

POSITION PAPER

Roma equality and inclusion in the proposed MFF 2028-2034 proposal: addressing risks and recommendations

April 2026

The [European Network on Roma Equality under EU Funds](#) (EURoma Network) has been working since 2007 to foster (through mutual learning, generation of knowledge and awareness-raising activities) an increased and effective use of European Cohesion Policy Funds (notably ESF/ESF+ and ERDF) to promote the social inclusion, equal opportunities and fight against discrimination of Roma¹ across the EU. To this end, it brings together public authorities responsible for Roma policies (i.e., National Roma Contact Points) and those in charge of European Cohesion Policy Funds from 15 EU Member States, as well as the European Commission. Fundación Secretariado Gitano (FSG), in charge of the Network's Technical Secretariat, leads and coordinates the Network.

This document presents the reflections and proposals of EURoma Network on key elements to be taken into account in the current debates on the next Multiannual Financial Framework 2028-2032, with a view to ensuring that EU Funds continue playing a central role in tackling the inequalities and discrimination experienced by Roma, the largest ethnic minority in the European Union.

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¹ The umbrella-term 'Roma' encompasses diverse groups, including Roma, Sinti, Kale, Romanichels, Boyash/Rudari, Ashkali, Egyptians, Yenish, Dom, Lom, Rom and Abdal, as well as Traveller populations (gens du voyage, Gypsies, Camminanti, etc.). EU policy documents and discussions commonly employ this terminology.

The drafting processes of EU Multiannual Financial Frameworks (MFF) are key milestones for European Roma as they set the basis for long-term periods of EU investments on social cohesion, on inclusion and equality.

EURoma Network has been providing its own view² of how this fundamental financial and policy instrument should be shaped every 7 years to better guarantee useful programmes for Roma on every Member State.

The European Commission (EC) proposal for the MFF 2028-2032 contains a substantial gear in its traditional approach. While understanding the need to adjust Europe's cohesion instruments to the new challenges, according to EURoma Network assessment, the proposed shift may put in danger the foundational protection of the European social model and the particular focus and support that so far, the MFF has meant for most disadvantaged groups such as Roma.

1. Overview of the relevance of Multiannual Financial Frameworks for Roma equality and inclusion to date

Roma equality and inclusion: a growing EU concern

Roma equality and inclusion has increasingly become an EU concern: the **persistent and structural inequalities and discrimination that Roma face** are a crosscutting challenge that happens, to a larger or lesser extent, **in all EU countries** (not only in those with the highest percentage of Roma), **in all categories of territories/regions** (regardless of their level of development/GDP) **and in all fields** (employment, education, housing, access to services, ...). As highlighted by the High-Level Group on Future of Cohesion Policy³, a lack of opportunities (one of the identified structural challenges of the EU) is particularly hitting more groups in vulnerable situations, including Roma people. 'Limited opportunities do not only apply to less developed or development trap regions. Even in the largest and most economically dynamic metropolitan areas, large pockets of people encounter a serious lack of opportunities.'

As shown by different sources, including the reports from the European Commission and the Fundamental Rights Agency (FRA)⁴, despite a timid progress and the differences across countries, regions and sub-regional units, **Roma continue to be disproportionately affected by poverty, social exclusion and discrimination and inequalities persist in key areas for social cohesion and progress**: high rates of poverty, including for Roma children⁵; low levels of education, with a proportion of Roma early school-leavers disproportionately high

² EUROMA Position Paper_ESF+ & Roma inclusion and equality. https://www.euromanet.eu/wp-content/uploads/2017/11/EUROMA-Position-Paper_ESF-Roma-inclusion-and-equality_FINAL-3.pdf

³ European Commission: Directorate-General for Regional and Urban Policy, Forging a sustainable future together – Cohesion for a competitive and inclusive Europe – Report of the High-Level Group on the Future of Cohesion Policy, February 2024, Publications Office of the European Union, 2024, <https://data.europa.eu/doi/10.2776/974536>

⁴ According to data from the study *Rights of Roma and Travellers in 13 European countries - Perspectives from the Roma Survey 2024* (<https://fra.europa.eu/en/publication/2025/roma-survey-2024>) from the EU Agency for Fundamental Rights (FRA) as well as the European Commission's *Report on the implementation of National Roma Strategic Frameworks (2024)* (https://commission.europa.eu/document/download/45a7ad5c-4fc3-4881-a681-407e47d70d7b_en?filename=Report%20Roma.pdf) and the *Assessment Report of the Member States' national Roma strategic frameworks (2022)* (<https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52023DC0007>).

⁵ 80 % of Roma are living below the at-risk-of poverty threshold of their country; Roma children are at least twice as likely to experience income poverty as their non-Roma peers: around 60 % of them live in severe material deprivation and 85 % are at risk of poverty, compared to 19.6 % for children in general.

compared to the general population; persistent situations of substandard and segregated housing (including settlements) where mainly Roma people live (including a high percentage of Roma minors); the low employment rates and poor working conditions, with a higher impact on women and youngsters⁶; lower levels of access to health services and higher levels of long-term health problems. This is linked to the high levels of discrimination in their daily lives. As a result, Roma can not fully enjoy their rights on an equal footing with other EU citizens.

This concern at EU level is reflected in the EU policy framework, notably the ***EU Roma strategic framework for equality, inclusion and participation 2020-2030***⁷ (including the European Commission Communication⁸ and the Council Recommendation⁹) in which the EU and Member States commit themselves to promote progress towards Roma equality, inclusion and participation, including the achievement of a series of minimum targets by 2030¹⁰ linked to seven objectives (three horizontal: equality, inclusion and participation; four sectoral: education, employment, housing and health). The EU Roma Framework is also linked to several other policy frameworks (e.g., EU Anti-Racism Action Plan 2020-2025¹¹ and the recently approved EU Anti-Racism Strategy 2026–2030¹², EU Child Guarantee¹³, European Pillar of Social Rights¹⁴, United Nations Agenda 2030 and Sustainable Development Goals¹⁵). Moreover, links and synergies will have to be established with the recently approved European Affordable Housing Plan¹⁶ and very clearly, with the upcoming EU Antipoverty Strategy and those under preparation such as the future EU action plan on the Pillar of Social Rights.

⁶ According to the FRA's EU-MIDIS Survey, one in four Roma aged 16 years or older reports 'employed' or 'self-employed' as their main activity. Roma women report much lower employment rates than Roma men, 16 % compared with 34 %; 63 % of Roma aged 16-24 were not employed, nor in education or training at the time of the survey, compared with the 12 % EU average on the NEET rate for the same age group.

