



# **Analysis** **of the post-2027** **Multiannual Financial** **Framework Proposal**

**November 2025**



# What does the MFF Proposal mean for Social Europe?

The European Commission's proposal for the post-2027 Multiannual Financial Framework (MFF) sets the tone for EU investment in the next decade. The next MFF will run from 2028 to 2034. In our [position paper](#) published in March 2025, and in our statement preceding the proposals, we issued **13 concrete recommendations** to outline the key aspects that the next MFF must consider if the EU is to create a budget that supports long-term investment in an inclusive society.

The following assessment will analyse the extent to which Social Platform's 13 recommendations have been met and will highlight key elements which should be taken into account in the upcoming negotiations between the EU institutions.



**Recommendation 1: The size of the post-2027 MFF must be larger than the current MFF and the Next Generation EU programme together, i.e. above EUR 2 trillion.**

### **Verdict: A Modest Increase at Risk in Negotiations**

At first glance, the proposed MFF is marginally larger than its predecessor. The proposal amounts to almost 2 trillion in spending which represents 1.15% of EU Gross National Income (GNI) with an additional 0.11% for repaying the borrowing for the Next Generation EU recovery package. This means the overall proposal comes to 1.26% of EU GNI.

For comparison, the 2021-2027 Multiannual Financial Framework (MFF) currently represents 1.02% of the EU's GNI in real terms. While 2 trillion equates to around €1.76 trillion in 2025 prices, the increase is small, and past experience shows that the MFF negotiations tends to result in a reduced budget from the initial proposal. We had called for a package exceeding €2 trillion to support long-term social investment and repay the NGEU debt, and the Commission proposal falls short.

### **Way forward**



Increase the proposed total budget for the next Multiannual Financial Framework (MFF) to greater than 2 trillion in 2025 prices.

**Recommendation 2: Cohesion Policy must remain a key pillar of the MFF and its partnership principle should be retained and reinforced.**

### **Verdict: Cohesion Policy is retained but diluted**

Cohesion policy remains a formal pillar yet is embedded in the new National and Regional Partnership (NRP) draft Regulation,<sup>1</sup> which also swallows the Common Agricultural Policy (CAP), fisheries policy, migration funding, and security budgets. All specific objectives for these instruments are listed in one place, under the NRP draft Regulation. However, not all instruments are financed the same way, leading to the situation of shared and direct management being mixed up under a single rulebook.

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1. *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, published 16 July 2025, COM(2025) 565 final.*



Whilst this is done in the name of simplification and coordination, it can easily lead to confusion as it risks blurring objectives and creating governance complexity. The significant reshuffling of the EU budget is coupled with a new tracking and performance framework which aims to track the impact of the MFF, including the social impact.

This approach has clearly been inspired by the Recovery and Resilience Facility and Plans. While the aim of cohesion policy is to address regional disparities and achieve upward social convergence, the shift to national plans runs the risk of squeezing the space at regional level. The centralisation under a single national programme, will presumably place further hurdles to access resources for smaller scale or local CSO beneficiaries. This risks undermining the local approach of current EU shared-management funding mechanisms, which have been instrumental in addressing specific regional challenges through tailored interventions.

Partnership with civil society is formally upheld, with a reference to the European Code of Conduct on Partnership in the draft Regulation. Whilst this is fundamental and annual consultations at the EU level are foreseen, tight drafting deadlines risk reducing these engagements to box-ticking exercises. This poses risks for smaller local, regional stakeholders to engage from design through implementation to monitoring of the use of EU funds due to the new structure of national plans. Moreover, exemptions for border management and internal security undermine the universality of the partnership principle.

### Way forward



Specify the role of local, regional actors including government and stakeholders in the design, monitoring and implementation of cohesion policy. Underline the role of civil society in the NRP plans and ensure regular, inclusive and meaningful seat at the table for civil society. Introduce more realistic deadlines to allow civil society to effectively engage with the consultation processes at all levels.



