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COVER NOTE

From: The Irish parliament (Houses of the Oireachtas)

date of receipt: 16 December 2025

To: The President of the Council of the European Union

Subject: Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing the European Fund for Regional Development including for European Territorial Cooperation (Interreg) and the Cohesion Fund as part of the Fund set out in Regulation (EU) [...] [NRP] and establishing conditions for the implementation of the Union support to regional development from 2028 to 2034
[11768/25 - COM(2025) 552 final]
Proposal 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) 2024/2509
[11815/1/25 - COM(2025) 565 final]
Proposal for a COUNCIL REGULATION laying down the multiannual financial framework for the years 2028 to 2034
[11691/25 - COM(2025) 571 final]
Proposal for a COUNCIL DECISION on the system of own resources of the European Union and repealing Decision (EU, Euratom) 2020/2053
[11705/25 - COM(2025) 574 final]

- Opinion on the application of the Principles of Subsidiarity and Proportionality

Delegations will find enclosed the opinion¹ of the Irish Parliament (Houses of the Oireachtas) on the above.

¹ The translations of the opinion may be available on the Interparliamentary EU Information Exchange website (IPEX) at the following addresses:
<https://secure.ipex.eu/IPEXL-WEB/document/COM-2025-0565>
<https://secure.ipex.eu/IPEXL-WEB/document/COM-2025-0552>
<https://secure.ipex.eu/IPEXL-WEB/document/COM-2025-0571>
<https://secure.ipex.eu/IPEXL-WEB/document/COM-2025-0574>

**An Comhchoiste um Airgeadas, Caiteachas Poiblí,
Athchóiriúchán Seirbhíse Poiblí agus Dígtiúchán,
agus an Taoiseach**

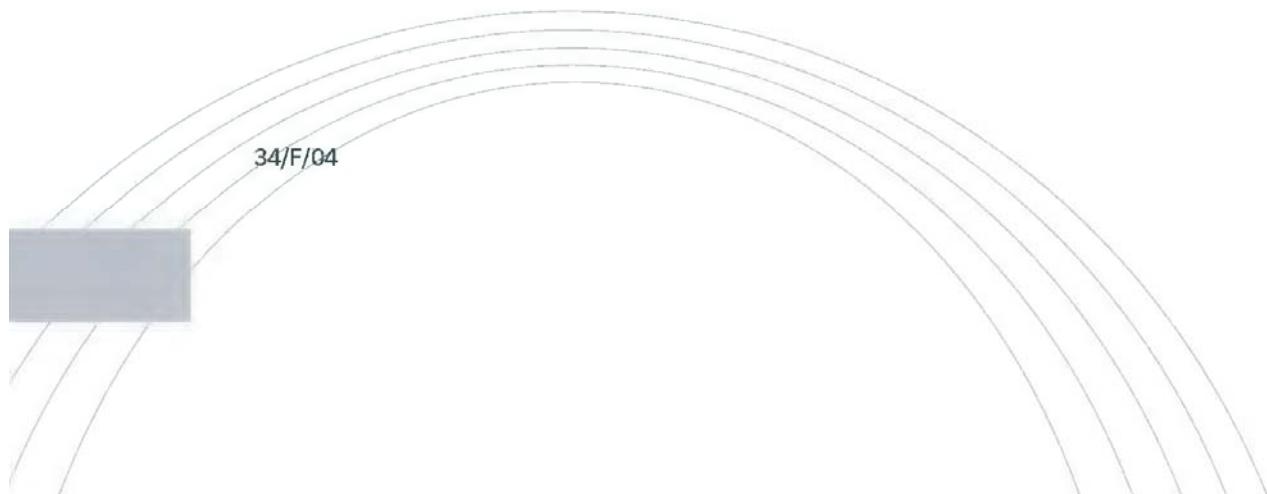
An Cion Polaitiúil maidir le COMs(2025)552, 565, 571, 574

Nollaig 2025

**Joint Committee on Finance, Public Expenditure,
Public Services Reform and Digitalisation, and
Taoiseach**

Political Contribution on COMs(2025)552, 565, 571, 574

December 2025



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1. Introduction

- 1.1. In July and September 2025, the European Commission published multiple proposals under the wider MFF 2028-2034 package. These include the Multiannual Financial Framework regulation (MFF), the Own Resources Decision (ORD) and regulations governing sectoral proposals such as agriculture and cohesion.
- 1.2. The Oireachtas Joint Committee on Finance, Public Expenditure, Public Services Reform and Digitalisation, and Taoiseach (“the Committee”) considers COMs(2025) 552,¹ 565,² 571³ and 574⁴ to be significantly important to Ireland and the EU.

