

## 2028-2034 MFF: Reinforcing competitiveness in the EU

This briefing provides an initial analysis of the strengths and weaknesses of the European Commission's impact assessment accompanying three multiannual financial framework proposals.<sup>1</sup> The proposals were adopted on 16 July 2025 and referred to the European Parliament's Committee on Industry, Research and Energy (ITRE).

### KEY FINDINGS

The impact assessment (IA) acknowledges a deviation from the scope and the depth of analysis of standard IAs as defined in the Better Regulation Guidelines (BRG) and Toolbox by reference to Tool #9 (special case of preparing a new multiannual financial framework). While the Regulatory Scrutiny Board (RSB) acknowledged the applicability of Tool #9, it concluded that the draft IA report contained significant shortcomings spread across almost all sections. It appears that the recommendations of the RSB were only partially taken into account in the final IA.

The IA, which relies on several data sources, provides a comprehensive description of the existing situation. The problem definition appears to rely on evidence from various data sources, including interim and ex-post evaluations of EU programmes. However, relevant elements of the evaluation's conclusions could have been stated more consistently throughout the IA. The description of the problems and their drivers could have been more structured and clearer.

The IA presents three options in addition to the baseline scenario. The options are only partially linked to the problems, the problem drivers and the objectives, against the requirement by the BRG. It is questionable whether they all present fully realistic alternatives to the baseline. The IA presents the core elements of each option only briefly and does not clearly describe how they will contribute to reaching the objectives of the initiatives. When comparing and scoring the options against the BRG criteria of effectiveness, efficiency and coherence, the scoring method could have been further clarified. Proportionality is not addressed in the IA.

The IA assesses the economic, social and environmental impacts of the options. The analysis encompasses both qualitative and quantitative components. However, the IA openly mentions the limitations constraining the completeness and consistency of the evidence base.

The proposals appear to be coherent with the preferred policy option identified in the IA.



## Background

On 16 July 2025, the European Commission adopted the first package of proposals for the next seven-year EU budget, the multiannual financial framework (MFF) for 2028-2034. The European Competitiveness Fund (ECF) [proposal](#) is part of this package and envisages bringing together 14 individual funding instruments<sup>2</sup> from the current MFF in one framework.<sup>3</sup> It should provide investment capacity to reinforce the EU's competitiveness in technologies and strategic sectors critical to competitiveness. Simplification, financing, and better coordination are the primary focus of the ECF. The [impact assessment](#) (IA) also accompanies the [proposal](#) for a self-standing EU framework programme for research and innovation 2028-2034 (Horizon Europe) and the [proposal](#) to implement Horizon Europe and the research and innovation parts of the ECF.<sup>4</sup>

The Commission has highlighted the need to enhance the competitiveness of the EU in several policy documents.<sup>5</sup> In her political guidelines, European Commission President Ursula von der Leyen announced a new European Competitiveness Fund as part of the proposal for a new MFF. The proposal was included in the 2025 Commission [work programme](#).

The IA refers to the Better Regulation Toolbox, specifically [Tool #9](#), which states that 'the special case of preparing a new multiannual financial framework is a unique process requiring a specific approach as regards scope and depth of analysis'.

## Problem definition

The IA starts by outlining the political and legal context of the initiatives. It states that 'the EU is currently falling behind in multiple areas, including technological development, research and innovation performance, market dynamism and industrial capacity' (IA, p. 10). The existing productivity gap makes the EU less competitive than other major economies. At the same time, the existing EU funding architecture is complex and is the major factor hindering the impact of the EU budget (IA, p. 9). The IA provides a definition of European competitiveness by referring to the Commission's Competitiveness Compass [communication](#) (IA, p. 7).

