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Opinion of the European Committee of the Regions – Cities' and regions' contribution to the simplification agenda

(C/2026/766)

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POLICY RECOMMENDATIONS

THE EUROPEAN COMMITTEE OF THE REGIONS

Background

1. draws attention to the letter from the Danish Presidency and reiterates its full support for the policy recommendations set out therein;
2. welcomes the European Council conclusions of 23 October 2025, which call for continued efforts to put forward proposals to simplify the EU regulatory framework;
3. highlights the 2024 Draghi report – which emphasises that the complexity of the EU regulatory framework adversely affects the EU's overall competitiveness – and therefore supports the objectives of the simplification agenda. The Committee stresses that simplifying rules while preserving regulatory stability is crucial for competitiveness; points out that the EU's internal market is based on a highly competitive social market economy, which aims at full employment and social progress and a high level of protection and improvement of the quality of the environment;
4. undertakes to do more to support the simplification agenda by taking account of the experiences of its members and networks, such as RegHub (Network of Regional Hubs for EU Policy Implementation Review) and the Subsidiarity Expert Group, when it comes to the day-to-day implementation of EU legislation and by proposing practical guidance for future legislative reforms; also undertakes to explore the rationale for the simplification measures in its opinions, where appropriate;

Basic principles of the simplification agenda

5. stresses that the involvement of local and regional authorities (LRAs), including the Committee of the Regions (CoR), in the implementation of the 'simplification agenda' is fully justified. **On a daily basis, representatives of LRAs are confronted with limited resources, the need for sound management of public finances and the need to cut red tape. They are often the first link in the decision-making chain during crises.** As a result, they have both experience and practical competence in simplifying procedures and improving management efficiency; it should be added that the simplification agenda needs to be geared not only to cutting red tape, but also, insofar as possible, to lowering administration running costs; furthermore warns that simplification measures, if they include a shift of responsibilities from the EU to the national and/or regional level, must take into account available resources on the regional and local level – such as administrative capacity, expertise and other capacities pertaining to the feasibility of such shift. Reducing the administrative burden on the EU level must not lead to increased burdens and over-regulation on the regional or local level;

6. points out that, in order to effectively implement the simplification agenda, LRAs, including the CoR, must play a greater political role in EU decision-making processes. This stems directly from the Treaty principles, in particular the principle of subsidiarity, which determines the division of competences between the different levels of government in the EU – local, national and EU – in accordance with the **principle of conferral**; Regrets against this background that the Commission does not provide for the systematic involvement of LRAs and/or of the CoR in its strategic and implementation dialogues;

7. welcomes the intention of the European Commission to continue working on simplification in its 2026 Annual Work Programme (in particular: chapter 3, 'Simpler rules, stronger delivery'); and recalls that the revised cooperation agreement between the European Commission and the CoR (<https://webapi2016.cor.europa.eu/v1/documents/cor-2024-00909-00-01-tcd-ref-en.docx/content>) commits both parties as institutions to close cooperation on better regulation and considers that simplification should be part of this cooperation;

8. underlines that EU institutions and bodies must ensure the right to good administration, as established in Art 41 of the EU Charter of Fundamental Rights. This right, together with the relevant provisions of the EU Treaties, must be the basis for the relations between the EU institutions and the general public, businesses, trade unions and civil society organisations. Notes that good administration in this sense comprises the principles of lawfulness, equality, impartiality, proportionality, legal certainty, timeliness, participation, privacy and transparency;

9. emphasises that simplification measures should be applied to all suitable areas of the EU's legislation and decision-making procedures, in particular: 1) legislative procedures, which should take greater account of the perspective of local and regional authorities, as expressed by the CoR, among others; 2) fund and programme management rules, which, in line with the idea of active subsidiarity, should be based on the **partnership principle, a place-based approach and flexibility** in order to tailor policies and actions to regional and local circumstances;

10. warns that simplification must not lead to centralisation of the EU, which would run counter to the principles of conferral of powers, subsidiarity and proportionality laid down in the Treaties. Centralisation only appears to be conducive to simplification. In practice, it leads to political disputes, hinders cooperation between levels of government and undermines the democratic legitimacy of decisions taken by EU institutions and bodies, by ignoring the principles of multi-level governance and the active subsidiarity;

11. considers that simplification should be supported by comprehensive digitalisation and the secure use of artificial intelligence (AI) to automate processes, reduce bureaucratic burdens and ensure interoperability between levels of government. Simplification will be enhanced by means of single electronic registration and digital reporting systems, promoting 24/7 accessibility;

12. also warns that simplification should not simply mean deregulation. Simplification can and should lead to a revision of the rules governing individual industries and sectors (e.g. transport), thereby ensuring legal certainty, but should not always and in every case mean deregulating them – only changing the form of intervention from an approach that is excessively complicated to one based on principles, standards and clauses. In this sense, it is essential to review the current regulations to assess whether they are still adequate and necessary, as well as to assess the potential effects that any new regulation intended for implementation may have on the various stakeholders, considering the proportionality of its means and ends and ensuring, in any case, that mechanisms are put in place to assess its effectiveness;

13. points out that simplification must not limit the transparency of decision-making in the EU. In particular, legislative processes should remain fully open, transparent and subject to public scrutiny. Transparency and access to information are prerequisites for ensuring the legitimacy of the EU and public trust in its actions. Therefore, simplification must not increase the influence of large economic operators at the expense of the EU institutions and democratic procedures or weaken SMEs, which are the backbone of the European economy. The principle of equal access to decision-making should also apply in relations with lobbying organisations and consulting firms. At the same time, transparency and the findings of scrutiny should be simple and communicated in easily comprehensible language;

