

Impacts of the 2028–2034 MFF proposals on the climate and the environment

Mapping of the Commission proposals

KEY FINDINGS

The proposed 2028–2034 multiannual financial framework (MFF) does not include any programme or instrument that is solely dedicated to climate or environment financing. Instead, it would introduce a binding, horizontal ‘do no significant harm’ principle and a 35 % spending target for the climate and the environment. The latter has a wider scope than the current climate and biodiversity target, as it would combine all policy areas related to the green transition.

Moreover, the emblematic Programme for Environment and Climate Action (LIFE) would be discontinued. Funding for the climate and the environment would go through two main programmes: the European fund for economic cohesion social and territorial cohesion, agriculture and rural, fisheries and maritime (NRP Fund) and the European Competitiveness Fund (ECF).

The NRP Fund (EUR 865 billion) would finance strategic nature projects and strategic integrated projects through a new EU facility (funding cross-border Union actions) and National and Regional Partnership Plans (NRP Plans), drafted by Member States for their own needs. NRP Plans would furthermore have to be consistent with relevant EU legislation, and notably with the Nature Restoration Regulation. Minimum spending for environment and EU-funded eco-schemes under the common agricultural policy (CAP) would be replaced by Member State-led voluntary agri-environmental and climate actions.

The ECF would integrate the objectives of the LIFE programme in its ‘Clean Industrial Transition and Decarbonation’ (EUR 26.21 billion) and ‘Health, Biotech, Agriculture and Bioeconomy’ policy windows (EUR 20.39 billion). The Commission would, however, have more flexibility in assigning funding to specific actions within these policy windows than under the current LIFE programme. Horizon Europe (EUR 52.587 billion) would complement it for research and innovation actions.

The Connecting Europe Facility (EUR 81.43 billion) would continue to support sustainable transportation networks and cross-border cooperation in the field of renewable energy. Likewise, the Global Europe programme (EUR 215.12 billion) remains unchanged in scope if not in structure, and would continue to support EU external action on climate, environment and sustainable development matters.



Background and objective

On 17 July 2025, the Commission released its proposal for the MFF for the 2028-2034 period in a communication entitled 'A dynamic EU budget for the priorities of the future - The Multiannual Financial Framework 2028-2034'. Amounting to almost EUR 2 trillion (or 1.26 % of the EU gross national income) in total, the proposed MFF introduces far-reaching changes compared to the previous one, as regards both its structure and the way it intends the EU budget to be spent. The Commission justifies this decision by its intention to have a more flexible, streamlined and harmonised long-term EU budget, which is tailored to local needs in order to boost EU competitiveness and defence readiness.

The European Parliament's Committee for Environment, Climate and Food Safety (ENVI Committee) has requested this briefing to analyse how the proposed MFF would provide funding for climate and environment objectives, comparing it to the current 2021-2027 MFF and the NextGenerationEU recovery instrument where relevant. The briefing begins by providing an overview of the programmes and instruments of the 2028-2034 MFF that are dedicated to the financing of climate and environmental actions. Then, taking each heading of the proposed MFF in turn, it provides an analysis of the scope, size and structure of each of the relevant programmes and instruments.

(Amounts in this briefing are provided at current prices, unless otherwise specified. However, the Council decision laying down the 2021-2027 MFF is expressed in 2018 constant prices, and the proposed 2028-2034 MFF in 2025 constant prices. Conversions from constant to current prices are performed through the application of a standard 2 % yearly deflator.)

Overview of the proposed financing for the climate and the environment

Structural changes compared to the 2021-2027 period

Figure 1 lists all the legislative proposals that are relevant to climate and environment funding and outlines how they fit in the overall MFF structure. **Table 1** provides an overview of the correspondences between the relevant current programmes and the proposals for the 2028-2034 period.