The IA defines **five problems**, caused by **eight problem drivers** resulting from market or regulatory failures (IA, pp. 10-26). The **five problems** (P1-P5) are:

- P1:** suboptimal support along the investment journey, from fundamental research, to applied research through scale-up, to industrial deployment, to manufacturing;
- P2:** a complex and uncoordinated funding landscape (different existing frameworks, lack of cohesion between funding programmes);
- P3:** an innovation gap (underinvestment in research and innovation in the EU, especially of the private sector; fragmented investment in strategic technologies and sectors);
- P4:** a challenging geopolitical situation, strategic dependencies (e.g. critical materials, technologies, industrial components), and security and resilience issues in the EU;
- P5:** high investment needs for delivering on EU priorities, including for decarbonisation, digital transition, resilience and security.

The IA identifies the following underlying **problem drivers**:

- Driver 1:** fragmented support through the investment journey (P1);
- Driver 2:** insufficient leverage of private investment (P1);
- Driver 3:** complexity to access, mobilise and implement EU funding for beneficiaries (P2);

**Driver 4:** inefficient structure and coordination mechanisms creating overlaps and reducing complementarities (P2);

**Driver 5:** insufficient flexibility of funding instruments (P2);

**Driver 6:** capacity gaps (labour and skills shortage, infrastructure, R&I divide) (P3);

**Driver 7:** weak translation of research results into marketable outputs (P3, P4);

**Driver 8:** low and fragmented investment in strategic technologies and sectors (e.g. clean tech, cross-border infrastructure, defence, digital, biotech) (P3, P4, P5).

The IA provides a comprehensive description of the existing situation and assesses the likelihood of the problems persisting without EU action. The problem definition appears to rely on evidence from various data sources, including desk research,<sup>6</sup> stakeholder input and targeted examples of relevant interim and ex-post evaluations of EU programmes. In general, they are well referenced. However, the relevant elements of the evaluation's conclusions could have been stated more consistently throughout the description of the problem definition.

With the help of a problem tree, the IA illustrates the drivers behind the problems and the general and specific objectives to solve them (IA, p. 30). The description of the problems and their drivers could have been more structured and clearer (e.g. P1 and problem driver 1 seem to be identical). The problem's consequences can be deduced from the text. However, they could have been discussed in more detail and added to the problem tree.

The problem definition does not analyse consistently how the problems, drivers and consequences affect the stakeholder groups, as advised by the BRG. In addition, the IA does not discuss whether all problems and drivers are equally relevant. However, references to stakeholder input and feedback from the Commission's consultation activities and examples in the description of the problem drivers compensate for these weaknesses to a certain extent.

## Subsidiarity/proportionality

The IA includes a section on subsidiarity (IA, pp. 27-29), where it describes the legal basis and explains the necessity and added value of EU action. The IA does not discuss proportionality.

The proposals rely on a number of separate legal bases. The IA's main text mentions [Article 173](#) (Industry) of the Treaty on the Functioning of the European Union (TFEU). Article 173(1) TFEU determines that 'the Union and the Member States shall ensure that the conditions necessary for the competitiveness of the Union's industry exist'. The IA mentions [Article 182\(1\) TFEU](#), which requires a multiannual framework programme to implement the activities set out in [Article 180 TFEU](#) (e.g. in the areas of research, technological development and demonstration programmes). Details of the legal bases of the sectoral policies within the scope of the proposals are provided in a separate annex (IA, Annex 8).

According to the IA, EU action is necessary to regain competitiveness by pooling resources at EU level to 'maximise the impact and added value of investment on the ground' and to 'support the type and scale of projects that would otherwise not be possible if Member States acted alone' (IA, p. 27). The IA sees added value in EU action to fund enhanced collaboration across stakeholders and borders. EU funding would address market failures and suboptimal investment conditions by mitigating investment risks. EU action would contribute to limiting duplication and inefficiencies caused by financing overlapping projects conducted in several countries (IA, p. 28).

The IA does not include a subsidiarity grid, as recommended by the [Task Force](#) on subsidiarity, proportionality and 'doing less more efficiently' (Better Regulation Toolbox, [Tool #5](#)). The deadline for the submission of [reasoned opinions](#) by national parliaments on the grounds of subsidiarity is 13 November 2025. No reasoned opinions had been submitted by the time of writing.

