihoods of people and regions across Europe and beyond.

The true value of the EU budget lies in the tangible impact it delivers on the ground. Through performance-based budgeting, which links the disbursement of EU funds to the results achieved, the EU ensures that every euro is spent effectively and efficiently to achieve its goals and objectives. This means that European citizens get better value for money. The performance dimension of the EU budget is key to ensuring maximum transparency and accountability, giving citizens a clear view of how their contributions are being used and the results achieved.

The current multiannual financial framework (MFF) — the EU's long-term budget — runs until the end of 2027. It supports the long- term objectives of sustainable and inclusive growth in the EU and the climate and digital transitions. In 2025, the Commission will put forth comprehensive proposals for the next multiannual financial framework.

Following the political guidelines of President von der Leyen for 2024-2029, the Commission will work for a more focused, simpler and more impactful European budget that fits our ambition. The next MFF will also need to be aligned with recent legal developments, including the 2024 Financial Regulation recast1 – which includes new requirements regarding gender equality, performance indicators and the principle of 'do no significant harm' to climate or environmental objectives.

This requires a careful assessment of what has worked well in the past and what could be improved in the future. The next EU budget will draw lessons from the current budget – notably in terms of simplicity and flexibility, speed and strategic focus.

The Commission is launching a series of public consultations to gather views from all interested parties. The decision to cluster issues serves to support the preparatory work and does not pre-empt the architecture of future programmes. This consultation focuses on the performance dimension of the EU budget, meaning: 1) the tools used to promote general priorities and principles across the EU budget (e.g. gender equality, digitalisation, climate and biodiversity, 'do no significant harm' to climate or environmental objectives), to ensure that EU spending is geared towards those objectives (also sometimes referred to as 'mainstreaming'); 2) the performance framework, including to monitor and report how effectively the EU budget is achieving its objectives.

This questionnaire consists of four parts:

Part 1 collects information about you. Part 2 contains questions related to the promotion of general EU priorities and principles. Part 3 contains questions related to the monitoring and reporting tools of the EU budget. Part 4 contains 2 closing questions.

It should take about 10 minutes to complete the survey. You can save your replies as draft and finish later. Please be concise for the questions that have a free text box for additional comments. You can upload a document stating your views at the end of the survey.

About you

Bulgarian

Croatian

Czech

*Language of my contribution

Company/business

	Danish
0	Dutch
•	English
0	Estonian
0	Finnish
0	French
0	German
0	Greek
0	Hungarian
	Irish
	Italian
	Latvian
	Lithuanian
	Maltese
0	Polish
0	Portuguese
0	Romanian
0	Slovak
0	Slovenian
0	Spanish
	Swedish
*I am	giving my contribution as
	Academic/research institution
•	Business association

Consumer organisation	
© EU citizen	
Environmental organisationNon-EU citizen	
Non-governmental organisation (NGO)	
Public authority	
Trade union	
Other	
*First name	
Felicia	
*Surname	
Covalciuc	
*Email (this won't be published)	
felicia.covalciuc@aecm.eu	
Which EU funds are you familiar with?	
250 character(s) maximum	
InvestEU, RRF, Cohesion funds, EAFRD	
*Organisation name	
255 character(s) maximum	
AECM - European Association of Guarantee Institutions	
*Organization size	
*Organisation size Micro (1 to 9 employees)	
Small (10 to 49 employees)	
Medium (50 to 249 employees)	
Large (250 or more)	

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

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*Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

