



Brussels, 17 July 2025
(OR. en)

11758/25
ADD 4

CADREFIN 108	MAMA 186
FIN 899	MOG 84
POLGEN 91	PTOM 11
RELEX 1028	ELARG 96
ACP 76	GLOBAL GATEWAY 25
DEVGEN 130	ATO 46
COHOM 128	EDUC 328
COHAFA 70	ENER 378
COAFR 210	MIGR 266
COASI 84	SAN 469
COEST 598	SUSTDEV 57
COLAC 111	PE 50
COTRA 14	CODEC 1045
COWEB 102	

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) 548 final
Subject:	REGULATORY SCRUTINY BOARD OPINIONImpact assessment on the Global Europe instrument

Delegations will find attached document SEC(2025) 548 final.

Encl.: SEC(2025) 548 final



EUROPEAN COMMISSION

13.6.2025

SEC(2025) 548

REGULATORY SCRUTINY BOARD OPINION

Impact assessment on the Global Europe instrument

{COM(2025) 551 }

{SWD(2025) 552-553}



Brussels,
RSB

Opinion

Title: Impact assessment on the Global Europe instrument

(A) Policy context

The Global Europe Instrument is part of the post-2027 Multiannual Financial Framework (MFF) package and will bring together several external policy funding instruments from the current MFF (the NDICI-Global Europe, the IPA III, humanitarian aid, the Ukraine facility and the Reform and growth facilities for the Western Balkans and Moldova) in one framework in order to meet the challenges of an increasingly difficult, fragile and volatile geopolitical context, while continuing to promote the EU's interests and values.

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 intervention logic: The intervention logic is not consistent with the issues raised in the report. The scope of the report covers the implementation architecture rather than the policy substance.

Unless the financial architecture is aligned with the policy objectives, desired synergies are unlikely to materialise. Furthermore, without this, relevant result and impact indicators and an evaluation and monitoring framework to allow for the effectiveness and efficiency of the intervention to be evaluated in the future cannot be established.

Since the Global Europe Instrument is assumed to build on the current funding programmes having redundancies, the report should analyse at least the baseline of the current funding

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

landscape for external action, notably which parts of it should be discontinued or re-oriented. The intervention logic should be revised to better account for the issues facing external action funding. If the trade off between predictability/flexibility is demonstrated to be the key problem, it should be unpacked and the current narrative revised, since the options proposed in the report do not respond to the need of rebalancing this trade-off.

The report should give a clear indication of the current order of magnitude of the split between programmed and non programmed funding and indicate why and in which areas of external action this is a problem. It should analyse the need for a better alignment between pre accession and neighbourhood funding in cases of backsliding as well as between country programmed funding and humanitarian emergency aid in other contexts. It should clearly set out other flexibility issues relating to: (i) the lack of a mechanism to revisit already programmed funds; (ii) inflexibility arising from mainstreaming requirements; and (iii) the rigidity of the structure of the budget for external programmes. The revision of the intervention logic should better reflect the sub-objectives outlined under the specific objectives and the formulation of additional policy options should be adjusted to align with them, the specific and the general objective. The objectives should be defined in a S.M.A.R.T. manner.

On the use of evaluations and the problem definition: The evidence base of the problem description is not comprehensively developed and relies too heavily on conclusions from previous evaluations that are not sufficiently substantiated by robust evidence. The link between the problem definition, objectives and the options is neither clear nor complete.

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 problem definition should make clear which identified problems constitute societal problems that justify a public intervention, and which problems are perceived shortcomings of already existing public interventions. The problem description should also be revised and made more granular to address better the challenges of effectiveness, predictability, flexibility, coherence and simplification facing external funding. Additional evidence should be presented to demonstrate the identified problems, and causal links between the problems and problem drivers. Quantitative evidence should be presented on the magnitude of identified problems. The public consultation should be better integrated throughout the report including with a differentiation of stakeholders' views and impacts on them.

On options: The options offer limited choice to policy makers and are not aligned with and do not address all of the problems. The report does not assess whether the tradeoffs between flexibility and predictability on the one hand, and complexity and simplicity of the funding landscape on the other hand, provide sufficient analytical dimensions to adequately identify options and fully assess their impacts.

The full range of measures and policy options needed to tackle identified problems and achieve the objectives should be developed. The first is deficient while the remainder are two variants of the same option addressing only one sub-problem (financing of Ukraine). In addition, it is unclear how measures linked to "geographisation", be it at country or at regional level, would enhance the flexibility of non-programmable funding. Given that the option of full programming has been discarded, logically so too should the first option (full

flexibility) since it is inconsistent with the objective of adjusting the balance between predictability and flexibility. The policy measures and their grouping into options should be revised to align with an amended and more granular problem definition.

The analysis of impacts on key assessment criteria should also be revised. The report should include more precise analysis of concrete measures, such as the use of financial instruments and leveraging using private and public capital, performance-based funding and governance, and propose options which best address key problems and identified objectives. The issue of Ukraine should be addressed separately, not to be confused with other issues.

The report should discuss whether other analytical dimensions would be needed to establish a full range of options and fully assess them, including how they contribute to the general and specific objectives of the programme.

The report should clarify the preferred option, if any, and present a consistent basis for policy decision makers. Annex 3 should be revised to focus on main categories of costs and benefits and identify impacts on all relevant stakeholder groups.

On the analysis of unintended consequences: The report does not analyse the unintended consequences that can result from the intervention, and in particular if they can be adverse and entail costs for various stakeholders.

On governance: The report does not sufficiently describe the governance mechanisms. It should clarify these, including how funding decisions will be taken, by whom and, at what stage, in each of the policy options, and how the risk of policy dilution is addressed. It should indicate criteria to be used for allocation decisions.

On coherence: The report does not specify how the Global Europe instrument fits with wider objectives of other parts of the next MFF particularly on the link between internal and external policies. Horizontal aspects vis-à-vis other MFF files should be addressed throughout the report. This should cover monitoring, governance, coherence and simplification as well as links with, in particular, the European Competitiveness Fund, where further synergies are envisaged. It should also analyse how Global Europe will relate to Member State interventions in the field of external action.

On future monitoring and evaluation: The report is unclear what monitoring and evaluations arrangements will be put in place to measure the achievement of objectives and EU budget impact. After defining the objectives in SMART terms the report should outline appropriate evaluation and monitoring arrangements which would allow to monitor the progress on achieving the objectives. The report should include a requirement for the data plan which would ensure that different types of data building on appropriate methods and modern tools for data collection, retrieval and analysis are available for the evaluation of effectiveness, efficiency and EU added value without increasing administrative burden.

It report should be cleared how the specific indicators relevant to the objectives of the instrument will be identified and used in the performance monitoring.

Some more technical comments have been sent directly to the lead Service(s).

(C) Conclusion

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

Full title	Impact assessment report accompanying the Commission proposal for the basic act of the Global Europe instrument
Reference number	2025/MFF/03
Submitted to RSB on	14 May 2025
Date of RSB meeting	4 June 2025