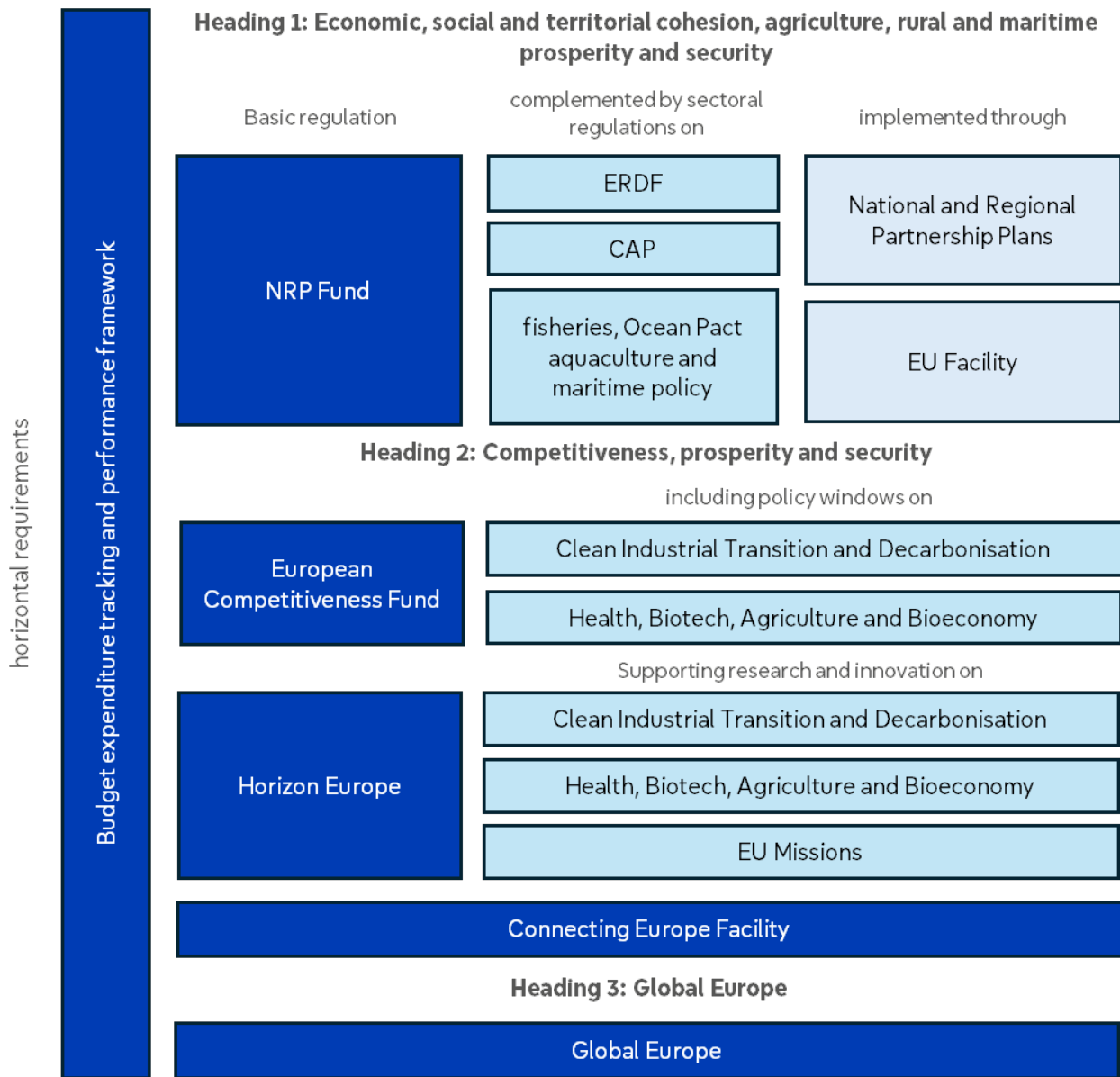
The 2028-2034 proposals do not include a specific heading, programme or instrument solely dedicated to climate or environment. As a consequence, **climate and environmental objectives will have to compete for funding with other policy objectives** in all relevant programmes of the 2028-2034 MFF. The significance of quantitative comparisons of the amounts set out by the 2021-2027 programmes and their successor programmes in the 2028-2034 MFF must therefore be carefully considered, taking into account the scope and structure of each programme.

The **LIFE programme**, which has been the cornerstone of EU funding for the climate and the environment since 1992, is discontinued. The new **ECF** and **NRP Fund** replace it in financing EU policy on climate change, biodiversity, nature, pollution and the circular economy. However, the new programmes cover additional policy areas not included under LIFE, such as competitiveness, agricultural policy and cohesion policy. The

end of the LIFE programme contrasts with the Parliament position expressed in its **resolution of 7 May 2025 on the post-2027 MFF¹**, which calls for ‘increased directly managed support for environment and biodiversity protection and climate action building on the current LIFE programme’ and opposes the merging of several programmes under the umbrella of the ECF.

Horizon Europe will support the ECF in its research and innovation activities, including in the climate and environmental fields. The **Connecting Europe Facility** continues to support sustainability and decarbonisation in the transport and energy sectors and sees its budget significantly strengthened. **Global Europe** is likewise maintained as the principal instrument to support sustainable development outside of the EU, although its internal structure is significantly reworked.