⁷ The new EU Roma strategic framework for equality, inclusion and participation (full package).

https://commission.europa.eu/publications/new-eu-roma-strategic-framework-equality-inclusion-and-participation-full-package_en

⁸ Communication from the Commission to the European Parliament and the Council- A Union of Equality: EU Roma strategic framework for equality, inclusion and participation. https://commission.europa.eu/document/download/99cc0720-68c2-4300-854f-592bf21dceaf_en?filename=eu_roma_strategic_framework_for_equality_inclusion_and_participation_for_2020_-_2030.pdf

⁹ Council Recommendation of 12 March 2021 on Roma equality, inclusion and participation. https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=oj:JOC_2021_093_R_0001

¹⁰ Reducing the poverty gap between Roma and general population by at least half; cutting the gap in participation in early childhood education by at least half; cutting the proportion of Roma children who attend segregated primary schools by at least half in Member States with a significant Roma population; cutting the employment gap and the gender employment gap by at least half; reducing the gap in housing deprivation by at least one third; ensuring that at least 95% of Roma have access to tap water; cutting the proportion of Roma with experience of discrimination by at least half; doubling the proportion of Roma filing a report when experiencing discrimination; cutting the gap in life expectancy by at least half.

¹¹ EU Anti-Racism Action Plan 2020-2025. https://commission.europa.eu/document/download/beb25da4-e6b9-459e-89f7-bcddb3a8f0c8_en?filename=a_union_of_equality_eu_action_plan_against_racism_2020_-2025_en.pdf

¹² Union of Equality. EU Anti-Racism Strategy 2026 – 2030. https://commission.europa.eu/document/download/f4acc4d4-689e-4db8-8c89-c7243b76ab88_en?filename=JUST_template_comingsoon_standard_0.pdf

¹³ European Child Guarantee. https://employment-social-affairs.ec.europa.eu/policies-and-activities/social-protection-social-inclusion/addressing-poverty-and-supporting-social-inclusion/investing-children/european-child-guarantee_en

¹⁴ European Pillar of Social Rights. https://employment-social-affairs.ec.europa.eu/policies-and-activities/european-pillar-social-rights-building-fairer-and-more-inclusive-european-union_en

¹⁵ Transforming our world: the 2030 Agenda for Sustainable Development. <https://sdgs.un.org/2030agenda>

¹⁶ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions. The European Affordable Housing Plan. https://housing.ec.europa.eu/document/download/756915b5-d1b1-4bde-ac82-03532d2d3d90_en?filename=0.pdf

Contribution of MFFs to address Roma equality and inclusion

Over the past programming periods, there has been a greater focus on Roma equality and inclusion in MFFs as an impact of the acknowledgement of the situation of Roma as a European concern in 2010¹⁷. The MFF has evolved from a lack of explicit acknowledgement of the Roma and misalignment between financial and policy frameworks during the 2007–2013 programming period to the existence of the Specific Objective (j) *promoting the socio-economic integration of marginalised communities such as the Roma*, and the enabling condition related to the National Roma Strategic Framework in the current 2021-2027 programming period (see the chart below). Without prejudice to the selection of specific objectives when drafting partnership agreements being optional for the Member States, this trend demonstrates the European institutions' and Member States' increased commitment to reversing the long-standing unequal situation of the Roma, and has contributed to trigger the majority of social investments being directed towards them.

OVERVIEW: EVOLUTION OF THE CONSIDERATION OF ROMA EQUALITY IN THE LAST THREE MFF PROGRAMMING PERIODS



EU funds have been key drivers of investments targeting Roma in Member States. European Funds and in particular European Social Fund (ESF+), in complementarity with European Regional Development Fund (ERDF), have proved to be **essential instruments to reduce socio-economic and territorial disparities and inequalities and to promote a more social and inclusive Europe** (in line with the European Pillar of Social Rights and EU values) by providing support to the groups/people in situations of greater exclusion and

¹⁷ Communication from the Commission to the Council, the European Parliament, the European Economic and Social Committee and the Committee of the Regions The social and economic integration of the Roma in Europe, COM/2010/0133 final. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52010DC0133>

vulnerability, such as Roma¹⁸. As ESF+ has showed, they **allow for specific, tailored and sustained investments benefiting these groups** in areas such as employment (including youth employment), education and skills, access to housing and essential services, fight against poverty (including child poverty) and discrimination, promotion of equality (including gender equality) or by supporting the capacity of civil society organisations. They can also play a key role at the policy level, by making it possible to implement and test interventions related to public policies that had not been developed before, and by prompting policy changes.

2. The European Commission's proposal: critical elements identified in the proposal

On 16 July 2025, the EC presented its proposal for the Multiannual Financial Framework for 2028-2034¹⁹, followed by a second package of sectoral proposals on 3 September²⁰, completing the framework for the next long-term EU budget for 2028-2034. **The current proposal for MFF**, which defines amounts and rules on financing the EU priorities and policies, **amounts to 1.26 % of the EU Gross National Income (GNI)**, a substantial increase in the next EU budget, which may reach €2 trillion compared to €1.21 trillion in the previous budget (an increase from 1.13 % to 1.15 %), and the 8 % representing repaying NextGenerationEU loans).

The main key features of the EC proposal for the new MFF are related to: **more flexibility** across the budget (to increase capacity to act and react fast and redefine new policy priorities); **simplification** of EU financial programmes for greater streamlining and harmonisation; **budget tailored to local needs through National and Regional Partnership Plans (NRPP)**²¹ for investments and reforms; a competitiveness boost on security, innovation and clean and smart technology; balanced package of **new own resources** that ensures adequate revenues for EU priorities; **performance-based orientation**; respect for the **Rule of Law**, as well as rights, freedoms and principles set out in the **Charter of Fundamental Rights of the European Union** set as horizontal principles to ensure respect in the preparation and implementation of the NRPP, **will remain unconditional**.

The MFF proposal is structured along four main categories of expenditures (**'headings'**) and provides for a maximum amount for each of them (**'ceilings'**):

- **Heading 1** (€865.000 billion) encompasses **National and Regional Partnership Plans (NRPP)**, decentralised agencies and the repayment of NextGenerationEU loans.