2. Scrutiny by the Joint Committee

- 2.1. The Committee first considered COMs (2025) 552, 571 and 574 at its meeting on 24 September 2025. The Committee first considered COM(2025)565 at its meeting on 1 October 2025. Following these meetings the Committee agreed to write to the Department of Finance and the Department of Public Expenditure, Infrastructure, Public Services Reform and Digitalisation to request further information on the proposals. The Committee also consulted the Joint Committee on Agriculture and Food and the Joint Committee on Fisheries and the Marine to seek their views on related proposals, COM(2025)559 and COM(2025)560.

¹ Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing the European Fund for Regional Development including for European Territorial Cooperation (Interreg) and the Cohesion Fund as part of the Fund set out in Regulation (EU) [...] [NRP] and establishing conditions for the implementation of the Union support to regional development from 2028 to 2034

² Proposal 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) 2024/2509

³ Proposal for a COUNCIL REGULATION laying down the multiannual financial framework for the years 2028 to 2034

⁴ Proposal for a COUNCIL DECISION on the system of own resources of the European Union and repealing Decision (EU, Euratom) 2020/2053

3. Decision of the Joint Committee

3.1. On 10 December 2025, the Committee also agreed to draft a political contribution and to forward a copy to Simon Harris T.D. Minister for Finance, Jack Chambers T.D. Minister for Public Expenditure, Infrastructure, Public Services Reform and Digitalisation, Ursula von der Leyen, President of the European Commission, Roberta Metsola MEP, President of the European Parliament, and to the President of the Council of the European Union.

4. Opinion of the Joint Committee

4.1. Having considered the proposals in detail, the Committee makes the following observations: -

COMs(2025)552 and 565

4.2. Pillar 1 of the proposed MFF 2028-2034 provides for pre-allocated national funding envelopes for Cohesion Policy funds, Common Agricultural Policy funds and Common Fisheries Policy funds to be consolidated under a single fund, governed by a National and Regional Partnership Plan (NRPP) in each Member State.

4.3. The Committee understands that the Commission proposes that the Fund would operate under a performance-based budgeting model, with funding disbursements tied to the achievement of predefined milestones.

4.4. The Committee is concerned by the proposal to consolidate Cohesion Policy funds, Common Agriculture Policy funds and Common Fisheries fund under a single fund.

4.5. While the Committee notes that a number of aspects of the proposed approach align with Ireland's cohesion policy priorities, the Committee is of the strong view that CAP should not be linked to Cohesion funding.

4.6. In relation to Common Agricultural Policy implementation, the Joint Committee is aware that the Joint Committee on Agriculture and Food have undertaken to conduct further scrutiny on COM(2025)560 which is closely related to the proposals discussed here. The Joint Committee commits to staying informed of

developments within this sectoral committee and will reflect on these views in advance of any further consideration of the MFF.

- 4.7. In relation to Common Fisheries Policy (CFP) implementation, the Joint Committee consulted with the Joint Committee on Fisheries and the Marine to ascertain its views on COM(2025)559 which is closely related to the proposals discussed here. A detailed list of concerns raised by the Joint Committee on Fisheries and the Marine is provided in Appendix A. The Committee is in full support of the views expressed by the Joint Committee on Fisheries and the Marine.

COM(2025)571

- 4.8. The Committee notes that this proposal carries significant implications for Ireland with regard to what will be received from and contributed to the EU budget.
- 4.9. The Committee further notes that the proposal seeks to restructure the MFF into four headings, representing a significant departure from the current seven headings.
- 4.10. Regarding elements of the MFF regulation not linked to overall expenditure levels, the Committee highlights a preference towards predictability and transparency of expenditure which assists in management of the domestic budget.
- 4.11. The Committee observes that flexibility provisions are proposed within various EU budget programmes, understanding that the aim is to increase the ability of the EU budget to react to unforeseen needs, while also increasing uncertainty for beneficiaries of funds and for Member States' contributions. The Committee considers that efforts to balance to these objectives is key.
- 4.12. The Committee notes that Articles 13 and 14 propose 1 July 2033, as the deadline for the European Commission to propose the post-2034 MFF, as the next MFF would need to come into force on 1 January 2035, 18 months later.
- 4.13. The Committee is concerned that this timeline would appear too short for thorough negotiation by Council and European Parliament, taking into account

that the current MFF regulation set this deadline at 1 July 2025, for an MFF entering into force on 1 January 2028 allowing 30 months.

COM(2025)574

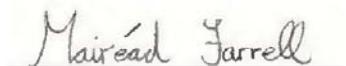
- 4.14. The Committee welcomes improvements to the current system of Own Resources but is of the strong view that GNI remains the fairest and most effective way to fund the EU budget.
- 4.15. The Committee notes that the existing Own Resources Decision does not have a sunset clause, and as such, can remain in place without need to agree a new one.
- 4.16. The Committee considers that the GNI based own resources ensures that Member States contribute according to relative income, which demonstrates to citizens that we play our rightful part in financing common EU goods.
- 4.17. The Committee takes the view that proposals for new own resources must meet the objectives of fairness, simplicity, transparency and equity, including fair burden sharing, as agreed in the July 2020 European Council conclusions. To be acceptable, they must bring benefits without excessive complication.
- 4.18. With regard to the own resources ceilings, the Committee believes that ceilings should be set at an amount that allows the EU to cover its financial obligations and contingent liabilities, while maintaining safeguards on the amounts that may be called upon from Member States, due to the disruption to national budgets that unexpectedly large calls for funds by the EU might cause.

