



# Towards an inclusive and rights-based EU budget (2028–2034)

Briefing on social inclusion and anti-poverty  
in the next EU Multiannual Financial Framework (MFF)



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# Introduction

The next Multiannual Financial Framework (MFF) 2028 – 2034 will define the future of EU investments and support EU member states' implementation of policies in the next decade on social inclusion, poverty eradication, access to essential services, social protection and migration.

PICUM has long advocated for an **EU long-term budget that prioritises investments in social inclusion, equal access to services and poverty eradication measures for all, and particularly for vulnerable groups who are systematically excluded from support, such as undocumented migrants.**

However, undocumented migrants and the organisations supporting them remain largely excluded from accessing support, including in those member states where national level funding for poverty eradication or social inclusion measures remain limited.

Together with strong and inclusive social policies, we believe that a strong, well-resourced MFF has the potential to support the member states to achieve

the Union's objectives in areas like the European Pillar of Social Rights and the EU Anti-Poverty Strategy<sup>1</sup>, which sets an extremely ambitious goal of eradicating poverty by 2050. This cannot be achieved while systematically excluding certain categories of people from social inclusion and support actions for the most deprived from funding support.

This includes making EU funding capable to respond to the needs on the ground and provide adequate and sustainable financial support to those actors that are best placed to reach marginalised groups that are often excluded from services.

In 2025, the European Commission presented a new MFF<sup>2</sup> that is currently negotiated by the European Parliament and member states. This paper provides an analysis of these proposals and concrete recommendations to make the MFF more inclusive, fit for delivering on social priorities, and more accessible to those organisations working with marginalised people.

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1 European Commission (Employment Social Affairs and Inclusion), May 2026, [The European Union Anti-Poverty Strategy: Addressing and preventing poverty from childhood to old age](#).

2 European Commission, [The 2028-2034 EU budget for a stronger Europe](#). [accessed 19 May 2026]

## The MFF 2028 – 2034: size and new architecture

The European Commission has proposed a Multiannual Financial Framework (MFF) of approximately 1.8 trillion euros (2025 prices<sup>3</sup>) for the 2028 – 2034 period. This represents a nominal increase compared to the current MFF 2021 – 2027, which amounts to approximately 1.2 trillion euros in 2025 prices. However, the comparison is affected by inflation and by the inclusion of 149.3 billion euros for the repayment of debt linked to NextGenerationEU. The European Parliament has noted<sup>4</sup> that, once these repayments are excluded, the proposed spending level is broadly comparable to the current programming period.

The proposed MFF also introduces significant changes to the structure and governance of the EU budget. The Commission proposes<sup>5</sup> to simplify the funding architecture **by reducing the number of spending programmes from more than 50 to 16** and reorganising the **budget under four main headings:**

### **1. Economic, Social and Territorial Cohesion, Agriculture, Rural and Maritime Prosperity and Security**

**946.4 billion euros; 53,7 % of the total MFF**

The largest heading, covering a broad range of priorities through National and Regional Partnership Plans (NRPPs), including social inclusion, migration, cohesion policy, agriculture, border management and internal security. The proposal also introduces an EU Facility managed directly by the European Commission (see table 2 below).

### **2. Competitiveness, Prosperity and Security**

**522.2 billion euros; 29,6 % of the total MFF**

A new heading centred around the European Competitiveness Fund, bringing together support for innovation, clean technologies, digitalisation, defence and strategic investments. It also includes AgoraEU, which supports culture, media, democracy, rights and civic participation.

### **3. Global Europe**

**190.0 billion euros; 10,8 % of the total MFF**

Covering the EU's external action, including international partnerships, development cooperation, enlargement support and humanitarian assistance.

### **4. Administration**

**104.5 billion euros; 5,9 % of the total MFF**

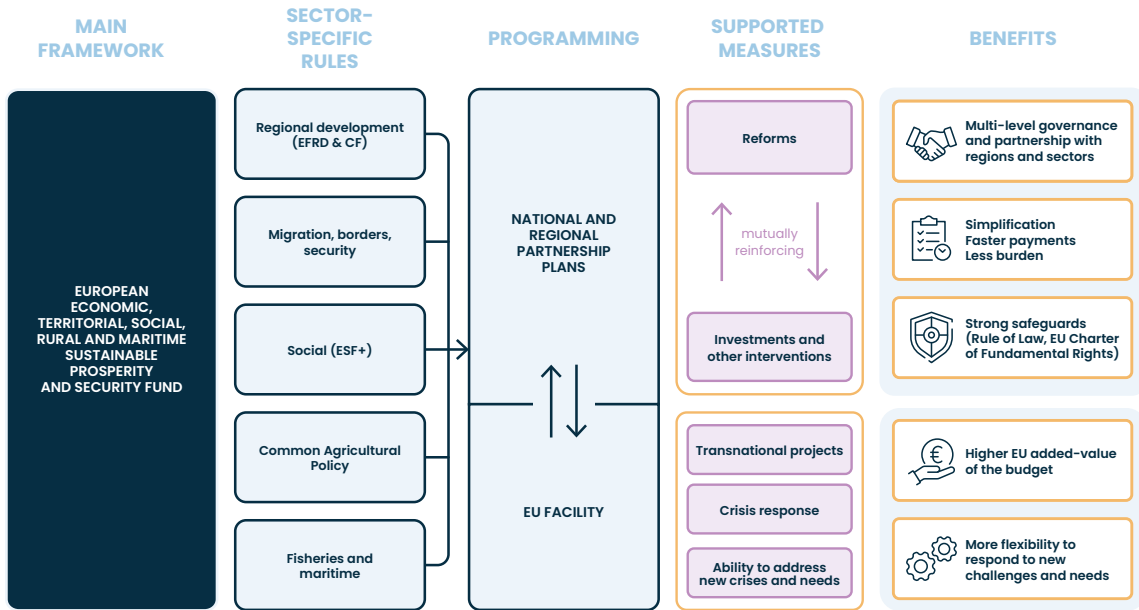
Covering the administrative expenditure of the EU institutions.

3 "2025 prices" refers to amounts expressed in constant prices adjusted for inflation, allowing comparisons across different programming periods without the distortions caused by changes in price levels. Unless otherwise specified, all amounts in this paper are expressed in 2025 prices.

4 European Parliamentary Research Service (EPRS), [EU Budget 2028–2034: Overview of the Commission's proposal](#), July 2025. According to the EPRS, the proposed MFF amounts to 1.15 % of EU Gross National Income, compared to 1.13% for the current MFF 2021–2027, making the overall level of spending broadly comparable in relative terms.

5 European Commission, Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, [A dynamic EU Budget for the priorities of the future – The Multiannual Financial Framework 2028–2034](#), COM(2025) 570 final.

**Table 1: Economic, Social and Territorial Cohesion, Agriculture, Rural and Maritime Prosperity and Security**



Source: European Commission<sup>6</sup>

6 European Commission, Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions, A dynamic EU Budget for the priorities of the future – The Multiannual Financial Framework 2028–2034, COM(2025) 570 final.

## Legislative proposals covered by this paper

This policy briefing is based on the analysis of the legislative files that will more directly impact the work of civil society organisations supporting people with precarious or irregular residence status across the European Union and is focused on proposals in the first heading of the Commission’s proposal, which includes the National Regional and Partnership Plans.

This paper does not cover proposals in the second and third headings of the proposed MFF (European Competitiveness Fund<sup>7</sup> and Global Europe<sup>8</sup>). An exception is made for the AgoraEU programme (under heading 2), given its relevance for civic space, fundamental rights, democracy and support for civil society organisations. The recently adopted European Parliament position<sup>9</sup> on the general architecture of the MFF (the interim report) has also been analysed for the purpose of this briefing.

**Table 2: List of legislative proposals 2028 – 2034 and related instruments during 2021 – 2027 period**

European Commission proposal (2028 – 2034)	Description	Related instrument during the 2021 – 2027 programming period
<b>General MFF Regulation 2028 - 2034<sup>10</sup></b> Proposal for a Council Regulation laying down the multiannual financial framework for the years 2028 to 2034	Sets the overall architecture and expenditure ceilings of the EU budget for the 2028 – 2034 programming period.	Regulation 2020/2093 laying down the Multiannual Financial Framework for the years 2021 to 2027 <sup>11</sup>
<b>Performance Framework Regulation<sup>12</sup></b> Proposal for a Budget expenditure tracking and performance framework and other horizontal rules for Union programmes and activities	Establishes common rules, indicators and reporting requirements to monitor performance and results across the EU budget.	No equivalent standalone regulation. The 2021 – 2027 framework included fund-specific monitoring and performance indicators in the specific programme regulations, rather than a single performance framework applicable across the EU budget.

7 European Commission, [Proposal for a regulation of the European Parliament and of the Council establishing the European Competitiveness Fund](#), COM(2025) 547 final.

8 European Commission, [Proposal for a regulation of the European Parliament and of the Council establishing the Global Europe Instrument](#), COM(2025) 537 final.

9 European Parliament position, [Interim Report on the Proposal for a Council regulation laying down the Multiannual Financial Framework for the years 2028 to 2034](#). [accessed 19 May 2026]

10 European Commission Publications, 17 July 2025, Multiannual Financial Framework. [accessed 19 May 2026]

11 Regulation (EU) 2020/2093 laying down the Multiannual Financial Framework for the years 2021 to 2027.

12 European Commission, [Proposal for a regulation of the European Parliament and of the Council establishing a budget expenditure tracking and performance framework and other horizontal rules for the Union programmes and activities](#), COM(2025) 545 final.