## Objectives of the initiative

According to the IA, the two **general objectives** (IA, p. 29) of the initiative are

- to establish a single investment capacity to support European competitiveness in strategic technologies and sectors, including disruptive innovation, decarbonisation, and resilience, through a more seamless investment journey from fundamental research, to applied research, to deployment and manufacturing; and
- to leverage the funding tools of the EU budget to unlock private, institutional and national investment in support of strategic technologies and sectors, including for research and innovation, in the EU.

According to the BRG, general objectives should be Treaty-based, and general and specific objectives should be clearly distinct. In this case, however, the general objectives seem to be partially overlapping with the following three **specific objectives**, defined in relation to the five identified problems:

- promote public and private investments throughout the whole investment journey, notably research and innovation (R&I), and better leverage the de-risking potential of the EU budget to maximise its EU added value;
- facilitate access to funding from EU programmes through user-centric, faster, simplified and harmonised procedures and improve coherence among EU instruments and with Member States' investments;
- steer and focus investments towards EU strategic sectors and technologies, including underlying value chains, critical infrastructures, capabilities and skills, and in support of decarbonisation, security and resilience.

The IA does not specifically set out **operational objectives** which define deliverables of specific policy actions after identifying the preferred option as envisaged by the BRG. The IA refers to the performance framework for the post-2027 budget without presenting specific indicators relevant to the objectives in the IA's section on monitoring and evaluation (see section on 'Monitoring and evaluation' below). This lack of specificity may weaken the measurability of the objectives. This weakness notwithstanding, the other BRG's S.M.A.R.T criteria, according to which objectives should be specific, measurable, achievable, relevant and time-bound, seem to be fulfilled (IA, p. 29).

According to the BRG, an IA shall include an assessment of the impacts on the relevant United Nations **Sustainable Development Goals** ([SDGs](#)). However, the present IA does not illustrate how the objectives contribute to the relevant SDGs.

## Range of options considered

In addition to the baseline (i.e. continuation of the current MFF with the same funding programmes within the scope of this IA), the IA presents **three policy options**, as shown in Table 1. The IA describes an option discarded at an early stage (partial consolidation of existing programmes into a small number of sectoral programmes) and it is transparent about the reasons for discarding it. Such

an option 'would not sufficiently improve flexibility to respond to emerging needs across the EU budget and would miss a number of the benefits put forward by the European Competitiveness Fund' (IA, p. 32).

The presented options are only partially linked to the problems, problem drivers and objectives (see section above), against the requirement by the BRG. For example, option A does not address problem drivers 1, 2 and 3. Therefore, problem 1 is not addressed. Option B does not fully address problem driver 3. Overall, it is questionable whether all options present fully realistic alternatives to the baseline as requested by the BRG and Toolbox ([Tool #16](#)). This is especially the case for option A. The IA presents the core elements of each option (predominantly funding architecture) only briefly in the main text (IA, pp. 30–32) and does not clearly describe how they will contribute to achieving the initiatives' objectives.

Table 1 – Policy options

Policy options	Description of the policy options
<b>PO A</b>	<b>Business-as-usual-plus: light coordination:</b> The funding landscape for competitiveness would continue to be divided across 14 programmes with their own individual rulebooks (including different funding rates, eligibility rules, application criteria). The Commission would make an effort to foster coordination across the programmes to improve horizontal consistency across funds and to help projects benefit from cumulative funding under several programmes.
<b>PO B</b>	<b>Enhanced coordination between existing programmes and a common rulebook:</b> This option would harmonise certain rules across the programmes (including a common rulebook), such as aligning the definition of objectives, strands and pillars, as well as ensuring consistency across the implementing tools and horizontal legal provisions across programmes (e.g. rules on third-country participation, monitoring and reporting, audits, evaluation procedures, funding rates).
<b>PO C</b>	<b>Consolidation of programmes in a new European Competitiveness Fund:</b> This option would create a single investment capacity and enable a stronger strategic steer prioritising policy rather than programmes. The European Competitiveness Fund would be structured along a small number of policy windows reflecting strategic priorities crucial to EU competitiveness and resilience. It would be informed by a steering mechanism across the entire MFF, of which the Competitiveness Coordination Tool will form part, to align funding and priorities.  Under this option, the budgetary guarantee and financial instruments would become available to all the policy windows, making them usable across areas of funding under a single fund. Synergies with other programmes will also be ensured, thanks to a more integrated approach at strategic level and at operational level. The integrated structure would also support cross-cutting activities and enable synergies with other structural parts of the MFF.