### **Recommendation 3: Keep both horizontal and thematic enabling conditions in the Common Provisions Regulation to ensure accountability and delivery on investments linked to the European Pillar of Social Rights.**

#### **Verdict: Only enabling conditions on the rule of law and fundamental rights remain**

The replacement of the Common Provisions Regulation with the NRP Regulation preserves two horizontal enabling conditions. The first safeguards the rule of law and the second ensures compliance with the Charter of Fundamental Rights. However, the thematic enabling conditions tied to the European Pillar of Social Rights have been dropped from the MFF for the next funding period. This weakens accountability on issues like equal opportunities, poverty reduction, social inclusion, and access to quality services including affordable, accessible long-term care services of good quality for people in need of care and informal carers, as per the European Care Strategy.

Furthermore, other thematic conditions previously recognised such as the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD) now appears solely in a recital, implicitly incorporated under the scope of the EU Charter of Fundamental Rights. This modification implies the absence of structured safeguards to ensure that financial resources are effectively directed towards social inclusion, deinstitutionalisation, and the implementation of the UNCRPD.

The removal of thematic enabling conditions represents a significant shift, given that these mechanisms have historically played an important role in aligning national and regional policies with overarching EU objectives and targets. Nevertheless, the reinforcement of the horizontal enabling conditions linked to the Rule of Law and the Fundamental Rights Charter constitutes a welcome development. The proposed linkage between the failure to comply with Rule of Law or Fundamental Rights recommendations and the potential freezing of allocations under the National Reform and Resilience Plans (NRRPs) may serve as a robust instrument to strengthen conditionality and promote substantive reforms in these domains.

The proposal to reallocate or recommit frozen funds to programmes under direct EU management that support civil society is also viewed positively. However, if such recommitment is intended to mitigate the negative impact of fund suspension on civic space, it is essential to establish a clear connection between these reallocated resources and expenditures within the affected Member State.



Furthermore, attention should be paid to the regional dimension of fund suspensions, as these may have detrimental effects on regional programmes even when the regions themselves are not responsible for the breaches prompting the suspension. The introduction of operating grants for civil society organisations under the EU Facility is a constructive measure in this regard. Nevertheless, it should be explicitly clarified that these grants will be managed directly by the European Commission to prevent any potential political interference by Member State authorities.

### Way forward



Reintroduce the horizontal and thematic enabling conditions into the MFF to ensure accountability and delivery on investments linked to the European Pillar of Social Rights.

## **Recommendation 4: The European Social Fund+ (ESF+) must be retained as a standalone fund supporting social inclusion.**

### **Verdict: European Social Fund, an empty shell**

The European Social Fund (ESF) survives in name but appears to be an empty shell with no dedicated budget line. The draft ESF Regulation contains only 8 articles and no description of its scope or objectives. The ESF Regulation refers to the NRP Regulation which governs the new structure. In effect, there is no standalone European Social Fund and no dedicated budget. A 14% social earmarking target applies within the NRP Regulation, intended to replace the European Social Fund. The money ringfenced for the Common Agricultural Policy (CAP) and the externally assigned revenue for the Social Climate Fund are excluded from the 14% earmarking. This means the money earmarked for social objectives is below the current total ESF+ allocation. In practice, social investment risks being spread thin across multiple objectives without strong guarantees that the necessary investments into poverty reduction, including for children, and social inclusion will be guaranteed. Supporting social economy is no longer a specific objective, unlike in the 2021-27 ESF+.

Social housing is a welcome addition to the list of specific objectives. However, if it counts towards the 14% then it can easily decrease the investments going to other priorities given the scale of investments expected in the housing sector. It is also of vital importance to ensure that investments in the social housing sector benefit the population most in need and not the private market investors in the housing market.



## Way forward



The EU must ensure that there is a dedicated budget for the European Social Fund to guarantee that the next MFF continues to increase social convergence, reduce poverty and tackle social exclusion.

The minimum target in the NRP Regulation to invest in social objectives should be increased from 14% for all Member States.

### **Recommendation 5: The earmarking for social inclusion under ESF+ should go beyond the current 25% for all Member States.**

#### **Verdict: The proposal contains no earmarking for social inclusion child poverty, material deprivation or youth employment**

The proposal drops specific earmarks for tackling child poverty, for social inclusion and for material deprivation under the 2021-27 European Social Fund Plus (ESF+). The proposals stipulate that Member States concentrate resources in their NRP plans on social inclusion, material and/ or basic food assistance, and implementing the Child Guarantee and the Youth Guarantee but these fall short of earmarkings to guarantee specific levels of funding.

