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COVER NOTE

From:	Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director
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To:	Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union

No. Cion doc.:	COM(2025) 351 final
Subject:	Proposal for a COUNCIL IMPLEMENTING DECISION amending Implementing Decision (EU) (ST 12524/21 INIT; ST 12524/21 ADD 1) of 29 October 2021 on the approval of the assessment of the recovery and resilience plan for Finland

Delegations will find attached document COM(2025) 351 final.

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Proposal for a

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THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) 2021/241 of the European Parliament and of the Council of 12 February 2021 establishing the Recovery and Resilience Facility¹, and in particular Article 20(1) thereof,

Having regard to the proposal from the European Commission,

Whereas:

- (1) Following the submission of the national recovery and resilience plan ('RRP') by Finland on 27 May 2021, the Commission proposed its positive assessment to the Council. The Council approved the positive assessment by means of the Council Implementing Decision of 29 October 2021². That Council Implementing Decision was amended on 14 March 2023³, on 8 December 2023⁴ and on 16 July 2024⁵.
- (2) On 30 April 2025, Finland made a reasoned request to the Commission to make a proposal to amend the Council Implementing Decision of 29 October 2021 in accordance with Article 21(1) of Regulation (EU) 2021/241 on the grounds that the RRP is partially no longer achievable because of objective circumstances. On that basis, Finland has submitted an amended RRP.

Amendments based on Article 21 of Regulation (EU) 2021/241

- (3) The amendments to the RRP submitted by Finland because of objective circumstances concern five measures.
- (4) Finland has explained that target 102 under measure P3C3I1 (RDI funding package promoting the green transition – Leading companies) under component P3C3 (RDI, research infrastructure and piloting) is partially no longer achievable because of delays in procurement procedures due to Russia's war of aggression and related higher interest rates. On this basis, Finland has requested to extend the implementation

¹ OJ L 57, 18.2.2021, p. 17.

² ST 12524/21 INIT; ST 12524/21 ADD 1

³ ST 6991/23 INIT; ST 6991/23 ADD 1 COR 1

⁴ ST 15836/23 INIT; ST 15836/23 ADD 1

⁵ ST 11535/24 INIT; ST 11535/24 ADD 1

timeline of target 102, as well as to amend the corresponding measure description. The Council Implementing Decision of 29 October 2021 should be amended accordingly.

- (5) Finland has explained that milestone 15 under measure P1C2R2 (Strategic promotion of the circular economy and reform of the Waste Act) under component P1C2 (Industrial reforms and investments in support of green and digital transition) is partially no longer achievable, because of delays in processing of commitment proposals and the voluntary nature of commitments. On this basis, Finland has requested to extend the implementation timeline of the milestone as well as amend the measure description. The Council Implementing Decision of 29 October 2021 should be amended accordingly.
- (6) Finland has explained that measure P2C2I3 (Accelerating key technologies (microelectronics, 6G, artificial intelligence and quantum computing) under component P2C2 (Accelerating the data economy and digitalisation) is partially no longer achievable, due to lower market demand for 6G, AI and quantum computing projects than initially predicted, compensated by higher than expected market demand for microelectronics projects. On this basis, Finland has requested to merge targets 65 and 67, whilst not reducing the ambition of the measure. The Council Implementing Decision of 29 October 2021 should be amended accordingly.
- (7) Finland has explained that two measures have been amended to implement a better alternative to achieve the original ambition of the measure. This concerns target 8 under measure P1C1I2 (Investments in new energy technologies) under component P1C1 (Transformation of the energy system) and measure P5C1I1 (Investments for clean transition) under component P5C1 (REPowerEU). On this basis, Finland has requested to amend the aforementioned measures, including the relevant milestones and targets. The Council Implementing Decision of 29 October 2021 should be amended accordingly.
- (8) The Commission considers that the reasons put forward by Finland justify the amendment(s) pursuant to Article 21(2) of Regulation (EU) 2021/241, and the Council Implementing Decision of 29 October 2021 should be amended accordingly.