¹⁸ For example, positive outcomes of EU-funded interventions targeting Roma have been documented in several Member States. In Portugal, the mid-term evaluation of the *Social Inclusion and Employment Operational Programme* reports favourable results for Roma children participating in the *Programa Escolhas*, particularly highlighted in paragraphs 268 and 286 of the final report (<https://www.adcoesao.pt/wp-content/uploads/1.-Av.-Intercalar-POISE-Relatorio-Final.pdf>). Similarly, in Spain, the evaluation of the *Acceder Programme* demonstrates significant results and a sustained positive impact on the labour market inclusion of Roma participants (https://www.gitanos.org/resources/research/evaluation_of_the_results_and_impact_of_the_acceder_programme_2000_2020/).

¹⁹ The 2028-2034 EU budget for a stronger Europe. https://commission.europa.eu/strategy-and-policy/eu-budget/long-term-eu-budget/eu-budget-2028-2034_en

²⁰ https://ec.europa.eu/commission/presscorner/detail/en/ip_25_2011

²¹ 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 https://eur-lex.europa.eu/resource.html?uri=cellar:0d5ded06-639d-11f0-bf4e-01aa75ed71a1.0001.02/DOC_1&format=PDF

- *Heading 2* (€589.6 billion) includes EU programmes like European Competitiveness Fund (ECF), Horizon Europe, Connecting Europe Facility, Union Civil Protection Mechanism+, Erasmus+, the new 'AgoraEU', etc.
- *Heading 3* (€215.2 billion) hosts Global Europe Instrument, as well as the Common Foreign and Security Policy and Overseas Countries and Territories (including Greenland).
- *Heading 4* (€118.000 billion) covers expenditures for the European Public Administration.
- Approximately €149 billion (8 % of the budget) reserved exclusively for debt repayment under the post-pandemic recovery plan.

The **Social Climate Fund (SCF)** envelope will remain outside the MFF ceilings, financed via externally assigned revenue.

While there are some general financial figures, there is lack of clarity on the amount that will be finally allocated to social cohesion and social inclusion in particular. This concern is also shown by the European Economic and Social Committee in its document Multiannual Financial Framework 2028-2034²² (ECO/682) (January 2026). Similarly, the European Committee of the Regions, in its Draft Opinion on the Multiannual Financial Framework (MFF) post 2027, including its own resources package²³, calls for predictable funding for cohesion policy throughout the period and that it be maintained at least at the current level, taking into account adjustments for inflation, and stresses that any reduction in the financial framework compared to the proposal must not reduce the overall amount of heading 1; underlines that the reduction in jointly managed funds (cohesion policy and common agricultural policy) will have a significant negative impact on regions, cities and rural areas, on the achievement of the targets set by the Commission and on the future of the European Union.

The number of programmes will be reduced from 52 to 16 and consolidated into a single national package tailored to each Member State, granting greater control over fund allocation. The EC will issue recommendations on priority areas and will approve them individually for each country. Overall, this entails a significant reduction from approximately 540 documents to just 27 national plans.

Aside from the general framework regulation, there will be sectoral regulations on National and Regional Partnership Plans²⁴ and related sectoral regulations²⁵ (including the ESF and ERDF regulations as described below); and EU programmes under Headings 2 and 3.

²² Opinion European Economic and Social Committee Multiannual financial framework 2028-2034.

https://www.europarl.europa.eu/meetdocs/2024_2029/plmrep/COMMITTEES/BUDG/DV/2026/03-17/EESC-2025-02245-00-00-AC-TRA_EN.pdf

²³ Draft Opinion Multiannual Financial Framework (MFF) post 2027, including own resources package,

https://www.europarl.europa.eu/meetdocs/2024_2029/plmrep/COMMITTEES/BUDG/DV/2026/03-17/cor-2025-02839-00-00-pac-tra_EN.pdf

²⁴ National and regional partnership plans. [https://op.europa.eu/en/publication-detail/-/publication/61f68e91-d63e-11f0-8da2-01aa75ed71a1/language-](https://op.europa.eu/en/publication-detail/-/publication/61f68e91-d63e-11f0-8da2-01aa75ed71a1/language-en?WT.mc_id=Searchresult&WT.ria_c=55576&WT.ria_f=9125&WT.ria_ev=search&WT.URL=https%3A%2F%2Fcommission.europa.eu%2F)

[en?WT.mc_id=Searchresult&WT.ria_c=55576&WT.ria_f=9125&WT.ria_ev=search&WT.URL=https%3A%2F%2Fcommission.europa.eu%2F](https://www.europa.eu/en/publication-detail/-/publication/61f68e91-d63e-11f0-8da2-01aa75ed71a1/language-en?WT.mc_id=Searchresult&WT.ria_c=55576&WT.ria_f=9125&WT.ria_ev=search&WT.URL=https%3A%2F%2Fcommission.europa.eu%2F)

²⁵ MFF: Legal documents. https://commission.europa.eu/strategy-and-policy/eu-budget/long-term-eu-budget/eu-budget-2028-2034_en#legal-documents

NRPP Regulation establishes 28 specific objectives, 6 of which are considered to be related to the social target:

Two specific objectives were already introduced under 2025 Mid-term review ESF/ERDF in current programming period:

- Housing (art 3.1.a.vii) Supporting social and affordable housing
- Strengthen Union's security (art 3.1.b.iii) Strengthening the Union's security by improving threat detection, prevention and response threat detection capabilities, including energy and transport critical infrastructure and cybersecurity.

Four specific objectives as in current programming period considered 'classic ESF financing':

- Employment and labour market policies (art 3.1.c.i) Supporting employment, equal access to the labour market, fair and quality working conditions and labour mobility.
- Education and skills (art 3.1.c.ii) Enhancing labour supply and improving education and lifelong acquisition of skills, in particular by promoting upskilling and reskilling.
- Equal opportunities and social inclusion (art 3.1.c.iii) Promoting equal opportunities for all, supporting strong social safety nets, fostering social inclusion and fighting poverty and homelessness, and supporting investment in social infrastructure.
- Access to social services (art 3.1.c.iv) Facilitating access to services and associated infrastructure, including modernisation, digitalisation and strengthening the quality and resilience of healthcare systems, child and long-term care services.

One specific objective that is only partially included in current programming period (ERDF):

- To protect and strengthen fundamental rights, democracy, the rule of law and to uphold Union values (art 3.1.e.i/ii/iii/iv).

Special relevance has the EC Proposal for a Regulation on budget expenditure tracking and performance framework²⁶, that sets out common provisions applicable across the entire budget, including those related to the evaluation of programmes and activities, as well as requirements on information, communication and visibility. **The performance framework introduces a unified monitoring system for spending and budget performance, based on a harmonised catalogue of intervention fields (i.e., types of actions) covering all funded activities.** This enables estimation of the budget's contributions to key policy areas, percentage-based EU climate, social and environment coefficients following a three-tier methodology (0 %, 40 % or 100 % per field). The Regulation also **establishes a standardised set of output and result indicators**, applicable across all EU budget programmes and directly tied to the intervention fields.