	Afghanistan	0	Djibouti		Libya	Saint Martin
	Åland Islands		Dominica		Liechtenstein	Saint Pierre and
						Miquelon
	Albania	0	Dominican		Lithuania	Saint Vincent
			Republic			and the
						Grenadines
0	Algeria		Ecuador		Luxembourg	Samoa
	American Samoa		Egypt		Macau	San Marino
	Andorra		El Salvador		Madagascar	São Tomé and
						Príncipe
	Angola		Equatorial Guinea	a	Malawi	Saudi Arabia
	Anguilla		Eritrea		Malaysia	Senegal
	Antarctica		Estonia		Maldives	Serbia
	Antigua and		Eswatini		Mali	Seychelles
	Barbuda					
	Argentina		Ethiopia		Malta	Sierra Leone
	Armenia		Falkland Islands		Marshall Islands	Singapore
	Aruba		Faroe Islands		Martinique	Sint Maarten
	Australia		Fiji		Mauritania	Slovakia
	Austria		Finland		Mauritius	Slovenia
	Azerbaijan		France		Mayotte	Solomon Islands
	Bahamas		French Guiana		Mexico	Somalia
	Bahrain		French Polynesia		Micronesia	South Africa
	Bangladesh		French Southern		Moldova	South Georgia
			and Antarctic			and the South
			Lands			Sandwich
						Islands
	Barbados		Gabon		Monaco	South Korea
	Belarus		Georgia		Mongolia	South Sudan
•	Belgium		Germany		Montenegro	Spain
	Belize		Ghana		Montserrat	Sri Lanka

	Benin		Gibraltar	0	Morocco		Sudan
	Bermuda		Greece	0	Mozambique	0	Suriname
	Bhutan		Greenland	0	Myanmar/Burma	0	Svalbard and
							Jan Mayen
	Bolivia		Grenada	0	Namibia		Sweden
	Bonaire Saint		Guadeloupe	0	Nauru		Switzerland
	Eustatius and						
	Saba						
	Bosnia and		Guam	0	Nepal	0	Syria
	Herzegovina						
	Botswana		Guatemala	0	Netherlands	0	Taiwan
	Bouvet Island	0	Guernsey	0	New Caledonia	0	Tajikistan
	Brazil	0	Guinea	0	New Zealand	0	Tanzania
0	British Indian	0	Guinea-Bissau	0	Nicaragua		Thailand
	Ocean Territory						
	British Virgin		Guyana		Niger		The Gambia
	Islands						
	Brunei	0	Haiti	0	Nigeria	0	Timor-Leste
	Bulgaria	0	Heard Island and	0	Niue	0	Togo
			McDonald Islands	3			
0	Burkina Faso	0	Honduras	0	Norfolk Island	0	Tokelau
	Burundi	0	Hong Kong	0	Northern	0	Tonga
					Mariana Islands		
	Cambodia	0	Hungary	0	North Korea	0	Trinidad and
							Tobago
0	Cameroon	0	Iceland	0	North Macedonia	0	Tunisia
0	Canada	0	India	0	Norway	0	Türkiye
0	Cape Verde	0	Indonesia	0	Oman	0	Turkmenistan
	Cayman Islands	0	Iran	0	Pakistan		Turks and
							Caicos Islands
	Central African	0	Iraq		Palau		Tuvalu
	Republic						
	Chad		Ireland		Palestine		Uganda
	Chile		Isle of Man		Panama		Ukraine
	China		Israel				

		Papua New		United Arab
		Guinea		Emirates
Christmas Island	Italy	Paraguay		United Kingdom
Clipperton	Jamaica	Peru		United States
Cocos (Keeling)	Japan	Philippines		United States
Islands				Minor Outlying
				Islands
Colombia	Jersey	Pitcairn Islands		Uruguay
Comoros	Jordan	Poland		US Virgin Islands
Congo	Kazakhstan	Portugal		Uzbekistan
Cook Islands	Kenya	Puerto Rico		Vanuatu
Costa Rica	Kiribati	Qatar		Vatican City
Côte d'Ivoire	Kosovo	Réunion		Venezuela
Croatia	Kuwait	Romania		Vietnam
Cuba	Kyrgyzstan	Russia		Wallis and
				Futuna
Curaçao	Laos	Rwanda		Western Sahara
Cyprus	Latvia	Saint Barthélemy		Yemen
Czechia	Lebanon	Saint Helena		Zambia
		Ascension and		
		Tristan da Cunha	l	
Democratic	Lesotho	Saint Kitts and		Zimbabwe
Republic of the		Nevis		
Congo				
Denmark	Liberia	Saint Lucia		

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. Fo r the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

*Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the personal data protection provisions

Promotion of general EU priorities and principles

The EU budget currently supports a number of general EU priorities and principles, such as gender equality, digitalisation, climate action, biodiversity and contributions to the UN Sustainable Development Goals. How do you assess the effectiveness of each of those tools?