The 14% target for social objectives is not comparable to the existing 25% earmarking for social inclusion under the current ESF+, as the 14% would cover multiple specific objectives, including social inclusion as well as employability, lifelong education and training, demographic change, facilitating access to and improving services, and addressing the social impacts of the inclusion of greenhouse gas emissions from buildings and road transport within the scope of Directive 2003/87/EC.

The broad 14% social spending target is insufficient to ensure deep investment in poverty reduction. Moreover, within the 14% target, the coefficient system used to monitor social spending includes 40% of social infrastructure costs previously financed by the ERDF. This could include construction and renovation of schools, hospitals, student housing, and social housing for example. This approach effectively reduces the resources available to meet social objectives, as it attempts to cover a broader range of priorities with fewer funds.



The 14% target will not only apply to the NRP Plans, but also to the Union Facility. The Facility aims to support projects of a transnational dimension, with a high Union added value, and help respond to unforeseen crises. As such, it pools current instruments directly managed by the European Commission, such as the Employment and Social Innovation (EaSI) programme, with crisis instruments for Member States, as well as the mobilisation of private investment. However, 82% of the Facility's resources are already earmarked to only three of its 14 priorities, and the remaining objectives – including the former EaSI tranche – will compete with other “union actions” for a limited number of resources.

### Way forward



Reintroduce an earmarking for social inclusion. Ensure that every Member States should allocate at least 25% of their resources of the ESF+ strand under shared management to foster social inclusion.

Ensure that at least 5% of the ESF's resources should be allocated to tackling child poverty in all EU Member States. For countries with an AROPE rate above the EU average, this allocation should be increased to at least 10%.

Ensure that at least 12.5% of the ESF's resources are allocated to supporting youth employment for countries with a NEET rate above the EU average; and at least 4% for tackling material deprivation.

**Recommendation 6: Recognise the value of public investment in research beyond industrial competitiveness. The EU needs a successor to Horizon Europe that supports research in the areas of social inclusion and fundamental rights, with the aim of improving the wellbeing of its people.**

### Verdict: Horizon is subsumed into Competitiveness

Horizon Europe is subsumed into the Competitiveness Fund and has a focus on increasing competitiveness. There are limited references to social research as it is subsumed into the competitiveness agenda. The Fund aims to focus investment on EU strategic priorities, including single market, clean transition, decarbonisation, circularity, digitisation, security, resilience and social cohesion. Furthermore, it will ensure a multidisciplinary approach, where appropriate, and provide for the integration of social



sciences and humanities (SSH) across all components under the Programme. Overall, there is a risk that social research will be deprioritised in the narrow pursuit of competitiveness.

### Way forward



Introduce greater references to public investment in social research beyond competitiveness recognising it as a goal in itself, reinstate the reference to co-design and co-delivery of the programme with civil society.

**Recommendation 7: A more comprehensive framework on Just Transition is needed with a broader geographical focus and strong social conditionalities. The focus of the Just Transition Fund (JTF) should be expanded beyond employment to address the broader social needs of disadvantaged groups impacted by the green transition and align with the principles of the European Pillar of Social Rights (EPSR)**

### Verdict: Just Transition Fund: Narrow Scope, Limited Resources

The Just Transition Fund (JTF) is abolished in the next MFF proposal as a standalone fund. The JTF's objectives of supporting clean energy, decarbonisation, and circular economy efforts in the regions most affected by the green transition remain referenced in the NRP framework, but without a dedicated envelope or explicit social conditionalities. This approach contrasts with Social Platform's recommendation on a more comprehensive Just Transition framework with a broader geographical focus and strong social conditionalities. While the Commission still references a "socially fair transition towards climate neutrality", the absence of a dedicated instrument will make it more difficult to ensure the people and regions most affected will receive the support they need. The proposal also fails to expand the scope of just transition measures beyond employment, overlooking key social policy measures that would be essential in protecting groups in vulnerable situations during transitions. This raises concerns that, the social dimension of the green transition is treated as an afterthought.