²⁶ COM (2025) 545 Proposal for a Regulation of the European Parliament and of the Council establishing a budget expenditure tracking and performance framework and other horizontal rules for the Union programmes and activities. https://eur-lex.europa.eu/resource.html?uri=cellar:bb24b1ec-62fc-11f0-bf4e-01aa75ed71a1.0001.02/DOC_4&format=PDF

The **Performance Regulation** explicitly refer to Roma in four interventions fields: **education, upskilling and reskilling, improving access to employment and improving access to quality services**. All these types of investments are assigned a 100 % social coefficient.

Intervention fields and indicators specifically related to Roma						Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing a budget expenditure tracking and performance framework and other horizontal rules for the Union programmes and activities.
INDICATOR	Contribution to the achievement of social goals	POLICY AREA (LEVEL 1)	POLICY AREA (LEVEL 2)	INTERVENTION FIELD	OUTPUT INDICATOR	RESULT INDICATOR
117		Education and skills	Education	Improving access of marginalised communities such as the Roma to education.	Number of participants – by gender and by age;	Number of participants in education or trainings – by gender;
132		Education and skills	Skills	Up -skilling and re-skilling for marginalised communities such as the Roma .	- Number of participants – by gender, by labour market status, by age, and by education level; - Number of organisations involved in transnational cooperation activities	- Number of participants gaining a qualification or self reported skills improvement– by gender; - Number of organisations benefitting from their participation in cross-border cooperation activities;
444		Social	Employment and labour market	Improving access of marginalised communities such as the Roma to employment.	Number of participants – by gender, by labour market status, by age and by level of education;	Number of participants – by status after participating (gaining a qualification, engaged in job searching, in education or training, in employment) and by gender;
480		Social	Social inclusion	Measures for the social inclusion including access to quality services for marginalised communities such as the Roma .	Number of participants – by gender, by labour market status, by age and by level of education;	Number of participants – by status after participating (gaining a qualification, engaged in job searching, in education or training, in employment) and by gender;

According to the European Court of Auditors in its Opinion 10/2026²⁷, the proposed Performance framework does not provide a clear link between funding and results because it incorporates performance indicators that, in certain cases, reflect procedural stages (e.g., adoption of legislation, approval of strategies, establishment of administrative structures) rather than clearly defined achievements; and there is a lack of correlation between the areas of intervention and the strategic objectives. Besides, 25 % of the intervention fields (134 out of 543) do not have result indicators, nearly half of which are related to reforms. This undermines the focus on results.

²⁷ Opinion 10/2026 EN (pursuant to Article 322(1), TFEU) EU budget 2028-2034 concerning the proposal for a regulation of the European Parliament and of the Council establishing a budget expenditure tracking and performance framework and other horizontal rules for the Union programmes and activities COM(2025) 545 final. https://www.eca.europa.eu/ECAPublications/OP-2026-10/OP-2026-10_EN.pdf

Member States shall provide an explanation on how NRPP will allocate resources on social measures categories which shall be agreed by the Commission (these measures do not exhaust the range of measures usually supported by the ESF).

To integrate with **the European Semester monitoring framework, each NRPP must address all or a significant portion of challenges outlined in the relevant country-specific recommendations**. Member States will have to develop and execute these plans collaboratively with partners such as regional and local authorities. Following submission, the Commission will assess the plans and, if favourable, propose a Council implementing decision.

It is also worth mentioning the **Proposal for Regulation related to emergency preparedness and response**²⁸ as it proposes a strengthened Union mechanism that improves the Union's overall ability to prevent, prepare for and respond to major disasters and serious cross-border health threats, by better coordinating civil protection and health emergency tools and filling capacity gaps at EU level. EURoma Network **welcomes the inclusion of vulnerable groups, particularly Roma and children, since Roma communities living in precarious residential contexts, such as slums and informal settlements, face significantly higher risks and hazards during crises**. However, and in order to mitigate this, there is a **need to establish anticipatory measures that specifically address the baseline conditions of these excluded populations** to prevent the widening of social and economic inequalities when crisis arise.

EURoma Network is **concerned about the provisions that allow unused funds to be carried over for response actions, as this mechanism could divert resources originally intended for social inclusion**.

In the overall EC proposal for next MFF 2027-2034 Roma are referred to in several documents:

Roma in overall proposal for future MFF

Roma do not appear as a specific objective as it is the case in the current MFF (in the current proposal objectives are established in the NRPP Regulation).

Mentions to Roma in NRPP Regulation appear only in recital (26): The Fund should not support actions that contribute to any form of segregation, discrimination or exclusion, including of racialised communities such as Roma, and, when financing infrastructure, should ensure the accessibility for persons with disabilities.

Roma explicit mentions appear in Annex I of the Performance Regulation solely under the policy areas of education and skills and social field. These identify four distinct interventions fields: improving access to

²⁸ COM (2025) 548 final -Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the Union Civil Protection Mechanism and Union support for health emergency preparedness and response, and repealing Decision No 1313/2013/EU (Union Civil Protection Mechanism). https://eur-lex.europa.eu/resource.html?uri=cellar:a65e66da-630b-11f0-bf4e-01aa75ed71a1.0001.02/DOC_1&format=PDF

education, upskilling and reskilling, improving access to employment and improving access to quality services. All such investment typologies carry a 100 % social coefficient.

In ESF Regulation there are only two references in recitals related to employment measures and inclusion measures, including childcare (6) and to equal equal opportunities, social inclusion and fight poverty (16).

References in ERDF Regulation relate to non-segregation investments.

The European social dimension: the ESF+ within the new proposal

As part of the set of proposals published by the EC outlining the upcoming MFF, there is a specific regulation establishing the European Social Fund²⁹, the main EU tool to support social and employment policies.

The legal text of this sectoral proposal, presented in a very concise form, outlines ESF+ support for social innovation, demographic transition, and material deprivation. Following the European Pillar of Social Rights, the ESF support would advance broad goals such as quality employment, education and skills development, and social inclusion; facilitate a just social transition to climate neutrality; safeguard and bolster EU democracy; and defend core EU values. Additionally, it would target specific aims, notably upskilling and reskilling, poverty and homelessness reduction, and (newly) tackling demographic challenges alongside social and affordable housing needs.

