



EAPN's position on the Multiannual Financial Framework (MFF) 2028 – 2034

2026

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About EAPN

The European Anti-Poverty Network (EAPN) is the largest European network of national, regional, and local networks, bringing together anti-poverty NGOs, grassroots groups, and European organisations active in the fight against poverty and social exclusion. Together, we defend the rights of people experiencing poverty and promote their active participation in the EU decision-making process.

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Glossary

2030 PORTO TARGETS

The 2030 Porto Targets are a set of social and economic goals adopted by EU partners at the 2021 Porto Social Summit, focusing on employment, training, and poverty reduction. The three main headline targets are: at least 78% of people aged 20 to 64 in employment; at least 60% of adults participating in training annually; and a reduction of at least 15 million people at risk of poverty or social exclusion, including 5 million children.

AROPE

The at-risk-of-poverty or social exclusion indicator, abbreviated as AROPE, refers to people who are either at risk of poverty, severely materially and socially deprived, or living in a household with very low work intensity.

EUROPEAN PILLAR OF SOCIAL RIGHTS

The European Pillar of Social Rights (EPSR) is a framework of 20 key principles and rights aimed at creating a fairer Europe in the areas of labour markets and welfare systems. Initiated by the European Commission and formally proclaimed in November 2017 in Gothenburg by the European Parliament, the Commission, and the Council, the EPSR is structured around three main categories: equal opportunities and access to the labour market, fair working conditions, and social protection and inclusion.

MARGINALISED GROUPS

In this paper, the term “marginalised groups” encompasses groups who are disproportionately affected by poverty: women, racialised people, LGBTIQIA+ people, older and younger people, undocumented people, migrants, Roma people, Travellers, people with disabilities, people discriminated against on the basis of religion or belief, and single parents.

MISSING POOR

The term “missing poor” refers to those who are invisible in traditional poverty statistics. From EAPN’s perspective, this includes the following groups: racialised people, Roma people, people in informal or undeclared work, homeless people experiencing multiple grounds of discrimination, undocumented migrants, refugees and asylum seekers, institutionalised individuals, and people deprived of liberty.

MULTIANNUAL FINANCIAL FRAMEWORK

The Multiannual Financial Framework (MFF) is the European Union’s long-term budget plan, setting expenditure ceilings for the EU over multiple years. The current MFF runs from 2021 to 2027. The next MFF will run from 2028 to 2034.

STABILITY AND GROWTH PACT (SGP)

The Stability and Growth Pact (SGP) is a set of EU rules designed to ensure fiscal discipline among Member States and maintain the stability of the Economic and Monetary Union (EMU), particularly the euro. Its

main purpose is to prevent excessive government deficits and debt levels that could threaten economic stability in the EU. According to the SGP, Member States should keep their annual government budget deficit below 3% of GDP, and public debt should not exceed 60% of GDP or, if it does, should be decreasing at a satisfactory pace towards that level.

Introduction

Adequate funding is the **cornerstone of any policy or legal action aimed at achieving transformative change**. In this sense, poverty cannot be eradicated without adequate financial and budgetary tools as core components of broader systemic and structural strategies¹.

On 16 July 2025, the European Commission launched its proposal for the Multiannual Financial Framework (MFF), the EU's long-term budget², for 2028–2034. By establishing annual expenditure ceilings across major policy areas for a seven-year period, the MFF plays a decisive role in **aligning the Union's political priorities with the financial resources necessary to deliver them**.

Without an MFF that is deliberately and strategically focused on protecting social rights, the objective of eradicating poverty by 2050, as set out by European Commission President Ursula von der Leyen³, risks remaining **window dressing rather than becoming an achievable reality**.

Likewise, without clearly defined, targeted, and adequately resourced budget lines and financial instruments in the next MFF, the **forthcoming EU Anti-Poverty Strategy, as well as the European Pillar of Social Rights (EPSR) Action Plan 2026–2030, will have only limited impact**.

According to the Porto Targets⁴, the EU has committed to reducing poverty by 15 million people by 2030, including 5 million children. As the next MFF will coincide with this deadline, and current data indicate that the objective is still far from being met⁵, the new funding period 2028–2034 will be crucial in providing the resources needed to achieve this goal.

In addition, through the MFF, the EU plays a vital role **in supporting national and local grassroots organisations that work every day alongside people experiencing poverty**, particularly those facing the most severe forms of marginalisation. The crucial work of civil society organisations to alleviate poverty and hardship must be upheld and safeguarded by the MFF, especially at a time when the return of austerity policies and the deregulation of social rights in many Member States are threatening the survival of these essential projects⁶.

¹ European Anti-Poverty Network (EAPN), *Towards a systemic approach to social protection – 2024 Poverty Watch* (2024)

² Proposal for a Council Regulation laying down the multiannual financial framework for the years 2028 to 2034 (COM(2025) 571 final)

³ State of the European Union 2025 – Speech by the President of the European Commission, Strasbourg, 10 September 2025 (European Commission/Directorate-General for Communication, EU Publications Office)

⁴ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions Establishing a European Pillar of Social Rights Action Plan (COM/2021/102 final)

⁵ Proposal for a Joint Employment Report 2026 (COM(2024) 701 final) from the Commission and the Council

⁶ Resto du Coeurs of Belgium, *Alert on food Aid in Belgium: A historic setback voted through for 2026*, October 2025 [Checked on 20 April 2026]

The MFF: one tool among others to fund the eradication of poverty

The MFF is one important component **within a broader policy mix** (*see below*) aimed at addressing the root causes of poverty. For this policy mix to be effective, it must be backed by adequate resources.

In this context, not only should the MFF place poverty eradication at its core, but the **broader EU economic governance framework must also be made fully coherent with the objective of eradicating poverty by 2050.**



Without centring people experiencing poverty and the objective of eradicating poverty in the EU economic governance framework, policy efforts will remain ineffective.

However, whether in the design of the Stability and Growth Pact, the architecture of the European Semester, the budgetary priorities set out in the MFF, or EU taxation policies, **people experiencing poverty are consistently among the last to be considered**. Their needs are often treated as secondary to fiscal, economic, or political constraints, resulting in policies that insufficiently address structural inequalities and the root causes of poverty⁷.

For EAPN, the EU's overall budgetary and economic framework should serve people's well-being, rather than the other way around. In this context, EAPN has long advocated for:

⁷ European Anti-Poverty Network (EAPN), *Competitiveness or Social Justice: A Choice to Make – Towards a Social, Green and Democratic European Semester* (2025)

- turning the European Semester into a Social Semester⁸,
- exempting social and green investments from the debt and deficit limits set out in the Stability and Growth Pact⁹,
- making tax justice the core principle of EU taxation policies¹⁰.

Therefore, the recommendations set out in this position paper on the MFF can only be effective if they are embedded in, and aligned with, an EU economic governance framework that prioritises social rights, poverty eradication, and well-being for all.

Scope and methodology of the position paper

This position paper focuses on providing EAPN’s views on the general and sectoral proposals for the MFF 2028–2034 launched by the European Commission on 16 July 2025. It aims to inform the current negotiations **between the European Parliament and the Council of the EU with concrete recommendations.**

It seeks to answer the following question: **what changes are needed in the MFF 2028–2034 proposal to ensure it effectively contributes to poverty eradication by 2050?**

It is based on desk research and analysis of the MFF 2028–2034 proposals, as well as EAPN reports referenced throughout this paper. As negotiations are progressing rapidly, EAPN will produce additional documents and recommendations up to the final adoption of the proposals.

The first part presents **EAPN’s overarching views on the 2028–2034 MFF proposal**, followed by a second part offering **concrete recommendations on the sectoral proposals most relevant to EAPN’s work.**

Part 1: EAPN’s General Comments on the MFF 2028–2034 Proposals

Since the launch of the MFF 2028–2034 proposals, EAPN has expressed significant concerns about the direction taken by the European Commission¹¹.

Overall, the proposal for the 2028–2034 MFF gives EAPN a clear impression of **an alarming disconnect from the reality that at least 93.3 million people living in poverty faced across the EU in 2024¹².**

⁸ *Idem*

⁹ *Idem*

¹⁰ European Anti-Poverty Network (EAPN), *Wealth, Tax and Redistribution - Fighting poverty by achieving a better sharing of wealth, opportunities and resources – an Explainer of EAPN’s value on wealth and redistribution* (2020)

¹¹ European Anti-Poverty Network (EAPN), *EU budget 2028–2034: Defence, security and competitiveness at the expenses of the most vulnerable* (2025)

¹² Eurostat, *Living conditions in the EU – poverty and social exclusion* (2025)

Our concerns can be grouped into the **following three categories**:

Prioritising defence, security, and competitiveness at the expense of the most vulnerable

The MFF 2028–2034 proposals reflect the **accelerating consolidation of the EU’s defence, security, and competitiveness paradigm**.

For EAPN, this paradigm is **deeply contradictory to the objective of eradicating poverty**.

Competitiveness is depicted by the European Commission as a prerequisite, a driver, and an objective in the pursuit of poverty eradication. Yet policies aimed at increasing competitiveness often conflict with efforts to eradicate poverty, as they prioritise cost-cutting, labour market flexibility, and reduced social spending, undermining wages, job security, and access to essential social protections for vulnerable groups¹³.