Source: IA, pp. 30–32. The preferred option is indicated in blue.

## Assessment of impacts

In accordance with the requirements of the BRG, the IA assesses the economic, social and environmental impacts of the options (IA, pp. 32–42). However, the IA states that 'given that the architecture of the new MFF will be significantly different from the current structure, assumptions on the budget of each programme would be unreliable at this stage. Therefore, the impact

assessment does not include sectoral funding scenarios.' (IA, p. 10). The IA also refers to [Tool #9](#) of the Better Regulation Toolbox, highlighting the special case of preparing a new multiannual financial framework, which requires a specific approach as regards scope and depth of analysis. Quantification is limited and a more detailed assessment of costs and benefits can only be found in the [supporting study](#) for the IA. The IA uses modelling to analyse the policy intervention's impacts (see section on 'Supporting data and analytical methods used' below).

In the qualitative and partially quantitative assessment of **economic impacts**, the IA provides a brief description of the impacts associated with each option (IA, pp. 32–42). The section within the IA that focuses on economic impacts could have been clearer and more structured, particularly regarding estimates of administrative costs and expected benefits for businesses and public administrations.

According to the IA, option A will have similar economic impacts compared to the baseline scenario. Option B would have a higher return on investment over a 15-year period (15-year gross domestic product (GDP) multiplier).<sup>7</sup> The total benefit of the investment per euro spent would be 1.51 % higher than for option A. For option C, this would amount to 15.74 % higher than option A. Option B envisages improved coordination between the programmes and a common rulebook. According to the IA, this would bring benefits to applicants and beneficiaries in terms of reduced costs of preparing the proposal and the time-to-inform (i.e. the duration between closure of a call and formal communication of the outcome to applicants) and time-to-grant (i.e. the duration between call outcome and the signing of the grant agreement). The proposal's preparation costs would decrease by 5 % compared to the baseline (10 % for option C compared to the baseline) depending on the complexity of a programme. The 'time-to-inform' and the overall 'time-to-grant' is expected to be reduced by 5–10 days (or up to 10–15 days for option C). However, the IA states that 'due to the low extent of quantitative evidence available, the estimates are of a high level of uncertainty' (IA, p. 37).<sup>8</sup> For option B, the IA expects (not quantified) adjustment costs to be moderate (short-term adjustment costs for the introduction of a single rulebook; modifying operational procedures; requiring applicants to adjust to new rules). For option C, higher adjustment costs (i.e. transition to a single, integrated fund) for applicants and beneficiaries would materialise than for option B. However, the IA states that 'while initial adaptation to the new fund would be needed, beneficiaries would only need to undertake this learning process once' (IA, p. 40). The IA expects an increase in EU exports because of a larger volume of investments (option B: 30.48 % higher compared to option A; option C: 57.53 % higher compared to option A).

The IA qualitatively assesses the **social impacts** of the following aspects for each option: employment; skills, education and training; health; resilience, technological sovereignty, economic security, security of supply. Option A is expected to have minimal impacts compared to the baseline scenario. Option B and option C would increase the volume of investment, which would have positive effects on employment. Option B would strengthen coherence in skills development in strategic sectors, such as artificial intelligence (AI), cybersecurity and green technologies. Option C would contribute to promoting targeted investments in re-skilling and up-skilling and improving synergies among education, research and business. Options B and C would foster a streamlined and flexible funding mechanism to respond better and faster to unforeseen health crises. Both options would enhance coordination in decision-making with a positive impact on fostering resilience, technological sovereignty and economic security.