All funds will be governed by the NRPP regulation and must adhere to rule-of-law standards and the EU Charter of Fundamental Rights (horizontal principles).

Following the NRPP Regulation, resources contributing to social objectives must concentrate on four categories of measures³⁰:

Promoting of social inclusion and socioeconomic integration	(a) To foster active social inclusion and socio-economic integration with a view to promoting equal opportunities, non-discrimination and active participation, and improving employability, in particular for disadvantaged groups, third-country nationals including migrants and marginalized communities.
Providing of food and/or basic material assistance	(b) To address material deprivation through food and/or basic material assistance to the most deprived persons and providing accompanying measures supporting their social inclusion;

²⁹ COM (2025) 558 – Proposal for a regulation establishing the European Social Fund as part of the National and Regional Partnership Plan (NRPP), 16 July 2025. <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52025PC0558>

³⁰ Annex VI (Methodology for the contribution to social objectives), Annexes to the NRPP Regulation. https://eur-lex.europa.eu/resource.html?uri=cellar:0d5ded06-639d-11f0-bf4e-01aa75ed71a1.0001.02/DOC_2&format=PDF

Addressing child poverty and implementing the Child Guarantee	(c) To implement the Child Guarantee through targeted actions and structural reforms to tackle child poverty particularly in Member States that have an average rate above the Union average of children of less than 18 years old at risk of poverty or social exclusion, based on Eurostat data, between the years 2024 and 2026;
Combating youth unemployment and implementing Youth Guarantee	(d) To implement the Youth Guarantee through targeted actions and structural reforms to support youth employment, vocational education and training, particularly in Member states that have an average rate above the Union average of young people of 15 to 29 years of age who are not in employment, education or training, based on Eurostat data, between the years 2024 and 2026.

Although some of these measures refer to certain vulnerable groups, they fail to explicitly mention Roma.

The Proposal of Regulation of ESF does not include a fixed thematic concentration requirement, as it is the case in current MFF (25 % for social inclusion, 5 % child poverty, ...).

While recital (12) of the ESF regulation proposal states that Member States should allocate a minimum amount of resources under their NRPPs to the ESF, neither the ESF regulation proposal nor the NRPP regulation sets a specific minimum for ESF, **thus lacking a dedicated article on budget allocation or methodologies for determining concrete contributions to social objectives**. Instead, the proposal for NRPP regulation establishes (Article 22.2.q) that 'at least 14 % of total Union contribution and loans' should contribute to 'Union's social objectives' and that are 'calculated by using the coefficients' of Annex I of Performance regulation, which exceed measures typically supported by ESF. While the NRPP regulation serves as the 'single rulebook' for all funding under the NRPP envelope (including ESF), the ESF retains its independent legal basis under Article 162 of the Treaty on the Functioning of the European Union (TFEU).

The European Commission's proposal integrates ESF+ into the €865 billion National and Regional Partnership Plans (NRPPs) alongside cohesion funds (ERDF, Cohesion Fund), agriculture, and fisheries, **reserving at least 14 % of the total envelope for social targets**, calculated by using the coefficients of Annex I of Performance regulation. This includes skills development and retraining, improvements to education and training systems, and tackling poverty, social exclusion and lack of housing. A menu of different investment typologies is established to count inside the established 14 % for social targets, including some which may distort the focus on social inclusion that such an earmarking should have. That is the case, for example, of *Protection, development and promotion of cultural heritage and tourism services, Early childhood education facilities, schools and universities – Development and construction of other buildings or Healthcare infrastructure – Development and construction of other types of buildings*.

The Commission has not confirmed yet the budget estimates dedicated to social objectives and investments. Details on financial allocations will be found in the Legislative Financial and Digital Statement of the NRP Plan Regulation. Ultimately, the exact figure would depend largely on the specific combination of social priorities selected by Member States.

While Roma have been acknowledged as a specific target group in the set of interventions qualifying to count as part of the established 14 % for social target, other investment typologies considered to qualify as part of the 14 % for social target, include areas not directly linked to social inclusion, including *Tourism financial support* or *Healthcare infrastructure*. This wide menu of actions accounting as social targets may mean, at the end of the day, Member States choosing hard investments and leaving out social inclusion soft measures including those needed for achieving Roma equality.

There is still no definite information of future amounts for social targets and how they may differ from current ESF+ allocations. Concerns about the overall ESF figure to be diminished in comparison with current programming period. There are concerns that the overall ESF budget will be reduced compared with the current programming period.

According to the proposal, regional and local authorities will continue to play a key role in the design and implementation of the supported measures throughout the entire process, but it does not specify how. Specifically, Member States will have flexibility to structure their plans to reflect their own constitutional and administrative structures and preferences. For example, Member States may choose to structure their plans with national, regional, or sectoral chapters. However, the Commission will formulate recommendations to each Member State on the priority areas needed to achieve the common objectives set at EU level. The plans will be approved by the Member States and the European Commission.

Other social spending outside the ESF regulation and overall shared management relates to Erasmus+ programmes, EU Facility and, very importantly, the **European Competitiveness Fund (ECF)**³¹, which aims to enhance EU competitiveness through the full investment chain: research, innovation, scaling, industrial deployment, manufacturing, and skills in strategic sectors like clean and digital technologies. While the ECF proposal mentions support for addressing skills shortages in strategic sectors via lifelong learning, education, training projects, and apprenticeships, **all these actions are framed strictly as a competitiveness tool, not linked to social inclusion for vulnerable groups**. No specific amounts are earmarked for these actions in the Fund's budget.

Economic, social and territorial cohesion: the ERDF within the new proposal

The ERDF appears as one of the main instruments of cohesion policy in the future MFF proposal. It is regulated³² in a dedicated proposal that defines provisions applicable to both the ERDF and the Cohesion Fund, including the European territorial cooperation (Interreg). This regulation, as the rest of sectoral funds, is part of the broader NRPP framework. While its regulation builds on the current 2021–2027 ERDF framework, it introduces several substantial changes in structure, priorities, and governance. It will work in complementarity with the other policies under the scope of the NRPPs, still covering the same core territorial-cohesion objective of correcting regional imbalances, but with priorities sharpened around green transition, digitalisation, competitiveness, and resilience. The ERDF is explicitly framed as part of a broader 'competitiveness pillar' and

³¹ Proposal for a Regulation of the European Parliament and of the Council on establishing the European Competitiveness Fund ('ECF'). <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A52025PC0555&qid=1753802586340>

³² 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) <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:52025PC0552>

is expected to work in closer synergy with other EU instruments (e.g., agriculture, maritime and fisheries, defence-related funds), aiming to reduce duplication and increase strategic coherence rather than scattering resources across many small-scale programmes.

