



Ms Ursula von der Leyen
President of the European Commission
European Commission
Rue de la Loi 200
Brussels

Brussels, 30 October 2025

Dear President Von der Leyen,

On behalf of the European Conservatives and Reformists Group (ECR) in the European Parliament, we write to you regarding the proposal of National and Regional Partnership Plans within the framework of the Multiannual Financial Framework (MFF) for the 2028-2034 period. We believe that key elements of your proposal require substantial revision if it is to command broad political support, respect the subsidiarity principle and safeguard the interest of all Member States and citizens.

First, we note that a performance-based financing model, such as the one used in the Recovery and Resilience Facility (RRF), introduces a significant layer of conditionality and complexity that might severely hinder the actual absorption of funds by Member States. We therefore set out below our main concerns and requests for modifications.

Policy autonomy and Fiscal Transparency

The proposed structure, centred on single National and Regional Partnership Plans for each Member State, risks fragmenting the Union's budget into 27 disparate separate programmes. Combining cohesion and agricultural funds under one national envelope, while reducing overall allocations, would erode two of the of EU's most successful policies and weaken territorial balance and undermine the broad support for the EU project. Funds for agriculture, cohesion, fisheries & maritime, social measures and internal security should be treated as distinct instruments, each with its own envelope and bespoke legal rules. That separation protects policy clarity, parliamentary oversight and the predictability beneficiaries need to plan investments and reforms. Pooling everything under a single scheme risk blurring accountability and reduces transparency for taxpayers. Moreover, while some policies such as the Common Agricultural Policy operate within the framework of the Single Market, others do not. Merging them under a unified national framework could distort fair competition across sectors and between Member States, ultimately undermining the level playing field that the Single Market is designed to guarantee.

Furthermore, we note with concern the absence of a clearly dedicated fund for the research, extraction and processing of Europe's critical raw materials. Given the strategic importance of secure supply chains, the MFF should include a targeted instrument to support exploration, sustainable extraction, domestic processing capacity and related R&D across the value chain. Without such a dedicated instrument, the Union risks perpetuating strategic dependencies and undermining its industrial and strategic autonomy.



Preserving a strong and autonomous Common Agricultural Policy

The proposed 2028–2034 MFF marks a turning point in the role traditionally assigned to the CAP. With over 20% less than in 2021–2027, the CAP would fall to just 14% of the EU budget, compared to more than 30% in the previous period.

Such a contraction contradicts the Treaties, which assign agriculture a key role in food security, market stability, and rural livelihoods. It also signals a structural shift: the Commission's new priorities relegate agriculture to the margins. The inconsistency is evident when compared with the draft NRPP, where 55 out of 90 articles address agriculture, proof of the sector's enduring strategic importance. The next MFF should reflect this reality by preserving a strong, autonomous CAP with stable resources and clear governance, able to tackle competitiveness, sustainability, and generational renewal.

Weakening the CAP's financial and institutional autonomy would erode a founding pillar of European integration and compromise food sovereignty, cohesion, Single market integrity and territorial balance.

Upholding Subsidiarity in a reformed Cohesion policy

While supporting a reform of the Cohesion policies focused on flexibility and reliability, we reaffirm that Cohesion and territorial development cannot be reduced to a central government exercise. The legal architecture should guarantee reinforced roles for regional and municipal authorities, require meaningful and continuous dialogue between the Commission and the articulations of the Member States, enshrining the partnership and subsidiarity principles. True multi-level governance and shared management must be preserved, with safeguards that respect each Member State's territorial setup.

The current Commission proposal does not respond to these concerns. We therefore call for an amended proposal that restores distinct policy instruments, maintains a strong and autonomous CAP, introduces a dedicated fund on critical raw materials and embeds genuine multi-level governance in a reformed cohesion policy in line with the principle of subsidiarity and democratic accountability.

We trust that you will give due consideration to these concerns and look forward to engaging constructively with the Commission to ensure a fair, transparent and balanced framework for the Union's next Multiannual Financial Framework.

Yours sincerely,

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