Distribution of milestones and targets

- (9) The distribution of milestones and targets in instalments should be modified to take into account the amendments to the plan and the indicative timeline presented by Finland.

Corrections of clerical errors

- (10) Four clerical errors have been identified in the text of the Council Implementing Decision, affecting one milestone and four measures under three components. The Council Implementing Decision should be amended to correct these clerical errors that do not reflect the content of the RRP submitted to the Commission on 27 May 2021, as agreed between the Commission and Finland. Those clerical errors relate to milestone 33 of measure P1C3I2 (Low-carbon built environment programme) under component P1C3 (Reducing the climate and environmental impacts of the building stock) and the description of the following measures: P1C2I1 (Low-carbon hydrogen and carbon capture and utilisation) under component P1C2 (Industrial reforms and investments in support of the green and digital transition), P1C5R1 (Modernisation of nature conservation legislation) under component P1C5 (Environmental sustainability and nature-based solutions), and P2C2R1 (Development of the residential and commercial property information system) under component P2C2 (Accelerating the

data economy and digitalisation). Those corrections do not affect the implementation of the measures concerned.

Commission's assessment

- (11) The Commission has assessed the amended RRP against the assessment criteria laid down in Article 19(3) of Regulation (EU) 2021/241.
- (12) The Commission considers that the amendments put forward by Finland do not affect the positive assessment of the RRP set out in the Council Implementing Decision 29 October 2021 on the approval of the assessment of the RRP for Finland regarding the relevance, effectiveness, efficiency and coherence of the RRP against the assessment criteria laid down in Article 19(3), points (a), (b), (c), (d), (da), (db), (e), (f), (g), (h), (i), (j) and (k).

Positive assessment

- (13) Following the positive assessment by the Commission of the amended RRP with the finding that the RRP satisfactorily complies with the criteria for assessment set out in Regulation (EU) 2021/241, in accordance with Article 20(2) of and Annex V to that Regulation, the reforms and investment projects necessary for the implementation of the amended RRP, the relevant milestones, targets and indicators, and the amount made available from the Union for the implementation of the amended RRP in the form of non-repayable financial support should be set out.

Financial contribution

- (14) The estimated total costs of Finland's amended RRP is EUR 1 949 227 000. As the amount of the estimated total costs of the amended RRP is higher than the updated maximum financial contribution available for Finland, the financial contribution determined in accordance with Article 4a of Regulation (EU) 2021/1755 of the European Parliament and of the Council and Article 20(4) and Article 21a(6) of Regulation (EU) 2021/241 allocated for Finland's amended RRP should be equal to the total amount of the maximum financial contribution available for Finland's amended RRP. This amount is equal to EUR 1 949 059 854. Therefore, the financial contribution made available to Finland remains unchanged.
- (15) Council Implementing Decision of 29 October 2021 on the approval of the assessment of the RRP for Finland should therefore be amended accordingly. For the sake of clarity, the Annex to that Council Implementing Decision should be replaced entirely,

HAS ADOPTED THIS DECISION:

Article 1

The Council Implementing Decision of 29 October 2021 on the approval of the assessment of the recovery and resilience plan for Finland is amended as follows: (1) Article 1 is replaced by the following:

“Article 1

Approval of the assessment of the RRP

The assessment of the modified RRP of Finland on the basis of the criteria provided for in Article 19(3) of Regulation (EU) 2021/241 is approved. The reforms and investment projects under the RRP, the arrangements and timetable for the monitoring and implementation of the RRP, including the relevant milestones and targets, the relevant indicators relating to the fulfilment of the envisaged milestones and targets, and the arrangements for providing full

access by the Commission to the underlying relevant data are set out in the Annex to this Decision.”;

(2) The Annex is replaced by the text in the Annex to this Decision.

Article 2
Addressee

This Decision is addressed to the Republic of Finland.

Done at Brussels,

For the Council
The President