

2028–2034 MFF: Civil protection, preparedness and crisis response

This briefing provides an initial analysis of the strengths and weaknesses of the European Commission's impact assessment (IA) accompanying the proposal for a Regulation on the Union Civil Protection Mechanism (UCPM) and the financing of health emergency preparedness and response. Submitted on 16 July 2025 as part of the first package on the multiannual financial framework (MFF) 2028–2034, the file was referred to the European Parliament's Committee on the Environment, Climate and Food Safety (ENVI) and the Committee on Public Health (SANT), acting under the joint committee procedure.

KEY FINDINGS

The present impact assessment (IA) is part of the Commission proposals for the EU spending programmes under the post-2027 multiannual financial framework (MFF). It acknowledges from the start that it deviates from the scope and depth of a standard IA by invoking Tool #9 of the Better Regulation toolbox, which governs the law-making process for spending programmes and financial instruments, including the MFF. While recognising the applicability of BRG Tool #9, the Regulatory Scrutiny Board delivered a critical opinion on the draft IA, pointing to significant shortcomings across all sections. In view of those shortcomings, the Board exceptionally issued an opinion without qualification.

Based on a dynamic baseline scenario, the IA identifies three policy options in response to the problem definition, of which one (the option envisaging a single Preparedness Fund) is discarded at an early stage as non-viable. However, only the discarded option would have reflected the wide and cross-cutting scope of the all-hazard approach set out in the intervention logic (in particular, the problem definition and objectives). The two retained policy options are narrower in scope. The assessment of the expected impacts of the remaining policy options falls short of Better Regulation standards. Similarly, the choice of the preferred option appears not to be sufficiently substantiated.

The evidence base of the initiative seems to be pertinent and is well-referenced throughout the IA, where qualitative data prevails. An open public consultation regarding EU funding for civil protection, preparedness and crisis response was carried out, running over the required period of 12 weeks. No targeted consultation activities were undertaken, nor was a call for evidence launched. With the exception of the legal basis, the proposal appears to be coherent with the preferred policy option. In the context of national parliaments' subsidiarity check, the French Senate issued a reasoned opinion on the proposal, raising concerns regarding compliance with the principles of subsidiarity and proportionality and the broad scope of the initiative.



Background

The [proposed Union Civil Protection Mechanism \(UCPM\)](#) is part of the first package of proposals put forward by the Commission for the **next multiannual financial framework (MFF)** for the period 2028-2034. It was released on 16 July 2025.¹ In line with the new MFF's overall aim to reduce fragmentation and complexity of the EU's funding instruments, the scope of the proposed future UCPM is broader than that of the current mechanism, established by [Decision No 1313/2013/EU](#). It integrates support for health emergency preparedness and response, which are currently covered under the [EU4Health programme](#).² Consistent with the 'new ambition on crisis and security preparedness' in Commission President Ursula von der Leyen's [Political Guidelines](#), the proposed instrument places great emphasis on anticipation and preparedness. Drawing on Sauli Niinistö's [report](#) on EU civil and military preparedness (2024), the initiative contributes to the implementation of the [European Preparedness Union strategy](#) put forward by the Commission in March 2025. The latter introduces the concept of '**preparedness by design**' as a horizontal principle to ensure that preparedness and security considerations are integrated and mainstreamed across EU legislation, policies and programmes.

The UCPM was set up in 2001 to strengthen civil protection cooperation between EU Member States and participating third countries³ and, in particular, to improve prevention, preparedness, and response to disasters. Countries in and beyond the EU can request emergency assistance through the UCPM, with the Commission coordinating the response. Since 2019, rescEU has complemented the UCPM, serving as a strategic EU-funded reserve of European disaster response capabilities and stockpiles.

In terms of **methodology**, the [impact assessment](#) (IA) stresses from the outset (p. 2) that it follows Tool #9 of the Better Regulation [toolbox](#). This tool governs the law-making process for spending programmes and financial instruments, including the MFF, in accordance with Article 34 and 35 of the EU's [Financial Regulation](#). It allows for a flexible approach to impact assessment, without, however, detailing what this 'specific approach as regards scope and depth of analysis' means in practice. This makes it difficult for EPRS to assess the quality of the IA.