Figure 1 - Relevant files for climate and environment funding in the proposed 2028-2034 MFF



Source: Author’s own elaboration.

Table 1 – Correspondence between the 2021–2027 and proposed 2028–2034 programmes linked to the climate or the environment

Policy Objective	2021–2027	2028–2034
Climate mainstreaming target	Interinstitutional Agreement of 16 December 2020 30 % for climate, and 7.5 % (2024) or 10 % (2026–2027) for biodiversity	Budget expenditure tracking and performance framework [2025/0545(COD)] 35 % for climate and environment
Support the development of a decarbonised transport network and facilitate cross-border cooperation in the field of energy	Connecting Europe Facility [Regulation (EU) 2021/1153] Budget: EUR 33.71 billion	Connecting Europe Facility [2025/0221(COD)] Budget: EUR 81.428 billion
Finance national plans supporting the green transition	Recovery and Resilience Facility [Regulation (EU) 2021/241] Budget: EUR 723.82 billion <ul style="list-style-type: none"> • Grants: EUR 337.97 billion • Loans: EUR 385.85 billion 	NRP Fund [2025/0240(COD)] Budget: EUR 865.08 billion Additional loan support: EUR 150 billion
Finance projects contributing to EU objectives relating to climate, environment, pollution and/or the circular economy	LIFE [Regulation (EU) 2021/783] Budget: EUR 5.432 billion ERDF and Cohesion Fund [Regulation (EU) 2021/1058] Budget: EUR 274.07 billion Common Agricultural Policy [Regulations (EU) 2021/2115, 2021/2116, and 2021/1117] <i>Earmarked for climate and environment (2023–2027)</i> <ul style="list-style-type: none"> • Budget: EUR 68.96 billion 	NRP Fund [2025/0240(COD)] Budget: EUR 865.08 billion Available loans: EUR 150 billion European Competitiveness Fund [2025/0555(COD)] <i>Policy window: ‘Clean Industrial Transition and Decarbonisation’</i> <ul style="list-style-type: none"> • Budget: EUR 26.21 billion <i>Policy window: ‘Health, Biotech, Agriculture and Bioeconomy’</i> <ul style="list-style-type: none"> • Budget: EUR 20.393 billion
Support EU external action on climate, environment and sustainable development	Global Europe [Regulation (EU) 2021/947] Budget: EUR 79.5 billion	Global Europe [2025/0227(COD)] Budget: EUR 215.12 billion
Support research and innovation on the climate and the environment	Horizon Europe [Regulation (EU) 2021/695] <i>Cluster: ‘Climate Energy and Mobility’</i> <ul style="list-style-type: none"> • Budget: EUR 15.123 billion <i>Cluster: ‘Food, Bioeconomy, Natural Resources, Agriculture and Environment’</i> <ul style="list-style-type: none"> • Budget: EUR 8.952 billion 	Horizon Europe [2025/0543 COD] <i>Clean Industrial Transition and Decarbonisation</i> <ul style="list-style-type: none"> • Budget: EUR 25.331 billion <i>Health, Biotech, Agriculture and Bioeconomy</i> <ul style="list-style-type: none"> • Budget: EUR 19.65 billion <i>Society</i> <ul style="list-style-type: none"> • Budget: EUR 7.606 billion

Source: Author’s own elaboration.

Climate and environmental mainstreaming

The absence of dedicated funding instruments for the climate and the environment is mitigated by a greater emphasis on climate and environmental mainstreaming in the Commission proposals, meaning that all programmes have to consider climate and environmental priorities in their design and implementation. Setting minimum spending targets (also known as ‘earmarking’) is a key instrument to achieve these priorities.

In its **resolution of 7 May 2025 on the post-2027 MFF**, the EP ‘underlines, therefore, that the next MFF must ensure that, across the board, spending programmes pursue climate and biodiversity objectives’, stressing ‘the need for a significant improvement in climate and biodiversity mainstreaming methodologies to move towards the measurement of impact’, and calling on the Commission ‘to adapt the spending targets contributing positively to climate and biodiversity in line with the Union policy ambitions.’

Article 4 of the **proposed budget expenditure tracking and performance framework** for 2028–2034 earmarks a minimum of **35 % of the total budget to climate and environment spending** to ‘help steer support towards the goals of the European Green Deal’, with the concrete categories being ‘**climate change mitigation**’, ‘**climate change adaptation and resilience**’, and ‘**environment**’². This 35 % objective will be achieved by applying targets for specific programmes, as detailed in Annex III of the proposed framework and shown in **Table 2**.