Likewise, through its **security and defence-driven agenda**, the Commission and Member States redirect political attention and financial resources towards military capabilities, border control, and surveillance infrastructure. This has been institutionalised through expanded defence funding and incentives for Member States to increase such spending, allowing security and defence considerations to dominate the policy agenda to the detriment of social rights and related priorities¹⁴.

As the 2024–2029 European Commission has elevated these priorities to the forefront of its political agenda, it is not surprising that the next MFF aligns with this strategic direction.

More broadly, the evolution of MFF priorities over successive budgetary periods illustrates a progressive reorientation of the EU budget towards this paradigm. What began as a framework primarily centred on cohesion and agricultural spending has progressively **incorporated and increasingly prioritised objectives related to security, defence, and economic competitiveness**.

The table below illustrates how some of the MFF headings have evolved over time. It clearly shows that, over successive budgetary periods, social cohesion priorities were gradually merged into broader priorities, **with competitiveness and security becoming the main guiding priorities**.

Policy Area	MFF 2007–2013	MFF 2014–2020	MFF 2021–2027	Proposal for MFF 2028–2034
Competitiveness	Sustainable Development – Competitiveness for Growth and Employment	Smart and Inclusive Growth – Competitiveness	Single Market, Innovation and Digital	Policy areas merged into the 2 main headlines for internal policies:

¹³ European Anti-Poverty Network (EAPN), *Advancing poverty eradication through the European Pillar of Social Rights* (2025)

¹⁴ *Idem*

		for Growth and Jobs		Competitiveness, prosperity and security & Economic, social and territorial cohesion, agriculture, rural and maritime prosperity, and security
Security	Citizenship, freedom, security and justice	Security & Citizenship	Security and Defence & Migration and Border Management	
Defence	N/A	N/A	<i>NB: Launch of the European Defence Fund</i>	
Social cohesion, including poverty eradication	Sustainable Development – Cohesion for Growth and Employment	Smart and Inclusive Growth – Economic, Social and Territorial Cohesion	Cohesion, Resilience and Values	

Source: EAPN desk research

However, the evolution of these headings appears to be disconnected from social needs across the EU. Indeed, in recent years, official at-risk-of-poverty or social exclusion (AROP¹⁵) statistics have not only stagnated¹⁶, but the drivers of **poverty have also become increasingly complex**.

The consequences of structural shocks, such as the COVID-19 pandemic, Russia’s invasion of Ukraine and the United States’ (US) and Israel’s aggression against Iran have further weakened segments of the population, particularly the most vulnerable groups. These shocks have driven sharp inflation, placing a heavy burden on those already at risk. For instance, in March 2026, oil and gas prices almost doubled worldwide¹⁷, following a supply shock caused by the US-Israel invasion of Iran.

Similarly, the **digitalisation¹⁸ of the welfare system and climate change** have had a disproportionately negative impact on people experiencing poverty. For instance, they are increasingly required to use digital tools to access their rights and employment opportunities, even though they often lack the material

¹⁵ See Glossary

¹⁶ Eurostat, *ibidem*

¹⁷ Euronews, *Why oil and gas prices could stay high in Europe even if the Iran war ends* [Checked on 20 April 2026]

¹⁸ European Anti-Poverty Network (EAPN), *An Explanatory Study on the Use of Digital Tools by People Experiencing Poverty* (2024)

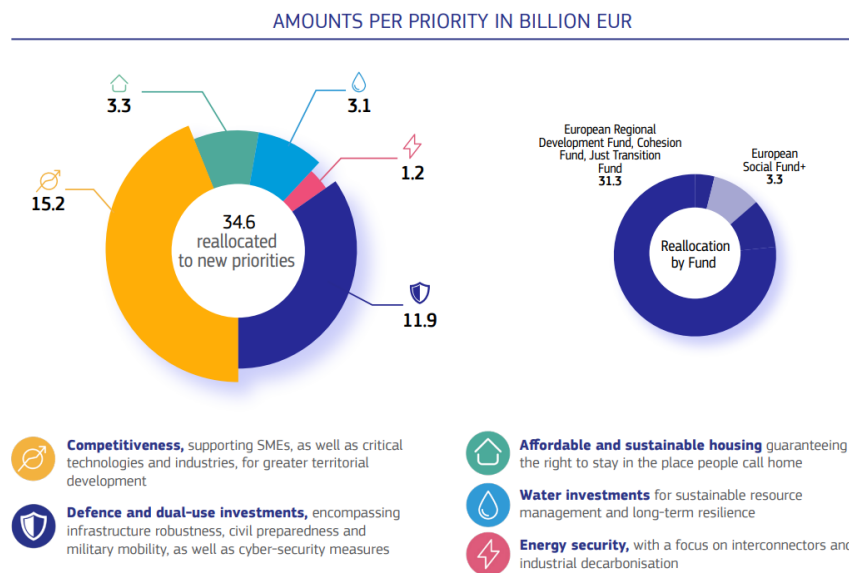
resources needed to do so. Likewise, they are among the most exposed to environmental risks posed by climate change, such as higher levels of air pollution, drought, and flooding¹⁹.

In this context, the political choices made by the European Commission, with their focus on defence, security, and competitiveness, appear increasingly in conflict with the goal of guaranteeing social cohesion, thereby undermining the EU’s capacity to eradicate poverty.

The results of the evaluation of the mid-term review of cohesion fund allocations in the current MFF period²⁰ provide a striking illustration of the **incompatibility between guaranteeing social rights and prioritising defence, security, and competitiveness**.

In April 2025, the European Commission undertook a mid-term review of the MFF 2021–2027, allowing Member States to reallocate unused cohesion funds to various priorities. Since then, more than three-quarters of the reallocated cohesion funds have gone to priorities **related to competitiveness and defence**.

Less than one-quarter has gone to priorities related to housing, investment in access to sanitation and water, and decarbonisation (*see below*). This example shows that, when Member States are given the opportunity, **they prioritise competitiveness and defence over issues such as ensuring the right to housing or access to clean water**.



Source: European Commission, March 2026

The next MFF is expected to follow this trend, as the proposals for the 2028–2034 MFF further illustrate these risks and raise concerns about their adequacy in promoting well-being and social cohesion.

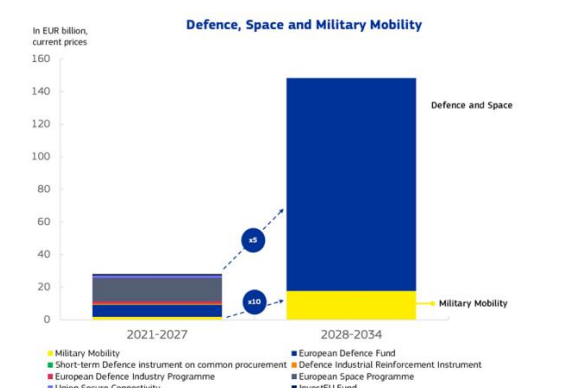
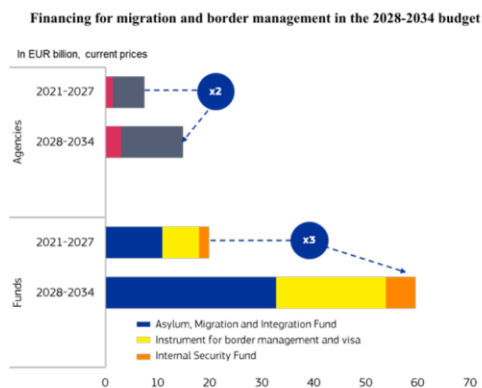
¹⁹ Organisation for Economic Cooperation and Co-development (OECD), [Why fighting poverty means tackling climate change head-on](#) (2025) [Checked on 20 April 2026]

²⁰ European Commission, *A modernised cohesion policy: Results of the Mid-Term Review, one year on* (2026)

Increasing budgetary allocations but neglecting social rights

The political choices of the European Commission in shaping the overall architecture of the 2028–2034 MFF are also directly reflected in the allocation of funds across the MFF headings.

While the Commission highlights increased spending on competitiveness, security, defence, and border management as key achievements, **it remains unclear how much of the budget will be devoted to fighting poverty and social exclusion in the next MFF.**



Source: European Commission, July 2025

The lack of clarity about the budget to be allocated to the European Social Fund (ESF), or to resources dedicated to achieving EU social objectives within future National and Regional Partnership Plans (NRPPs), **is deeply concerning.**

This lack of political willingness to clarify how much funding will be made available to address poverty and social exclusion reflects a broader mindset in which **poverty is treated as an inevitable phenomenon rather than a problem that can be eradicated through sustained political and financial action.**

EAPN believes that **eradicating poverty is a matter of political choice**, requiring the allocation of **sufficient resources to achieve meaningful change.** Without adequate overall resources and targeted earmarking for those most at risk of social exclusion in the MFF 2028–2034, marginalised groups²¹ will be the primary victims of the EU’s increasing prioritisation of militarisation and securitisation.