Problem definition

Following reflections on the political and legal context of EU crisis management, including the current funding architecture, the IA recognises that transboundary crisis preparedness is so broad in scope that it cannot be 'addressed by a single instrument or programme alone' (p. 7). It therefore concedes that the proposed instrument will merely '*contribute* to resolving the issues and addressing the objectives'. Throughout the IA, **crisis management** is understood as covering the full cycle from **risk awareness, preparedness, prevention and response to recovery** (IA, p. 19).

The IA's 'problem definition' section (pp. 7-15) discusses in a seemingly comprehensive manner the hindrances hampering effective EU crisis management in a broad all-hazards context, cutting across different sectors (e.g. public health, critical infrastructure, environmental systems, food security, cybersecurity, civil protection, transport, energy and geopolitics). One of the key messages is that 'none of the major crises during the last years were sufficiently anticipated and prepared for' (IA, p. 8). According to the IA, **EU crisis management is fragmented and sector-specific**, while **strategic foresight and anticipation remain underused**. The IA also stresses that, despite the UCPM's multi-hazard approach covering natural and man-made disasters, '**significant gaps remain**

in anticipating new risks and hazards and in consolidating relevant data across sectors' (IA, p. 8). To illustrate the fragmentation, the IA cites an EU crisis management inventory listing 56 mechanisms, tools and instruments (IA, p. 10), though without properly referencing it. With regard to funding, the IA notes shortcomings in the current EU funding instruments 'over the entire crisis management cycle' owing to 'the diversity of funding sources and varied eligibility rules', and an insufficient strategic alignment of national budgets (IA, pp. 13–15).

The three main problems identified in the IA and their underlying drivers are summed up in the table below. The problem analysis is supported by relevant evidence from desk research, including the Commission's 2024 [UCPM evaluation](#), and illustrated by pertinent examples.

Table 1 – Problems identified and their underlying causes

| Number | Problems | Problem drivers |
|--------|---|---|
| P1 | EU crisis management being mostly reactive (rather than proactive) | <ul style="list-style-type: none"> insufficient leverage of strategic foresight, anticipation, innovation, and early warning; lack of integrated risk and threat assessment. |
| P2 | EU crisis management toolbox being fragmented and lacking strategic integration | <ul style="list-style-type: none"> persisting sectoral and cross-border coordination gaps; prevalent deficits in civil-military coordination; disconnect between internal and external EU coordination efforts. |
| P3 | EU's constrained ability to act in solidarity in crises | <ul style="list-style-type: none"> limited whole-of-society engagement, including with the private sector; shortcomings in EU funding mechanisms for crisis response; insufficient strategic alignment of national budgets; persisting capacity and capability gaps. |

Source: IA, pp. 7–15.

Subsidiarity/proportionality

The IA identifies Article 122 of the Treaty on the Functioning of the European Union (TFEU), the emergency provision allowing the EU to react swiftly to unfolding crises or supply shortages, Article 196 TFEU (on civil protection), Article 222 TFEU (the solidarity clause in case of terrorist attack, or natural or man-made disaster) and Article 42(7) of the Treaty on European Union (TEU), the mutual defence clause, as **legal bases**. These are complemented by Articles 6(a) and 168(1) and (5) TFEU to cover health security preparedness and response. On the choice of legal basis, the **legislative proposal deviates partially from the IA**, suggesting Articles 168(5) and 196 TFEU instead, in combination with Article 322(1) TFEU (providing for the implementation of spending programmes).

In terms of **subsidiarity**, a distinct section of the IA (Chapter 3 – 'Why should the EU act?') analyses and justifies the necessity of EU action in the area of civil protection. The IA acknowledges the primary responsibility of the Member States in civil protection, crisis prevention and response, with the EU having a supporting competence. In this vein, the IA stresses the overall broad consensus on the added value of coordinated Union-level action in response to transboundary and cross-sectoral crises in cases where the complexity or scale of a crisis overwhelms national capacities. Furthermore,

the IA sees a need to enhance EU coordination between civilian bodies and military authorities to prevent duplication of efforts, and to support the preparedness and crisis management capacities of third countries (mainly candidate and neighbouring countries), 'to mitigate crises with wider repercussions on the Union' (IA, p. 87). The IA argues that all this can be better achieved at the EU level than by Member States acting alone.

