COM CPR draft – some key differences CoR draft opinion & EP draft opinion (ERRIN)

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CoR draft opinion Amendment	Reference	Topic	Difference to EP draft
2	Recital 2	Demographic and territorial handicaps	The EP draft doesn't mention regional handicaps, even though these have significant effects on education, social support structures, innovative capacity and regional competitiveness (see 7^{th} Cohesion report).
3	Recital 10	Appropriate geographical level	No references to regions and regional authorities in terms of their role in designing and implementing programmes. Unfortunate, as level closest to citizens and corresponds to multi-level governance, subsidiarity and the regional initiatives in R&I (regional innovation ecosystems, DIH, ESFRI etc.).
16	Art 8.1	Demographic challenges	Same issue as in CoR Amendment 2.
18	Art 11.1	Enabling conditions	The EP draft doesn't pick up on this issue. In order to limit the (currently vast) scope of the proposed enabling conditions and possible links to the reform support instrument, the CoR rapporteurs are proposing that enabling conditions are fine as long as they are linked to the programmes as part of Cohesion policy and can actually be influenced by regional authorities (instead of e.g. national tax law etc being designated an enabling condition).
21	Art 14	Performance Review	The CoR rapporteurs are in favour of a 7-year programming period, i.e. 5 years + 2 years' worth of indicative allocations (2026 & 2027) at the beginning of the programme, subject to a possible mid-term review, where appropriate, in mid-2025. The EP draft doesn't pick up on this issue to the same extent. CoR rapporteurs' aim is to strike the right balance between planning and investment certainty and the flexibility to react to changing circumstances during the 7-year funding period. Having a 5+2 system where only the first 5 years are allocated and the COM then decides what to hand out post-MTR would be equivalent to an enhanced central performance reserve and not suitable regional planning purposes.
27	Art 17.6	Financial allocation for the mid-term review	See issue above (CoR Amendment 21).

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49	Art. 84.2	Pre-financing	Pre-financing is important to get programmes and projects off the ground and to avoid as much investment time lag as possible at the beginning of the funding period. As projects get off the ground, significant frontloading of investment can also be necessary. This is why the CoR rapporteurs consider the COM's suggestion of 0,5% pre-financing largely inadequate. This also applies to a certain extent to the EP's suggestion of a staggered approach (2022 0,7%, 2023 1% … 2026 2%). The CoR rapporteurs instead propose 2% each year to boost programme implementation.
52	Art 99.1	N+3	The EP draft doesn't pick up on this issue. The COM is suggesting n+2 for final payment applications to wrap up programmes, instead of the n+3 which is the current practice. While it may suit the COM to wrap this up faster, this would cause chaos in the transition from the current to the next funding period and increase pressure on managing authorities already struggling to implement the programmes and deal with audits etc. Increased speed could also lead to increased mistakes. The CoR rapporteurs therefore propose to stick with n+3.
53	Art. 103.2	Regional safety net	The EP draft doesn't pick up on this issue. As it currently stands, a combination of an overall budget decrease for the MFF in real terms, a decrease Cohesion policy's part of the MFF, shifts in the categories of regions and planned decreases in the cofinancing rates mean that regional budgets will be pummeled on several fronts, undermining the progress achieved over the last years/decades. This is particularly problematic given the results of the 7th Cohesion report (middle-income trap, lagging and peripheral regions, innovation gap etc.). The CoR rapporteurs are thus proposing to enshrine a regional safety net in the next CPR to ensure that the minimum overall allocation from the funds for each individual region, are equal to at least 76% of the current allocations (2014-2020). This is to ensure that the progress made so far can be continued and that regions don't move to a lower development trajectory due to flagging investment.