	Very effective	Effective	Moderately effective	Not effective	Don't' know/not applicable
Embedding policy priorities into the design of EU funds, for instance by defining specific objectives (e.g. gender equality).	0	•	•	•	0
Applying principles and rules to ensure that funded projects are aligned with such priorities and principles.	•	•	•	•	•
Establishing a strong performance framework to measure the results achieved through the EU budget (e.g. through indicators).	0	0	•	0	0
Using minimum spending targets either at the level of the entire EU budget or within specific EU funds.	0	•	0	0	0

why you think those tools have not been effective/very effective?	

If you replied 'moderately effective' or 'not effective', please give us more details on

The EU budget currently supports a number of general EU priorities and principles, such as gender equality, digitalisation, climate action, biodiversity and contributions to the UN Sustainable Development Goals. How effectively do you believe the EU budget promotes each of these general priorities?

	Very effective	Effective	Moderately effective	Not effective	Don't know/not applicable
Gender equality	0	0	0	0	•
Digitalisation	0	•	0	0	0
Climate action	0	•	0	0	0
Biodiversity	0	0	0	0	0
UN Sustainable Development Goals	0	0	0	0	•

The EU budget supports gender equality. For instance, by funding dedicated projects (e.g. encouraging women into the labour market, combatting gender segregation, promoting women's rights and empowerment), and by including this objective in the design of some EU funds (e.g. 'enabling condition' in the Common Provisions Regulation, or requirement under some EU funds for proposals to support gender equality or for beneficiaries to have Gender Action Plans). Moreover, the Commission developed a methodology to measure expenditure supporting gender equality in the 2021-2027 MFF, which assigns scores to interventions based on their objectives. It is estimated for the year 2024 that 11% of the EU budget is contributing to gender equality, while 73% has the potential to do so. How do you assess the way in which gender equality has been promoted across the EU budget so far?

- Very effective
- Effective
- Moderately effective
- Not effective
- Don't know/not applicable

Could you please give us more details on why? And which EU funds are you referring to?

500 character(s) maximum	
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n/a

The 2024 Financial Regulation requires that the EU budget is implemented taking into account the principle of gender equality, where feasible and appropriate in accordance with the relevant sector-specific rules. It also requires breaking down by gender the data collected, where appropriate. For the future, how do you think the EU budget could better support gender equality? Please indicate if you agree with the objectives below.

	Strongly agree	Agree	Neutral	Disagree	Strongly disagree	Don't know/not applicable
More consistency is needed in the way gender equality is embedded in the design of EU funds (e.g. in the form of specific objectives or conditions).	0	0	0	0	•	•
The EU budget should be used to incentivise gender-specific reforms in the Member States (e.g. by setting milestones and targets)	0	0	0	0	•	•
Respect and promotion of gender equality as part of the fundamental rights should be a precondition to EU funding.	0	0	0	0	0	•
Support from the EU budget should be monitored in a consistent way by means of gender-specific indicators.	0	0	0	0	0	•
Data collected on the implementation of the EU budget should be systematically disaggregated by gender, where appropriate and available.	0	0	0	0	©	•
Support should be provided to develop capacities of EU funds beneficiaries to mainstream gender equality in	0	0	0	0	0	•

	the implementation of their projects.
	there any other way in which the EU budget could better support gender equality
	n/a
m	ow do you assess the contribution that the principle of 'do no significant harm' has ade to ensuring that the current EU budget and relevant EU funds do not
ur	dermine climate and environment objectives? Very effective
	© Effective
	Moderately effective
	Not effective
	Don't know/not applicable
	you identify some of the following problems as challenges with the application the principle of 'do no significant harm'? Please select all that apply. Lack of clear guidance on how to implement the principle of 'do no significant harm' Lack of knowledge, skills or human capacity Lack of environmental data Disproportionate administrative burden Difficulties in monitoring and verification No significant challenge Other, please specify
	you have selected 'Disproportionate administrative burden': for whom? [select all at apply] For Member State authorities and bodies managing and implementing EU funds For beneficiaries of EU funding
	For implementing partners (such as promotional banks implementing budgetary guarantees)