This lack of clarity is occurring in a context where EU funding is increasingly conditioned on **macroeconomic surveillance and reforms linked to the European Semester process.**

For instance, Articles 67 and 68 of the proposal for a Regulation on the National and Regional Partnership Plans (NRPPs) (*hereafter, the NRP Regulation*)²², outline cases where the Commission can propose that the Council suspend or reduce payments of EU funds to a Member State. These cases include, among

²¹ See Glossary

²² Proposal for a Regulation of the European Parliament and of the Council of the EU establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime,

others, the lack of effective action to correct an excessive deficit if the Member State does not comply with the Stability and Growth Pact.

On several occasions, EAPN has exposed the **fundamental contradiction** between the debt and deficit limits imposed by the Stability and Growth Pact, as outlined in Article 126 of the Treaty on the Functioning of the EU (TFEU) and Article 9 of the TFEU, which provides the legal basis for EU action against poverty and social exclusion²³.

The Stability and Growth Pact is operationalised by the European Semester process. However, by prioritising deficit reduction over well-being, the European Semester **encourages cuts to social spending in EU Member States**. Its focus on fiscal discipline, growth, and competitiveness comes at a significant human cost, failing to support the inclusion of marginalised groups²⁴.

This is illustrated, for instance, by the 2025 Spring Package of the European Semester, in which the Commission has carved out an exception to the Stability and Growth Pact. In practice, this means that overspending on defence will be tolerated and even encouraged.

Meanwhile, Member States investing “too much” in public services, decent wages for care workers, adequate minimum income schemes, or climate-resilient infrastructure risk sanctions. This asymmetric treatment is not merely a technical matter; it reflects a dangerous new consensus: that **military power is a strategic necessity, while social and climate justice are luxuries**²⁵.

In this context, Articles 67 and 68 of the proposed NRP Regulation appear to be dangerous drivers of austerity policies, conditioning the use of EU funds on reforms outlined in the European Semester process, which itself leaves behind social rights and marginalised groups.

Who will effectively benefit from the MFF 2028–2034?

In addition to concerns related to budgetary allocation, the Commission’s overfocus on competitiveness, security, and defence raises another fundamental question: **who will benefit from these budget increases?**

Several elements of the proposals risk increasing the channelling of EU funds **from public budgets to private actors for private profit**. For instance:

- The proposed **EU Competitiveness Fund** aims to boost sectors identified as competitive by the European Commission, such as defence, industry, space, the clean transition, and decarbonisation. It foresees mechanisms aimed at mitigating the risk of private investment in sectors such as

²³ European Anti-Poverty Network (EAPN), *Towards the Eradication of Poverty – EAPN Vision and Recommendations for the EU Anti-Poverty Strategy* (2025)

²⁴ European Anti-Poverty Network (EAPN), *ibidem*

²⁵ European Anti-Poverty Network (EAPN), *Competitiveness or Social Justice: A Choice to Make – Towards a Social, Green and Democratic European Semester* (2025)

renewables, sustainable transport, the circular economy, and industrial decarbonisation by using public funding²⁶, **instead of dedicating public funding to these priorities from the outset.**

- The increase of funding for defence, security, and border management leads to the **growing channelling of public resources towards private actors**, including defence contractors, technology companies, and security service providers, which play a central role in implementing these policies²⁷.
- This analysis must be understood within the broader architecture of the MFF, and especially the **system of Own Resources** proposed by the European Commission 2028–2034.

Together with Member States' contributions, Own Resources provide the main revenue to fund the MFF. In the 2028–2034 proposals, the European Commission proposed a renewed system with five new Own Resources²⁸, including a Corporate Resource for Europe (CORE), consisting of an annual lump-sum contribution from all companies in scope operating and selling in the EU with an annual turnover above EUR 100 million. For EAPN, the CORE proposal falls short by not targeting corporate profits, **a lost opportunity to implement more equitable forms of capital taxation and to ensure the private sector contributes its fair share to public financing.**

Similarly, EAPN regrets that the Financial Transaction Tax (FTT) proposal has been dropped by the European Commission²⁹.

For EAPN, tax justice must be at the heart of how revenues for the MFF are generated. In the MFF 2028–2034, corporations and other private actors risk becoming the main beneficiaries of EU funds, despite not contributing their fair and proportionate share. Such a disconnect between contribution and benefit risks deepening inequalities, especially for people already experiencing poverty.

The absence of a structured budget to eradicate poverty

Ultimately, not only is the initial allocation for social funding unclear, but the **objective of eradicating poverty is also absent from the overall MFF 2028–2034 objectives.**

Even though the European Social Fund (ESF) has been maintained as a separate sectoral proposal, EAPN regrets its **lack of focus on poverty eradication and on marginalised groups**, such as Roma and homeless people (*see Part 2*).

²⁶ KPMG, [The future of EU funding: The new budget proposal for 2028–2034](#) [Checked on 20 April 2026]

²⁷ Access Now, *Shadowy surveillance: Access Now maps the companies implementing the EU's migration policies (2026)* & Equinox, *The EU announces a war budget – funds should be re-distributed to safety, solidarity & social protection* [Checked on 20 April 2026]

²⁸ European Commission, Publications Office of the EU, *Factsheet on Europe's budget - Own Resources (2025)*

²⁹ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee, and the Committee of the Regions on the Commission Work Programme 2026, COM(2025) 870 final

Similarly, neither the ESF nor the NRP Regulation proposals outline how the MFF 2028–2034 will contribute to reaching the 2030 Porto Target on poverty reduction and the objective of eradicating poverty by 2050.

In addition, no reference is made to the link with the upcoming EU Anti-Poverty Strategy. Without clear budget allocations, its implementation will be seriously compromised³⁰.

EAPN recommendations for the MFF 2028–2034

• Ensuring the MFF contributes to the objective of eradicating poverty by 2050

The MFF 2028–2034 should be underpinned by a **clear and measurable plan contributing to the eradication of poverty by 2050**, in line with the commitments of the European Commission.

This means including poverty eradication as an objective of the NRP Regulation and ESF Regulation³¹ (*see Part 2*), as well as ensuring the Performance Framework Regulation embeds indicators on the implementation of the EPSR.

• Strengthening and earmarking EU social and green investments

The next MFF must significantly **increase and secure dedicated funding for both social and green investments**. Clear earmarking is essential to ensure that resources are effectively directed towards poverty eradication, social inclusion, and access to quality, affordable services across the EU. At the same time, investments in the green transition must be designed and implemented to effectively deliver tangible benefits for people, particularly marginalised groups.

A socially just transition requires that climate and environmental spending be systematically aligned with social objectives³². This means ensuring that green investments actively contribute to reducing inequalities, preventing energy poverty, and supporting quality employment, rather than exacerbating existing disparities.

• Moving away from the “money-for-reform” approach

The increasing practice of linking EU funding to structural reforms should be urgently reconsidered. EU funding should instead provide stable and predictable support for social inclusion, rather than being contingent on reform agendas that may not align with social rights.

³⁰ European Anti-Poverty Network (EAPN), *Towards the Eradication of Poverty – EAPN Vision and Recommendations for the EU Anti-Poverty Strategy (2025)*

³¹ Proposal for a Regulation of the European Parliament and of the Council establishing the European Social Fund as part of the National and Regional Partnership Plan set out in Regulation (EU) [...] [NRPPlan] establishing conditions for the implementation of the Union support to quality employment, skills and social inclusion for the period from 2028 to 2034, 2025/0239 (COD)

³² European Anti-Poverty Network (EAPN), *EAPN messages on the European Green Deal and Just Transition (2020)*

The possibility that the European Commission may suspend or reduce EU funding for Member States with excessive deficits, or those not complying with macroeconomic surveillance, puts additional pressure on them. This conditionality risks strengthening fiscal enforcement mechanisms and raises concerns about the potential social and cohesion impacts of withholding EU funds, particularly in already challenging contexts.

- **Putting tax justice at the core of the EU's Own Resources system**

A fair and sustainable EU budget requires a strong commitment to tax justice. The EU's system of Own Resources should be reformed to ensure that corporations and high-net-worth individuals contribute their fair share. Strengthening tax justice would not only enhance the EU's own resources but also support greater investment in social and green priorities.

Part 2: EAPN's Recommendations on the Sectoral Proposals for the MFF 2028–2034

The following part provides concrete recommendations on how sectoral proposals for the MFF 2028–2034 should integrate an anti-poverty perspective, with the aim of contributing to the implementation of the EU Anti-Poverty Strategy and the objective of eradicating poverty by 2050.

The European Social Fund 2028–2034

Reference: [Proposal for a Regulation of the European Parliament and of the Council establishing the European Social Fund as part of the National and Regional Partnership Plan set out in Regulation \(EU\) \[...\] \[NRPP\] establishing conditions for the implementation of the Union support to quality employment, skills, and social inclusion for the period 2028–2034.](#)

We strongly welcome the European Commission's proposal to **maintain a stand-alone European Social Fund (ESF)** for the 2028–2034 programming period. Since its creation in 1957, the ESF has proven to be one of the EU's most important financial instruments for promoting social inclusion and supporting impactful projects at both national and local levels³³.

ESF funding earmarked to address material deprivation remains **one of the rare and essential guarantees of dedicated support for the most marginalised groups**. In the ESF+ 2021–2027, a minimum of 3% was earmarked for the distribution of food and goods and for accompanying measures to address material deprivation, with a co-funding rate of 90% for beneficiary organisations.