The Do No Significant Harm (DNSH) principle has been introduced as a horizontal principle in the new MFF proposal. This is a welcome step toward ensuring that all EU spending is consistent with climate and environmental objectives. However, while the MFF proposal maintains climate and decarbonisation objectives, these remain largely



unaligned with the European Pillar of Social Rights. There is little guarantee that social inequalities will be addressed in the green transition and disadvantaged groups protected.

### Way forward



Invest in a just transition that supports the communities most affected by decarbonisation. Introduce a dedicated financial envelope for the Just Transition Fund with explicit social conditionalities. The next MFF should include a revamped Just Transition Fund, with a broader scope, increased budget, and stronger social criteria to address transition impacts beyond coal regions and ensure support reaches all affected communities. If the Commission moves forward with integrating funds into the NRPP framework, a mandatory, ring-fenced just transition chapter with binding social and territorial requirements must be included to guarantee continuity and social fairness.

**Recommendation 8: Increase the Social Climate Fund budget. Ensure that 100% of revenues from ETS2 are allocated to the SCF and extend it beyond the year 2032, to effectively mitigate its social consequences**

### Verdict: Social Climate Fund is too limited in capacity

Under the new MFF proposal, the Social Climate Fund will continue to receive roughly 25% of the Emissions Trading System (ETS2) revenues, with an estimated €50bn in externally assigned revenue foreseen for 2026-2034. While the proposed extension of the SCF's duration is welcome, the limited share of ETS2 revenues allocated to it will severely limit its capacity to protect low-income households, micro enterprises, and energy- and transport-poor groups from rising energy and transport costs. This falls far short of our recommendation of 100% of the ETS2 revenues to be channelled into the SCF to effectively mitigate the social consequences of ETS2.

Furthermore, integrating the SCF under the new National and Regional Partnership Plans (NRPPs) framework risks weakening its social focus. Allowing Member States to apply SCF funding through the NRPPs rather than the dedicated SCF Regulation could dilute its specific objective of supporting those most affected by the transition and loosen current earmarking for groups in vulnerable situations.



## Way forward



Increase the Social Climate Fund budget. Ensure that 100% of revenues from ETS2 are allocated to the SCF and ensure its long-term continuation beyond 2034. Maintain the SCF's separate regulation, objectives and conditionalities under Regulation (EU) 2023/955 so that funding will reach low-income, energy-poor and transport-poor groups.

## **Recommendation 9: The Citizens, Equality, Rights and Value programme (CERV) must be retained as a standalone fund supporting a vibrant civil society, supporting, defending and promoting human rights**

### **Verdict: Larger budget, but some concerns**

The Citizens, Equality, Rights and Values (CERV) programme has been merged with Creative Europe and the new Democracy Shield into a new “Agora EU” fund, with a significant budget boost but also a loss of focus. We welcome the substantial increase of its total budget, and the maintenance of clearly identifiable thematic strands, and earmarked strands for culture, media, and ‘CERV+. However, the citizen’s engagement strand disappears (e.g. town twinning, general support to civil society organisations) and there is no dedicated strand to support Human Rights Defenders. The regranting mechanism seems to be streamlined across the Agora EU programme. Especially in light of the general funding cuts for civil society, CERV+ budget should be further strengthened and partially ring-fenced in support to CSOs.

## Way forward



Clear and adequate funding for both single-strand and cross-strand actions within the Agora EU programme. Protect a dedicated envelope for civil society organisations and ensure that advocacy is an eligible activity.

Reinstate structured Civil Dialogue mechanism, an objective for representative organisations to coordinate citizen opinion voicing on EU priorities and for meaningful participation of impacted communities in EU decision making, as well as a dedicated protection mechanism for Human Rights Defenders within the EU.

Additionally to gender equality perspectives, mainstream children's rights perspectives especially into the MEDIA+ and CERV+ strands of Agora EU and include specific allocations for the rights of children.



## **Recommendation 10: The Asylum Migration and Integration Fund (AMIF) must continue to support both integration and socio-economic inclusion of third-country nationals.**

### **Verdict: A short-term view on Migration and Integration**

Funding for asylum, migration and integration has also been subsumed into the NRP Regulation with a separate proposed regulation for asylum migration and integration.

Overall, the proposal represents a substantial increase in EU resources dedicated to asylum and migration, but particularly in border management. In total, EUR 81 billion is proposed for home affairs, encompassing funding under direct, indirect, and shared management, as well as allocations for EU agencies.