The IA qualitatively analyses the **environmental impacts** of the options, focusing in particular on potential positive impacts through prioritisation of research and development for decarbonisation

(e.g. clean technology) and on climate, as envisaged in option C. According to the IA, the expected environmental impacts of options A and B are similar to those of the baseline.

Regarding **territorial impacts**, the IA expects the positive effects of option C to 'unlock significant economic growth in regions with strategic advantages, driving innovation, development, and overall productivity' (IA, p. 42). However, it is not clear what impacts the IA expects there to be on territorial cohesion and how synergies with other parts of the post-2027 MFF focused on national and regional funding will be achieved.

When comparing the options, which is mainly done in a qualitative way, the IA considers their **effectiveness, efficiency and coherence**. To facilitate the assessment of the options against these criteria, the IA presents all options in summary tables showing how they score. However, the scoring system is not explained in the IA, but only in the supporting study. The score ranges from '+' to '+++', indicating the extent of an improvement compared to the baseline.

In terms of **effectiveness**, Option A would bring limited improvements (with remaining fragmented financial instruments and a lack of integrated tools). Option B is expected to bring moderate improvements (alignment of objectives and governance under a common rulebook). Option C scores highest and is expected to significantly enhance investment support (integrated framework, unified governance, simplified funding). When assessing **efficiency**, quantification of costs and benefits is limited. Option A would bring limited efficiency gains (and administrative burdens would still exist). Option B is expected to bring moderate gains (standardisation, reduced costs, easing applications). Option C scores highest and would bring significant gains (a single and integrated fund with streamlined processes). In the assessment of **coherence**, option A would bring limited improvements (unaddressed fragmentation). Option B would offer moderate improvements (standardised rules, fragmented governance would remain). Option C scores highest and would bring significant enhancement (consolidated funding, reduced duplication).

After comparing the options, the IA concludes that **option C is the preferred option**.

### SMEs/Competitiveness

Given the high relevance of this initiative for small and medium-sized enterprises (SMEs) (see [SME filter](#)) the IA contains a four-step SME test (IA, Annex 6), as required by the BRG and Toolbox ([Tool #23](#)). It identifies the directly affected SMEs and estimates their number at approximately one million. In addition, the IA estimates the number of employees in these directly affected SMEs at 3.5 million (IA, pp. 83–84). The IA states that 'since the budget allocation has not yet been determined and falls outside of the scope of this IA, it is currently impossible to specify which sectors will be most affected' (IA, p. 83). Input from SMEs was gathered through a public consultation (with contributions from over 100 SMEs and SME associations) and in a plenary meeting of the [Industrial Forum](#) specifically dedicated to the present initiatives. The IA expects costs related to adjusting to the new rules of the preferred option. SMEs are expected to benefit from easier and faster access to funding and streamlined and unified processes under one funding tool. However, the expected costs and benefits for SMEs are not quantified in the IA. The SME test lists measures to mitigate the costs without going into much detail (e.g. single-entry application portal, simplified rules, streamlined advisory bodies).

The IA contains a compulsory annex on the **competitiveness check** (IA, Annex 5) which analyses the impacts of the preferred option on competitiveness. According to the IA, the initiatives would improve cost and price competitiveness (e.g. reduced administrative complexity, harmonised

procedures, lower participation costs). The expected adjustment costs would be one-off costs and the new funding structure would offer a predictable and cost-efficient landscape (IA, p. 81). On international competitiveness, the IA expects positive impacts through 'consolidating fragmented programmes into a single strategic fund capable of supporting large-scale cross-border projects' (IA, p. 82), increased GDP and enhanced EU exports.

### Simplification, burden reduction and other regulatory implications

In light of the '[one-in, one-out](#)' approach, the preferred option is expected to generate (one-off) adjustment costs for businesses (applicants, beneficiaries), which are not quantified in the IA. The IA expects a reduction of administrative costs (through a common rulebook and a shorter grant proposal preparation time). For citizens (e.g. researchers), administrative burdens would be reduced over time, due to a common rulebook and a simplified funding and application process. Researchers may face higher adjustment costs, if they are not supported in the preparation phase of a proposal. Overall, the IA expects lower administrative burdens which would outweigh the (one-off) adjustment costs and current administrative burdens (IA, Annex 3).