Table 2 – Specific climate and environment spending targets established by Annex III of the proposed budget expenditure tracking and performance framework for 2028–2034

Programme	Target (%)	Target (EUR billion)
National and regional partnership plans (including loan support)	43 %	427.09
European Competitiveness Fund	43 %	46.91 - 100.75
Horizon Europe	40 %	70.0
Connecting Europe Facility	70 %	57.0
Global Europe	30 %	60.09
Total	35 %	661.1 - 714.94

Source: Author’s own elaboration.

Defence expenditure (made through the ECF or NRP Fund) will be excluded from the calculation of the climate and environment target, hence the exact amount that the target represents is subject to change depending on future priorities. Spending on military mobility will, however, contribute towards the target, due to its dual civilian–military use.

In any case, Article 4(4) empowers the Commission to adopt delegated acts to adjust the specific targets of Annex III to take into account new developments and/or priorities. Where progress towards the target is

insufficient, Article 4(5) provides that the institutions will consult on appropriate measures to ensure that EU spending on the climate and the environment corresponds to at least 35 % of the total amount of 2028–2034 MFF – although it is unclear whether the calculation would include or exclude defence spending.

By comparison, the interinstitutional agreement between Parliament, the Commission and the Council of 16 December 2020³ sets a **30 % climate spending target for the 2021–2027 period**, including both the MFF and NextGenerationEU. This represents EUR 609.1 billion, out of a total budget of EUR 2 030.4 billion. Additionally, the agreement sets an additional **biodiversity mainstreaming target** of 7.5 % (for 2024) and 10 % (for 2026 and 2027); a single instance of expenditure can contribute to both climate and biodiversity targets.

Assuming a conservative target of EUR 661.1 billion and uniform spending over the 2028–2034 period, the Commission-proposed target represents a **8.5 % increase** (in current prices) compared to the 2021–2027 target. However, in constant 2025 prices, this amounts to a **7.1 % reduction**. Direct comparison should, however, be taken with caution, since the scope of the two targets is different. Those absolute amounts likewise **do not indicate where the focus of the green mainstreaming would be**, as it would be possible to meet the target while providing comparatively little funding for some climate or environmental objectives. The risk is particularly high for biodiversity, since it will no longer be the subject of a specific target and the EU is already expected to fall short of its current spending goals⁴.

In qualitative terms, the **scope of the new green target is broader and more integrated**, as it aims to include all policy areas related to the green transition (i.e. climate change mitigation, climate change adaptation and resilience, biodiversity, water and marine, pollution prevention and control, the circular economy). Moreover, the proposed target would **be legally binding and have a more robust legal basis** than for the previous period, being a regulation and not a simple interinstitutional agreement.

Annex I of the proposed **expenditure tracking and performance framework** consolidates in a single list all 543 intervention fields where the EU provides funding, detailing for each one the **coefficient of contribution** (either 100 %, 40 % or 0 %) towards the objectives of climate change adaptation, climate change mitigation or the environment, which all contribute to the overall target. If an instance of expenditure contributes to more than one objective, only the highest coefficient is to be taken into account. Although 47 intervention fields are directly related to the climate and the environment, **other policy areas (e.g. agriculture, transportation etc.) also contribute to the climate and environmental target**.

During the **Commission's presentation of the MFF proposals to the ENVI Committee on 11 November 2025**, Members pointed out weaknesses in the methodology of the proposed expenditure tracking and performance framework, such as the inclusion of road infrastructure or airport terminals in the list of intervention fields contributing to the climate and environment target, or the blurring of the line between climate change mitigation and adaptation.

Do no significant harm principle

Article 5 of the budget expenditure tracking and performance framework introduces a **horizontal requirement to respect a streamlined do no significant harm (DNSH) principle across all programmes**, inspired by the Taxonomy Regulation (EU) 2020/852. As set out in Article 33(2) of Regulation (EU, Euratom) 2024/2509⁵, the EU budget should be implemented to achieve its objectives 'without doing significant harm

to the environmental objectives of climate change mitigation, climate change adaptation, the sustainable use and protection of water and marine resources, the transition to a circular economy, pollution prevention and control and the protection and restoration of biodiversity and ecosystems.'

To this end, **the Commission will adopt a 'single and simple guidance' to facilitate the implementation of the DNSH principle**, by outlining policy areas that are considered to be always in line with the principle, and policy areas deemed not in line with the principle, and that as such cannot be financed through the EU budget.

