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#### COVER NOTE

From:	Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director
date of receipt:	17 July 2025
To:	Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union
No. Cion doc.:	SEC(2025) 545 final
Subject:	Regulatory Scrutiny Board opinion Impact assessment of the MFF - Civil Protection, preparedness and response to crises

Delegations will find attached document SEC(2025) 545 final.

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EUROPEAN COMMISSION

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### **REGULATORY SCRUTINY BOARD OPINION**

**Impact assessment of the MFF - Civil protection, preparedness and response to crises**

{COM(2025) 548 }

{SWD(2025) 545-546}



EUROPEAN COMMISSION  
REGULATORY SCRUTINY BOARD

Brussels,  
RSB

### Opinion

**Title: Impact assessment of the MFF – Civil protection, preparedness and response to crises**

#### (A) Policy context

The financial instrument on “Civil protection, preparedness and response to crises” is part of the post-2027 Multi-annual Financial Framework (MFF) package. Contributing to the Preparedness Union Strategy adopted by the Commission in March 2025, it will build on the existing Union Civil Protection Mechanism (UCPM) and elements from the EU4Health Programme.

Under the Commission’s Political Guidelines, the next MFF sets out to be more focused, simpler and more impactful. Better Regulation Tool #9 acknowledges that ‘the special case of preparing a new multiannual financial framework is a unique process requiring a specific approach as regards scope and depth of analysis’. The architecture of the new MFF will be significantly different from the current structure. Given that at this stage the impact assessment lacks several key elements the Board has decided, exceptionally, to issue an Opinion without qualification.

#### (B) Key issues and recommendations

The Board notes the additional information provided and commitments to make changes to the report. However, the report still contains significant shortcomings. The Board makes the following recommendations for the lead Service(s) to rectify:

**On scope and coherence:** The report is not clear about the scope of the instrument, notably why only the current civil protection fund and health aspects are integrated given the much wider concept of “preparedness”. It is not clear how the new instrument is supposed to interact with other funding programmes, and also with measures in the Preparedness Strategy. The coherence of the proposed Hub with existing crisis and civilian military coordination structures is not sufficiently analysed.

The report should define upfront concepts such as ‘preparedness’, ‘whole of society’, ‘all hazards’, ‘whole of government’. It should better explain and justify the scope of the instrument and why it includes only activities under the current UCPM and elements of the EU4Health programme, and no other relevant policy areas (e.g. climate adaptation, critical infrastructure, cybersecurity). It should further elaborate how the fund will

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This opinion concerns a draft impact assessment which may differ from the final version.

Commission européenne/Europese Commissie, 1049 Bruxelles/Brussel, BELGIQUE/BELGIË - Tel. +32 22991111  
regulatory-scrutiny-board@ec.europa.eu

contribute to broader “preparedness” policy objectives and what types of activities would receive funding. The report should outline the respective competences and resources of the EU Member States and EU institutions in areas of civil protection and crisis management. It should clearly explain how the proposed instrument would work together with the other EU and national funds and how “preparedness” will be mainstreamed across other policies and funds. The report should also explain whether mainstreaming is a prerequisite for the proposed fund being able to deliver.

The report is not clear on the coherence of the initiative with other existing structures – notably, but not exclusively, those related to civilian/military operations in the EEAS and EEAS crisis coordination structures. It should be clarified how duplication and added complexity will be avoided and synergies and streamlining achieved.

**On intervention logic and objectives:** The report does not sufficiently explain what success would look like, and how the contribution of the fund to the broader policy objectives will be measured. It is not clear to what extent the contribution of the fund to the broader policy objectives depends on the mainstreaming of “preparedness” across other funds and policies.

The report should better indicate different types of emergencies it is intended to respond to. The impact assessment should ensure that all objectives are expressed in S.M.A.R.T. terms and elaborate on how the contribution of the instrument will be measured including what interplay there is with other measures and actions contributing to the same objectives. Given that the objectives are defined as ‘contribute to...’, ‘support...’, ‘enhance...’, the report must clearly show how the expected effects of the intervention will be disentangled from other factors.