European Commission proposal (2028 – 2034)	Description	Related instrument during the 2021 – 2027 programming period
<p><b>National Regional and Partnership Plans (NRPP) Regulation<sup>13</sup></b>            Proposal for a European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security for the period 2028 – 2034</p>	<p>Sets the common framework for the National and Regional Partnership Plans, bringing together several EU funding instruments under a single national planning and implementation structure.</p>	<p>Regulation 2021/1060<sup>14</sup>, known as the Common Provisions Regulation (CPR)</p>
<p><b>AMI Regulation<sup>15</sup></b>            Proposal for a Union support for asylum, migration and integration</p>	<p>Defines EU funding priorities and support measures for asylum, migration, reception and integration policies.</p>	<p>Regulation 2021/1147<sup>16</sup>, known as the Asylum, Migration and Integration Fund (AMIF)</p>
<p><b>Schengen and Border Management Regulation<sup>17</sup></b>            Proposal for a Union support for the Schengen area, for European integrated border management at the external borders and for the common policy on visas</p>	<p>Defines EU funding priorities for border management, visa policy and the functioning of the Schengen area.</p>	<p>Regulation 2021/1148<sup>18</sup>, known as the Border Management and Visa Instrument (BMVI)</p>

13 European Commission, Proposal for a regulation of the European Parliament and 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, COM(2025) 565 final.

14 Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy

15 European Commission, [Proposal for a Regulation of the European Parliament and of the Council establishing the Union support for asylum, migration and integration](#), COM(2025) 540 final.

16 [Regulation \(EU\) 2021/1147](#) of the European Parliament and of the Council of 7 July 2021 establishing the Asylum, Migration and Integration Fund.

17 European Commission, [Proposal for a regulation of the European Parliament and of the Council establishing the Union support for the Schengen area, for European integrated border management and for the common policy on visas for the period from 2028 to 2034](#), COM(2025) 541 final.

18 [Regulation \(EU\) 2021/1148](#) of the European Parliament and of the Council of 7 July 2021 establishing, as part of the Integrated Border Management Fund, the Instrument for Financial Support for Border Management and Visa Policy.

European Commission proposal (2028 – 2034)	Description	Related instrument during the 2021 – 2027 programming period
<b>European Social Fund (ESF) Regulation<sup>19</sup></b> Proposal for a European Social Fund as part of the National and Regional Partnership Plan	Provides EU funding to support employment, social inclusion, poverty reduction, skills, education and access to essential services across the European Union.	Regulation 2021/1057 establishing the European Social Fund Plus (ESF+) <sup>20</sup>
<b>AgoraEU programme<sup>21</sup></b> Proposal for establishing an “AgoraEU” programme	Brings together EU funding programmes supporting culture, media, rights, equality, democracy and civic participation under a single framework.	Regulation 2021/692 <sup>22</sup> , known as the Citizens, Equality, Rights and Values (CERV);  Regulation 2021/818 <sup>23</sup> , Creative Europe

19 European Commission, [Proposal for a Regulation of the European Parliament and of the Council establishing the European Social Fund as part of the National and Regional Partnership Plan](#), COM(2025) 558 final.

20 [Regulation \(EU\) 2021/1057](#) of the European Parliament and of the Council of 24 June 2021 establishing the European Social Fund Plus (ESF+) and repealing Regulation (EU) No 1296/2013.

21 European Commission, [Proposal for a regulation of the European Parliament and the Council establishing the “AgoraEU” programme for the period 2028-2034](#), COM(2025) 550 final.

22 [Regulation \(EU\) 2021/692](#) of the European Parliament and of the Council of 28 April 2021 establishing the Citizens, Equality, Rights and Values Programme and repealing Regulation (EU) No 1381/2013 of the European Parliament and of the Council and Council Regulation (EU) No 390/2014

23 [Regulation \(EU\) 2021/818](#) establishing the creative Europe programme (2021 to 2027)

# PICUM's vision and objectives for the MFF

PICUM has long advocated<sup>24</sup> for a budget that is inclusive of people with particular vulnerabilities and facing marginalisation, such as undocumented migrants, and that is rooted in strong bottom-up and participatory approaches.<sup>25</sup>

We believe that the MFF has a key role to play in achieving crucial EU objectives on the reduction of poverty, including of children, access to basic services

for everyone, such as healthcare and education, enjoyment of fundamental rights including labour rights, and contribute to overall social cohesion. To achieve these objectives, no one should be left behind, including from EU-funded actions.

According to our vision, the next EU budget should be based on the following principles:

## Social inclusion and anti-poverty at the core of EU investment

The EU budget should maintain a strong focus on poverty reduction, social inclusion, and access to essential services, including for people in vulnerable and marginalised situations, in line with EU priorities and commitments in these areas. Access to basic services and anti-poverty support should not be restricted due to residence status, but it should be based on the actual needs.<sup>26</sup>

Social investment objectives should not be weakened by prioritisation of migration enforcement or security-oriented spending that would result in a deprioritisation of EU objectives in the area of social inclusion.

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24 PICUM, May 2025, [PICUM's priorities for the next EU long-term budget: Contribution to the European Commission consultation](#).

25 For more information on previous PICUM's analysis and positions on the Multiannual Financial Framework, including in collaboration with the European Council on Refugees and Exiles, please visit this webpage: [https://picum.org/our-publications/?\\_categories=eu-funding](https://picum.org/our-publications/?_categories=eu-funding) [accessed on 4 June 2026].

26 PICUM, August 2025, [Why inclusive, needs-based social policies matter](#).

### **Inclusive and bottom-up participation as a cornerstone for EU funding decisions**

The design and implementation of EU funding should ensure transparency, accountability, and meaningful participation of civil society organisations, social partners, local authorities, and affected communities. The partnership principle should remain a central element of EU funding

governance, as it ensures that the people and organisations directly affected by EU funded projects have a say in how those funds are used, making the process more transparent, effective, and responsive to real needs.

### **Accessible funding environment for civil society organisations**

EU funding mechanisms should be accessible to organisations working directly with people in vulnerable situations, including small, grassroots, and community-led organisations. Administrative requirements, co-financing obligations, and reporting systems should not prevent civil society from accessing and

managing EU funds. EU funding programmes that are more accessible are also more effective, as they would empower the very actors most capable of reaching marginalised communities.

## Full compliance and promotion of fundamental rights

All EU funding instruments should comply with the Charter of Fundamental Rights of the European Union and contribute to the protection of human rights, equality, and non-discrimination in their

implementation. Strong monitoring and accountability mechanisms protect EU funding from abuses and ensure that everyone enjoys their fundamental rights, including in EU funding actions.

## Protection of civic space across the European Union

In line with the EU Civil Society Strategy<sup>27</sup>, the next MFF should support an enabling environment for civil society and human rights defenders, as they are key actors in defending and promoting fundamental rights, rule of law and democracy. EU funding should contribute to protecting democratic participation,

independent advocacy, and community-based support structures across member states, including supporting organisations working with migrants in an irregular administrative situation.

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<sup>27</sup> European Commission, November 2025, [Communication on the EU Strategy for Civil Society](#).

# Overview of key concerns

The proposed MFF for the 2028 – 2034 programming period introduces significant changes to the structure, priorities and governance of EU funding.

While it aims to increase flexibility and simplify implementation, the current design raises serious concerns regarding its ability to deliver on the Union's

social objectives, particularly in the areas of social inclusion, poverty reduction and access to services for people in vulnerable situations.

From PICUM's perspective, **the following overarching issues characterise the proposal for the new MFF for 2028-2034:**

## Shift towards security, defence, and border management objectives with a clear restrictive approach

The proposed MFF reflects a growing emphasis on migration control, border management and internal security. Financial and structural choices within the proposal indicate a clear prioritisation of restrictive approaches over inclusion and protective measures. This is reflected in the substantial increase in resources around border management and visas, which would rise from 7,92 billion euros in the 2021 – 2027 period to 15,40 billion euros in the proposed MFF 2028 – 2034 (current prices), almost doubling from the current funding period.

At the same time, social investment instruments appear less prominently defined and protected within the overall architecture, with, for instance, the budget for the European Social Fund not being clearly defined in the proposed regulations. This imbalance risks reinforcing a policy approach that focuses on enforcement rather than addressing the root causes of poverty, exclusion and marginalisation.

As a result, we are concerned that the MFF may not be adequately aligned with the EU's broader commitments on social inclusion, fundamental rights and poverty reduction.

### **Deprioritisation of social inclusion and anti-poverty objectives**

The proposal weakens the visibility and the possibility to achieve social inclusion objectives across funding instruments. Compared to previous programming periods, there is a reduced emphasis on dedicated social priorities, fewer explicit links to key EU social policy frameworks, and the removal of mechanisms such as minimum spending requirements for the European Social Fund and the Union Support for Asylum, Migration and Integration.

This creates a risk that investment in key challenging areas such as child poverty, material deprivation, housing exclusion and the inclusion of marginalised groups will decline, particularly in the absence of binding safeguards.

### **Merging and centralisation of funding may create top-down and more exclusive budgets**

The introduction of National and Regional Partnership Plans (NRPPs) for member states represents a major shift in the governance of EU funding, merging multiple programmes under a single national plan.

While this approach aims to simplify implementation and increase flexibility, it also concentrates decision-making at national level and reduces the role of regional authorities and civil society to shape funding decisions. This may weaken the capacity of EU funding to respond to specific needs on the ground and to deliver targeted social outcomes.

## Reduced accessibility of EU funding and shrinking space for civil society

Barriers such as high co-financing requirements may further exclude organisations that are best placed to reach marginalised communities. In the new proposal, project applicants in more developed regions may be required to cover up to 40 % of the grants with their own funds<sup>28</sup>. In parallel, reduced oversight and weaker partnership mechanisms could

limit the role of civil society in shaping and monitoring funding priorities. With an already difficult application process, the proposed changes risk limiting access to EU funding for civil society organisations, particularly smaller, grassroots and migrant-led actors.

## A new system based on performance that risks leaving many behind

One of the main novelties of the proposed MFF is the creation of a new performance framework applicable to the entire EU budget, which intends to simplify reporting and create a performance-based budget based on the model of the Recovery and Resilience Facility.

The proposed system mainstreams horizontal principles such as gender equality and “do no significant harm” to all budget programmes and creates a single list of indicators to be used for reporting across all programmes and projects.

However, the proposed framework risks placing greater emphasis on projects that can be easily measured, rather than on the quality and long-term outcomes of social investment projects. At the same time, the proposed indicators in the areas of migration and border management may reinforce deterrence-oriented approaches, including through indicators linked to immigration detention capacity, rather than prioritising inclusion and protection.<sup>29</sup>

In addition, while simplification may reduce administrative burdens between the Commission and member states, it remains unclear whether the new system will improve accessibility for smaller civil society organisations and local actors delivering services on the ground.