Climate and environment under Heading 1 of the proposed MFF

European fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security (NRP Fund)

The new NRP Fund is the proposed main funding instrument under Heading 1 of the proposed 2028–2034 MFF, centralising currently stand-alone programmes such as the Recovery and Resilience Facility (RRF), CAP, the European Regional Development Fund and cohesion funds. It is granted a **total budget of EUR 865 billion**, and has the 'overall aim of promoting economic, social and territorial cohesion, the **sustainable development and competitiveness of the Union**, its security and its preparedness' (Article 2).

Article 3 further details specific objectives related to climate and environmental policy, including: boosting sustainable manufacturing and accelerating the clean industrial transition; supporting the EU 2030, 2040 and 2050 targets for energy and climate; supporting climate adaptation and efficient water management; enhancing conservation and restoration biodiversity, soil quality and natural resources; promoting circularity and resource efficiency; supporting pollution prevention and nature restoration; ensuring the sustainability and resilience of EU agriculture, forestry, fisheries and aquaculture; and ensuring strong ocean governance for clean and sustainably managed oceans.

National and Regional Partnership Plans

Of the total budget of the NRP Fund, **EUR 782.88 billion will be dedicated to the financing of NRP Plans**. Additionally, EUR 150 billion of loan support will be available to Member States for the implementation of their NRP Plans.

The NRP Plans constitute a fundamental shift in the way the EU budget is spent, following, to a large extent, the **'single national plan' template introduced by the RRF** (which will itself end in 2026). As set out in Title III of the draft regulation establishing the NRP Fund, each Member State will draw up its annual NRP Plan, in collaboration with regional and local authorities, economic and social partners and relevant civil society representative (Article 21). The Commission has to assess the NRP Plans within four months of their submission, and may ask Member States to provide additional information or to amend their plans (Article 23). The NRP Plans will then be adopted through a Council implementing decision (Article 23(1)).

In its **resolution of 7 May 2025 on the post-2027 MFF**, Parliament emphasised 'that the "one national plan per Member State" approach ... cannot be the basis for shared management spending post-2027' and

'underlines that the design of shared management spending under the next MFF must fully safeguard Parliament's roles as legislator and budgetary and discharge authority and be designed and implemented through close collaboration with regional and local authorities and all relevant stakeholders'.

NRP Plans have to respect to requirements as concerns the climate and the environment. On the one hand, they have to comply with the **43 % climate and environment spending target** set out in the MFF performance framework. On the other hand, Article 22(2)(a) provides that the NRP Plans must be consistent with the **National Restoration Plans** under Regulation (EU) 2024/1991 and the **Integrated National Energy and Climate Plans** under Regulation (EU) 2018/1999 (see Box 1).

NRP Plans may finance the types of projects that are considered under the LIFE Regulation as Strategic Nature Projects (SNaPs) or Strategic Integrated Projects (SIPs) with a national or regional focus.

Box 1: National Restoration Plans and Integrated National Energy and Climate Plans

Regulation (EU) 2024/1991 on nature restoration requires Member States to prepare and implement National Restoration Plans, which must contribute towards the objectives set out in Articles 4 to 13 of said regulation. These include the following targets:

- restoring at least 30 % of the terrestrial, coastal, freshwater and marine ecosystems that are not in good condition by 2030, at least 60 % by 2040, and at least 90 % by 2050;
- reversing the decline of pollinator populations and improving pollinator diversity by 2030;
- planting at least three billion additional trees at Union level by 2030.

Regulation (EU) 2018/1999 on the governance of the Energy Union and Climate Action requires Member States to prepare and implement Integrated National Energy and Climate Plans, which must respect the following targets, among others:

- achieving net GHG removals of at least 310 million tonnes of CO₂ equivalent by 2030;
- reducing GHG emissions by 40 % by 2030 (compared to 2025 levels) and achieving carbon neutrality by 2050;
- 32% of renewable energy by 2030.

Source: Author's own elaboration.

EU Facility

Article 10 of the proposed NRP Fund allocates **EUR 71.9 billion to the EU Facility**. Of this amount, EUR 63.22 billion will be dedicated to Union actions for agriculture, home affairs, social policy and 'LIFE actions', and EUR 8.71 billion will serve a budget cushion to address emerging challenges and priorities (Article 26).