This focus is crucial to ensuring that those most excluded continue to receive targeted and adequate assistance, **in line with ambitious funding to prevent, alleviate, and eradicate poverty in the long term.**

³³ Social Platform, *Post-2027 MFF: Risk of underinvestment in Social Europe* (2025)

However, EAPN notes **several concerns** regarding the ESF 2028–2034 proposal.

At this stage, the proposal appears to largely **weaken some key provisions of the ESF 2021–2027** and is far from demonstrating the **ambition required to respond to today’s social realities and the EU’s strengthened commitments on poverty reduction and eradication.**

Indeed, the policy context has evolved significantly since the launch of the ESF+ in 2021. In the same year, the European Commission adopted the first EPSR Action Plan, including the Porto Target on poverty reduction, which EAPN calls to be strengthened through the adoption of the first-ever EU Anti-Poverty Strategy³⁴.

As mentioned in the introduction, poverty is stagnating across the EU³⁵, while its underlying drivers have become increasingly complex and interlinked. These include recurrent crises, inadequate benefits that leave people unable to withstand shocks, housing exclusion, in-work poverty, the deregulation of labour rights, structural inequalities, inadequate access to essential services, military conflicts, the impact of the COVID-19 pandemic, climate change, and digitalisation.

Taken together, these developments highlight a clear need to strengthen the EU’s social ambition, with the ESF 2028–2034 serving as one of its main operational tools.

We therefore call on negotiators to preserve a strong, stand-alone European Social Fund in the final agreement, ensuring it retains its distinct mandate, dedicated and adequate resources, and clear focus on poverty eradication and marginalised groups.

EAPN recommendations for the ESF 2028–2034

- **Introducing a minimum earmark of 30% for social inclusion and poverty eradication in the ESF 2028–2034**

EAPN regrets that the ESF+ 25% earmark for social inclusion has disappeared from the ESF 2028–2034 proposal. It is urgent not only to reintroduce this earmark, but also to increase it to 30% and expand its scope to poverty eradication.

This earmarking should be specifically dedicated to the implementation of the targets and milestones of the future EU Anti-Poverty Strategy, with a view to **operationalising** the objective of eradicating poverty in the EU by 2050. It is crucial to ensure **that political commitments are backed by adequate resources.**

³⁴ European Anti-Poverty Network (EAPN), *Towards the Eradication of Poverty – EAPN Vision and Recommendations for the EU Anti-Poverty Strategy* (2025)

³⁵ Eurostat, *Ibidem*

Such earmarking would ensure that adequate funding is directed towards **people experiencing poverty** by prioritising initiatives such as **addressing homelessness, strengthening minimum income schemes (MIS)**, ensuring access to **quality employment**, and guaranteeing adequate **access to essential services**.

The earmarked resources should support Member States in developing and implementing **Local and National Anti-Poverty Strategies (LAPS and NAPS)**, thereby contributing to the objectives of the forthcoming EU Anti-Poverty Strategy.

- **Introducing a separate earmark of at least 10% for support to address material deprivation, accompanied by a 90% co-financing rate**

In 2024, 6.4% of people in the EU faced severe material and social deprivation³⁶. As such, EAPN regrets that the earmark for material deprivation, currently set at 3% of the ESF+, has disappeared from the ESF 2028–2034 proposal.

For EAPN, this is a matter of concern. Earmarking for material deprivation represents one of the only guaranteed funding lines specifically targeting marginalised groups. Even though Article 6 explicitly identifies support for addressing material deprivation as a field of intervention under the ESF, it does not include any provisions ensuring that Member States allocate sufficient resources.

Maintaining a **binding mechanism requiring Member States to allocate a minimum share of their ESF envelope to address material deprivation** remains essential to ensure that these groups are not overlooked.

EAPN also calls for the reintroduction of earmarking for material deprivation, accompanied by a **90% co-financing rate**. This higher co-financing rate is crucial to easing access to ESF funding for the organisations delivering these services, which are often small civil society actors operating at national and local levels.

Given the persistently high levels of material deprivation across the EU, the growing complexity of its underlying drivers, and the Union’s objective of eradicating poverty, EAPN considers that 10% of the ESF 2028–2034 should be earmarked to address severe material deprivation³⁷.

Simultaneously, Member States should retain sufficient flexibility to use this earmarking either for **accompanying measures alone or in combination with food and material assistance**, allowing programmes to better respond to national and local needs.

Finally, while support for addressing material deprivation is essential to alleviate immediate hardship, **it should not become the sole instrument targeting marginalised groups**. It must be embedded within a **comprehensive approach towards poverty eradication**, combining immediate assistance with preventive

³⁶ Eurostat, *Severe material & social deprivation* [Checked on 20 April 2026]

³⁷ Internal consultation with FEBA – European Food Banks Federation, April 2026

and structural measures addressing the root causes of poverty and exclusion, including access to adequate income support, quality social services, housing, employment, and inclusive education.

- **Introducing a dedicated budget of at least EUR 20 billion for the European Child Guarantee, with a separate earmark of between 5% and 10% to address child poverty**

In 2024, 24.8% of children in the European Union were at risk of poverty or social exclusion, highlighting the persistent scale of child deprivation across Europe³⁸. **Child poverty not only affects children's immediate well-being but also creates the conditions for intergenerational poverty**, as children growing up in disadvantaged households often face reduced access to quality education, healthcare, adequate housing, and democratic participation. These structural disadvantages can limit their opportunities later in life, making it more difficult to escape poverty once they become adults.

Recognising this cycle, the European Child Guarantee (ECG)³⁹, adopted in 2021, was designed to ensure that children in need have effective and free access to key services such as early childhood education and care, healthcare, healthy nutrition, and adequate housing. In this regard, the ECG operates as both a preventive and corrective measure against poverty.

The current ESF does not allocate a specific budget to address child poverty. However, without dedicated earmarking, there is a significant risk that funding intended to support children in vulnerable situations will be diluted among competing priorities within broader social and employment objectives.

Together with the EU Alliance for Investing in Children, EAPN is concerned that, in the absence of clear financial commitments, EU support to tackle child poverty may fall short of what is needed to effectively respond to the scale of the challenge⁴⁰.

This is particularly concerning given the objectives of the European Child Guarantee, which aims to ensure that children in need have effective access to key services such as education, healthcare, nutrition, and adequate housing.

To ensure the meaningful implementation of this initiative across Member States, the EU Alliance for Investing in Children calls for a **dedicated budget of at least EUR 20 billion, combined with minimum national allocations of 5%, rising to 10% where needs are higher**. This would improve predictability, support the implementation of the European Child Guarantee, and strengthen delivery where child poverty is most acute.

³⁸ Eurostat, *24% of EU children at poverty risk or social exclusion* (Checked on 20 April 2025)

³⁹ Council Recommendation (EU) 2021/1004 of 14 June 2021 establishing a European Child Guarantee

⁴⁰ EU Alliance For Investing in Children, *A Europe that protects every child: Aligning EU's policies and budget to eradicate child poverty* (2025)

Such earmarking would help guarantee that sufficient and predictable funding is available to support national measures tackling child poverty, strengthen essential services for children and families, and contribute to breaking the cycle of poverty across generations.

- **Ensuring marginalised groups receive adequate ESF support**

The disappearance of explicit references to marginalised groups in the ESF 2028–2034 is deeply concerning.

- **Women, young people, homeless people, Roma people, and people with disabilities** are mentioned only in the recitals of the ESF proposal.
- **Migrants as well as undocumented people, single-parent families, racialised people, LGBTQIA+ people, people discriminated against based on religion or belief** are entirely absent from the European Commission’s proposal.
- **Young and older people**, meanwhile, are only **addressed through an employability lens**, overlooking the many other challenges they face.

Without clear commitments and robust safeguards, marginalised groups risk receiving little to no support from the NRPP envelope allocated to each Member State. In practice, ESF funding is therefore likely to be channelled towards easier-to-reach groups, particularly those experiencing poverty who are already in, or close to entering, the labour market.

EAPN calls for the explicit inclusion of marginalised groups in the body of the ESF 2028–2034 Regulation (*see proposed amendments below*).

Similarly, access to ESF funding should be made conditional on the implementation of **National and Local Anti-Poverty Strategies, as well as National Roma Inclusion Strategic Frameworks**. These recommendations are further elaborated in the following section on the National and Regional Partnership Plans (NRPPs).

In the same spirit, ESF measures aimed at fostering social inclusion, ensuring access to essential services such as healthcare and housing, and providing material support to the most disadvantaged should be **explicitly made accessible to all those in need, regardless of their migration status**.

This is especially significant considering the European Child Guarantee, which already requires Member States to support every child in need, including third-country nationals, regardless of their migration status. Upholding this approach is key to ensuring that ESF funding effectively reaches the most marginalised groups, including undocumented people⁴¹.