For others

If you have selected 'Disproportionate administrative burden', please share with us any information and potential estimates (qualitative and/or quantitative) you may have about such administrative burden and costs.

One clear example of the disproportionate administrative burden associated with applying the DNSH principle is the variation in compliance requirements across financial instruments; for instance, meeting compliance standards is significantly more burdensome for guarantee instruments than for loans. Besides, each fund manager is required to develop specific expertise in applying DNSH, which not only increases the workload but also demands specialised knowledge that may not be readily available across all Managing Authorities.

Specify which EU funds you have experience with, in relation to the implementation of the DNSH principle:

InvestEU, RRF, Cohesion Funds

What would be your suggestions to help implementing the DNSH principle?

The DNSH principle is a challenge for the use of EU Funds. Its implementation varies across different programmes and funds, lacking coherence with approaches under the RRF, the InvestEU Programme and Cohesion Policy Funds. This inconsistency is concerning given that all these programmes derive the meaning of DNSH from the same legal basis, Article 17 of the Taxonomy Regulation. The differing approaches not only cause confusion regarding the applicable rules but also hinder the seamless combination of various funding instruments. Further, the differing methods of compliance with the DNSH criteria add unnecessary administrative complexity.

To address these issues, we strongly encourage the European Commission to:

•Harmonise and simplify the implementation of the DNSH principle. More specifically, at national level, there is a lack of consistency in how compliance with the DNSH criteria is demonstrated, and whether this requirement applies at the programme level or extends to individual projects. In the case of Cohesion Policy Funds, MSs can create their own methodologies to proof compliance, as opposed to RRF where the assessment is based on the Commission's pre-defined methodology. Regarding the implementation level, while DNSH compliance under Cohesion Policy is mandatory at the programme level, i.e. for the types of actions defined, the regulatory framework does not impose an obligation for project-level assessments of DNSH compatibility. However, MA have the discretion to voluntarily introduce specific DNSH-related conditions when establishing criteria for the selection of operations. This has created inconsistencies and differences across MAs and MSs. Furthermore, this uneven implementation raises the bar beyond merely complying with existing legislation, creating an increased administrative burden associated with applying the DNSH principle. To ensure this inconsistency is reduced, we advocate for a uniform application at the programme level. If the DNSH principle is to be extended to the project level, we recommend exempting projects below EUR 10 million, similar to the current practice under the InvestEU Programme. •Minimise the administrative burden for Managing Authorities by developing a single set of simple and practical DNSH guidelines. Instead of having 3 separate documents i.e. 'DNSH Technical Guidance for the RRF', 'Explanatory note on the Application of the DNSH principle under Cohesion Policy', as well as the InvestEU Sustainability Proofing Guidance' for the repayable support under InvestEU, this document should clearly explain how the measures included in EU funding instruments should comply with the principle. Having a common exclusion list applicable to the different EU funds could be a way to simplify the implementation of the DNSH assessment, reduce the administrative burden, and facilitate synergies across EU funds to support investments. However, this list should be restricted to activities that cannot make progress in their green transition, ensuring the principle of 'leave no one behind' is upheld. Additionally, it

should include exceptions to these exclusions, laying down clear conditions or criteria that need to be met for these exceptions to apply. This will guarantee that EU funding will not be withheld from companies that are working towards significant investments in green transitions.