LIFE actions are defined in Annex XV, paragraph 1, point (n) as:

- strategic nature projects, strategic integrated projects and strategic action projects that address environmental policy priorities with a cross-border or transnational dimension;

- activities that underpin the design, implementation, monitoring, evaluation and enforcement of environmental and climate legislation and policies, and which promote the development of governance at all levels, and support and empower networks and civil society organisations;
- other projects of Union interest contributing to the implementation of environmental law and policies.

The EU Facility may therefore finance projects that were previously classified under the LIFE Regulation as SNaPs or SIPs with a cross-border or transnational dimension.

Article 26 provides that the EU Facility may be implemented under **shared, direct or indirect management**, following a Commission financing decision. It will provide funding through grants, but may also provide budgetary guarantees and financial guarantees, including when combined with grants or other forms of non-repayable support.

Sector-specific regulation complementing the NRP Fund

Article 1(2) of the regulation establishing the NRP Fund lists **sector-specific regulations** that complement it, may not contradict it and do not establish additional budgetary commitments. Among those sectoral rules, the following proposals are relevant to climate and environment spending: the CAP proposal; the proposal for a regulation on the Common Fisheries Policy, European Ocean Pact and the Union's maritime and aquaculture policy (CFP proposal); and the proposal on the European Fund for Regional Development, including for European Territorial Cooperation (Interreg) and the Cohesion Fund (ERDF proposal).

CAP proposal

A minimum of **EUR 295.7 billion will be ring-fenced for CAP expenditure** within the NRP Plans. According to Article 2(1)(c) of the CAP proposal, the Commission will provide guidance to the Member States on the implementation of the CAP, including recommendations based on enhancing climate action, ecosystem services provision, circular solutions, the conservation of biodiversity and natural resources, sustainable farming and improving animal welfare.

Certain types of CAP support are conditional on meeting the **farm stewardship'** requirements defined in Article 3 of the CAP proposal. This includes protective practices defined by Member States to protect soils, sensitive permanent grasslands and water bodies, as well as statutory requirements to address water pollution and preserve biodiversity and habitats listed in Annex I, Part A of the CAP proposal.

Additionally, Article 4 requires Member States to provide support for farmers regarding, among other things: climate change adaptation and water resilience; climate change mitigation including carbon removals and on-farm renewable energy production; soil health; and the preservation of biodiversity, including habitats or species conservation.

Lastly, Article 10 requires Member States to provide incentives for **voluntary agri-environmental and climate actions (AECAs)**, with the objectives including: protecting water and soil quality; implementing climate change mitigation and adaptation measures; and enhancing forest conservation.

Those voluntary AECAs **replace the environmental ring-fencing present in the current CAP Regulation**: under the 2021–2027 MFF, 25 % of CAP expenditure for direct payments under Pillar I must be allocated to

eco-schemes (100 % funded by the EU) and 35 % under Pillar II to environmental measures such as agri-environment-climate schemes or green investments. This combined green earmarking amount to EUR 68.96 billion for the 2023–2027 period.

During the Commission's presentation of the MFF proposals on 11 November 2025, ENVI Members highlighted the impact of the agricultural sector on climate change and the environment, and raised concerns that the end of environmental ring-fencing and fully EU-funded eco-schemes under the CAP would discourage Member States from continuing to support greener agricultural practices at the same level as before.

CFP proposal

The Commission indicated, in the Annex to the MFF communication, that a minimum of **EUR 2 billion would be allocated to the Common Fisheries Policy**. With regard to the environment, Article 3(2) of the proposed CFP regulation provides that 'Member States shall take into account in their NRP Plan the contribution to environmental, economic and social sustainability of fishing operations'.

ERDF proposal

The ERDF proposal would support the NRP Plans where they aim to reduce regional imbalances in the Union and the backwardness of the least favoured regions and promote European territorial cooperation, **including supporting projects in the area of environment** (Article 2). By contrast, the 2021–2027 ERDF regulation is more precise, listing in Article 3(1)(b) a series of objectives contributing specifically to supporting a greener, low-carbon transitioning towards a net zero carbon economy.

Moreover, Article 5 of the proposal provides that Member States are to support through their NRP Plans 'integrated urban development strategies which focus on sustainable development and tackle environmental, energy and climate challenges, in particular the fair transition towards a clean and climate-neutral and resilient economy by 2050.'

Climate and environment under Heading 2 of the proposed MFF

European Competitiveness Fund

The ECF is the largest programme under Heading 2 (Competitiveness, prosperity and security) of the proposed MFF. It is allocated EUR 234.3 billion and has a general objective of 'increasing European competitiveness' while ensuring a '**just transition to a sustainable, decarbonised and digital economy**'.