5. Recommendations of the Joint Committee

- 5.1. The Committee notes the moves towards a performance-based instrument where funding is not based on costs incurred, but rather on milestones reached. The Committee is concerned with the proposed approach which would see a financial architecture where cost is not at the centre of the model.
- 5.2. Given Ireland's strong reliance on CAP and CFP, the Committee has concerns around the potential impacts to cohesion funding and would request that this kept closely under review as MFF negotiations continue.

- 5.3. The Committee notes Ireland's status as net contributor to the EU budget and further notes that Cohesion funding represents a significant portion of the budget. Within this context, the Committee highlights the benefits derived by Ireland as a result of Cohesion funding and states a preference that similar benefits should be accrued to other Member States in the same way.
- 5.4. The Committee is concerned with the proposed direction of the structure of the MFF 2028-2024 and retains the right to continue to monitor developments in negotiations closely.

Yours sincerely,



Mairéad Farrell, T.D.

Cathaoirleach to the Committee

Appendix A: Views of the Joint Committee on Fisheries and the Marine on COM(2025)559

Opinion of the Joint Committee on Fisheries and the Marine:

1. The Committee considers the question of EU funding in support of the fisheries and maritime sector under the MFF 2028-2034 to be of critical importance in enabling Ireland to fully implement CFP and supporting Ireland's capacity in sustainable management of fisheries control and enforcement, implementation of the Common Market Organisation Regulation for fisheries and aquaculture, and community-led local development in coastal areas.
2. The Committee further notes that the MFF is being negotiated in the context of existential challenges facing the Irish fisheries sector: anticipated reductions in total allowable catch of pelagic species, irresponsible overfishing by non-EU coastal states, and the ongoing impacts of Brexit. The Committee considers that the fisheries sector plays a vital role in the culture and heritage of at-risk Irish coastal communities. As such, the Committee considers that the Commission's proposals in this area merit significant engagement.

The Joint Committee on Fisheries and the Marine notes the following:

3. The Irish seafood sector has historically received low EMFAF funding in relation to other maritime countries;
4. The funding ringfenced for implementation of CFP in Ireland under Commission Fiche 12 equates to 38% of equivalent EMFAF funding for the current funding period;
5. Article 35(11) of the NRPP regulation is significantly more limited in its scope than the EMFAF regulation, and does not include fisheries data collection or fisheries control and enforcement, and it is unclear whether funding is available for these measures at member state level under the EU facility;
6. Pending the outcome of MFF negotiations, the Committee has been briefed that there may be a funding gap of between €35.4 million and €88.4 million in relation to Ireland's seafood sector;
7. The measures set out under Article 35(11) of the NRPP regulation relate to broader environmental policy objectives, and the regulation lacks a clear

distinction between measures to support CFP implementation and broader environmental measures, which the Committee considers does not reflect Ireland's strategic priorities and does not reflect the critical role of fisheries in European food security;

8. The Committee considers that the priorities of funding should revolve around adaptation and innovation and to further enhance carbon footprint reduction; the modernisation of the fleet with co-financing for vessels over 12 metres; and a policy emphasis to underpin long-term sustainable sectoral competitiveness and resilience to include fleet consolidation;
9. The Committee considers that the proposed single MFF framework places the fisheries sector in competition at national level for funding, undermines the sector's ability to address current challenges, and disregards the socio-economic pillar of the Common Fisheries Policy;
10. COM (2025) 559, which is closely related to COM (2025) 565, lacks a clear distinction between measures to support CFP implementation and those to support measures under the Ocean Pact, and risks placing the seafood sector in direct competition with the whole of the blue economy and other bigger industries;
11. The low ring-fenced allocation of €2 billion for fisheries, according to representative organisation Europeche, "places the future of the sector at the mercy of national priorities, risking uneven support across the EU and creating an unlevel playing field that undermines fair competition and cohesion within the single market";
12. COM (2025) 559 lacks provisions for Commission guidance and oversight for funding of CFP implementation measures in a similar manner to those included for CAP implementation;
13. Prioritisation of funding for small-scale fisheries should be balanced against the need to modernise and adapt larger vessels particularly in the context of decarbonisation;
14. The likely timeline for adoption does not match timelines for potential CFP reform, which may inhibit funding available; and

15. The Committee considers that enhanced engagement with Irish Producer Organisations, both on the part of national Government and the EU Commission is essential for these proposals.