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28 Article 20 of the NRPP Regulation, COM 565 final.

29 This includes “number of places in detention centres created” or “number of places in detention centres refurbished or renovated” as an output indicator for contributing to the objective related to “countering irregular migration, enhancing effective, safe and dignified return and readmission”. The full list of indicators can be consulted in the [Annex I of the proposal for a Performance Framework Regulation](#). For more details see section 4 Strengthen the social impact of the performance framework.

## Analysis and recommendations

The following section examines the proposed MFF in light of PICUM's key priorities for the next EU budget<sup>30</sup>. It assesses whether the current proposals can effectively contribute to the EU's social objectives and fundamental rights commitments, identifies key gaps and risks, and outlines recommendations to

strengthen the social impact, accessibility and rights compliance of EU funding.

PICUM identified **seven key priorities that should be addressed across the MFF proposals to ensure a more inclusive, accessible and rights-based EU budget:**

- 1. Ensure that social inclusion and protection are not overshadowed by migration enforcement and security priorities**
- 2. Protect social inclusion, anti-poverty and European Child Guarantee objectives in the MFF**
- 3. Promote inclusive and accountable governance of the MFF**
- 4. Strengthen the social impact of the performance framework**
- 5. Improve access to EU funding for civil society**
- 6. Strengthen participation and partnership principle across EU funding**
- 7. Ensure compliance with the EU Charter of Fundamental Rights through strong safeguards**

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30 PICUM, May 2025, [PICUM's priorities for the next EU long-term budget: Contribution to the European Commission consultation](#).

## 1. Ensure that social inclusion and protection are not overshadowed by migration enforcement and security priorities

### Analysis of the following Commission proposals:

- General MFF Regulation (overall figures)
- NRPP Regulation
- AMI Regulation
- Schengen and Border Management Regulation
- AgoraEU Regulation

### Increase in budget for borders and security

In line with the European Union's growing focus on migration control and enforcement, the proposed new MFF foresees a substantial increase in funding for migration, border management, and internal security. **The European Commission has indicated<sup>31</sup> that approximately 81 billion euros will be allocated to migration, borders, and security** and that this would represent a tripling of the resources available in the 2021 – 2027 period<sup>32</sup>. This figure combines funding:

- Managed by EU member states (and regulated in the AMI, Schengen and Border Management and Internal Security regulations)
- Directly managed by the European Commission (regulated by the NRPPs)
- To the EU Home Affairs agencies (e.g. Frontex, European Union Asylum Agency, Europol), whose financial envelopes are established through the general MFF regulation and annual EU budgets, within the framework of their respective founding regulations.

In particular, the most significant increase in funding concerns **the Schengen and Border Management Regulation, which has clearly emerged as a top priority of the new EU budget**. This confirms a long-standing trend: EU funding for border management increased by 136 % between the 2014 – 2020 and 2021 – 2027 budget cycles, and the proposed new MFF continues this trajectory.<sup>33</sup>

31 Directorate-General for Migration and Home Affairs (European Commission), July 2025, [EU 2028-2034 proposed budget triples funds for migration, border management and internal security](#).

32 Regulation (EU) 2021/1147 establishing the Asylum, Migration and Integration Fund (AMIF); Regulation (EU) 2021/1148 establishing the Instrument for Financial Support for Border Management and Visa Policy (BMVI); and Regulation (EU) 2021/1149 establishing the Internal Security Fund (ISF). Together, these instruments provided approximately 18,05 euros billion for the 2021–2027 programming period. Direct comparisons with the proposed 81 billion euros envelope are difficult due to changes in the architecture of the MFF and inflation adjustments under the proposed framework.

33 PICUM & ECRE, June 2024, [Beyond walls and fences: EU funding used for a complex and digitalised border surveillance system – Study on the use of the Border Management and Visa Instrument during the 2021 – 2027 Multiannual Financial Framework](#).

Under the new model, migration, asylum, and internal security instruments will be integrated within the National and Regional Partnership Plans, alongside other policy areas, such as territorial cohesion, agriculture, rural and maritime prosperity, and social

inclusion. However, unlike the European Social Fund, migration and security-related spending benefit from clearly defined and visible budget allocations, reinforcing their prominence within the overall architecture.

### New EU Facility will group several EU funds managed by the Commission

At the same time that the EU funding on migration and security managed by member states will increase, an additional instrument managed by the European Commission will dedicate even more funding to migration, border management and security.

**The newly established EU Facility under the NRPP Regulation is expected to play a major role in managing funding for migration, asylum and border management, with a potential allocation of around 25 billion euros,<sup>34</sup> representing a rise of 273 % compared to the current period, according to ECRE calculations.<sup>35</sup> The EU Facility will become the new instrument grouping funds managed by the European Commission covering migration, border management and security, alongside situations of crisis, social investment and skills, the LIFE programme,<sup>36</sup> competitiveness, business support, and other areas. At the same time, the Employment and Innovation Strand (EaSI) that has played a crucial role<sup>37</sup> in providing long-term and stable funding**

**to civil society networks will also be absorbed by the EU Facility, however, without a clear dedicated budget.** For Home Affairs, the EU Facility can also be used for supporting actions in or in relation to third countries, as long as they are consistent with internal Union policy objectives. However, there is no limitation in terms of percentage of the EU facility or maximum amount to its potential use for this scope.

Furthermore, the EU Facility is not subject to structured consultation requirements with civil society and other stakeholders. This creates a risk that funding decisions may be driven primarily by political priorities rather than needs identified on the ground.

34 European Commission, *Proposal for a Regulation establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security for the period 2028–2034* COM(2025) 565 final, art 26(4)(a) and Annex XV (Home Affairs actions), allocating EUR 25.285 billion to Home Affairs actions.

35 ECRE (2026), [Budgeting for asylum, migration and inclusion in Europe after 2027](#).

36 The LIFE Programme refers to the EU's funding instrument for environment and climate action.

37 European Commission, *Study Supporting the Mid-Term Evaluation of the ESF+ during the Programming Period 2021–2027* (Publications Office of the European Union 2025), sections on the EaSI strand and stakeholder feedback.

### Lack of prioritisation on inclusion within migration funding

In parallel, the proposed framework does not clearly prioritise inclusion and integration measures within the migration instruments. Compared to the current programming period – where Union Actions under

AMIF played a key role in supporting transnational projects on migrant inclusion – the new proposal lacks explicit commitments in this area, despite the proposed increase in available resources.

**Table 3: EU budget allocations for migration, border management, social and civil society programmes: 2021 – 2027 and proposed 2028 – 2034 (in billion euros).**

	Total envelope (2021–2027)	European Commission proposal (2028 – 2034)	European Parliament position (interim report)
Asylum, migration and integration (former AMIF)	10,94	11,98	13,31
Schengen, border management and visa (former BMVI)	7,92	15,40	17,12
Internal security (former ISF)	1,91	6,84	7,61
EU Facility for Home Affairs (former Thematic Facility)	6,6	25,28	Not specified, but reduces overall allocation to EU facility
European Social Innovation Fund (EaSI)	0,762	Not specified	Not specified, but reduces overall allocation to EU facility
European Social Fund (former ESF+)	98,5	No dedicated envelope	124,19
AgoraEU	4,35	7,61	10,72
	*The amount merges two programmes: Creative Europe, and CERV+		

Source: European Commission and other official sources<sup>38</sup>

<sup>38</sup> Data for the 2021–2027 programming period are based on the financial envelopes of the relevant EU programmes and the latest figures reported by the European Commission for their implementation (AMIF, BMVI, ISF), expressed in current prices. Data relating to the ESF+ 2021 – 2027 are drawn from [this EPRS briefing](#) (December 2025) and expressed in current prices. Data referring to the predecessors of AgoraEU are drawn by [this EPRS briefing](#) (February 2026) and expressed in 2025 prices. Data relating to the European Commission proposals and European Parliament position are based on the Parliament's interim report on the 2028–2034 MFF and expressed in current prices. Due to differences in price bases, reporting dates and the architecture of the funding instruments across programming periods, figures should be interpreted with caution and are intended primarily to illustrate broad trends in funding priorities.

While the proposed AgoraEU programme includes increased support for democracy, rights and civic participation, the scale of investment remains comparatively limited when contrasted with the substantial increase in funding allocated to migration control, border management and security objectives, as highlighted by a letter signed by over 500 organisations.<sup>39</sup>

More broadly, the objectives of the AMI<sup>40</sup> and Schengen and Border Management<sup>41</sup> regulations reflect an increased focus on returns, detention, surveillance and externalisation of migration management:

- In the AMI regulation, **member states are no longer required to secure minimum percentages of funding for their asylum systems or integration measures** for third country nationals, as was the case in the current and previous EU budget (both 2021 – 2027 and 2014 – 2020). This will be further addressed under the next section.
- The AMI regulation introduces a **limitation to inclusion measures for third country nationals “during the early phases of settlement”**. This change risks limiting long-term integration support and excluding migrants who remain in need of assistance beyond the initial settlement phase.
- **A focus on returns<sup>42</sup>** is now established as an explicit objective in both the AMI and Border Management and Schengen regulations (whereas previously it was an objective only of the AMIF regulation 2021 – 2027);
- **“Innovative methods and technology”<sup>43</sup>** and the possible use of AMI funds under the solidarity objective in third countries. The breadth of these provisions raises concerns that they could provide a legal basis for financing external return infrastructures, including so-called “return hubs”.
- The concepts of **“instrumentalisation and weaponisation of migration”**,<sup>44</sup> now embedded within objectives related to return, readmission, reintegration, and countering irregular migration, further reinforce a securitised framing of migration governance.
- The EU Facility, which establishes funds managed by the European Commission, **no longer prioritises inclusion measures to be implemented by local authorities and civil society organisations** – a crucial element of the Union Actions under the current programme 2021 – 2027.