The ERDF will also ensure coherence with the current and upcoming Union of Equality Strategies³³ and legislation that aim at combating any form of discrimination based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation. In fact, the EC **proposal for ERDF establishes that those Member States with significant Roma populations are asked to pay ‘specific attention to Roma equality and inclusion’ and to avoid support that contributes to segregation or exclusion of persons with disabilities and marginalised communities such as Roma.**

In line with the principle of intergenerational fairness and the Union’s commitment to the rights of the child and the Youth Strategy, the ERDF and the Cohesion Fund should support measures that contribute to sustainable development for future generations, promote access to opportunities for young people across all territories, and address the specific needs of youth in disadvantaged areas, particularly in disadvantaged and depopulating regions, including infrastructure for skills, innovation, entrepreneurship, sustainable livelihoods and culture or sports. Such support may be implemented via integrated urban or local strategies.

While two relevant provisions can be closely related to Roma (Article 4 on support for disadvantaged areas and Article 5 on sustainable urban development, paying special attention to housing, poverty and an effective and efficient EU budget), there is no specific objective on the socioeconomic inclusion of marginalised communities, low-income households and disadvantaged groups, including persons with specific needs, through integrated actions such as housing and social services. In contrast, the current ERDF Regulation 2021-2027 has such a Specific Objective, accompanied by recitals explicitly referencing Roma and National Roma Integration Strategies. **In the new proposal, references to the Union of Equality remain largely declaratory and need to be operationalised into concrete objectives and conditions, including specific performance and monitoring indicators.**

It is striking to see there are **no explicit references to synergies with ESF+, despite the fact that combining ERDF and ESF+ investments are essential to effectively address inequality among the most disadvantaged groups, such as Roma**, particularly in socially excluded contexts linked to substandard and segregated housing, as well as in access to employment, education and social services for children and adults.

ERDF Regulation proposal calls on Member States to pay attention to Roma equality and inclusion (as part of marginalised communities), avoiding supporting segregation.

However, it fails to define a specific objective for marginalised communities as it is the case in current ERDF Regulation. Its linkages with the EU Roma Strategic Framework are reframed and embedded in a broader

³³ https://commission.europa.eu/topics/equality-and-inclusion/equality-and-inclusion-key-actions_en

Union-of-Equality architecture, reflecting a less explicitly Roma-specific wording that in current ERDF Regulation. Such linkages with equality need to be made more concrete and further substantiated.

3. Risks for future investments in Roma equality

The proposed MFF introduces several elements that can constitute critical risks as they could undermine the resources necessary for the pursuit of the objectives of EU social policy, and overall, the effectiveness and inclusiveness of its main financial instruments, particularly the ESF+, but also the ERDF, thereby diminishing their positive impact on the most disadvantaged groups, such as the Roma population.

For EURoma Network, this proposal entails a **worrying reconfiguration** of the European Union's budgetary architecture. While the European Commission's proposal reads that it is imperative that the next EU budget plays a central role in social and territorial cohesion and that the EU budget should continue improving the quality of life and the livelihoods of citizens, it lacks concreteness and clear translation into specific terms.

The objective and articulation of EU funds to maintain and strengthen the European social model appears to be substantially weakened in comparison with previous programming periods.

All EU sectoral policy frameworks contributing to Europe's social cohesion and equality must be backed by financial instruments that guarantee fulfilment of their strategic objectives. So far, there has been increasing alignment between such social policy frameworks and financial objectives for Roma equality and inclusion in Multiannual Financial Frameworks, particularly in the European Social Fund and also, but to a lesser extent, to ERDF.

When doing otherwise, there is the danger that such policy frameworks remain mere narratives.

Far from strengthening cohesion, **the reform proposal risks blurring the distinct objectives** of individual funds, **particularly by mainstreaming the European Social Fund (ESF+) into National and Regional Partnership Plans (NRPPs) without clearly ringfencing or earmarking social inclusion investments**. This **threatens to dilute social priorities** and undermine the capacity to address the structural needs of vulnerable groups like Roma, **failing to guarantee investments in social inclusion as currently ensured by the ESF+'s 25 % earmark**.

In the following box there is a summary of the main risks encountered in the analysis of the EC Regulation proposal.

Risks to EU Funds Investments for Roma Equality in the EC Proposal

→ Dilution of the social thematic approach: undermining the European Social Model

The integration of the ESF+ into the new National and Regional Partnership Plans, **without a clear mandate and earmarking of social inclusion thematic requirements**, poses a direct threat to social inclusion investments. **The absence of binding criteria to ensure social inclusion investments signals the undermining and disregard of the European social model, one of the EU's foundational pillars.**

Moreover, the provisions of a mechanism that allows unused funds to be carried over for response actions, could divert resources originally intended for social inclusion.

→ Lack of clarity regarding social objectives under 14 % social target

The Proposal Regulation **lacks clear guidance on how social inclusion activities should be included toward the 14 % social target**, without binding sub-allocations for targeted investments. **Permitting broad spending (like 40 % of social infrastructure to meet this quota) risks diluting focus on ESF objectives, namely address to vulnerable groups, making support for the most disadvantaged, such as Roma, discretionary.** This ambiguity endangers decades of ESF+ achievements as a dedicated tool against poverty, discrimination and exclusion. **This is particularly worrying as the ESF has been the EU's primary financial instrument for Roma inclusion and equality across Member States.**

The **current uncertainty regarding the final overall budget for social targets raises concerns that it may face significant reductions**, leading to severe cuts in social investments across the EU.

→ Potential negative effects of the Performance framework

The **shift to purely performance-based funding focused on immediate results can penalise transformative social inclusion efforts that demand sustained resources, continuity and long-term commitment.** This is the case of most investments to tackle Roma structural inequality. These policies require ongoing support to deliver real impact. A performance approach should thus integrate evaluations of processes and social outcomes, not just financial metrics or short-term result criteria. **A potential key risk of the proposed performance framework is sidelining long-term interventions for vulnerable groups like Roma.**

→ False dichotomy between Competitiveness and Social Inclusion

Framing competitiveness as an isolated EU priority, disconnected from the European social model, is misleading, as **social inclusion is essential to true competitiveness.** **Portraying them as opposites ignores their clear synergy: social inclusion fuels competitiveness by building skills, reducing inequality, and boosting productivity across the workforce, including vulnerable groups like Roma.**

→ **Overall danger of flexibility and simplification via merged funds in NRPPs**

While **flexibility and simplification** may seem positive at first glance, they **can pose real dangers by undermining cohesion objectives**. They **grant broad discretion over budget (re)allocation, potentially sidelining social inclusion, and especially investments in disadvantaged groups like Roma**, in favor of other priorities. In practice, **it may weaken what should be EU core social inclusion goals**.