The IA describes the links with other post-2027 MFF proposals and existing provisions at the EU level in fairly general terms. However, a separate annex includes a comprehensive description of synergies between Horizon Europe and other EU programmes (IA, Annex 7).

## Monitoring and evaluation

To monitor the implementation of the initiatives, the IA refers to the performance framework for the post-2027 budget, which is examined in a [separate IA](#) and includes an implementation report during the implementation phase of the programmes and an ex-post evaluation (IA, p. 49). According to the IA, the evaluation will be conducted in accordance with the BRG and will include indicators relevant to the initiatives' general and specific objectives. However, the IA remains unclear on how progress in achieving the objectives will be measured. It should have been clearer on how the specific indicators will be identified and used, and how, and which, data will be collected.

## Stakeholder consultation

In accordance with the BRG, a summary (synopsis report) of the stakeholder consultations and an outline of the targeted stakeholder groups (including citizens, academia/research institutions, businesses, SMEs, public authorities, recipients of EU funding, civil society organisations) are provided in a separate annex (IA, Annex 2). As recommended by the BRG, the Commission conducted an [open public consultation](#) on the next MFF (2 034 responses and 462 position papers) over a 12-week period, which ran from 12 February 2025 to 7 May 2025. Furthermore, it conducted consultation activities with industry and research and innovation stakeholders (e.g. a plenary meeting of the [Industrial Forum](#)) to gather feedback on the present proposals.

Overall, the stakeholders' views are clearly presented and systematically referred to throughout the IA. However, the IA should have assessed stakeholders' support for the preferred option in more detail.

## Supporting data and analytical methods used

The IA primarily relies on desk research complemented by economic modelling by the Joint Research Centre (JRC), stakeholder input and an external [supporting study](#) (carried out by a consortium led

by the Centre for Strategy & Evaluation Services ([CSES](#)). The supporting study focused on the cost-benefit analysis, the comparison of options and the public consultation synopsis report. The data sources are well referenced and publicly available. The IA provides a comprehensive table including the main sources of evidence for all 14 programmes within the scope of the IA. The list includes previous IAs, mid-term and ex-post evaluations, studies and reports (IA, Annex 1, pp. 52–56).

The IA describes the analytical methods used in a dedicated annex (IA, Annex 4). It outlines the methodological approach used, which includes a cost-benefit analysis (see paragraph above) and modelling. Regarding modelling, the IA explains the use of the RHOMOLO model, which is well referenced. A description of the use of the model is publicly available in the Commission's Modelling Inventory and Knowledge Management System ([MIDAS](#)). For the qualitative analysis of responses and position papers to the open public consultation, the Commission relied on AI by using Large Language Model-driven topic modelling combined with expert human validation.

Overall, the IA openly mentions the limitations constraining the completeness and consistency of the evidence base, such as: i) limited comparability of findings and uneven availability of evaluation documents across programmes; ii) reliance on various uncertain estimates and assumptions (for the cost-benefit analysis, e.g. administrative costs, benefits for businesses and public administrations); iii) missing information on procedures and management structures envisaged in the options. In addition, the IA states that 'results from the public consultation cannot be generalised as they refer to a limited sample' (IA, p. 80).

## Follow-up to Commission Regulatory Scrutiny Board opinion

The Regulatory Scrutiny Board (RSB) issued an [opinion](#) on the draft IA on 13 June 2025, following the submission of a draft version of the IA on 19 May 2025. The opinion states that 'given that at this stage the impact assessment lacks several key elements, the Board decided, exceptionally, to issue an Opinion without qualification' (RSB opinion, p. 1).<sup>9</sup> While the RSB acknowledged the applicability of [Tool #9](#) of the Better Regulation Toolbox (preparation of a new MFF), the RSB concludes that the draft IA report contains significant shortcomings spread across almost all sections (e.g. lack of consistency in the problem definition; proposed objectives are not S.M.A.R.T.; the full range of options is not adequately identified; lack of adequate assessment of the costs and benefits of the options; no specification of coherence with other parts of the post-2027 MFF; and unclear monitoring and evaluation arrangements). The IA explains in a short table (IA, Annex 1, p. 50–52) how the RSB's recommendations were addressed. However, it appears that they were only partially taken into account in the final IA.