39 European Civic Forum, 8 April 2026, [Joint Letter – Call to support the European Parliament’s proposal to increase AgoraEU’s budget in the next MFF](#).

40 European Commission, *Proposal for a Regulation establishing the Union support for asylum, migration and integration for the period from 2028 to 2034* COM(2025) 540 final.

41 European Commission, *Proposal for a Regulation establishing the Union support for the Schengen area, for European integrated border management and for the common policy on visas for the period from 2028 to 2034* COM(2025) 541 final.

42 European Commission, *Proposal for a Regulation establishing the Union support for asylum, migration and integration for the period from 2028 to 2034* COM(2025) 540 final, art 3(1)(b) (objective of enhancing effective return, readmission, reintegration and countering irregular migration). See also European Commission, *Proposal for a Regulation establishing the Union support for the Schengen area, for European integrated border management and for the common policy on visas for the period from 2028 to 2034* COM(2025) 541 final, recitals 2-5 and objectives relating to European integrated border management, including on returns.

43 COM(2025) 540 final, art 3(1)(d), which provides for solidarity actions, including practical cooperation, innovative methods and new technologies, and supports activities involving third countries in the areas of migration management, return, readmission and reintegration.

44 COM(2025) 540 final, recital 6 and art 3(1)(b); see also COM(2025) 541 final, recitals 2–4.

The Schengen and Border Management Regulation has doubled its budget in the proposal but focuses on selected areas of the European Integrated Border Management policy<sup>45</sup>. Some areas that are currently covered by the Border Management and Visa Instrument Regulation 2021–2027, and which form an integral part of the European Integrated Border Management policy are not reflected in proposal objectives. The measures that are excluded in the proposal include:

- **the assistance and protection of vulnerable people at borders**, including unaccompanied children,

- integrated child protection systems at borders,
- facilitation of access to international protection, and support for search and rescue in the context of border surveillance at sea.

A PICUM–ECRE study<sup>46</sup> on the implementation of the BMVI already **highlighted that member states have already been failing to use their border management allocations for assistance and protection measures at borders during the 2021 – 2027 period.**



Rather than addressing the persistent underfunding of protection measures, the proposal will likely institutionalise this imbalance by significantly increasing the resources devoted to restrictive border measures while continuing to leave core protection obligations unaddressed.

### Why is this a concern?

This funding shift raises serious concerns about the overall balance of EU priorities, as the substantial expansion of migration control, border management and security instruments is not matched by equivalent safeguards or reinforced commitments for social inclusion. The stronger emphasis on enforcement-oriented measures increases the risk that funding

decisions will progressively prioritise control over inclusion. This imbalance could ultimately undermine the EU's ability to address the root causes of poverty and exclusion and jeopardise progress towards long-term commitments on social rights and poverty reduction.

45 PICUM & ECRE, June 2024, [Beyond walls and fences: EU funding used for a complex and digitalised border surveillance system – Study on the use of the Border Management and Visa Instrument during the 2021 – 2027 Multiannual Financial Framework](#).

46 Ibid.

## Our recommendations

For the MFF Regulation and NRPP regulation:

- **Ensure that migration-related funding maintains dedicated resources for inclusion, reception, access to services and community-based support.** This would mean a current reorientation of funding from the border management, detention and return priorities to social inclusion.
- **Clarify the breakdown of funding to the EU facility and its governance** (see the section on Partnership Principle), by ensuring that any readjustment of allocations (as proposed by the European Parliament) does not affect the funding available for supporting civil society networks and social innovation and include a minimum earmarking for the former EASI strand;
- **Support a funding envelope of 10,71 billion euros for the AgoraEU programme (in current prices), which is about two billion higher than the Commission’s proposal** and it is in line with the European Parliament’s position in the interim report.

For the AMI and Schengen and Border Management regulation:

- **Delete the reference to “early phase of settlement” from the AMI Regulation,** as this wording may introduce arbitrary limitations to support and exclude potential beneficiaries from support;
- **Delete the references to innovative methods and new technologies:**
  - » From objective (d) of the AMI Regulation, as this wording is overly broad and risks introducing a securitising logic into an objective that should remain focused on solidarity among member states. Its inclusion may redirect AMI funding from protection and solidarity measures towards potentially harmful responses.
  - » From objective (b) of the Schengen and Border Management instrument, as this wording is overly broad and embeds a technology-first and potentially securitising logic into the core objective of the instrument. Its inclusion risks incentivising surveillance- and deterrence-oriented funding decisions without clear necessity, proportionality and fundamental rights safeguards.

- **Delete the references to instrumentalisation and weaponisation** from objective (a) of the AMI Regulation and objective (b) of the Schengen and Border Management instrument, as this wording introduces dehumanising language and risks normalising exceptional and crisis-driven logic into the ordinary objectives of a long-term funding instrument, as well as incentivise measures that undermine compliance with fundamental rights obligations at borders.
- **Introduce assistance and protection objectives** in the Schengen and Border Management instrument, by encouraging the use of this fund for actively promoting the protection of people with vulnerabilities, children, legal assistance at borders, integrated child protection systems, measures facilitating access to international protection, and support for search and rescue in the context of border surveillance at sea, in line with human rights obligations and the European integrated border management. Include a reference to the provision of care to persons in need of, or applying for international protection, in line with the European integrated border management strategy<sup>47</sup>.

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47 European Commission, 14 March 2023, [Communication from the Commission to the European Parliament and the Council: establishing the multiannual strategic policy for European integrated border management](#).

## 2. Protect social inclusion, anti-poverty and European Child Guarantee objectives in the MFF

### Analysis of the following Commission proposals:

- NRPP Regulation
- AMI Regulation
- European Social Fund Regulation

### Deprioritisation of social inclusion and anti-poverty objectives

The new NRPP regulation weakens long-established links to key EU social strategies, creating a risk that the new MFF architecture does not adequately protect social objectives in its structure.

While the preamble references the European Pillar of Social Rights (EPSR), the connection between EPSR principles and EU support is weaker than in the past programming period. The ESF+ programme 2021 – 2027 included specific objectives aligned with EPSR principles on education, gender equality, and equal opportunities. In the newly proposed MFF, **while the ESF is maintained as a separate instrument, it lacks the necessary structures and details to adequately address the EPSR objectives, and the 2030 Porto Target on poverty reduction and the objective of eradicating poverty by 2050.**<sup>48</sup>

Some social objectives are embedded within the NRPP regulation, where Article 22 requires member states to align their funding priorities with the objectives of the European Pillar of Social Rights and with the country-specific recommendations addressed to the member states in the context of the European

Semester. However, the prioritisation of social policies and anti-poverty objectives has traditionally been weak in the European Semester cycle, as the instrument has primarily been used to align with broader competitiveness and economic objectives.<sup>49</sup>

A description of the social objectives is provided in Annex VI to the NRPP Regulation:

- Foster active social inclusion and socio-economic integration with a view of promoting equal opportunities, non-discrimination and active participation, and employability, in particular for disadvantaged groups, third country nationals and marginalised communities.
- Address material deprivation through food and/or basic material assistance to the most deprived persons.
- Implementation of the Child Guarantee.
- Implementation of the Youth Guarantee.

48 EAPN, 2026, [EAPN's position on the Multiannual Financial Framework \(MFF\) 2028-2034](#).

49 EAPN, 2025, [Competitiveness or Social Justice: a choice to make. Reframing the 2025 Spring Package to prioritise social well-being in the EU](#).

While this prioritisation is welcome, the overall description of actions and priorities is much shorter than in the past and only included in the annex of the proposal rather than in the regulation itself, with only a few references to supporting people in vulnerable situations or at the margins of society. **Similarly, references to the EU Anti-Poverty Strategy and housing exclusion initiatives are missing, and there is no reference to the Action Plan on Integration and Inclusion as a key policy tool that should guide the implementation of ESF funding.** The proposal also overlooks measures that bridge child, protection and youth policies, recognising that migrant children and young people often face specific barriers when transitioning into adulthood and may otherwise fall through gaps between different support systems.

**Notably, priorities that were previously explicit, such as the socio-economic integration of third-country nationals, are only included in the annex of the new proposal.** While in the 2021 – 2027 ESF+ there were specific objectives clearly linked to the implementation of the EPSR targeting the socio-economic integration of third country nationals, marginalised communities such as Roma, the most deprived persons and children, the new proposal is vaguer and does not include clear specific objectives or ringfencing on the priorities mentioned.

At the same time, the new ESF proposal also removes the use of thematic enabling conditions, which in the current budget required member states to adopt specific national strategies, such as on Roma inclusion, disability rights and others, to be linked with clear resources from the ESF. However,

a system linking national strategies for specific EPSR priorities and funding similar to the current in place would be welcome in the next MFF as well. As previously recommended by PICUM,<sup>50</sup> in line with the EU Action Plan on Integration and Inclusion, the upcoming budget should reintroduce the previous national strategies and an additional one on national inclusion strategies for migrants, clearly referring to the key areas identified by the Action Plan: education, labour market integration and vocational training, access to basic services and social inclusion.

To ensure that these priorities are translated into meaningful action, the future MFF should also identify concrete areas for investment and support targeted measures addressing poverty, exclusion and barriers to rights.

Access to affordable and decent housing has become a clear priority of the EU,<sup>51</sup> but was not included in the current MFF nor in the new proposals. **The new MFF should clearly address homelessness and social exclusion with actions adapted to various target groups, such as undocumented migrants, which make up for a significant portion of people experiencing homelessness in the EU.** This includes equitable access to adequate housing, housing assistance, protection against forced eviction, and shelter and support services for people experiencing homelessness, without discrimination based on migration status.<sup>52</sup>

50 PICUM and ECRE, 2018, *Promoting Socio-Economic Inclusion of Migrants and Refugees in the Next EU Budget (2021–2027)*, pp. 3–7; PICUM, 2025, *PICUM's Priorities for the Next EU Long-Term Budget*, pp. 7–8.

51 European Commission, 2025, [The European Affordable Housing Plan](#), Communication of 16 December 2025.

52 PICUM and FEANTSA, 2026, [Housing and homelessness of undocumented migrants across Europe: patterns, barriers, and ways forward](#).