⁴¹ Internal consultation with PICUM (Platform for International Cooperation on Undocumented Migrants), April 2026

EAPN suggested amendments for the ESF 2028–2034

Reference	EAPN's proposal
New Recital	<i>Taking into account the persistent levels of poverty and social exclusion across the European Union, the European Social Fund Plus (ESF+) should contribute to the effective implementation of Union frameworks and targets aimed at progressively reducing poverty and ultimately eradicating it by 2050. In this context, ESF+ interventions should support the delivery of the principles set out in the European Pillar of Social Rights, contribute to the achievement of the Porto Social Targets, and reinforce the implementation of the EU Anti-Poverty Strategy.</i>
<p>Justification</p> <p>Persistent levels of poverty and social exclusion in the EU demonstrate the need for stronger alignment between EU funding instruments and EU policy frameworks. Ensuring this alignment would help translate these commitments into concrete action and measurable progress, with a view to eradicating poverty by 2050, as committed by the President of the European Commission during the 2025 State of the Union address.</p>	

Reference	EAPN's proposal
Recital 16	Support through the ESF should be used to promote equal opportunities for all, to support strong social safety nets, foster social inclusion, intergenerational fairness and fight <i>contribute to eradicate poverty by 2050</i> . [...]
Recital 21	The ESF should contribute to the reduction <i>eradication</i> of poverty by supporting national <i>and local</i> schemes aiming to alleviate food and material deprivation and promote the social integration of people at risk of poverty or social inclusion, and <i>including</i> the most deprived. Member States should allocate resources of the ESF <i>to eradicate poverty by 2050, including addressing</i> to address the forms of extreme poverty with the greatest social inclusion impact, such as homelessness and food and material deprivation.
Recital 24	Taking into account the special characteristics and constraints of the outermost regions, the Member States should include in their Chapter for outermost regions, measures <i>for eradicating poverty, by</i> enhancing <i>social infrastructures and essential services</i> , employment and labour mobility, in particular for young people, education and skills, social inclusion.
<p>Justification</p> <p>The following amendments aim to strengthen the role of ESF in contributing to the eradication of poverty. They seek to ensure that ESF more clearly supports the EU's objectives and frameworks aimed at tackling poverty and social exclusion.</p>	

Reference	EAPN's proposal
<p>Recital 22</p>	<p>In light of persistently high levels of <i>young people who are Not in Employment, Education of Training (NEET) youth unemployment and inactivity</i> in a number of Member States and regions it is necessary that those Member States continue to invest sufficient resources of the ESF towards measures to promote youth employment, including through the implementation of the Youth Guarantee. Member States should therefore allocate an appropriate amount of resources to this challenge. Member States seriously affected by <i>youth unemployment youth poverty</i> should allocate resources of the ESF to support <i>youth employability specific measures targeting them, such as access to Minimum Income Schemes, quality jobs and essential services</i>.</p>
<p>Justification</p> <p>EAPN firmly opposes any language that shames people experiencing poverty.</p> <p>While “inactivity” may describe someone not currently in paid work, it should not imply fault or lack of effort, as unemployment is frequently caused by systemic obstacles, discrimination, and inadequate support systems. The term also fails to recognise forms of unpaid work, such as domestic and care work.</p> <p>Young people experiencing poverty face specific and multidimensional challenges that must be addressed comprehensively, rather than solely through an employment lens. Conditioning access to social protection on employment risks pressuring them into precarious, low-quality jobs, to the detriment of their physical and mental health as well as their working and living conditions.</p>	

Reference	EAPN's proposal
<p>Article 6 Support for addressing material deprivation</p>	<p>(1) Member States may provide support for addressing material deprivation shall allocate at least 10% of their ESF resources to support the most deprived, irrespective of their migration status, through the distribution of food and goods that are in conformity with the Union law on consumer product safety, <i>and/or accompanying measures, such as referrals to competent services or by promoting social integration of the most deprived persons</i>.</p>
<p>Justification</p> <p>We advocate for a minimum earmark in this area, as it is one of the few MFF budget lines specifically dedicated to supporting marginalised groups.</p> <p>Furthermore, we strongly believe that additional ESF resources are essential, given the persistent levels of material deprivation across the EU. This budget line is critical not only for immediate support but also for enabling long-term strategies.</p> <p>However, while immediate and short-term alleviation measures are necessary, their effectiveness depends on being part of broader, systemic strategies aimed at preventing and eradicating poverty in the long term.</p>	

Reference	EAPN's proposal
<p>NEW ARTICLE (1) Poverty Eradication & Social Inclusion Earmarking</p>	<p><i>Member States shall allocate at least 30% of their ESF resources to foster social inclusion and contribute to the eradication of poverty in the EU by 2050, based on the following specific objectives:</i></p> <ul style="list-style-type: none"> <i>(a) Ensuring access to adequate, accessibility and enabling Minimum Income Schemes;</i> <i>(b) Fighting in-work poverty and guaranteeing access to quality jobs;</i> <i>(c) Enhancing equal and timely access to quality, sustainable and affordable services, including services that promote the access to housing and person-centred care including healthcare; modernising social protection systems, including promoting access to social protection, with a particular focus on children and disadvantaged groups; improving accessibility including for persons with disabilities, effectiveness and resilience of healthcare systems and long-term care services;</i> <i>(d) Promoting social inclusion and addressing poverty of third-country nationals, including migrants, regardless and independently of their migration status;</i> <i>(e) Promoting social inclusion and addressing poverty of marginalised groups, including women, racialised people, LGBTQIA+ people, older and younger people, Roma people, people with disabilities, people discriminated against because of their religion or belief, and single parents.</i> <i>(f) Addressing homelessness and ensuring social inclusion of homeless people; Addressing material deprivation through food and/or basic material assistance to the most deprived persons, and providing accompanying measures supporting their social inclusion.</i>
<p>NEW ARTICLE (2) National and Local Anti-Poverty Strategies</p>	<p><i>Member States shall reflect their 30% earmarking for social inclusion and poverty eradication in their National and Local Anti-Poverty Strategies, in alignment with the targets set out in the EU Anti-Poverty Strategy and the European Pillar of Social Rights Action Plan.</i></p> <p><i>These National and Local Anti-Poverty Strategies shall clearly specify the actions implemented under each objective outlined in Article [NEW] and demonstrate how these actions contribute to the long-term goal of eradicating poverty by 2050.</i></p> <p><i>The actions outlined in the National and Local Anti-Poverty Strategies must be mirrored in the Member States National and Regional Plan, to ensure coherence and complementary.</i></p>
<p>NEW ARTICLE (3) National Roma Inclusion Strategy</p>	<p><i>Member States shall reflect their 30% earmarking for social inclusion and poverty eradication in their National Roma Inclusion Strategies and, where applicable, in alignment with the targets set out in the EU Anti-Poverty Strategy and the European Pillar of Social Rights Action Plan.</i></p> <p><i>These National Roma Inclusion Strategies shall clearly specify the measures implemented under each objective outlined in Article [NEW], with particular</i></p>

	<i>attention to Roma equality, inclusion, and participation, and demonstrate how these measures contribute to the long-term goal of eradicating poverty by 2050.</i>
Recital 19	To ensure that the social dimension of Europe as set out in the European Pillar of Social Rights is duly put forward and that a sufficient amount of resources is targeting those most in need, Member States should allocate minimum 30% of their resources of the ESF to eradication poverty and fostering social inclusion
<p>Justification</p> <p>EAPN supports the introduction of a minimum 30% poverty eradication and social inclusion earmark in the ESF 2028–2034. This measure would ensure that adequate funding is directed towards people experiencing poverty and support Member States in developing and implementing Local and National Anti-Poverty Strategies (LAPS and NAPS), thereby contributing to the objectives of the forthcoming EU Anti-Poverty Strategy. Similarly, Member States should ensure that the ESF contributes to the adequate funding of National Roma Inclusion Strategies.</p>	

Reference	EAPN’s proposal
Article 20 Content of the Priority	Due to the particular need to support children in poverty a dedicated budget of at least €20 billion for the European Child Guarantee should be allocated. Member States should also programme resources at least 5% - and at least 10% for Member States with AROPE rates higher than the EU average - of the ESF to address the measures under the Child Guarantee.
<p>Justification</p> <p>In 2024, 24.8% of children in the European Union were at risk of poverty or social exclusion, highlighting the persistent scale of child deprivation across Europe. Child poverty not only affects children’s immediate well-being but also creates the conditions for intergenerational poverty, as children growing up in disadvantaged households often face reduced access to quality education, healthcare, adequate housing, and democratic participation.</p> <p>The current ESF does not allocate a specific budget to address child poverty. However, without dedicated earmarking, there is a significant risk that funding intended to support children in vulnerable situations will be diluted among competing priorities within broader social and employment objectives.</p>	

The National and Regional Partnership Plans (NRP Regulation)

Reference: *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.*

Eradicating poverty **cannot be achieved through isolated actions** at the EU, national, or local levels. For this reason, EAPN advocates for coordinated and integrated measures across all three levels of decision-

making, including through the promotion and implementation of EU, National, and Local Anti-Poverty Strategies (NAPS and LAPS)⁴².

The same principle applies to funding: EU resources managed at the national and regional levels are essential not only for responding to local and national needs, but **also for ensuring coherent and effective action across levels of decision-making**. The impact of projects funded at the local level is crucial to strengthening efforts at the national and EU levels, and vice versa.