- •Ease the reporting requirements for final recipients to ensure that SMEs, especially micro-enterprises, can access affordable finance in the future. Currently, non-listed SMEs do not have the obligation to report on their ESG data. The reality of the market shows, however, that SMEs' stakeholders (investors, banks, larger suppliers of a supply chain, etc.) are impacted by the ESG reporting requirements and are cascading these requirements to SMEs already today. A recent study by DG GROW reveals that demonstrating taxonomy alignment can cost micro-enterprises approximately EUR 22 500, and up to EUR 125 000 for SMEs, primarily due to the requirements for DNSH proofing. These costs are significant for many small and medium-sized enterprises, which may struggle to meet such reporting demands. Similarly, the EC should make sure that the DNSH does not create any ambiguity for financial intermediaries as in some Member States, EU financing programmes could be avoided in favour of less complex and less risky domestic funding opportunities.
- •Develop capacity building activities to support the implementation of the DNSH principle. As a relatively new principle, it can be interpreted differently by Member States, thereby creating confusions in its implementation. Capacity building is needed at national level to ensure there is uniform understanding of the principle among Managing Authorities and final beneficiaries and that national authorities have the right knowledge to apply it properly.

Performance framework including monitoring and reporting tools

The EU budget has encouraged a stronger focus on performance, for instance by making possible payments to beneficiaries conditional on the achievement of outputs and/or results, or by relying on strategic planning to ensure a stronger focus on results. How do you assess the attempts to strengthen the performance dimension of the EU budget so far?

- Very effective
- Effective
- Moderately effective
- Not effective
- Don't know/not applicable

The EU budget has a system to monitor the support provided for our priorities. It is made up of a set of tools, such as indicators, which are usually set for each EU fund. How do you assess the current monitoring system?

- Very effective
- Effective
- Moderately effective
- Not effective
- Don't know/not applicable

The EU budget uses indicators providing an indication of how each programme has performed. Those indicators could measure 'inputs' (e.g. amount of EU funds dedicated to supporting researchers), 'output' (e.g. number of researchers supported by a project), 'results' (e.g. number of patents thanks to EU funds) or 'impacts' (e.g. boosting EU competitiveness thanks to research projects financed through the EU budget). How do you assess those indicators?

	Very effective	Effective	Moderately effective	Not effective	Don't know/not applicable
Input indicators	©	0	0	0	•
Output indicators	0	0	0	0	•
Result indicators	0	0	0	0	•
Impact indicators	0	0	0	0	•

How do you assess reporting obligations when benefiting from an EU fund?

- Very effective
- Effective
- Moderately effective
- Not effective
- Don't know/not applicable

The Commission reports performance information on the EU budget through a number of reports (such as the Programme Performance Statements) and dashboards (such as the Cohesion Open Data Platform and the Recovery and Resilience Scoreboard). How do you assess the way in which the Commission reports information about the implementation of the EU budget?

- Very effective
- Effective
- Moderately effective
- Not effective
- Don't know/not applicable

For the future, would you support the objective of moving towards a simpler and more streamlined reporting system?

Yes

Don't know/not applicable					
The Commission manages websites that inform potential beneficiaries about funding opportunities and calls available under EU funds, such as the Funding and Tenders Portal and the EU Rural toolkit. How do you assess the way in which the Commission informs about funding opportunities? Very effective Effective Moderately effective Not effective Don't know/not applicable					
Would you support the objective of simplifying and streamlining the websites through which the Commission informs applicants about funding opportunities and calls available under EU funds? Yes No Don't know/not applicable					
Please share with us any other ideas about the future performance framework for					
the EU budget.					
500 character(s) maximum					
Closing questions					
If you wish to add further information — within the scope of this questionnaire — please feel free to do so here. (500 characters maximum)					
Feel free to attach any relevant documents to support your replies. Only files of the type pdf,txt,doc,docx,odt,rtf are allowed bcd381e0-af81-4b2e-83b4-ff349f5d4010/AECM-requests-for-future-funding-financing-instruments-MFF-2028-2034.pdf 521cd951-d033-4960-9015-1c38480ad134/AECM_reflections_on_the_future_of_Cohesion_Policy.pdf					

[◎] No

Contact

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