According to the IA (pp. 17 and 50), the proposed actions (under the preferred policy option) are both **proportionate and necessary** to achieve the objectives effectively, with due respect for subsidiarity and national competences. This was contested by the **French Senate** in the form of a [reasoned opinion](#) in the framework of **national parliaments' subsidiarity check** (deadline expiring on 11 November 2025). Aside from concerns regarding compliance with the principles of subsidiarity and proportionality, the French Senate also voiced concerns regarding the broad scope of the initiative (in particular, civil–military cooperation), insisting that any strengthening of preparedness 'must be in line with the division of competences provided for in the Treaties'. In the context of the political dialogue, further contributions were received from the [German Bundesrat](#), the [Spanish Cortes General](#), and the [Romanian Senate](#). The German Bundesrat cautioned that a too-wide interpretation of Article 196 TFEU could, over time, lead to an expansion of EU competence. It also requested that certain elements of the proposed regulation which are currently only stated in recitals be defined in the main body of the legal text, to enhance legal clarity.

Objectives of the initiative

To address the problems identified, the IA puts forward **four general objectives**, which are, as the IA stresses, aligned with the principles enshrined in the [Preparedness Union strategy](#) (March 2025). Like the problem definition section, they draw on a wider concept of preparedness. The objectives contribute to the **overarching goal** of protecting citizens against crises:

1. Implement an integrated all-hazards, anticipatory, and proactive approach to threat and risk management (corresponding to P1).
2. Implement an efficient and effective cross-sectoral coordination framework for various crises in a whole-of government approach⁴ (corresponding to P2).
3. Ensure a whole-of-society approach⁵ to preparedness and response to crises (corresponding to P3).
4. Ensure the Union is equipped to act in a timely manner, flexibly, and in solidarity, to protect people in the Union against crises, including health (also corresponding to P3).

The IA then defines a bundle **of specific objectives** for each general objective – 19 in total. Their wording, however, could be more specific (e.g. 'contribute to Union policy making, including crisis management, which is guided by risk aware decision making'). This lack of specificity makes progress in implementation hard to measure, a point also raised by the Regulatory Scrutiny Board (RSB). Moreover, the specific objectives appear to meet the BRG's S.M.A.R.T. criteria (specific, measurable, achievable, relevant and timebound) only partially. While the specific objectives are not further broken down into more detailed operational objectives, the IA suggests a number of headline indicators for each of the four general objectives for monitoring progress in implementation (see IA, table on pp. 53–54). These are aligned with the **performance framework for the post-2027 budget**, which is examined in a separate [impact assessment](#) (see section on 'Monitoring and evaluation').

According to the IA (p. 73), the initiative supports the achievement of **UN Sustainable Development Goals** (SDGs) #2 (zero hunger), #3 (good health and well-being), #6 (clean water and sanitation), #11 (sustainable cities and communities) and #13 (climate action).

Range of options considered

Framing the basic requirements for the new crisis management instrument, the IA stipulates that potential policy options 'need to allow for a simple, flexible and integrated budget structure to support Member States with a minimum level of constraints'. At the same time, they need to address prevention and preparedness-related activities, such as anticipation, foresight and capacity development (IA, p. 25).

Before developing the policy options, the IA describes a **dynamic baseline scenario**. More specifically, it depicts a pre-2026 baseline and a post-2026 baseline, although only the latter appears relevant in view of the fact that the new MFF targets the 2028–2034 period. Under the post-2026 baseline scenario, the IA assumes that Next Generation EU (NGEU) – a temporary stimulus package to assist the post-pandemic economic recovery – would not be extended. Consequently, rescEU stockpiles purchased under NGEU funds would be phased out (only the aerial firefighting capacities would continue to be maintained).⁶ Similarly, the EU4Health programme would no longer be available, as it is set to be phased out after 2027.

Based on this premise, the IA identifies **three policy options** (POs).

Option 1 puts forward a **strengthened sectoral UCPM**, which aims to enhance the [European Response Coordination Centre](#) (ERCC) in terms of operational coordination. Response capacities and stockpiles at EU level (in particular [RescEU](#)) would remain unchanged. Health emergency response would continue to be financed through a separate programme. Civil-military cooperation in crisis situations within the EU would be conducted on an ad-hoc basis, and mainly for logistics support. Under this option, EU-level action would need to be complemented to a significant extent by the Member States. Consequently, EU response capacities and stockpiles would continue to be limited to the 'traditional' civil protection sector (e.g. medical stockpiles; chemical, biological, radiological, nuclear (CBRN) stockpiles; aerial forest firefighting; and shelter).