All these elements in the EC proposal pose significant risks by diluting specific social priorities and attention to vulnerable groups, ultimately leading to reduced investments, particularly for the most disadvantaged, such as Roma.

4. Key Recommendations

✓ **Safeguarding the European Social Model: social inclusion as a core EU priority upheld by the ESF+**

- The **ESF should be maintained as a stand-alone fund** and the ESF Regulation should specifically establish **a ring-fenced budget** which should be at least equal to the current allocation to ESF+ in the MFF 2021-2027.
- It is necessary to **strengthen the ESF Regulation** by including **explicit objectives on social inclusion**, investment priorities and governance provisions that reflect the fund's essential social mission and its demonstrated impact in relation to vulnerable groups such as a Roma³⁴.
- If eventually the ESF were not to be a stand-alone fund with its own specific budget, it would be necessary to link the 14 % allocation exclusively to ESF and to clarify the core social objectives **within the 14 % social target to distinguish genuine social inclusion investments for vulnerable groups from broader social infrastructure spending** (such as social housing, health, or other services). The **14 % allocation should be based on the historical ESF+ concept of investments and maintain, if not increase, current ESF+ budget allocation** in the MFF (2021-2027) for employment, training, education, social inclusion, and poverty reduction.
- **Earmark at least 25 % of ESF budget for social inclusion investments for vulnerable groups,**

³⁴ Namely, the objectives connected to the category of measures that are identified in Annex VI - Methodology for the contribution to social objectives of NRPP regulation.

explicitly linking these investments to the priorities set out in the NRPP regulation. It will provide Member States with concrete guidance on eligible actions and target groups, **guaranteeing specific and sustained support, and linking it to the relevant indicators of the Performance framework.**

- **Adopting an increased flat co-funding rate for interventions targeting vulnerable groups, such as Roma.** This is already the case in fields such as innovation in the current programming period and it would be in line with the proposal in the European Parliament's Report on the ESF+ post 2027, which calls for a co-financing rate of at least 90 % for measures targeting the most deprived.
- **Apply the same co-financing rate across all regions, irrespective of their economic development level, since vulnerable groups' (including Roma) poverty, exclusion, and discrimination occur nationwide, beyond GDP disparities.**
- **Guarantee MFF to fully align with EU social sectoral policy frameworks as an exercise of institutional coherence and search for synergies.** This includes the EU Framework for Roma equality, inclusion and participation as well as other mainstream instruments, such as the future EU action plans on anti-racism and on the Pillar of Social Rights, the European Child Guarantee, the EU Youth Guarantee, the European Affordable Housing Plan and the upcoming Anti-Poverty Strategy. In fact, **the ESF+ must be consolidated as the EU's primary financial instrument for investment in people, ensuring coherence with the future European Anti-Poverty Strategy and other already existing policy frameworks and its political priorities regarding the social and labour inclusion of the most vulnerable groups, including Roma.**
- **Integrate social inclusion targets within the European Competitive Fund (ECF) as it can create greater synergies with social inclusion targets inside the NRPPs** by building skills, reducing inequality, and boosting productivity across the workforce. **Competitiveness will happen if the European social model works:**
 - Strengthening of the social dimension, namely with regard to the development of skills, in the reporting and monitoring obligations of the ECF;
 - Clarification of the coordination mechanisms between ECF and NRPP, allowing, where appropriate, a clear articulation between social policy objectives and the investments planned within the scope of the ECF.

✓ **Explicit recognition and sustained support for Roma equality as an EU priority**

- There is a **need to intensify efforts to address the persistent situation of inequality and discrimination suffered by Roma**, in coherence with the EU Framework for Roma equality, inclusion and participation, the EU Anti-Racism Action Plan 2020-2025, and the rest of sectoral policies such as the Child and Youth Guarantees, the European Pillar of Social Rights, the United Nations Agenda 2030 and the Sustainable Development Goals, as well as the new Anti-Racism Strategy, the European Affordable Housing Plan or the upcoming Anti-Poverty Strategy. **Roma equality should be considered an EU challenge spanning all european countries** (not just those with the highest Roma populations), all region types regardless of development level or GDP, and all policy areas. **EU-level investments offer clear added value and thus require a clear mandate in the next MFF to ensure sustained progress.**

- **Explicit but not exclusive mention to Roma as one of the socially vulnerable groups. Such mention has proved to be a necessary condition** (although not sufficient) **for the acknowledgment and awareness of the specific situation of persistent structural inequality and discrimination and for increasing the efforts to tackle it.** It signals public authorities (at national, regional and local levels) and other stakeholders the need to focus on them and helps guide/focus investments and ensure they are more targeted and effective towards the promotion of social change, real equality and non-discrimination of Roma in the EU. In addition, historical evidence shows that when Roma are not explicitly named and considered, instead being assumed to be included in broader investments targeting disadvantaged or marginalised groups, they are often overlooked, as is frequently the case in mainstream and territorial approaches.
- For this purpose, **it is essential to introduce a specific objective related to Roma population, as it is the case now in the current ESF 2021-2027 (specific objective j) together with specific indicators that guide not only the evaluation,** but also, and very importantly, the target planning of interventions and distribution of EU funds **(particularly the ESF, but also ERDF among others).** The current proposal includes only four Roma-specific intervention fields in the Performance Framework, a relevant step but insufficient on its own. Specific objectives paired with indicators are essential: they steer planning, implementation, and strategic investments while ensuring measurable impact.
- To strengthen accountability, **it is essential to link fund allocation to progress on these intervention fields and specify Roma in the output and result indicators for investments in vulnerable groups, acknowledging the fact that outcomes and results do not appear necessarily in the short-term.**
- To strengthen financial commitment, it is **necessary to leverage and expand a variety of typology of investments supported from other funds, such as the ERDF, or the Competitive Fund** by incorporating specific objectives for the most vulnerable groups **particularly in relation to deprived housing (particular housing segregation such as settlements/slums or substandard housing), infrastructure and services in education, employment or health, etc. Roma inequality should be the concern of ESF+ but also from other funds, particularly of ERDF.**
- Given the **persisting inequality** in the areas of employment (including youth employment), education and training, health, housing and essential services or fight against discrimination and poverty, it is crucial:
 - **To ensure a comprehensive support by strengthening financial commitment that integrates both soft and hard interventions, leveraging and broadening the range of investment types supported by different funding instruments such as the ERDF and the European Competitive Fund among others.** These should include specific objectives addressing the most vulnerable groups, particularly regarding housing. **While the ESF+ plays/can play a central role in promoting Roma inclusion, its efforts should be complemented and reinforced through other funding instruments to ensure more coherent and inclusive outcomes.**