The ECF covers four policy windows, namely: '**Clean Transition and Industrial Decarbonisation**'; '**Health, Biotechnology, Agriculture and Bioeconomy**'; 'Digital Leadership'; and 'Resilience and Security, Defence Industry and Space'. The first two policy windows are relevant to EU action on the climate and the environment.

Clean Industrial Transition and Industrial Decarbonisation policy window

The 'Clean Industrial Transition and Industrial Decarbonisation' policy window (Chapter IV of the proposal) is allocated **EUR 26.21 billion**.

According to Article 33 of the proposal, activities that may receive funding under this policy window include **LIFE activities**, which are defined as 'bottom-up projects for the demonstration, testing and market uptake of innovative solutions and best practices in clean transition and industrial decarbonisation and awareness raising on climate to relevant governance levels'.

It will also support: decarbonisation solutions in industry and mobility; energy efficiency, energy storage and renewable energy; clean technology manufacturing; the circular economy, water and resource efficiency; ocean health and environmental policy, including preserving air, water and soil quality, halting and reversing biodiversity loss, tackling the degradation of ecosystems, and developing sustainable solutions for climate action in agri-food and forestry supply chains; climate and water resilience; pollution prevention, control and remediation; and sustainability and clean transition of small and medium-sized enterprises.

In practice, this policy window aims to cover all policy areas of the current LIFE programme, and is intended to replace it in financing bottom-up initiatives from the private sector and civil society.

Health, Biotech, Agriculture and Bioeconomy policy window

A further **EUR 20.39 billion** will be allocated to funding activities that support health, biotech, agriculture and the bioeconomy (Chapter V). According to Article 37, this includes improving and protecting health, including non-communicable diseases related to pollution, and fostering sustainability and resilience in the agricultural, fisheries, aquaculture and forestry sectors, and in rural and coastal areas.

Governance of the ECF

The amounts indicated for each policy window is indicative. Article 15 provides that the Commission should adopt **annual or multiannual work programmes** through implementing acts to provide the budget for specific actions. A **Strategic Stakeholders Board** (Article 14), composed of sectoral experts appointed by the Commission for a four-year term, will provide input on the design of the work programmes.

According to Article 83 and as regards actions related to the climate and the environment, the proposed work programmes will be presented for adoption to a **Clean Transition Committee or a Health, Biotech, Agriculture and Bioeconomy Committee** and follow the **advisory procedure** within the meaning of Article 4 of Regulation (EU) No 182/2011. In other words, a committee composed of representatives of the Member States and chaired by the Commission has to deliver its opinion on the Commission proposal, which should be taken into account by the Commission before it adopts the implementing act.

The use of the advisory procedure marks a departure from Article 2 of Regulation (EU) No 182/2011, which requires the use of the more stringent **examination procedure** for implementing acts relating to 'programmes with substantial implications' and/or to 'the environment, security and safety, or protection of the health or safety, of humans, animals or plants'. According to Article 5 of that regulation, the Commission may only adopt an implementing act under the examination procedure if the committee responsible either

delivers a positive opinion or abstains from delivering an opinion. Article 18 of the current LIFE programme requires the multiannual work programmes to be adopted through the examination procedure.

Horizon Europe

The proposed 2028–2034 Horizon Europe framework programme aims to ‘strengthen the EU’s competitiveness, scientific technological base, and **address global challenges based on excellent research and innovation**’, in line with the ‘**general and specific objectives of the European Competitiveness Fund**’ (Article 3 of the proposal). Although the term ‘global challenges’ is likely intended to include climate and environmental concerns, the regulation establishing Horizon Europe only mentions climate directly in recital 25 and the protection of the environment in recitals 2 and 21. This stands in sharp contrast to Article 3 of the 2021–2027 Horizon Europe Regulation, which makes direct reference to climate change, the UN Sustainable Development Goals (SDGs), the UN 2030 Agenda and the Paris Agreement while defining programme objectives.