The NRPP should also contribute to improving access to fair and decent working conditions for all workers, including undocumented workers, and to preventing, identifying and remedying situations of labour exploitation. In line with EU legislation, protection from labour exploitation and access to justice should not depend on a person's residence status<sup>53</sup>. The NRPP should therefore support measures that

strengthen workers' rights and access to remedies with specific safeguards put in place to ensure safe reporting, including effective and safe labour complaints mechanisms, access to independent legal advice, mechanisms to recover unpaid wages, and capacity-building for labour inspectorates and other relevant authorities to identify and address exploitation affecting undocumented workers.

### Loss of thematic concentrations or minimum percentages within the ESF and AMI proposals

Beyond reduced overall investment, the new framework eliminates specific ringfencing for groups most at risk of marginalisation, including children, and material deprivation from the ESF or NRPP objectives. Previous funding cycles required member states to allocate minimum percentages to priority areas such as social inclusion, child poverty, youth employment, and material deprivation – ensuring that these target groups remained a concrete focus of EU spending. Similarly, the AMI regulation no longer sets minimum percentages for specific priorities for the plans managed by the member states. In a context where returns and detention dominate the agenda, this raises concerns for inclusion priorities, which are often sidelined when they are not clearly ringfenced.<sup>54</sup> This change reflects a broader shift in EU funding architecture: member states now have far more freedom to decide how to spend allocations, with far fewer guarantees that funds

will reach people experiencing social disadvantage and exclusion.

This change in structure may also negatively affect the implementation of the European Child Guarantee, which is currently not backed by clear financing and ringfencing in the proposals. The European Commission's initiative to strengthen the European Child Guarantee<sup>55</sup> recognises the pivotal role of EU funding in supporting its implementation. While addressing child poverty and implementing the European Child Guarantee is an objective of the NRPPs, there is no minimum earmarking or dedicated budget to its implementation, as previously recommended by PICUM and its partners through the EU Alliance for investing in children<sup>56</sup>, and the European Parliament's position on the Anti-Poverty Strategy<sup>57</sup>, and draft report on the ESF regulation<sup>58</sup>.

53 PICUM, 2022, [Guide to Undocumented Workers' Rights at Work under International and EU Law](#).

54 Thematic concentrations under the 2021–2027 MFF included: AMIF: minimum of 15 % of AMIF had to be spent on "legal migration and integration"; ESF: minimum of 25 % of ESF for social inclusion; minimum of 5 % for child guarantee (for 11 member states); minimum of 3 % for material deprivation measures; minimum of 12,5 % for youth employment.

55 Directorate-General for Employment, Social Affairs and Inclusion, May 2026, [Breaking the cycle of child poverty. Strengthening the European Child Guarantee](#).

56 EU Alliance for investing in children, 12 February 2026, [European Parliament backs real investment to end child poverty, now the EU must deliver](#).

57 European Parliament, 2026, [Resolution of 12 February 2026 on developing a new EU anti-poverty strategy \(2025/2095\(INI\)\)](#).

58 Committee on Employment and Social Affairs (Rapporteurs: MEP David Casa, MEP Marit Majj), 20 April 2026, [Draft Report on the on the proposal for a regulation of the European Parliament and of the Council establishing the European Social Fund as part of the National and Regional Partnership Plan set out in Regulation \(EU\) \[...\] \[NRPP\] establishing conditions for the implementation of the Union support to quality employment, skills and social inclusion for the period from 2028 to 2034](#).

Experience from the 2021 – 2027 cycle confirms the importance of minimum allocations. For instance, the mid-term review of ESF+<sup>59</sup> found that thematic concentration on material deprivation measures was critical in ensuring funding for these groups. While the Regulation required Member States to allocate at least 3 % of ESF+ resources to support the most deprived, the share of total allocations dedicated to material deprivation reached 5,3 %. Nevertheless, eight member states (Czechia, Germany, Denmark, Estonia, Hungary, Portugal, Sweden and Slovakia) allocated only the minimum required amount.<sup>60</sup> **Without comparable earmarking requirements in the next MFF, there is a significant risk that investments in social inclusion, material deprivation, child poverty and youth support will decline.**

In line with the [draft report](#) of the EMPL committee<sup>61</sup>, minimum percentages of expenditure for social inclusion (30 %), child poverty, material deprivation, and homelessness (at least 5 % each) would allow to ensure that these become clear priorities in the member states. Similarly, in the AMI regulation, in line with ECRE position<sup>62</sup>, we recommend reintroducing

minimum earmarking of at least 20 % for both the asylum and inclusion objectives.

The new system sets a spending target of 14 % of the NRPPs (excluding agriculture) for social objectives, covering both loans and grants. However, the definition of “social objectives” is much broader than traditional social inclusion or employment measures funded by the ESF+ 2021–2027. The target is calculated using a three-tier coefficient system (100 %, 60 %, 40 %), which applies to a wide range of actions: traditional ESF activities in employment and social inclusion, social infrastructure projects (such as school and hospital construction), social housing, culture, research, and democracy initiatives.

Although the 14 % target corresponds to roughly 100 billion euros, this represents a real reduction in dedicated social spending. By comparison, the ESF+ alone was 98,5 billion euros in the current MFF (current prices<sup>63</sup>), which means that when adjusted for inflation, there would be no financial increase, as underlined by the EU Funds for Social Coalition.<sup>64</sup>



The risk is that the new MFF is trying to deliver on more social objectives, with less resources.

59 Directorate-General for Employment, Social Affairs and Inclusion, 2 December 2025, [Study supporting the mid-term evaluation of the ESF+ during the programming period 2021-2027](#).

60 European Commission, 2025, [Commission Staff Working Document Accompanying the Mid-Term Evaluation of the European Social Fund Plus \(ESF+\)](#), SWD(2025) 391 final, p. 41.

61 Committee on Employment and Social Affairs (Rapporteurs: MEP David Casa, MEP Marit Majj), 20 April 2026, [Draft Report on the on the proposal for a regulation of the European Parliament and of the Council establishing the European Social Fund as part of the National and Regional Partnership Plan set out in Regulation \(EU\) \[...\] \(NRPP\) establishing conditions for the implementation of the Union support to quality employment, skills and social inclusion for the period from 2028 to 2034](#).

62 ECRE, 11 February 2026, [ECRE Policy Paper: Budgeting for Asylum, Migration and Inclusion in Europe after 2027](#).

63 EPRS briefing (December 2025), [European Social Fund 2028 – 2034](#).

64 EU Funds for Social Coalition, 17 March 2026, [Joint statement – Building on what works: an EU budget that delivers for people and regions](#).

**Why is this a concern?**

The combined removal of thematic concentrations, minimum spending requirements, and clear links to EU social policy frameworks represents a significant weakening of the EU's ability to achieve its social objectives and ensure that funding reaches those most at risk of poverty and social exclusion. Experience from previous programming periods has shown that earmarking and specific objectives are essential to guarantee investment in priority areas such as child poverty, material deprivation, and the inclusion of marginalised groups.

In their absence, funding decisions are likely to become more dependent on national political priorities, which do not always align with EU social objectives. This creates a high risk of underinvestment in social inclusion, particularly for groups that are already structurally excluded from national systems, including undocumented migrants.

At the same time, the broader and more flexible definition of "social expenditure" under the new framework risks diluting the focus of EU social funding, allowing resources to be counted towards social targets without directly addressing poverty or exclusion. As a result, the EU may attempt to deliver on an expanded set of social objectives with fewer dedicated resources and weaker safeguards.

Overall, this shift risks undermining progress towards the European Pillar of Social Rights, the Anti-Poverty Strategy, and the EU's commitment to eradicate poverty by 2050, by reducing both the visibility and the effectiveness of social investment within the MFF.

## Our recommendations

For the NRPP and ESF regulations:

- **Ensure that EU funding supports long-term and structural social inclusion measures**, including community-based services, housing inclusion and sustained anti-poverty strategies, rather than short-term or purely output-oriented interventions.
- **Clarify that EU-funded anti-poverty measures and essential services should be accessible to all people in need, regardless of residence status.**
- **Strengthen the links between funding and the policy objectives** of the European Pillar of Social Rights, Anti-Poverty Strategy, housing exclusion initiatives, the European Child Guarantee and the Action Plan on Integration and Inclusion, and ensure that these objectives remain clearly identifiable, monitored and protected across the future architecture.
- **Introduce clear thematic concentrations with minimum spending targets for key priorities**, where member states are required to ringfence spending for their European Social Fund envelopes for:
  - » At least 30 % for social inclusion measures;
  - » At least 5 % for the Child Guarantee in all member states, and 10 percent in member states with higher AROPE rates<sup>65</sup>;
  - » At least 5 % for material deprivation support;
  - » At least 5 % for homelessness.
- **Introduce specific objectives clearly defining target groups** to ensure the fund is genuinely inclusive and adapted to real needs in the texts of the NRPP and ESF regulations. In the current MFF, the ESF explicitly included social inclusion of third country nationals as a specific objective. This reference has disappeared. It is essential to reintroduce clear references to groups experiencing social exclusion and poverty, so that responses match current challenges.

<sup>65</sup> AROPE refers to the share of the population at risk of poverty or social exclusion.

For the AMI Regulation:

- **Introduce a minimum of 20 % minimum expenditure** for objective (c) on “legal migration and integration” and objective (a) on the implementation of the Common European Asylum System.
- **Remove the limitation to “early phases of settlement”** regarding inclusion and access to services measures under objective 3.
- **Ensure that the EU Facility in the NRPP Regulation maintains a specific focus and clear link on objective (c)** of the AMI Regulation on promoting the inclusion and access to services for third country nationals.

### 3. Ensure inclusive and accountable governance of the MFF

#### **Analysis of the following Commission proposals:**

- NRPP Regulation
- Performance Framework Regulation

The new MFF proposal foresees a major restructuring of EU funding architecture, with the merging of 14 previously separate programmes into a single comprehensive national plan managed at national level.