- To that end, **adopting a policy-based approach to address Roma inequalities that is long term and large scale in both budgetary and geographical scope, as enabled by the MFF programming periods, would represent an essential step forward** compared to the scattering and fragmentation of EU funding. Experiences with this approach have already demonstrated its effectiveness in tackling structural inequalities and enhancing the impact of EU funds.
 - In this context, it could be also useful to count on **mechanisms that allow for renewing and giving continuity to pilot and/or short-term actions that prove their value and success**, allowing for their consolidation/scaling up during the same programming period or beyond, when relevant.
- ✓ **Specifically include the situation of vulnerable groups such as Roma in the streamlined European Semester and in each country's policy-based budget plan**
- Given that the streamlined European Semester and country-specific plans are proposed as key frameworks to promote policy-based budgeting and ensure the alignment of national policies with EU financial instruments, it is **essential that these mechanisms fully incorporate social cohesion and inclusion objectives**, alongside economic ones. In particular, they **should address in a formal and stable manner the situation of vulnerable groups, including the Roma population, by integrating the most relevant targets of the EU Roma Strategic Framework and other related sectoral policies:**
 - This **integration should occur horizontally across all Member States, not only in those with the largest Roma populations**, as Roma inequality and discrimination are present in all EU countries and across all regions.
 - The **plans should include robust data and evidence capturing the situation of Roma communities and identifying key challenges** that must be tackled to ensure their equality and inclusion. This should be aligned with each Member State's NRSFs (needs assessments).
 - Moreover, **specific social indicators related to Roma inclusion and equality should be developed and embedded within the monitoring and evaluation mechanisms** of the European Semester. **These indicators are vital to track progress and hold stakeholders accountable.**
 - **A strategic combination of reforms and targeted investments**, grounded in evidence-based policies, **offers the most effective approach to addressing the structural barriers that hinder progress for vulnerable groups, including Roma**. This dual approach should be at the core of the EU's commitment to social fairness and equality.
 - However, it must be **accompanied by safeguards to ensure that the focus goes beyond outlining critical milestones and short-term actions**, therefore, securing continuity of essential long-term investments needed to achieve equality.
 - **Strengthening governance in this area is essential to ensure better alignment and coherence between policy objectives and financial instruments at both the EU and national levels.**

✓ **Anticipatory crisis strategy: crisis impacts on disadvantaged groups, stable investments and red lines on social inclusion budget reallocation**

- Provisions allowing the carry-over of unused funds for crisis response actions should include red lines limiting the reallocation of resources originally designated for social inclusion, particularly those targeting disadvantaged groups such as Roma. These mechanisms should establish clear thresholds or restrictions to prevent the diversion of funding intended for structural social cohesion objectives.
- Disaster resilience goals must integrate cross-sectoral impact analysis regarding disadvantaged populations, such as Roma, to inform future measures.
- The best way to anticipate vulnerable groups facing crisis is to guarantee ongoing, stable, scale investments as MFF allows for. Ultimately, ensuring synergy between the new regulation and other EU instruments like the ESF+/ERDF is considered indispensable for an effective and equitable response to future crises.

✓ **Assuring meaningful involvement of relevant stakeholders**

In line with the current European Code of Conduct on Partnership, the strong and quality partnership and cooperation with all relevant stakeholders should be promoted and ensured in all phases of the Funds' cycle, from planning to implementation, monitoring and evaluation. This includes public authorities at all levels (including the National Roma Contact Points and the regional bodies in charge of Roma policies), equality bodies, civil society organisations, representatives of groups that are significantly affected or likely to be significantly affected by the Funds, in particular groups considered to be at risk of discrimination and social exclusion and other relevant stakeholders in all phases of the programming period (and the entire management cycle). In this respect, the following elements have proved their value:

- To advance towards structured mechanisms, to involve stakeholders and to establish processes and methods that allow for an active and quality partnership (going beyond mere informative sessions and moving towards real consultation and partnership), to develop mechanisms for the systematic monitoring and evaluation of stakeholder involvement and to foster the capacity of stakeholders to get involved. This will be of particular relevance when designing NRPPs priorities and follow up, including the cycle of the European Semester.

✓ **Balancing risks of flexibility, simplification, and performance-based on social inclusion**

Overall, while acknowledging some of the benefits of flexibility, simplification, and performance-based approaches in EU funding, it is essential to nuance their potential risks to social inclusion priorities:

- While levels of flexibility can be granted, safeguards as assure social inclusion investments should be established at European level as a way to avoid potential sidelining of social inclusion investments in disadvantaged groups like Roma, in favor of other priorities.
- A performance-based approach should therefore integrate assessments of processes and long-term social outcomes, beyond mere financial metrics or short-term result indicators, therefore

ensuring that sustained interventions for vulnerable groups like Roma are not marginalised by capturing both short-term indicators and enduring social impact in evaluations.

- **To mitigate simplification risks in NRPPs under the next MFF (2028-2034), there should be an EU mandate of explicit social targets (earmarking at least 25 % ESF for social inclusion and securing its inclusion under the minimum 14 % on social targets).**

EURoma Network proposals presented aim to improve the regulatory proposal for the next Multiannual Financial Framework and ensure that the ESF remains an effective and transformative instrument, capable of responding to new social and labor market needs, while maintaining its focus on inclusion, employment and cohesion. ESF+ should be maintained for explicitly targeting social inequality of Roma, among other vulnerable groups.

EU Funds (notably ESF+ and ERDF) should play a crucial role in advancing social inclusion and in addressing disparities and inequalities experienced by groups/people in situations of greater exclusion and vulnerability such as Roma. This role must be recognised and strengthened.

It is essential that the European Commission, Parliament, and Council act decisively to address current shortcomings so that European funds, and the ESF in particular, can continue to be a key tool for moving towards a more accessible, equitable, and cohesive Europe, in line with the legal and political commitments undertaken by the European Union. This will help restore public trust in the European project and place social cohesion at the heart of its political action.

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