Option 2 envisages a **cross-sectoral UCPM 2.0** incorporating **public health security preparedness** into the UCPM (currently part of the EU4Health programme) and embedding broad flexibility rules. The UCPM 2.0 is characterised by two working methods, a regular emergency working method and an exceptional crisis working method. Under this option:

- a new **EU crisis coordination hub** would be established through the EU budget, to provide central capacity for cross-sectoral risk preparedness (including stockpiling and crisis management coordination);
- the ERCC would be strengthened (similar to PO1);
- a **comprehensive cross-sectoral risk and threat assessment** would be produced at regular intervals (including foresight and AI-based tools), creating synergies;
- EU response capacities would be further developed (additional capacities, such as pontoon bridges and broad band telecoms; and reinforcement of existing capacities);
- civil-military cooperation would be enhanced at EU level through a civil-military preparedness framework and expert working groups.

According to the IA, PO2 integrates the recommendations of the Commission [evaluation](#) of the current UCPM and of serious cross-border health threats (forthcoming), as well as the [recommendations](#) of the European Court of Auditors on the EU's response to the COVID-19 pandemic (IA, p. 32).

In contrast to PO1 and 2, **PO3** proposes to centralise all preparedness-relevant elements of the entire MFF under a (new) **single EU Preparedness Fund** within the MFF architecture. This new fund would subsume all preparedness-relevant mechanisms and funding elements for the entire MFF (including preparedness-relevant elements in the National Envelopes, the Competitiveness Fund, and Erasmus+). In terms of fund structure, the various management modes of the programmes (direct, shared and indirect management) would be used within this single Preparedness Fund. However, this option is **discarded at an early stage** because of (i) its inconsistency with the EU's Preparedness Union strategy; (ii) its increased complexity in financial management due to the combination of direct, indirect and shared management requirements;⁷ and (iii) an amalgamation of different types of competences, both supporting and shared.

This leaves only two options, both seemingly realistic, with PO2 building on PO1. However, **PO1 and PO2 are far narrower in scope than the intervention logic** set out in the problem definition and objectives sections. Only the discarded PO3 retains the wide and cross-cutting scope of an all-hazard approach, but since it is discarded **the IA effectively examines only PO1 and PO2**.

Table 2 – Policy options considered in the IA

| Problems | General objectives | PO 1: Strengthened sectoral UCPM | PO 2: Cross-sectoral UCPM 2.0 (measures in addition to PO 1) |
|--|--------------------|---|--|
| EU crisis management is reactive rather than proactive | GO 1 | Harmonised sectoral risk assessment parameters at EU level. Improved interlinkages of early warning systems, anticipation and foresight. | EU comprehensive cross-sectoral risk assessment. Streamlined anticipation efforts through EU crisis coordination hub. |
| Fragmented EU crisis management hinders preparedness for and response to new complexity of risks and threats | GO 2 | Slightly strengthened ERCC, but lack of central coordination capacity at EU level. Civil-military cooperation in emergencies is enhanced but remains ad hoc. | EU crisis coordination hub as central operational capacity facilitating a whole-of-government approach. Advanced civil-military cooperation to prepare for emergencies. |
| EU ability to act in solidarity in crises is constrained | GO 3 | Population preparedness and whole-of society approach is advanced mainly at national level, with the EU level playing a complementary role. Limited private sector engagement for preparedness and response. | Intensified EU-level population preparedness, in support of national efforts. Intensified private sector engagement at EU level, allowing e.g. for virtual stockpiling. |

| | | | |
|--|------|--|---|
| | GO 4 | <p>EU-level response capacities maintained at current level, allowing for response to certain types of crises at EU level.</p> <p>Intensified development of capacities at Member State level.</p> | <p>EU-level response capacities to cater for complex crises, efficiently complementing national stockpiling of essential crisis-relevant products.</p> <p>More flexible procurement arrangements.</p> |
|--|------|--|---|

Source: IA, p. 94. Preferred policy option highlighted in blue.

Assessment of impacts

The assessment of impacts remains **superficial** (IA, pp. 37–40), although this should be a core section of any impact assessment. According to the [Better Regulation Guidelines](#), the IA should, 'once a set of policy options is selected, carry out a robust assessment of their economic, social and environmental impacts and of who will be affected and to what degree'. Moreover, it should inform policymakers to what extent the identified policy options meet the objectives, 'with what benefits, at what cost, with what implications for different stakeholders, and at what risk of unintended consequences'. In the present IA, these requirements are at best partially met.