Member states would prepare one single National and Regional Partnership Plan covering all EU funds allocated under shared management. These plans would run for seven years and include chapters on a wide range of policy areas, including cohesion and regional development, agriculture and fisheries, migration and border management, and social inclusion.

The plans would be managed centrally by national authorities and, in principle, developed in consultation with regional and local authorities and other stakeholders. As with previous programmes such as the AMIF for the period 2021-2027, the plans would be negotiated between national governments and the European Commission, and implemented under national management.

Under The current MFF 2021 - 2027, by contrast, regional and local authorities play a formal role through the partnership principle and, in many member states, directly manage programmes and engage extensively with the Commission throughout the programming and implementation cycle. The proposed NRPP model would therefore centralise negotiations and decision-making at national level, reducing the influence of regional and local authorities over the design and delivery of EU-funded investments.

These concerns are shared by local and regional authorities. The European Committee of the Regions has warned that the proposed NRPP model risks a “massive renationalisation” of EU funding and could undermine multi-level governance by concentrating decision-making in national administrations.<sup>66</sup>

Furthermore, in the new architecture, the European

Social Fund is a chapter of the NRPP, and while there is a separate Regulation, there is no dedicated budget, and the priorities are split between the NRPP and ESF Regulations.

This shift towards merging and centralisation reflects the European Commission’s objective of simplifying EU funding and increasing flexibility at national level.



The merging of different funds and priorities risks undermining the effectiveness of EU funding to deliver on specific priorities, which traditionally required a close involvement of different stakeholders, through a bottom-up and multi-governance approach.

The new management model also reduces oversight from the European Commission because it would make it more difficult to link funding expenditure to specific EU objectives, as explained in the opinion of the European Court of Auditors.<sup>67</sup>

#### Why is this a concern?

While the MFF proposals set out priorities and objectives of the next EU funds, they leave to the member states a high degree of flexibility compared to the past in deciding how to allocate resources, define the implementation measures, and reporting on progress. **This is particularly problematic in the area of social inclusion, as the proposals do not adequately address the specific situations of people in vulnerable situations, failing to define target groups, specific objectives, or meaningful**

**links to flagship priorities, such as the Anti-Poverty Strategy or the European Pillar on Social Rights.**

The ESF has been crucial to ensure stable and reliable funding support for marginalised people and communities, the most deprived, the European Child Guarantee, Roma, and third country nationals. **A programme with clear resources and objectives dedicated to employment, education, social inclusion, poverty reduction and access to services is crucial to ensure the achievement of EU objectives in these areas.** PICUM has joined the call of several partners calling for a standalone programme<sup>68</sup>, with a dedicated budget, as the main tool to invest in people. This call is in line with the European Parliament’s position<sup>69</sup> that was adopted in April 2026.

66 European Committee of the Regions, 2025, *EU budget post-2027: democracy and European unity at risk under current proposal, local and regional leaders warn*.

67 European Court of Auditors, 24 February 2026, *Opinion 09/2026 concerning the proposal 2025/0240 (COD) 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) 2024/250*.

68 EU Funds for Social Coalition, 17 March 2026, *Joint statement – Building on what works: an EU budget that delivers for people and regions*.

69 European Parliament, 28 April 2026, *Interim report on the proposal for the multiannual financial framework for 2028-2034*.

### Our recommendations

For the NRPP and ESF regulations:

- **Prevent excessive centralisation of decision-making within the NRPP framework** by preserving a meaningful role for regional authorities, civil society organisations and local actors throughout the programming and implementation cycle.
- **Guarantee transparency in the design, implementation and monitoring of the NRPPs**, including through public access to information on funding priorities, allocations and performance.
- **Support the European Parliament's position for a standalone European Social Fund programme with dedicated budget and priorities**

## 4. Strengthen the social impact of the performance framework

### Analysis of the following Commission proposals:

- Performance Framework Regulation and Annex I of the Regulation

One of the main novelties of the new MFF is the introduction of a regulation with a single list of indicators for reporting on projects that is applicable to the entire EU budget and to all management models: the Performance Framework Regulation.

**The proposed Regulation significantly reduces the number of indicators from more than 5,000 in the current programming period to around 900, with the aim of simplifying reporting.**<sup>70</sup> It also mainstreams important horizontal principles like “do no significant harm” and gender equality to all funding programmes. In the new system, member states are required to report on their activities based on a list of intervention fields, connected to output indicators and result indicators. The member states will be reimbursed based on their performance, which will be measured based on a list of milestones and targets. In duly justified cases, the member states can propose an alternative list of indicators.

While the proposed system has the potential to simplify the cumbersome financial reporting of EU projects for beneficiaries and administrations, we find a number of challenges that may hamper the potential of social innovation and transformation of the EU budget:

- **Insufficient link between funding and results, which would leave member states with a wide margin of manoeuvre on implementation.** The European Court of Auditors has underlined<sup>71</sup> that the proposed system does not adequately match funding with attended results, raising concerns regarding its capacity to create a truly results-oriented budget. This is particularly evident in the proposed annex of indicators which lists intervention fields (which can be understood as types of activities). Some of these intervention fields or activities are reforms to be completed by the member states, however, instead of measuring performance based on the results attended, it will be sufficient for member states to pass a law in a certain area, without any particular requirements regarding the quality of the legislation, or alignment with the EU objectives. For example, in the area of early childhood and education reforms, member states are only required to adopt a law in this area, without any specifications regarding its attended results. This system replaces the horizontal enabling conditions that required member states to have in place national strategies, for example for ensuring the inclusion of Roma, with a vaguer system that would leave the member states with a wide margin of manoeuvre.

<sup>70</sup> [Annex I to the Performance Framework Regulation.](#)

<sup>71</sup> [European Court of Auditors, 24 February 2026, Opinion 10/2026 concerning the proposal for a regulation of the European Parliament and of the Council establishing a budget expenditure tracking and performance framework and other horizontal rules for the Union programmes and activities.](#)

- **Extensive use of quantitative indicators with no attention to the quality of projects, especially in the social inclusion and anti-poverty fields.**

The use of quantitative indicators to measure progress and performance risks incentivising short-term, easily measurable actions that are incompatible with social projects aimed at tackling difficult issues that require long-term planning and investment. In addition, several actions under the social inclusion objectives are not linked with any results (for example, “measures to address homelessness” is not matched with any clear result). This risks disincentivising member states from social inclusion, community development and long-term resilience projects, and prioritise instead projects that can be easily measured.

- **Use of indicators that favour detention and other harmful policies, over broader objectives of social inclusion and protection.** For migration and border management objectives, several result indicators favour regularisation, inclusion in the labour market and access to services. However, other indicators, especially those linked to the policy objective of “countering irregular migration, enhancing safe and dignified return and readmission, and promoting reintegration in countries of origin” use indicators like “number of places in detention centres created”. The indicator on detention centres is entirely new<sup>72</sup> and may reinforce an approach that associates

increased detention capacity with higher return rates or better migration management outcomes, which are concepts that do not find any evidence in the research and that have been challenged by several academics<sup>73</sup> and civil society organisations. Instead of focusing on the resolution of irregular status, these indicators promote a deterrence-oriented approach, which may discourage investment in community-based approaches, such as case management and case resolution projects, including on return counselling or regularisation of residence permits.

- **Simplification... But for whom?** Finally, the proposed system is intended to promote simplification of the new budget. While for instance the introduction of a Single Gateway for reporting has a clear added value in promoting transparency and simplification, we are concerned that the system will not make reporting easier for the project beneficiaries, and therefore it will not improve accessibility of EU funding for smaller actors working on social projects. This is also in line with the opinion of the European Court of Auditors, which underlined that while simplification may be achieved between the member states and the Commission, “the administrative burden at regional, local and beneficiary level may remain unchanged or even increase”.<sup>74</sup>

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72 While detention facilities and services can already be funded under [AMIF 2021 – 2027](#), the programme does not include specific indicators measuring the creation of detention places or otherwise explicitly incentivising the use of funding for detention infrastructure.

73 MORE Project, [Deliverable D8.2 Policy Brief: Policy recommendations for the dignified treatment of irregularised, non-removable third-country nationals in the EU](#), Section 3.1.3.

74 *ibid.*

## Our recommendations

For the Performance Framework regulation:

- **Ensure that the performance framework measures the quality, accessibility and long-term impact of social inclusion and anti-poverty measures**, rather than focusing primarily on short-term and easily quantifiable outputs.
- **Strengthen the link between funding, reforms and meaningful social outcomes** by ensuring that performance assessments take into account the effective implementation and impact of measures, and not only the adoption of legislative or policy reforms
- **Introduce indicators that better reflect long-term social inclusion, access to services, community-based support and durable solutions for people in vulnerable situations**, including undocumented migrants.
- **Replace indicators on detention capacity linked to migration enforcement activities with indicators promoting legal assistance and community-based case management in the context of migration procedures, as well as non-custodial alternatives to detention.**
- **Ensure that intervention fields and indicators related to social inclusion objectives are systematically linked to meaningful result indicators**, including in areas such as homelessness, poverty reduction and community-based inclusion measures.
- **Maintain and strengthen mechanisms linking EU funding to national social inclusion and anti-poverty strategies**, including on Roma inclusion, disability rights and migrant inclusion.
- **Ensure that simplification measures effectively reduce administrative burdens for beneficiaries**, particularly smaller civil society organisations and local actors implementing social projects on the ground.
- **Involve civil society organisations, social partners and relevant experts in the development, monitoring and review of indicators and performance methodologies.**

## 5. Improve access to EU funding for civil society organisations

### Analysis of the following Commission proposals:

- NRPP Regulation
- AMI Regulation
- European Social Fund Regulation
- AgoraEU Regulation

The transformative potential of the EU budget can only be achieved if it becomes more accessible to organisations delivering services to the most vulnerable.

PICUM members consistently report that they are unable to access EU funding because of the administrative burden for applying and managing grants,

the high co-financing requirements, and the size of some grants that are too large for them to manage. These are recurring problems that are consistently observed across PICUM members and other civil society organisations, especially when they are small, newly established, or led by communities already facing discrimination.<sup>75</sup>

### Civil society required to contribute more in co-funding in new MFF

A significant change in the MFF proposals concern the streamlining of EU contribution rates for measures covered by the NRPP plans. In the proposal, the co-financing rates are determined based on the type of regions, with national contributions of 15 % for less developed regions, 40 % for transition regions, and 60 % for more developed regions. No exceptions are foreseen for any specific measure or policy area.