As such, EAPN is concerned that the new architecture for regional and cohesion funds, particularly as implemented through the National and Regional Partnership Plans (NRPPs), **may reduce the capacity to respond adequately to regional and local priorities**, especially those affecting people experiencing poverty. As proposed by the European Commission, NRPPs consist of single national plans setting out how the funds covered by the NRP Regulation will be used in areas such as agriculture and fisheries, cohesion and regional development, and migration and border management.

In the current MFF programming period, these funds are governed through distinct Operational Programmes (OPs), prepared through a multi-level process involving local authorities and civil society organisations, which in theory allows their needs to be considered.

The NRPPs risk giving less room for local needs by centralising programming and decision-making at the national level, particularly as the drafting process must begin as early as possible to ensure readiness for the new funding period, thereby reducing the time available for meaningful consultation. Similarly, in a context where competitiveness, security, and defence increasingly dominate EU and national political agendas, **merging competing priorities in a single plan and financial envelope**, such as strengthening the EU's defence capabilities while investing in social infrastructure, risks resulting in the former being prioritised over the latter. As outlined in the first part of this paper, leaving it to Member States to prioritise these areas risks sidelining social priorities and marginalised groups.

Furthermore, **poverty eradication should not be confined to the ESF alone**. EAPN calls for the fight against poverty to be **mainstreamed across all EU funding instruments**. This is particularly **crucial under the NRP Regulation**, as many of its funding components directly affect the daily lives of people experiencing poverty. This includes the proposed 14% earmark for the EU's social objectives. EAPN believes this minimum allocation should be **increased to 25%** to ensure Member States dedicate adequate resources to matching the scale of social challenges across the Union, in addition to the resources provided by the ESF.

Similarly, an anti-poverty perspective should be embedded in the **conditionalities governing access to these funds**. Including robust safeguards in the NRP Regulation will be instrumental in ensuring that an adequate share of financial resources is allocated to poverty eradication when EU Member States begin drafting their plans.

⁴² European Anti-Poverty Network (EAPN), *Poverty Watch Report 2025 – Promoting & Strengthening National and Local Anti-Poverty Strategies* (NAPS & LAPS) (2026)

The **Partnership Principle** remains essential to ensuring the meaningful participation of civil society organisations working with people experiencing poverty. However, EAPN members, including EAPN Italy, Poland, and Portugal, reported inconsistencies in its implementation during an internal consultation on the EPSR undertaken in 2025⁴³. Member States must ensure that the participation of civil society organisations is meaningful and sustainable. The Partnership Principle framework should therefore clarify not only **who** is involved, but also **how** their participation is ensured in practice.

Finally, as outlined in the first part of this paper, EAPN expresses concern regarding the **strengthened link between the design of the NRPPs and the Country Specific Recommendations (CSRs) issued under the European Semester**. For many years now, EAPN has called for a fundamental reform of the European Semester, with poverty eradication and social inclusion placed at the centre of its objectives and governance⁴⁴.

To date, the Semester has too often been used to promote fiscal consolidation and other measures that have contributed to the normalisation of austerity-oriented policy approaches across the EU, with social measures promoted only where fiscal space is available. Without a clear rebalancing of the European Semester towards social objectives, **there is a significant risk that the NRPP framework will further entrench these dynamics** rather than support the EU's commitment to reducing and ultimately eradicating poverty.

We therefore call on negotiators to ensure that a strong anti-poverty perspective is systematically integrated across all funds and provisions covered by the NRP Regulation, with the aim of contributing to the eradication of poverty by 2050.

EAPN recommendations for the NRP Regulation

- **Dedicating specific sub-objectives within the Fund to the implementation of the European Pillar of Social Rights and poverty eradication**

While Article 3 on the specific objectives of the NRP Regulation includes a general reference to the fight against poverty and homelessness, this provision **remains too vague** to guarantee meaningful operationalisation and ensure that adequate resources are directed towards marginalised groups.

The NRP Regulation should therefore introduce explicit poverty eradication sub-objectives, including specific references to homeless people, Roma people, children living in poverty, third-country nationals, including migrants, and other marginalised groups. It should also require Member States to mainstream poverty eradication across all relevant priorities rather than treating it as optional.

⁴³ European Anti-Poverty Network (EAPN), *Members' Consultation on the European Pillar of Social Rights (2025)*

⁴⁴ European Anti-Poverty Network (EAPN), *Competitiveness or Social Justice: A Choice to Make – Towards a Social, Green, and Democratic European Semester (2025)*

A stronger and more explicit focus on poverty eradication and marginalised groups within the sub-objectives of the NRP Regulation would provide additional safeguards, helping to ensure that Member States take these priorities adequately into account when drafting their national plans.

- **Increasing the 14% allocation for meeting the Union’s social objectives to 25% and ensuring that it is strictly allocated to activities aimed at eradicating poverty**

The current allocation of 14% for social objectives within the MFF should be revised and increased to at least 25% to better reflect the scale and urgency of poverty in the EU.

This 25% comes on top of the ESF budget and must contribute to mainstreaming poverty eradication across all components of the NRPPs.

This reinforced allocation must be coupled with clear and binding requirements to ensure that funded activities are explicitly and demonstrably focused on poverty eradication, in line with EAPN’s proposal to amend the Annex I templates for Member States.

In addition, robust safeguards should be established in the text of the NRP Regulation to prevent the dilution of social spending into broader, less targeted measures, thereby ensuring that resources are effectively directed towards marginalised groups.

- **Reinstating the UNCRPD among the Article 7 Horizontal Principles that should be respected by future NRPPs**

The Article 7 of the proposed NRP Regulation requires Member States to ensure compliance with the 2020 Rule of Law Conditionality and the EU Charter of Fundamental Rights. Upholding democracy, the rule of law, and fundamental rights is essential to achieving sustainable poverty eradication in the long term.

However, EAPN regrets that the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD)⁴⁵, ratified by the European Union in 2011, is not included among the Horizontal Principles outlined in Article 7 of the proposed Regulation, contrary to the current common provisions governing the management of cohesion funds for 2021–2027⁴⁶.

EAPN therefore supports the calls of organisations such as the European Disability Forum (EDF) to **reinstate the UNCRPD as a core Horizontal Principle**.

Its inclusion should be ensured from the earliest stages of drafting the NRPPs to guarantee that disability rights are systematically integrated into policy design and implementation.

Funding instruments covered by the NRP Regulation play a critical role in advancing independent living and community inclusion, particularly for persons with disabilities. These investments are key drivers in

⁴⁵ United Nations, Convention on the Rights of Persons with Disabilities. Treaty Series, 2515, 3 (2006)

⁴⁶ Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions

preventing and alleviating poverty and must therefore be aligned with the obligations set out in the UNCRPD.

- **Introducing an enabling condition on LAPS and NAPS requiring Member States to adopt Local and National Anti-Poverty Strategies**

The introduction of a LAPS and NAPS conditionality clause as an enabling condition under the NRP Regulation would ensure that the use of EU funds is systematically aligned with the objective of eradicating poverty.

By requiring Member States to adopt comprehensive Local and National Anti-Poverty Strategies⁴⁷ as a condition for accessing funding, the NRP Regulation would embed social priorities at the core of future NRPPs.

NAPS and LAPS should rely on a human rights-based definition of poverty, as well as intersectional and comprehensive approaches. They should be aligned with other frameworks and strategies at all levels of decision-making. They should also ensure participation of people experiencing poverty and civil society. They should include clear and robust timelines, budgets, indicators, and monitoring and evaluation processes.

- **Including a National Roma Inclusion Strategy enabling condition requiring Member States to address structural discrimination faced by Roma people**

Roma people are disproportionately represented among those experiencing poverty. According to the EU Agency for Fundamental Rights (FRA), around 70% of Roma people are at risk of poverty or social exclusion, compared to an average of 16% in the EU⁴⁸.

As explained by ERGO Network, *“the reality for many Roma remains one of chronic poverty, marginalisation, and limited access to basic rights and services. Moreover, the poverty experienced by many Roma in Europe is not only widespread but also deep, as their living standards and material deprivation reflect conditions that meet the definition of absolute poverty (lack of access to food, shelter, and basic services).”*⁴⁹

In view of this, EAPN regrets that the thematic enabling condition 4.5 of the CPR 2021–2027, requiring the adoption of a **National Roma Inclusion Strategic Policy Framework**, has been removed from the NRP Regulation proposal.

⁴⁷ European Anti-Poverty Network (EAPN), *Poverty Watch Report 2025 – Promoting & Strengthening National and Local Anti-Poverty Strategies* (NAPS & LAPS) (2026)

⁴⁸ EU Agency for Fundamental Rights (FRA), *Rights of Roma and Travellers in 13 European countries - Perspectives from the Roma Survey 2024*

⁴⁹ European Roma Grassroots Organisations (ERGO) Network, *Roma Poverty in Europe* (2025)

This enabling condition has contributed to directing greater policy attention and EU funding towards tackling the structural discrimination faced by Roma people. Likewise, it has contributed to greater involvement of Roma civil society in the design, implementation, monitoring, and review of the frameworks⁵⁰.