The Asylum, Migration and Integration Fund (AMIF) retains a dedicated financial envelope increased to EUR 11 975 428 500 in current prices (EUR 9.88 billion under the current AMIF). Yet the integration focus is limited to the early phases of settlement and longer-term socio-economic inclusion is not guaranteed.

AMIF has just 4 objectives: 1) strengthening the Common European Asylum System; 2) enhancing returns; 3) strengthening legal migration and promoting the effective integration and social inclusion of third-country nationals during the early phases of settlement; 4) ensuring solidarity and fair sharing of responsibility between the Member States. Return becomes the second objective and there is a clear focus on short-term integration only.

Furthermore, all earmarking related to AMIF have been dropped in the new proposal, including the obligation for member states to dedicate at least 30 % of their resources to the objective of “legal migration and integration”. Without a clear spending target dedicated to integration, the risk is that any monetary increase to AMIF will not contribute to improving social inclusion support for migrants under this instrument.

### **Way forward**



Expand the scope of the AMIF to support the long-term integration of third country nationals, including through the support from civil society organisations, and introduce a minimum earmarking towards this goal.

Introduce a minimum spending target of 30% for the integration of third-country nationals.



## **Recommendation 11: Pre-Accession Assistance funding must prioritise social inclusion and compliance with fundamental rights standards.**

### **Verdict: Rights in Principle, not in practice**

Pre-accession assistance is absorbed into the broader Global Europe instrument, which champions human rights and non-discrimination in principle, but lacks explicit links to EU social policy frameworks like the EPSR or ESF. This falls short of our recommendation to prioritise social inclusion and compliance with fundamental rights standards.



#### **Way forward**

Introduce references to social inclusion and fundamental rights standards into the Global Europe instrument to ensure they are enshrined in pre-accession funding and reinstate references to supporting NEETs to enable the continued implementation of the Youth Guarantee in candidate countries.

## **Recommendation 12: Ensure strong and sustained EU investment in health to build resilient and accessible healthcare systems. Propose a well-financed successor to EU4Health**

### **Verdict: Health subsumed into Competitiveness**

Health funding is merged into a “Competitiveness Fund” alongside biotechnology and agriculture, without a ring-fenced envelope. While health is named as a priority, the merger risks framing it as an industry issue rather than a public good. There is no standalone health programme as a successor to EU4Health.



#### **Way forward**

The next MFF should ensure that health remains a central, well-funded priority by combining cross-sector integration with dedicated, ring-fenced funding and a standalone health programme.



## **Recommendation 13: Increase funding for ERASMUS+ fivefold to ensure accessibility for all students and life-long learners**

### **Verdict: Increase for Erasmus+ but misguided focus**

Erasmus+ receives a nominal boost from €26 billion to €40.8 billion, but inflation and the merger with the European Solidarity Corps erode much of the increase. The removal of the dedicated Youth Chapter and earmarking undermines youth participation and inclusion, particularly for disadvantaged young people. The shift toward labour market skills also narrows the programme's historic mission of active citizenship, non-formal education and lifelong learning.

#### **Way forward**



The budget for Erasmus+ should be increased to 130 billion, and the Youth Chapter added, to ensure no young person is left behind.



## Conclusion: Where is the social vision?

The post-2027 MFF proposal contains language and structures that acknowledge social rights, cohesion, and inclusion. Yet, compared to civil society's recommendations, it often takes the form of diluted targets, merged funds, and broad priorities that risk sidelining the most vulnerable.

**The proposed 14% social spending target is neither ambitious nor precise enough to drive transformative change.** Without stronger safeguards, ring-fenced budgets, and participatory processes that allow real input from citizens and communities, the social dimension of the MFF will remain an aspiration rather than a lived reality.

In the coming negotiations, the European Parliament and Member States face a choice as to whether to accept a framework where social objectives are folded into economic growth and competitiveness agendas or **rebuild the MFF as a true social contract for Europe**. The stakes are high for the kind of Union that emerges in the next decade.



Social Platform is the largest, leading organisation working on social issues. We have strength in numbers and put power back into people's hands who want a more Social Europe. Collectively we unite and give a voice to tens of thousands of organisations and hundreds of millions of people in Europe in all their diversity.

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