This stands at odds with the practice of the current MFF, where lower rates for national contributions were foreseen in both the ESF (10 % for support for the most deprived or 5 % for social innovative actions), and in the Home Affairs (25 % as a standard co-financing rate, with 10 % for some priority actions, such as the inclusion of third country nationals).

<sup>75</sup> Voicify, 2025, [#PartofEurope Report](#).

**The new co-financing requirements in the MFF proposals would make it impossible for civil society to access EU funding in more developed regions, and potentially in transition regions, creating a real gap in the support provided to people in need.**

For example, a civil society organisation in a more developed region would be required to contribute 40 % for Home Affairs activities, such as for actions in the area of integration of third country nationals, while in the current MFF they were required to contribute 10 %.

At the same time, the proposed AgoraEU programme creates an important opportunity to strengthen support for civil society organisations working on democracy, equality, rights and civic participation. The proposed envelope for the Citizens, Equality, Rights and Values + (CERV+) strand is a welcome development and should continue supporting the full range of actions currently covered under the CERV programme. In particular, maintaining operating grants for civil society organisations will remain essential to ensure stable and long-term support for organisations working on social inclusion, anti-poverty, migration and fundamental rights.<sup>76</sup>

Furthermore, previous ESF and AMIF programmes have often imposed<sup>77</sup> strict and burdensome requirements for social services providers for the identification of the final recipients, including regarding their migration status as an eligibility requirement for receiving support. Even where EU funding regulations do not include any references to the status of beneficiaries, audit rules at national level, or indicators in the financial reporting may introduce additional status checks, for example by requiring social service providers to check social security numbers, which undocumented migrants may not have. The proposed MFF does not address

this gap by clarifying that basic services and anti-poverty measures should be accessible to everyone in need, despite their migration status.

**Why is this a concern?**

These barriers significantly undermine the capacity of EU funding to reach the organisations that are best placed to support people in vulnerable situations. **High co-financing requirements, large-scale funding structures, and complex administrative procedures may exclude smaller, grassroots and community-led organisations.** This creates a structural mismatch between the objectives of EU social investment and the actors able to access funding, weakening the effectiveness and inclusiveness of EU interventions on the ground.

At the same time, the absence of flexibility in co-financing rates for social inclusion measures risks creating geographical inequalities in access to funding, particularly in more developed regions where national contribution requirements are highest. This may lead to gaps in service provision, despite the presence of significant needs.

In addition, the lack of clarity regarding access to services irrespective of migration status allows restrictive national practices to persist, both effectively excluding some of the most vulnerable groups from EU-funded support and ensuring that undocumented people remain undocumented for longer, as they cannot access often very-necessary support to resolve their administrative situation. As a result, EU funding risks reinforcing existing inequalities rather than addressing them, limiting its transformative potential and undermining its contribution to poverty reduction and social inclusion objectives.

<sup>76</sup> Civil Society Europe, 6 March 2026, [Civil Society amendment position paper on AgoraEU](#).

<sup>77</sup> PICUM, 25 May 2021, [How do undocumented migrants fare in the new EU funds?](#) [accessed 21 May 2026]

## Our recommendations

For the NRPP, AMI and ESF regulations:

- **Define the amount of co-financing rates** requested to apply for AMI funding at the national level, and **establish a rate of 10 % co-funding** for organisations applying for social inclusion and access to services actions in the ESF, AMI or NRPP Regulations
- **Consider introducing smaller grants** that are accessible to organisations with limited budget and resources, to make EU funding closer to the needs on the ground and to the organisations that are best placed to intercept marginalised groups, or that are themselves led by marginalised communities, such as migrants.
- **Clarify in the ESF, AMI and NRPPs that any grant requirements** for actions related to socio-economic inclusion, access to services such as healthcare and housing, and material aid to the most deprived must be explicitly accessible to all those in need, irrespective of migration status. This is particularly crucial for the European Child Guarantee, which already commits member states to support all children in need, including third country national children, regardless of migration status.
- **Ensure that reporting, audit and administrative requirements are proportionate to the size and nature of projects**, particularly for smaller civil society organisations and community-based actors.

For the AgoraEU regulation:

- **Ensure that the CERV+ strand within AgoraEU maintains the full scope of actions currently supported under the CERV programme**, including operating grants for civil society organisations.

## 6. Strengthen participation and the partnership principle across EU funding

### Analysis of the following Commission proposals:

- NRPP Regulation
- AMI Regulation
- European Social Fund Regulation

The partnership principle remains a cornerstone of the new funding model. It continues to guide the implementation of key EU funds under shared management, previously including the ESF+, AMIF, and others, and now forms a central element of the NRPPs.

Under this principle, governments are required to work closely with local and regional authorities, civil society organisations, social partners, and other relevant stakeholders throughout the entire funding cycle, from planning and implementation to monitoring. **The aim is to ensure that those directly affected by EU-funded projects have a meaningful role in shaping how funds are used, thereby improving transparency, effectiveness, and responsiveness to needs on the ground.**

Years of experience with structural and Home Affairs funds have demonstrated that strong stakeholder involvement leads to more effective, accessible, and needs-based funding. During the 2021 – 2027 funding period, the partnership principle has applied to all structural funds and Home Affairs funds under shared management, including the ESF, AMIF, BMVI, and the Internal Security Fund. In the new cycle, it will formally apply to the NRPP plans. **However, Article 6(5) of the NRPP regulation introduces a**

**concerning derogation for border management and internal security funding, which would not require the participation of civil society in the design, monitoring and implementation of EU funds at national level, reducing the accountability and monitoring of these funds.** This approach risks dismantling promising participatory practices and undermining years of experience in regionalised, partnership-based, bottom-up programming.

A key mechanism for implementing the partnership principle remains the establishment of monitoring committees at national level. In the new regulation, these committees should include representatives of civil society and other stakeholders, and member states may establish one or more monitoring committees for each chapter of the NRPPs.



Given the breadth of chapters concerned by the NRPPs, the fact that there is no obligation to include a monitoring committee per each chapter creates a risk that participation and oversight is diluted, less specialised, and with a weaker connection to the ground.

However, while the partnership principle remains formally embedded in the proposed legislation, the new proposal does not address the implementation challenges already [identified](#) by PICUM and ECRE<sup>78</sup> in the current funding cycle. In practice, civil society participation has often been weak, particularly at national level, with barriers to involvement in programme design, implementation, and monitoring. Limited resources and significant administrative burdens further constrain meaningful engagement in monitoring committees.

A welcome clarification in the new proposal is that all members of monitoring committees should have voting rights. This responds to previously reported challenges, notably in BMVI monitoring committees, and aligns with recommendations from the European Ombudsman<sup>79</sup>. However, unlike in the current Common Provisions Regulation<sup>80</sup>, the NRPP regulation does not explicitly incorporate the 2014 Code of Conduct on Partnership<sup>81</sup>. This removes an important reference setting out minimum standards for stakeholder participation, including in monitoring committees.

Moreover, the scope of the partnership principle remains limited. It continues to apply only to funds managed under shared management, where national or regional authorities are responsible for implementation and the European Commission oversees compliance with EU rules. **PICUM has previously argued that EU funds managed directly by the Commission,<sup>82</sup> such as the new EU Facility, would also benefit from structured and formalised consultation with civil society.** Without extending the partnership principle beyond shared management, meaningful stakeholder involvement risks remaining partial and inconsistent across EU funding instruments.

78 PICUM, 23 March 2023, [Partnership principle in EU funds: strong on paper, weak in practice](#).

79 European Ombudsman, 21 February 2025, [Decision on how the European Commission monitors fundamental rights compliance in the context of EU funds granted to Greece for border management \(case 1418/2023/VIS\)](#).

80 See Article 8 of Regulation (EU) 2021/1060 (Common Provisions Regulation), which requires Member States to organise partnerships in accordance with the European Code of Conduct on Partnership established by Commission Delegated Regulation (EU) No 240/2014.

81 European Commission, 7 January 2014, [Commission Delegated Regulation \(EU\) No. 240/2014 of 7 January 2014 on the European code of conduct on partnership in the framework of the European Structural and Investment Funds](#).

82 PICUM, 2025, [PICUM's Priorities for the Next EU Long-Term Budget](#).

## Our recommendations

For the NRPP Regulation:

- **Guarantee early, continuous and meaningful involvement of local authorities, social partners, and civil society organisations** in the design and implementation of the NRPPs, in accordance with the partnership principle, through structured consultations with civil society actors before the plans are drafted, and proper involvement in the monitoring committees.
- **Ensure that participation mechanisms are meaningful, accessible and adequately resourced, and go beyond formal or ad hoc consultation processes**, including by supporting the participation of stakeholders in the monitoring committees, and by ensuring that at least one monitoring committee covers all chapters of the NRPP plans.
- **Safeguard proper oversight of all EU funding** by deleting the derogation to the partnership principle for border management and security funds.
- **Mainstream the partnership principle to funds directly and indirectly managed by the European Commission**, such as the EU Facility, by setting up a Civil Dialogue Group with the beneficiaries of the actions and other relevant stakeholders.
- **Provide adequate financial and administrative support to enable the effective participation of civil society organisations**, particularly smaller and grassroots actors, in monitoring and partnership structures.

## 7. Ensure compliance with the EU Charter of Fundamental Rights through strong safeguards

### Analysis of the following Commission proposals:

- NRPP Regulation

In the newly proposed system, compliance with the EU Charter of Fundamental Rights is a horizontal principle governing all chapters of the NRPP Regulation, together with the principles of rule of law.

This structure is similar to the one under the 2021 – 2027 programming period, under which compliance with the Charter was a horizontal enabling condition in the Common Provisions Regulation. However, one crucial difference from the current system is that compliance with the UN Convention on the Rights of Persons with Disabilities (UN CRPD) is no longer an explicit requirement for receiving EU funding. While it remains a legal commitment for the EU and its member states as they have ratified it, in the current system it was a horizontal enabling condition, together with the EU Charter of Fundamental Rights.

