

Ensuring Transparency in the drafting of the National and Regional Partnership Plans

Open Letter

Dear Minister of Finance,
Dear Minister of Energy, Climate and Environment,
Dear Minister of Employment and Social Affairs,
Dear Permanent Representatives,

While negotiations on the Multiannual Financial Framework are ongoing, Member States are already beginning preparatory work on their National and Regional Partnership Plans at the national level. This early phase offers an important opportunity to embed the partnership principle and genuine multilevel governance from the outset, through timely and meaningful engagement of local and regional authorities, civil society, energy communities, energy agencies, trade unions, social and economic partners.

The 53 undersigned organisations call on the European Commission and Member States to ensure transparent, structured, and inclusive National and Regional Partnership Plans (NRPPs)¹. Strong implementation of the partnership principle and genuine multi-level governance can maximise the added value of EU funds through enabling more targeted, place-based investments and wider dissemination of impacts. It can also ensure social buy-in of national reforms, contributing to overall EU objectives. Crucially, integrating citizens' needs into the long-term financial decision-making process can restore trust in European values at a time of multiple and overlapping crises.

We call for:

- **A strong and meaningful application of the Partnership Principle** from the early design to the preparation, implementation and monitoring of the NRPPs, fully aligned with the code of conduct on partnership². Today, the application of the partnership principle in Member States is not fully reflecting the requirements outlined in the code of

¹ While the scope of this Letter focused on Heading 1, we recommend extending the The European Code of Conduct on Partnership to the entire MFF (i.e., including the the European Competitiveness Fund together with Horizon Europe, Connecting Europe Facility, AgoraEU, Erasmus+ and Global Europe),

² [Commission Delegated Regulation \(EU\) No 240/2014 of 7 January 2014 on the European code of conduct on partnership in the framework of the European Structural and Investment Funds](#)

conduct³ when it comes to the selection of a diverse range of partners to the monitoring committees, and the procedures in their work. At the same time, we call for further strengthening the partnership principle and removing the systemic bottlenecks to meaningful inclusion, as identified by the European Community of Practice on Partnership⁴

- **The establishment of multilevel governance structures in all Member States.**
Considering that 70% of the EU's climate and energy transition objectives should be implemented at the local and regional level, cities, regions, and social partners must have a more prominent role in the design of the NRPPs. That is why, there is a need for continuous dialogue and co-creation in relation to the Plans, while ensuring strong coordination with other MFF headings. This should include the preparation (e.g., through dedicated working groups), as well as implementation and monitoring phases (e.g., through monitoring committees).
 - **Poland** can be viewed as a positive example in this sense, as the Ministry of Development Funds and Regional Policy has proposed the creation of a dedicated Working Group to collect stakeholders' feedback on the NRPP. However, safeguards are needed to ensure genuine and meaningful participation by relevant partners and all levels of governance, including cities.
- **Making use of existing multi-level and multi-stakeholder governance structures.**⁵
Many Member States already have structures that provide stakeholders with a voice in policy making (e.g., Territorial Just Transition Plans). This will ensure continuity of reforms and investments, building trust and predictability.
- **Using the annual European Semester cycle to uphold the Partnership Principle.**
Member States should work closely with stakeholders when implementing the Country Specific Recommendations (including via the programming of NRPPs) to ensure meaningful public participation.

³ Canali, Francesca, 2023: Monitoring cohesion policy funds in Central and Eastern Europe. *CEE Bankwatch Network*. URL: [2023_12_Monitoring-cohesion-policy-funds-in-central-and-eastern-Europe.pdf](#)

⁴ European Community of Practice on Partnership: European Code of Conduct on Practice. Recommendations to date. Link for downloading: [InfoREGIO - European Community of Practice on Partnership \(ECOPP\)](#)

⁵ The aforementioned NRPP's governance structures should build on and strengthen the participatory frameworks established under the Governance Regulation of the Energy Union or required for the Social Climate Fund, the Just Transition Fund and for the implementation of Sustainable Urban Mobility Plans under TEN-T legislation. To address the persistent gaps in their national implementation, clearer guidance and more robust enforcement are essential. This would improve coherence and effectiveness across these complementary EU processes, reduce administrative burdens, and provide greater predictability.

Lessons learned from previous budgeting cycles have shown that meaningful partnerships have resulted in better planning quality and higher trust among all parties⁶. Member States should thus already today make the best use of existing tools and procedures to foster public participation in the NRPPs. At the same time, the signatories point out that the ongoing MFF negotiations present an opportunity to further embed multilevel governance in European policy making.

The undersigned organisations:



⁶ Chelariu, Bogdan-Alexandru (2024): Strengthening the participation of civil society in monitoring committees through technical assistance. CEE Bankwatch Network





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