According to the ERGO Network, there is a clear risk that, if this is not reintroduced as an enabling condition, some Member States will overlook Roma people in NRPPs and that National Roma Inclusion Strategic Policy Frameworks remain unfunded and therefore not implemented. Considering these challenges, **reinstating a strong and binding enabling condition on Roma Inclusion Strategic Framework is essential.**

EAPN suggested amendments for the NRP Regulation

Reference	EAPN's proposal
<p>Article 3 Specific objectives of the Fund</p>	<p>(a) to support the Union's sustainable prosperity across all regions by:</p> <p>[...]</p> <p>(iii) supporting a just transition towards the Union's 2030, 2040 and 2050 targets for energy and climate, in particular by prioritising support for clean energy generation and infrastructure, promoting energy efficiency and decarbonisation, storage and technology, developing smart energy systems and domestic transmission and distribution grids also taking into account the Trans-European Network (TEN-E) and technology and promoting a circular economy, ensuring that all territories and everyone can contribute and benefit from the clean transition, <i>especially people experiencing poverty or at risk of social exclusion</i>;</p> <p>(c) to strengthen social cohesion by supporting people and strengthening the Union's societies and the Union's social model by:</p> <p>[...]</p> <p>(iii) promoting equal opportunities for all <i>by contributing to the implementation of the European Pillar of Social Rights</i>, supporting strong social safety nets, fostering social inclusion and <i>contributing to the eradication of fighting</i> poverty and homelessness, and supporting investment in social infrastructure;</p>
<p>Justification</p> <p>Strengthening the reference to the EPSR and the objective of poverty eradication is essential to ensure that they are systematically integrated from the earliest stages of drafting the NRPPs.</p>	

Reference	EAPN's proposal
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⁵⁰ Internal consultation with the ERGO Network, April 2026

<p>Article 7 Horizontal Principles</p>	<p>The Member States and the Commission shall take appropriate steps to prevent any discrimination based on gender, racial or ethnic origin, religion or belief, disability, age or sexual orientation during the preparation, implementation, monitoring, reporting and evaluation of the Plans. In particular, accessibility for persons with disabilities and <i>respect of the United Nations Convention on the Rights of Persons with Disabilities</i> shall be ensured throughout the preparation and implementation of the Plans in accordance with accessibility requirements laid down in Directive (EU) 2019/882. Member States shall prevent EU funds going towards any actions of settings that further segregate marginalised communities.</p>
	<p>EAPN regrets that the United Nations Convention on the Rights of Persons with Disabilities (UNCRPD), ratified by the European Union in 2011, is not included among the Horizontal Principles outlined in Article 7 of the proposed Regulation. EAPN therefore supports calls from organisations such as the European Disability Forum (EDF) to reinstate the UNCRPD as a core horizontal principle. Its inclusion should be ensured from the earliest stages of drafting the NRPPs to guarantee that disability rights are systematically integrated into policy design and implementation.</p>
	<p>[NEW PARAGRAPH]</p> <p><i>The Member States and the Commission shall take appropriate steps to ensure the prevention and reduction of poverty and social exclusion throughout the preparation, implementation, monitoring, reporting and evaluation of the Plans.</i></p> <p><i>(a) national and local anti-poverty strategies, ensuring effective coordination across all levels of governance. These strategies shall demonstrate how they contribute to the achievement of the 2030 Porto target on poverty reduction and to the implementation of the EU anti-poverty framework. They shall set baseline and measurable milestones and targets, establish arrangements for monitoring, evaluation and review, and ensure their design, implementation, monitoring and review are carried out in close cooperation with people experiencing poverty and civil society organisations at local and national levels.</i></p> <p><i>national Roma inclusion strategic policy frameworks, including measures to prevent and eliminate segregation, taking into account the gender dimension and the situation of young Roma. These frameworks shall set baselines and measurable milestones and targets, establish arrangements for monitoring, evaluation and review at national, regional and local levels, and ensure that their design, implementation, monitoring and review are carried out in close cooperation with Roma civil society and all relevant stakeholders, including at local and regional level.</i></p>

	<p>The introduction of a LAPS & NAPS conditionality clause in Article 7 of the NRP Regulation would ensure that the use of EU funds is systematically aligned with the objective of eradicating poverty.</p> <p>By requiring Member States to adopt comprehensive Local and National Anti-Poverty Strategies as a condition for accessing funding, the NRP Regulation would embed social priorities at the core of the future NRPPs.</p>
<p>Article 10 Budget</p>	<p>At least 14% 25% of the financial envelope referred to in paragraph 2 and of the amount referred to in paragraph 4 shall be dedicated to meeting the Union’s social objectives, calculated by using the coefficients referred to in Article 6(1) of Regulation (EU) [Performance Regulation].</p> <p>The amount set out in paragraph 2, point (a) letter (ii), as well as the external assigned revenue from the Social Climate Fund, shall be excluded from the basis for the calculation of this minimum allocation.</p>
<p>Justification</p> <p>The current allocation of 14% for social objectives within the MFF should be revised and increased to at least 25% to adequately reflect the scale and urgency of poverty in the EU.</p> <p>This 25% comes on top of the ESF budget and must contribute to mainstreaming poverty eradication across all components of the NRPPs.</p> <p>This reinforced allocation must be coupled with clear and binding requirements to ensure that funded activities are explicitly and demonstrably focused on poverty eradication, in line with EAPN’s proposal to amend the Annex I templates for Member States.</p>	
<p>Annex V Template for the National and Regional Partnership Plan</p>	<p><i>1.7 Comprehensive overview of the Plan’s support to the social measures listed in Annex VI [methodology, for contribution to social objectives], taking into account the specific national and regional needs and challenges identified, inter alia, in the context of the European Semester</i></p> <p>Category of measures referred to in Annex VI</p> <p>a) Social inclusion <i>and poverty eradication</i></p> <p>(a) to foster active social inclusion and socio-economic integration with a view to <i>eradicating poverty</i>, promoting equal opportunities, non-discrimination and <i>active inclusion participation</i>, and improving access to <i>minimum income schemes, quality employment and essential services employability</i>, in particular for disadvantaged groups, third-country nationals including migrants and marginalised communities.</p>

Justification

The current template of the NRPPs tends to steer Member States towards allocating the earmark for social objectives predominantly to employment-related measures.

This approach risks overlooking broader structural drivers of poverty and social exclusion.

It is therefore essential to prioritise an active inclusion approach and ensure that funding is directed towards comprehensive poverty eradication measures across all policy areas, enabling a more holistic and effective response.

The Performance Framework Regulation

Reference: [*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*](#)

The Performance Framework Regulation aims to establish a comprehensive and unified system to track how the MFF budget is implemented at national and local levels, and to assess its effectiveness in delivering its initial objectives.

Covering all EU funds, the proposed Regulation provides a common approach to monitoring, reporting, and evaluation, with the objective of simplifying procedures and reducing administrative burden. This framework is essential to ensuring greater transparency and accountability in the use of EU resources, and to **better assess how EU funding contributes to the Union's social objectives**, including the eradication of poverty in the EU by 2050.

From EAPN's perspective, the European Commission's proposal includes several promising elements, including the mention of the **European Pillar of Social Rights** (Recital 7), the requirement to **mainstream gender** in all EU programmes (Article 8), and the spending target of at least 35% on **climate action and environmental objectives** (Article 4).

However, EAPN believes there is still a long way to go to ensure the Performance Framework Regulation **includes a meaningful anti-poverty perspective** and actively contributes to the implementation of the 2030 Porto Target on poverty reduction and the eradication of poverty in the EU by 2050.

EAPN recommendations for the Performance Framework Regulation

- **Strengthening Article 6 on Social Policies so that an anti-poverty perspective is mainstreamed across all EU funds**

Article 6 of the proposed Performance Framework Regulation rightly emphasises the importance of tracking the EU budget's contribution to social policies.

However, the wording of Article 6 makes **no reference to specific targets or political objectives related to poverty eradication**, nor to the EPSR. This **vague wording and these omissions are concerning**, as they leave considerable discretion to Member States and set no measures of success or adjustment pathways.

This risks deprioritising the fight against poverty in the allocation of the EU budget in favour of better-defined priorities.

- **Tailoring intervention fields and output indicators to ensure that the EU budget contributes to the eradication of poverty by 2050**

The Annex to the proposed Performance Framework Regulation sets out a list of intervention fields and output indicators linked to Article 6 on social policies. However, most of these indicators focus on employment-related measures, with very limited attention given to marginalised groups, access to essential services, or non-discrimination. Moreover, they are primarily tied to quantitative outputs, such as the number of participants, rather than broader policy outcomes, such as their impact on overall poverty rates. **This approach risks reinforcing short-term actions while failing to provide a coherent long-term vision for reducing poverty in a structural and sustainable way.**

- **Ensuring that the 35% climate spending target reaches marginalised groups**

For EAPN, a socially just transition must **actively contribute to the eradication of poverty**, rather than only limiting or mitigating the negative impact of climate change on people experiencing poverty. Therefore, social goals must not be secondary to environmental goals. **They must be equal and mutually reinforcing⁵¹.**

Strong and sustainable welfare states, robust social protection systems, including adequate minimum income schemes, living wages and decent jobs are the best way to mitigate the harms of climate change. The levels and coverage of social protection systems must be high enough to prevent negative impacts of the transition and fairly distribute its benefits. Massive public investment is needed to create decent green jobs, retrain those affected, and finance adequate social protection and minimum income, as well as sustainable energy, housing, transport, and food, ensuring that nobody is left behind⁵².