Instead, on a mere three pages, the impacts of PO1 and PO2 are presented in a way that seemingly prejudices them and is **geared towards a preferred option**, with the conclusions lacking substantiation. For example, the IA states, before any meaningful analysis is carried out, with regard to PO1: 'Thus, the EU added value is not capitalised on.' [...] PO1 'misses out on important positive impacts across the environmental, economic and social dimensions' (IA, p. 37). In contrast, the first sentence of the analysis of impacts for PO2 reads: 'Policy Option 2 fully utilises the EU added value and, in doing so, comprehensively achieves the objectives.' This point was also [commented](#) on by the RSB, which found the (earlier draft version of the) IA 'not clear enough about the impact of the options and about the differences between them' and noted that 'the choice of preferred option is not sufficiently substantiated'.

While the IA presents some **general conclusions on economic impacts**, it addresses social and environmental impacts in a cursory manner. The analysis of social impacts is limited to some reflections on population preparedness, which is found to be better under PO2. In terms of environmental impacts, the EU points to PO2 resulting in more successfully preserving natural spaces and biodiversity.

The IA does not analyse budgetary impacts, arguing that 'the impact assessment does not include funding scenarios and, consequently, only qualitative cost benefit analysis is possible' (IA, p. 2). Conversely, the legislative proposal allocates an indicative financial envelope of €10.7 billion to the proposed programme. The initiative is **not subject to the 'one-in, one-out' (OIOO) approach**, as stated in the IA (p. 72). Similarly, an assessment of the initiative's impact on fundamental rights is not included in the IA (although it is in the explanatory memorandum of the proposal).

Following a **(purely qualitative) comparison of PO1 and 2** (IA, pp. 41–49) against the criteria of effectiveness, efficiency, external coherence, simplification, synergies and the 'ability to act', the IA concludes that **PO2 is the preferred option**, scoring best across all criteria. An annexed table (IA, p. 89) rates both policy options against the specific objectives that the IA identified, but without elaborating on the assessment method. In this respect, the IA could be more transparent.

SMEs/Competitiveness

Although the main text of the IA discusses neither impacts on small and medium-sized enterprises (SMEs) nor competitiveness, it includes an annex on a **competitiveness check** and **SME check** (IA, pp. 75-79). The SME check concludes that the initiative's relevance for SMEs is low, as it does not entail any legal obligations for SMEs. Individual SMEs may be directly affected through the procurement of goods, and they will indirectly benefit from a faster and more coordinated response to crises (including early warning) and better preparedness. In addition, better population preparedness may positively impact SMEs.

The **competitiveness check** concludes that the preferred policy option has only indirect impacts on competitiveness of companies, especially SMEs, as the proposed instrument does not impose any legal obligations on private companies.

Simplification, burden reduction and other regulatory implications

The initiative would change the legal instrument of the UCPM: the proposed instrument for the new UCPM is a **regulation**, meant to replace and repeal [Decision No 1313/2013/EU](#). This proposed change in the choice of legal instrument is not discussed in the IA.

Generally, the new MFF is intended to be simpler and to reduce administrative burden for beneficiaries, managing authorities, and public institutions, in order to increase the effectiveness and efficiency of EU funding programmes. Moreover, the proposed UCPM is expected to have a positive impact on 'simplification, synergies, and the ability to deliver' (IA, p. 49), as it brings together civil protection and health preparedness into a single programme. This merger addresses overlaps in the current framework, as identified in the Commission's 2024 evaluation of the UCPM. The initiative is also expected to reduce administrative burden for Member States (e.g. in terms of reporting obligations, direct procurement and co-financing).

Monitoring and evaluation

As mentioned above, in relation to monitoring and evaluating the implementation of the initiative, the IA indicates that it 'will be monitored through the performance framework for the post-2027 budget, which is examined in a separate [impact assessment](#)' (IA, p. 51). The performance framework provides for an implementation report during the implementation phase of the programme, and an ex-post evaluation to be carried out in accordance with Article 34(3) of the EU's [Financial Regulation](#). According to the IA, the evaluation will be conducted in accordance with the Better Regulation Guidelines (BRG) and 'will be based on indicators relevant to the objective of the programme' (IA, p. 51) These indicators are set out in the IA itself, in table format, grouped by general objective (IA, pp. 53-54) and they are aligned with the performance framework. They appear to be S.M.A.R.T., specifying clear targets and how the data should be collected.