The NRPP plans are required both to actively contribute to the protection and strengthening of democracy, fundamental rights, the rule of law and uphold Union values (articles 2 and 3 of the NRPP regulation), as well as to ensure compliance with these principles. **As with the rule of law principles, compliance with the Charter of Fundamental Rights is intended as a precondition for receiving funds and must be maintained throughout the**

**entire budgetary period.** Where the Commission considers that the member states do not comply with these requirements, it may adopt a decision determining the non-fulfilment of the horizontal principles, and suspend payments related to those specific activities, until the breach has been remedied (articles 8 and 9 of the NRPP regulation). A welcome development compared to the current system is the introduction of an obligation for member states to continue payments to beneficiaries, thereby preventing their own shortcomings from affecting final recipients.

In this context, **the introduction of elements of “smart conditionality” is a welcome development,** particularly where it seeks to ensure that final beneficiaries and civil society organisations do not bear the consequences of breaches attributable to national authorities.<sup>83</sup> This approach has the potential to strengthen the link between EU funding, Union values and fundamental rights compliance, while reducing harmful impacts on organisations and people relying on EU-funded support.

As under the previous system, member states are required, when preparing the plans, to specify through a self-assessment how they will ensure

83 Directorate-General for Budgetary Affairs (Budgetary Support Unit), October 2025, [Smart conditionality in practice: exploring legality, feasibility and implementation](#).

compliance with the rule of law and Charter horizontal conditions, as well as to identify deficiencies and remedial actions, without the involvement of an independent body. **However, the proposed legislation does not require the Commission to provide specific guidelines for operationalisation or publicly available criteria for assessing compliance with fundamental rights**, despite recommendations made by the European Ombudsman in 2025<sup>84</sup>, therefore leaving room for continued misuse.

**Monitoring committees play a role in examining the fulfilment of the horizontal principles throughout implementation.** However, there is no formal role for independent bodies, such as national human rights institutions, either in contributing to the self-assessments, monitoring implementation or in reviewing any complaints. Furthermore, the legislation does not specify that the European Commission should base its assessment on the relevant jurisprudence of the Court of Justice of the European Union, the European Court of Human Rights, nor on information provided by independent international bodies or complaints, another point raised by the European Ombudsman.

Under the previous system member states were required to establish a complaint mechanism for breaches of fundamental rights in EU-funded operations. Together with ECRE, and in line with the Fundamental Rights Agency<sup>85</sup>, PICUM has repeatedly highlighted<sup>86</sup> that the system remained underused due to the lack of transparency and safeguards for complainants, as complaints could only be submitted directly to national authorities, without guarantees of protection or anonymity and often without review by bodies possessing specific expertise in fundamental rights. Nevertheless, the new system no longer requires member states to establish complaint mechanisms at all, representing a clear step backwards at a moment when lessons could instead have been drawn from existing practice.

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84 European Ombudsman, 21 February 2025, [Decision on how the European Commission monitors fundamental rights compliance in the context of EU funds granted to Greece for border management \(case 1418/2023/VS\)](#).

85 European Union Agency for Fundamental Rights (FRA), 2023, [EU funds: Ensuring compliance with fundamental rights](#).

86 ECRE and PICUM, 2023, [Fundamental Rights Compliance of Funding Supporting Migrants, Asylum Applicants and Refugees Inside the European Union](#).

### Our recommendations

The next MFF must build on past experiences to improve and mainstream the implementation of the conditionality to the Charter of Fundamental Rights in EU funds, by ensuring that the NRPPs take due account of relevant human rights jurisprudence, are properly accountable through safe complaint mechanisms and involve fundamental rights bodies and civil society in the monitoring and planning. We recommend to:

- **Ensure that NRPPs are drafted and implemented in accordance with relevant national and regional human rights jurisprudence**, including that of the Court of Justice of the European Union and the European Court of Human Rights, and that independent bodies with expertise in fundamental rights, such as national human rights institutions, are involved not only in the preparation of the self-assessment (articles 8 and 22 of the NRPP Regulation), but also in monitoring implementation and compliance throughout the programming period.
- **Establish effective and accessible mechanisms with a central role for fundamental rights bodies to ensure compliance with the Charter of Fundamental Rights conditionality, including preventive measures, risk assessments, and capacity building** in the field of fundamental rights. This should include a mandatory, independent, and confidential complaint mechanism at national level for reporting breaches of fundamental rights in EU-funded operations, with guarantees of anonymity, protection from retaliation, and review by independent bodies with demonstrated expertise in fundamental rights.
- **Clarify and strengthen the role of the European Commission by requiring it to develop and publish clear assessment criteria and methodological guidance for evaluating compliance with fundamental rights.** The Commission should base its assessments on transparent standards, including relevant jurisprudence and independent information from monitoring bodies and complaints, and should ensure consistent application of supervisory, preventive, and corrective measures across member states.

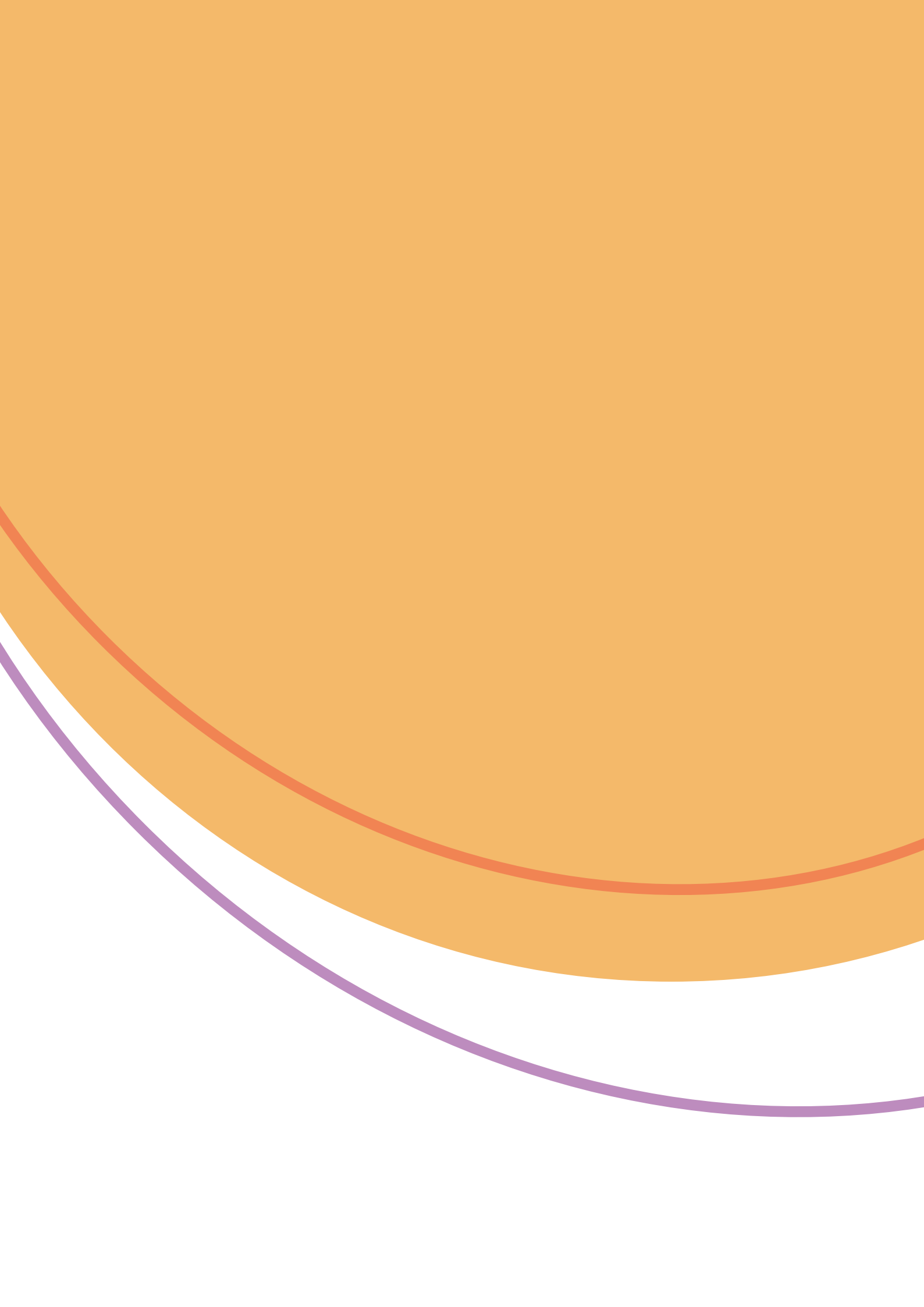
## Conclusion: What happens next?

The European Commission aims for the adoption of the MFF package by the Council and the European Parliament before the end of 2027, allowing implementation to start in January 2028. Negotiations are already underway, and both institutions have begun to develop their positions on the different elements of the package.

The proposed architecture of the MFF fundamentally changes how decisions on EU funding priorities will be taken. By bringing together agriculture, cohesion policy, migration, social inclusion, integration and security under the NRPPs, **many discussions that previously took place within sector-specific policy frameworks may increasingly shift towards broader negotiations on national reforms, investment priorities and budget implementation.**

The proposal also requires member states to begin preparing their NRPPs before the legislative negotiations are concluded. Draft plans may be submitted from June 2027, with formal submission expected by January 2028. **Consultations on national priorities are therefore likely to begin well before the start of the new programming period.**

For civil society organisations working on migration, anti-poverty and social inclusion, engagement with the MFF can no longer be limited to traditional policy actors and ministries. Decisions on funding priorities will increasingly involve finance ministries, central coordination bodies and authorities responsible for national reform programmes and performance-based funding. **Ensuring meaningful participation in the preparation, implementation and monitoring of the NRPPs will therefore be critical to safeguarding social inclusion objectives, fundamental rights and support for people in vulnerable situations.**





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