**On comparison of options and impacts:** The report is not clear enough about the impact of the options and about the differences between them. The choice of preferred option is not sufficiently substantiated. The proposed single EU comprehensive risk and threat assessment is not sufficiently explained.

The assessed options should be much more clearly differentiated and their limitations as regards the broader policy framework clarified. When the options are compared and one is found to contribute more or less to the broader policy framework, it is unclear how this contribution is determined.

In the analysis of the comprehensive cross-sectoral risk assessment proposed in option 2 the report needs to demonstrate that such a facility will have better foresight ability than the many existing foresight efforts, which (according to the report) have failed to sufficiently anticipate the major crises of the last years. It also needs to be demonstrated if and why a centralised comprehensive EU level risk assessment will be superior to having decentralised national and sectoral risk assessments efforts. The report should assess [ risks of complexity and duplication and what the EU added value is of a centralised system.

In terms of budget and financing architecture, the report, should clarify what it means when option 1 is described as having a “non-integrated budget structure that is still flexible and fast enough to react to emergencies”, and what the underlying evidence is. Similarly, it should be better explained why the report finds that option 2 will ensure long-term predictability by allowing “a balancing of crisis reaction with long-term preparedness. The report should substantiate the impacts of the assessed options. Views of stakeholders should be more systematically presented. The report and Annex 3 should be more explicit



about the expected benefits of better “preparedness” and response to crises. It should include an analysis of costs, including of costs related to mainstreaming preparedness.

If and when referring to evaluations the report should clearly state the relevant conclusions reached in those evaluations, and how strongly the conclusions are supported by a reliable evidence base, taking also into account opinions from the RSB. The report should analyse the baseline of the current funding landscape, notably if parts of current programmes should be discontinued or re-oriented. Since the UCPM and EU4Health programme have been in place for several years, evidence and examples of their added value should be included in the report to illustrate in which situations EU action and coordination is more efficient and effective than national or regional efforts of the Member States, based on an analysis of Member States’ interventions on civil protection and preparedness.

**On governance:** It is not clear how the funds will be governed or allocated and what types of activities will be eligible for funding. The EU crisis coordination hub is not sufficiently explained.

The report should describe the governance mechanisms, including taking fully into account the competences of the Member States. It should also describe the functioning of the preparedness hub, its composition and chains of command as well as how funding and allocation decisions will be taken, how the specifics of different policy actions (e.g. UCPM versus health) will be considered and how it would articulate with the IPCR. The report needs to demonstrate that the financial architecture is well suited to facilitate delivery on the policy objectives, since desired synergies and results are unlikely to materialise without the alignment between the policy objectives and financial architecture.

**On future monitoring and evaluation:** The report is not clear what monitoring and evaluation arrangements will be put in place to measure the achievement of the programme’s objectives and how it will interact with the Performance Framework Regulation.

The report should include a requirement for a data plan that would ensure that different types of necessary data are available for the evaluation of effectiveness, efficiency and EU added value without increasing administrative burden, building on appropriate methods and modern tools for data collection, retrieval and analysis. It should be clarified how the Performance Framework Regulation will integrate specific indicators relevant to the objectives of the instrument since the Performance Framework Regulation’s list of indicators is supposed to be usable across instruments/funds. In addition the report should indicate what indicators and underlying data will be used specifically to monitor any mainstreaming of preparedness.

*Some more technical comments have been sent directly to the author Service.*

#### **(C) Conclusion**

The lead Service(s) should revise the report in accordance with the Board’s recommendations before launching the interservice consultation.

Full title	MFF - Civil protection, preparedness and response to crises
Reference number	2025/MFF/05
Submitted to RSB on	28 May 2025
Date of RSB meeting	18 June 2025