As such, **it is crucial that the 35% climate spending target reaches marginalised groups.** Without strong provisions in the Performance Framework Regulation and explicit connection with the EPSR, there is a significant risk that these funds will not effectively benefit those most in need.

EAPN suggested amendments for the Performance Framework Regulation

Reference	EAPN's proposal
Recital 6	As the economic, financial and societal costs linked to climate change and environmental degradation are growing, it is crucial to invest in decarbonisation, climate resilience, circular economy, water resilience, and the natural environment. It is in particular essential to enhance the Union's and Member States' capability to anticipate, prepare for, and respond to crises, disasters and impacts of climate change and extreme weather events, and to protect the investments under the EU budget. <i>In this context, climate action must contribute to the implementation of the European Pillar of Social Rights and supports a socially just transition by reaching people</i>

⁵¹ European Anti-Poverty Network (EAPN), *EAPN messages on the European Green Deal and Just Transition* (2020)

⁵² *Idem*

	<p><i>experiencing poverty</i>. Deploying new innovative technologies and solutions boosting climate resilience will at the same time increase the competitive edge of the EU companies not only through their improved adaptive capacity and climate resilience but also due to new export opportunities.</p>
<p>Article 4</p>	<p>(2) Programmes and activities shall be implemented with a view to achieving an overall spending target of at least 35% of the total amount of the budget on climate action and environmental objectives ('climate and environment spending target'), <i>while ensuring that climate action contributes to the implementation of the European Pillar of Social Rights and supports a socially just transition by reaching people experiencing poverty</i>, over the entire 2028-2034 multiannual financial framework, calculated by using the highest coefficient amongst climate mitigation, climate adaptation and resilience, and environment of the framework referred to in paragraph 1. Defence and security spending shall be excluded from the basis for the calculation of the climate and environment spending target.</p>
<p>Justification</p> <p>It is crucial that the 35% climate spending target reaches marginalised groups. Without strong provisions in the Performance Framework Regulation and an explicit connection with the European Pillar of Social Rights, there is a significant risk that these funds will not effectively benefit those most in need, and that the just transition will not be socially just for people experiencing poverty.</p>	
<p>Article 6 Social Policies</p>	<p>(1) The contribution from the budget to social policies within the Union shall be monitored by means of the budget expenditure tracking and performance framework laid down in Article 8, including by means of EU coefficients.</p> <p><u>NEW PARAGRAPH</u></p> <p><i>Programmes and activities shall be implemented in a manner that ensures the implementation of the European Pillar of Social Rights, and the systematic integration of poverty eradication and social inclusion considerations across the entire 2028–2034 Multiannual Financial Framework. To this end, the contribution of the Union budget to reducing poverty, addressing material deprivation, improving access to essential services, and supporting the inclusion of marginalised groups shall be tracked through an appropriate methodology. Defence and security expenditure shall be excluded from the basis for this tracking.</i></p> <p>(2) Programmes and activities shall, where feasible and appropriate in accordance with the relevant sector-specific rules, be implemented to achieve their set objectives respecting working and employment conditions under applicable national law, Union law, ILO conventions and collective agreements in accordance with Article 33(2), point (e), of Regulation (EU, Euratom) 2024/2509.</p>
<p>Justification</p> <p>These proposed amendments seek to strengthen the anti-poverty dimension of the Performance Framework Regulation.</p> <p>Without robust integration of this perspective, it will not be possible to effectively track the EU budget or assess its impact on poverty reduction.</p>	

<p>Annex to the Regulation</p>	<p>New Indicator Category: Social Sub-Category: Social Inclusion</p> <p><i>Measures to ensure Minimum Income Schemes are accessible, adequate and enabling in line with Council Recommendation of 30 January 2023 on adequate minimum income ensuring active inclusion 2023/C 41/01</i></p>
<p>Justification</p> <p>This amendment proposes a new indicator to measure the implementation of the 2023 Council Recommendation on Minimum Income, as a key framework for strengthening the accessibility, affordability, and enabling characteristics of minimum income schemes.</p>	

The AgoraEU Programme

Reference: [Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL establishing the 'AgoraEU' programme for the period 2028–2034, and repealing Regulations \(EU\) 2021/692 and \(EU\) 2021/818](#)

In the next MFF, the AgoraEU Programme will be the main source of direct EU funding in key areas linked to poverty, including anti-discrimination, gender equality, the protection of victims of gender-based violence, and the participation of people experiencing poverty in decision-making processes.

EAPN’s position is that, for the EU to actively contribute to the eradication of poverty, policy frameworks must be streamlined, coherent, and mutually reinforcing. **The same principle should apply to funding instruments.**

In this regard, we consider that the current wording of the AgoraEU Programme does not place sufficient focus on anti-discrimination and marginalised groups, particularly those living in poverty. **Without explicit prioritisation and targeted measures,** there is a risk that funding will not effectively reach those most in need, thereby limiting its potential impact on poverty reduction and social inclusion across the Union.

EAPN recommendations for the AgoraEU Programme

- **Supporting the participation of people experiencing poverty in EU, national, and local decision-making**

EAPN believes that no legal, policy, or budgetary initiatives should be undertaken without involving those directly affected by political systems and structural dynamics that exclude them. This **involvement should not be limited to the policy design phase but must also extend to the implementation and evaluation.**

We believe that adequate funding is needed at the EU level to support the development of sound structures for the meaningful and sustainable participation of affected communities at all levels of decision-making.

- **Securing funding for survivors of gender-based violence from marginalised groups**

Gender-based violence is a widespread human rights violation that cuts across all social, economic, and cultural contexts. Domestic violence by an intimate partner is frequently identified as one of the strongest contributors to women’s homelessness⁵³. For many survivors, limited access to affordable and safe housing significantly constrains their ability to leave abusive environments. A lack of viable housing alternatives can trap individuals in violent relationships, force them to return to abusive situations, or lead to homelessness.

These risks are particularly acute for marginalised groups. Migrant women, Roma women, single mothers, women with disabilities, trans women, and their children face compounded vulnerabilities due to structural discrimination, violence, and limited access to social protection systems and justice. In low-income households, exposure to gender-based violence can perpetuate cycles of trauma, economic instability, and intergenerational poverty.

We believe that the AgoraEU Programme must fully reflect this reality to **secure adequate funding for survivors of gender-based violence who also live in poverty.**

EAPN suggested amendments for the AgoraEU Programme

Reference	EAPN’s proposal
Article 8 Daphne	<p>Within the CERV+ strand, the ‘Daphne’ specific objective shall focus on:</p> <p><i>(NEW) ensuring the full transposition and effective implementation of the Directive on combating violence against women and domestic violence, including by guaranteeing that women experiencing poverty have adequate and unconditional access to shelters, survivor support services, legal aid, and social welfare, regardless of their residence or migration status.</i></p>
Justification	<p>AgoraEU should support the implementation of the Directive to ensure that EU funding effectively reinforces existing legal obligations and delivers tangible protection for survivors across all Member States.</p> <p>A specific focus on marginalised groups is essential to address structural barriers to access and ensure that those most at risk of violence, particularly people experiencing poverty, are not left behind.</p>
Article 9 Democratic participation and the rule of law	<p>Within the CERV+ strand, the ‘Democratic participation and rule of law’ specific objective of the Programme shall focus on:</p> <p><i>(NEW) supporting the meaningful participation of marginalised groups in EU, national and local decision-making processes, including consultations, policy design, and evaluation;</i></p>
Justification	<p>AgoraEU should explicitly support the sustainable and meaningful participation of marginalised groups in EU decision-making as a key component of sound, transparent, and effective policymaking.</p>

⁵³ FEANTSA, *Guide for developing effective gender-responsive support and solutions for women experiencing homelessness* (2021)

CONCLUSION

As the European Commission puts forward its priorities for the next MFF, it must ensure that poverty eradication is placed at the core of the overall budgetary framework.

The current direction of the MFF 2028–2034, with its strong emphasis on defence and competitiveness, is deeply concerning if it comes at the expense of social justice and marginalised groups.

The simplification exercise undertaken by the European Commission, which was initially intended to ease access to EU funds, fundamentally weakens targeted support for, and attention to, marginalised groups. A truly forward-looking MFF must embed social justice at its core and use its full potential to reduce injustice and improve living conditions for all.

This requires more than rhetorical commitment. It demands **clear and binding priorities across all funding instruments, including robust earmarking for poverty eradication and strong safeguards** to ensure that no programmes or competing priorities undermine poverty reduction objectives. Similarly, meaningful involvement of civil society and people experiencing poverty in the design and implementation of funds is crucial.

Ultimately, investing in poverty eradication is not a cost but the foundation for a cohesive Europe. By prioritising poverty eradication and social justice within the MFF, the EU has the potential to strengthen territorial cohesion and ensure that economic progress translates into tangible improvements in people's lives, rather than only benefiting the wealthiest. Only then can the next MFF turn the EU's commitment to leave no one behind into a reality.

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