Article 4 of the Commission proposal mixes climate and environment components in Part II (Competitiveness and Society) of the programme, which supports:

- **collaborative research and innovation activities under the ECF**, notably the Clean Industrial Transition and Decarbonisation (**EUR 25.331 billion**) and Health, Biotech, Agriculture and Bioeconomy (**EUR 19.65 billion**) policy windows;
- **EU Missions**, as defined in Article 8 of the current Horizon Europe Regulation, which are large-scale initiatives addressing major challenges such as ‘climate change, cancer, ocean restoration, soil health, and the development of climate-neutral and smart cities’ (funded through a **EUR 7.606 billion** ‘Society’ pool).⁶

By comparison, the 2021–2027 Horizon Europe programme, including NextGenerationEU, is funding climate and environment research and innovation in its Pillar II (Global Challenges and European Industrial Competitiveness), and in particular with its clusters for Climate Energy and Mobility (EUR 15.123 billion) and Food, Bioeconomy, Natural Resources, Agriculture and Environment (EUR 8.952 billion), which include a dedicated budget for EU missions.⁷

Hence, the 2028–2034 proposal includes funding for the climate and the environment in budget lines having a **broader scope** than is currently the case; however, it represents a **sizeable increase in the total funding pool** that could be directed towards those objectives, from EUR 24.075 billion to EUR 53.587 billion.

Connecting Europe Facility

The Connecting Europe Facility (CEF) is allocated a budget of **EUR 81.428 billion** over the 2028–2034 period. Of this total amount, EUR 51.515 billion is dedicated to expenditures linked to the **transport sector**, and EUR 29.912 billion to the **energy sector**. By comparison, the 2021–2027 MFF provided the CEF with a budget of EUR 33.71 billion (EUR 25.8 billion for the transport sector, EUR 5.8 billion for energy and EUR 2.1 billion for digital, which is excluded from the scope of the proposal).

The objectives of the proposed CEF are identical to its current version. Namely, they are to build, develop, secure, modernise and complete the trans-European networks in the transport and energy sectors. This

includes supporting the development of **sustainable, resilient and decarbonised transport networks**, as well as facilitating **cross-border cooperation in the field of renewable energies** in order to achieve the EU decarbonisation objectives. However, contrary to the 2021–2027 regulation, the proposed CEF does not include a list of actions eligible for EU funding under the programme.

As with the previous CEF programme, the Commission proposal can fund actions aiming to adapt parts of the trans-European transport network with a view to improving both civilian and military mobility. Despite being defence expenditure, spending for military mobility may contribute towards the CEF's **70 % climate and environment target** due to its dual civilian-military use.

Climate and environment under Heading 3 of the proposed MFF

Global Europe

Global Europe is the only programme funding EU external action, including neighbourhood and enlargement policy, under the proposed MFF. It is allocated a total budget of **EUR 215.12 billion** (compared to EUR 79.5 billion for the 2021–2027 period).

The general objectives of the proposed regulation include: achieving the international commitments of the EU, in particular the **SDGs**, the **2030 Agenda**, the **Paris Agreement** and the **Kunming-Montreal Global Biodiversity Framework**; and contributing to the **sustainable development of partner countries**. These objectives are already present in the current Global Europe programme, except for the Kunming-Montreal Global Biodiversity Framework, which was adopted in 2022 – its objectives are enshrined in the Nature Restoration Regulation.

However, the Commission proposes to **change the internal structure of Global Europe**. For the 2021–2027 period, funding for climate, environment and sustainable development is made available in the budgets of four geographic programmes (Neighbourhood, Sub-Saharan Africa, Asia and the Pacific and America and the Caribbean) as well as the Global Challenges thematic programme. Annexes II and III to the proposed regulation set more precise areas of intervention, including: supporting awareness about climate change, climate change mitigation and climate change adaptation; tackling pollution; promoting the phasing-out of fossil fuels; and promoting sustainable agricultural practices and the conservation of biodiversity and ecosystems.

The proposed 2028–2034 Global Europe removes all thematic programmes, to preserve only **six geographic programmes** (Europe, Middle East, North Africa and the Gulf, Sub-Saharan Africa, Asia and the Pacific, America and the Caribbean and Global). Annex II sets more **specific objectives on the climate and the environment** for each programme, including: supporting climate change adaptation and mitigation; fostering pollution prevention and reduction; preserving and restoring biodiversity and ecosystems; and promoting a sustainable green, blue and circular economy (including the bioeconomy and agriculture).

In both the current and proposed regulations, there is no specific budget line dedicated to international action in the fields of climate, environment or sustainable development. Instead, the overall climate and biodiversity spending targets of the 2021–2027 MFF programme are applied to the current programme, and

the proposed expenditure tracking and performance framework sets a **30 % climate and environment target** for the 2028–2034 period.

As with the current programme, the Commission intends to allocate funding to specific actions through implementing actions that define **annual or multiannual action plans and measures**, which have to be adopted through the **examination procedure** established by Article 5 of Regulation (EU) No 182/2011.

References

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