A key element in the monitoring framework is the mainstreaming of the horizontal principle '**preparedness by design**'¹⁸ (alongside the principles 'do no significant harm' and gender equality). In response to the Commission's UCPM evaluation, a new data repository ('Civil Protection Data Repository') is currently being set up within the Commission's Directorate-General for European Civil Protection and Humanitarian Aid Operations (ECHO), to collect operational data (e.g. deployment of capacities and stockpiling locations).

Stakeholder consultation

As required by the BRG, Annex 2 of the IA presents a clear and detailed synopsis report of the stakeholder consultation activities undertaken for the initiative in question. These appear to be limited to a specific **open public consultation** (OPC) regarding EU funding for civil protection, preparedness and crisis response. **No call for evidence was launched, nor would Annex 2 suggest that any targeted consultations took place.** Notwithstanding, the explanatory memorandum to the legislative proposal mentions several 'meetings with external stakeholders, experts in civil protection representing Member States' (proposal, p. 6) in recent years having informed the revision of the legal framework.

The questionnaire-based OPC ran from 12 February to 7 May 2025, thus respecting the default 12-week duration set out in the BRG (Tool #51). It yielded 1 187 responses (two thirds of which came from individual citizens) and 139 position papers (mainly from non-governmental organisations (NGOs), businesses and business organisations). In terms of geographical balance, two thirds of the responses stemmed from only three Member States (France, Belgium and Germany). According to the public consultation, the following issues were perceived as the main risks and threats to Europe: (i) consequences of climate change and natural hazards; (ii) disinformation and cyber-attacks, and the resilience of Europe's digital infrastructure; and (iii) threats to biodiversity and animal and plant health. The synopsis report concludes that, while respondents generally favour EU investments in civil protection, preparedness and stockpiling, they show awareness of gaps in effective preparedness (e.g. outdated critical infrastructure, underfunded health systems, and insufficient coordination between the EU and Member States).

The scope of the questionnaire was, notably, broader than that of the IA; for instance, it considered irregular migration, organised crime and political unrest in the EU's neighbourhood. Where appropriate, for triangulation purposes, the Commission compared the consultation results with the outcome of a recent [Eurobarometer survey](#) on civil protection. Stakeholder input is systematically referenced throughout the IA.

For the **analysis** of the free text answers received from the OPC, the Commission relied on artificial intelligence (AI). More specifically, it applied a **large language model** (based *inter alia* on the [executive summary](#) of the Niinistö report), and a [sentiment analysis model](#) (XLM-RLnews-8) provided by the Joint Research Centre (JRC).

Supporting data and analytical methods used

The IA draws on a wealth of relevant reports and studies, which are transparently referenced throughout the IA report. Several Commission evaluations contribute to the evidence base, with due respect for the 'evaluate first' principle. These include the findings of the [UCPM](#) evaluation (2024) and the [HERA review](#) (2025) as well as preliminary findings from the upcoming mid-term evaluation of Regulation 2022/2371 on serious cross-border threats to health⁹ and the interim evaluation of the EU4Health programme 2021–2027.¹⁰ Additionally, the IA indicates that it has included important preliminary findings from the [UCPM capacity gaps report](#), which came out in June 2025, shortly before the IA.

Annex 4 of the IA, entitled 'analytical methods' (p. 74) is supposed to explain the methods used and could thus be more detailed. Effectively, it is limited to a list of information sources used, including:

- the [Draghi report](#) on the future of European competitiveness;
- the [Niinistö report](#) on Europe's civil and military preparedness;
- the Commission's recent [progress report](#) on the UCPM response capacities;
- the JRC's 2025 [risk analysis report](#);
- the European Court of Auditors' 2024 [special report](#) on the EU's response to the COVID-19 pandemic; and
- reports by international organisations, such as the United Nations Office for Disaster and the World Bank Group.

The evidence was 'qualitatively analysed', as the IA states (p. 74), and indeed, quantitative data appear largely absent from the evidence base. In terms of **methodology**, the IA acknowledges that 'deficits with regards to the cost-benefit analysis of interventions due to the volatile response environment and the impossibility of counter-factual analyses persist' (p. 55).