## Coherence between the Commission's legislative proposal and IA

The proposals appear to be coherent with the preferred policy option (option C) identified in the IA.

## ENDNOTES

- <sup>1</sup> [Proposal](#) for a Regulation of the European Parliament and of the Council on establishing the European Competitiveness Fund ('ECF'), including the specific programme for defence research and innovation activities, repealing Regulations (EU) 2021/522, (EU) 2021/694, (EU) 2021/697, (EU) 2021/783, and amending Regulations (EU) 2021/696, (EU) 2023/588, (EU) [EDIP]; [Proposal](#) for a Regulation of the European Parliament and of the Council establishing Horizon Europe, the Framework Programme for Research and Innovation, for the period 2028-2034 laying down its rules for participation and dissemination, and repealing Regulation (EU) 2021/695; [Proposal](#) for a Council Decision on establishing the Specific Programme implementing Horizon Europe – the Framework Programme for Research and Innovation, for the period 2028-2034, laying down the rules for participation and dissemination under that Programme, and repealing Decision (EU) 2021/764.
- <sup>2</sup> Horizon Europe, Innovation Fund, Digital Europe Programme, Connecting Europe Facility – Digital, European Defence Fund, the Act in Support of Ammunition Production, the European Defence Industry Reinforcement through Common Procurement Act, the European Defence Industry Programme, EU4Health, the European Space Programme, IRIS2, InvestEU, Single Market Programme (SME Strand) and LIFE.
- <sup>3</sup> See, for example, Pari, M. and Pradier, S., [EU Budget 2028-2034](#), Overview of the Commission's proposal, EPRS, European Parliament, September 2025.
- <sup>4</sup> The ECF will be linked to the Framework Programme for Research and Innovation, for the period 2028-2034 (Horizon Europe) through the development of integrated work programmes and a single rulebook in the ECF regulation.
- <sup>5</sup> Europe's choice, [Political guidelines](#) for the next European Commission 2024-2029; European Commission, [communication](#): A Competitiveness compass for the EU, COM(2025) 30; The future of European competitiveness, [report](#) by Mario Draghi, 2024; Much more than a market, [report](#) by Enrico Letta, 2024; European Commission, [communication](#): Savings and Investment Union: A strategy to foster citizen's wealth and economic competitiveness in the EU, COM(2025) 124; European Commission, [communication](#): The clean industrial deal: A joint roadmap for competitiveness and decarbonisation, COM(2025) 85; European Commission, [communication](#): The road to the next multiannual financial framework, COM(2025) 46.
- <sup>6</sup> This includes the European Court of Auditors' special [report](#) on the EU's financial landscape, 2023.
- <sup>7</sup> The IA defines the 15-year GDP multiplier as 'a figure that can be interpreted as the number of euros of GDP generated over a given period for each euro spent on the policy' (IA, p. 77). See Annex 4 of the IA (pp. 77-78) for more details.
- <sup>8</sup> Annex 9 of the IA provides an overview of the recent 'time-to-inform' and 'time-to-grant' per specific programme.
- <sup>9</sup> The qualification to the opinion can be 'positive', 'positive with reservations', or 'negative' (BRG and Toolbox, [Tool #3](#)).

This briefing, prepared for the Industry, Research and Energy (ITRE) Committee, analyses whether the principal criteria laid down in the Commission's own Better Regulation Guidelines, as well as additional factors identified by the Parliament in its Impact Assessment Handbook, appear to be met by the IA. It does not attempt to deal with the substance of the proposal.

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