Follow-up to Commission Regulatory Scrutiny Board opinion

Following the submission of a draft version of the IA on 28 May 2025, the Regulatory Scrutiny Board (RSB) issued a profoundly critical [opinion](#) on 18 June 2025, which identified a number of 'significant shortcomings'. Remarkably, and 'exceptionally', the Board **refrained from giving a qualification** (i.e. 'positive', 'positive with reservations' or 'negative', as set out in BRG Tool #3) to the opinion. This absence of quality scoring concerns all seven MFF-related IAs that the Commission released between July and September 2025.

While the Board acknowledged the applicability of BRG Tool #9 for the preparation of a new MFF, it nonetheless found that the draft IA was lacking 'several key elements' across all sections. In particular, the RSB noted a lack of clarity in the scope definition and in the programme's interaction with other funding programmes within the MFF architecture; flaws in the intervention logic; and the proposed objectives not being S.M.A.R.T. Moreover, it found that the draft IA was 'not clear enough about the impact of the options and about the differences between them', arguing further that the 'choice of preferred option is not sufficiently substantiated'. The Board also posed questions regarding the governance mechanism and the monitoring and evaluation framework. It concluded that the IA report needed to be revised before proceeding with the file.

The final IA (pp. 54-55) provides a brief explanation of how the RSB comments have been dealt with. Certain recommendations have been taken on board, resulting, for instance, in more clarity to the description of the coherence chapter and the monitoring framework. However, given the persisting shortcomings in the final IA (discussed also in this briefing), it appears that some RSB recommendations have only been partially addressed.

Coherence between the Commission's legislative proposal and IA

The proposed regulation appears to be coherent with the preferred policy option (PO2). However, two deviations are worth mentioning. As stated above, the proposal departs from the IA in the **choice of legal basis**. Furthermore, the IA does not analyse budgetary impacts, arguing that 'the impact assessment does not include funding scenarios'. The proposed regulation provides for a **budgetary ceiling** of €10.6 billion for crisis management for the MFF period 2028-2034 (which is roughly three times the size of the allocated resources under the current UCPM).

ENDNOTES

- ¹ The second package of MFF proposals was adopted on 3 September 2025. The post-2027 MFF proposals were announced in the [2025 Commission work programme](#).
- ² For a detailed analysis of the legislative proposal, see D. Yougova, Union Civil Protection Mechanism: 2028–2034 programming period, EPRS, European Parliament (forthcoming).
- ³ At present, 10 non-EU countries participate in the EU Civil Protection Mechanism: Albania, Bosnia and Herzegovina, Iceland, Moldova, Montenegro, North Macedonia, Norway, Serbia, Türkiye, and Ukraine.
- ⁴ The IA defines the 'whole-of-government' approach as an approach that brings together all relevant actors across all levels of government (local, regional, national and EU). At the same time, it promotes collaboration (including civil-military cooperation), policy coherence and the sharing of resources. (IA, p. 1, glossary).
- ⁵ A 'whole-of-society' approach is defined as an 'approach which fosters an inclusive culture of preparedness and resilience involving citizens, local communities and civil society, businesses and social partners as well as the scientific and academic communities' (IA, p. 1, glossary).
- ⁶ Under the current programme period, the [total budget](#) for rescEU is about €3.32 billion, of which €2.06 billion is under NGEU.
- ⁷ **Direct management** is implemented by the Commission; it applies, for instance, to stockpiling or response operations. **Shared management** between the EU Member States and the Commission relates, for instance, to the implementation of structural funds. Finally, **indirect management** concerns cooperation with international organisations in the implementation of funding programmes, such as the WHO, UNHCR and UNICEF.
- ⁸ In the case of new initiatives, the potential impacts of the preferred policy option on preparedness and security should be identified.
- ⁹ According to the Commission's 'Have your say' portal, this evaluation was planned to be [completed](#) during the fourth quarter of 2024, but has not yet been adopted.
- ¹⁰ According to the 'Have your say' portal, this [interim evaluation](#) is planned to be completed in the fourth quarter of 2025.

This briefing, prepared for the ENVI and SANT committees, analyses whether the principal criteria laid down in the Commission's own Better Regulation Guidelines, as well as additional factors identified by the Parliament in its Impact Assessment Handbook, appear to be met by the IA. It does not attempt to deal with the substance of the proposal.

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