14. strongly emphasises that efforts should be made to maintain EU citizens' living standards, in particular as regards access to public services and ecosystem services. Simplification must not lead to reductionism in EU policies or in existing legal standards;

Better regulation

15. points out that law-making in the EU requires a new approach. Legislative acts should be based on general principles and clauses deriving from the Union *acquis*. This approach would make the law more flexible and enable it to better respond to diversity and political, social and economic changes, avoiding overly detailed regulations, which involve excessive and unnecessary bureaucratisation;

16. understands that simplification must include different facets: regulatory simplification, reduction of bureaucratic burdens and the application of new technologies. Overall, simplification leads to improvements in the efficiency and effectiveness of administrations, reduces costs and shortens the time frames people face when carrying out procedures;

17. believes that simplification measures should be adopted in an appropriate legal form that is suited to the purpose. The choice between a regulation or a directive should be based on an analysis of the effectiveness and feasibility of each option;

18. is aware that, throughout the history of European integration, the Commission has frequently started out by proposing flexible instruments or general legal provisions in order to achieve commonly agreed objectives, but progressively regulation has become more detailed as implementation across Member States continued to be uneven. Simplification may therefore also require a re-confirmation of the common goals and credible commitments to achieve them, in order to ensure a level playing field across the EU;

19. calls on the European Commission and the co-legislators to actively monitor compliance with the subsidiarity principle. LRAs are key partners in this regard, as they are primarily responsible for implementing EU law. The CoR should therefore be formally involved in trilogue meetings in order to monitor compliance with the principle of subsidiarity and prevent overregulation;

20. strongly underlines the need to assess the relevance and effectiveness of *Protocol (No 2) on the application of the principles of subsidiarity and proportionality*. Its role in the legislative process should be not only formal but also practical. The CoR should have a legally guaranteed role in this process, including the option of carrying out a subsidiarity-based regulatory audit and a territorial impact assessment. The CoR should be equipped with concrete legal tools so that it can have a real impact on the legislative process;

21. points out that it is worth developing practices to help create a simple and effective regulatory framework. In this regard, attention should be drawn to previous CoR opinions: CDR-0975-2025, A simpler and faster Europe (Jelena DRENJANIN, SE/EPP) ⁽¹⁾; CDR-5624-2023, Active subsidiarity: a fundamental principle in the EU better regulation agenda (Mark SPEICH, DE/EPP) ⁽²⁾; CDR-1562-2023, Strategic foresight as an instrument of EU governance and better regulation (Giorgio MAGLIOCCA, IT/EPP) ⁽³⁾; and CDR-4071-2021, Better regulation (Pietro Mauro ZANIN, IT/EPL) ⁽⁴⁾. The priority should be to develop a uniform legislative methodology and a common set of rules for legislative drafting, including: simpler legislative techniques, including results-based legislation, i.e. setting objectives rather than laying down detailed measures for achieving them; sunset clauses, which cause legislation to automatically expire if it is not extended; regular audits of the consistency of regulations to avoid contradictions and ensure that EU legislation has real added value; territorial impact assessments; implementation assessments to analyse how effective legislation is in practice;

⁽¹⁾ Opinion of the European Committee of the Regions – A simpler and faster Europe (OJ C, C/2025/4414, 29.8.2025, ELI: <http://data.europa.eu/eli/C/2025/4414/oj>).

⁽²⁾ Opinion of the European Committee of the Regions – Active subsidiarity: a fundamental principle of the EU better regulation agenda (own-initiative opinion) (OJ C, C/2024/5366, 17.9.2024, ELI: <http://data.europa.eu/eli/C/2024/5366/oj>).

⁽³⁾ Opinion of the European Committee of the Regions – Strategic foresight as an instrument of EU governance and better regulation (OJ C, C/2023/1327, 22.12.2023, ELI: <http://data.europa.eu/eli/C/2023/1327/oj>).

⁽⁴⁾ Opinion of the European Committee of the Regions – Better regulation: Joining forces to make better laws (OJ C 97, 28.2.2022, p. 10).

22. regrets that in its current phase of relaunch or reconsolidation, the EU's better regulation agenda has become quite opaque. While the better regulation tools, such as implementation dialogues, strategic dialogues, reality checks or the evaluation of legislation in the Commission Work Programme 2026 have multiplied, these exercises seem to be 'à la carte' and do not provide for structured or institutional representation of local and regional authorities or of the CoR;

Access to EU funds and programmes

23. stresses in the strongest possible terms that simplification cannot mean centralisation. The European Commission's proposals to consolidate funds under the 2028-2034 multiannual financial framework should be noted with concern. Such actions lead to excessive centralisation of key policy areas, including cohesion policy and the common agricultural policy, making them less ambitious **and simultaneously undermining the EU's strategic objectives, including competitiveness;**

24. believes that programming should continue to include a place-based approach, diverse objectives and the principle of flexibility, which means that local and regional authorities must be duly taken into account. The role played by regions in the EU budget should not be weakened. Therefore, LRAs must have a guaranteed role to play in managing EU funds, as has so far been the case with cohesion policy. The implementation of programmes by LRAs increases the EU's visibility on the ground and helps build public support for the European integration process, in particular in less-developed, rural and border regions where tangible EU investments are essential for citizens' trust;

25. recommends that a single rulebook be adopted to govern all EU funds and programmes. It should lay down common rules, reduce fragmentation and prevent the emergence of additional national requirements (gold-plating). At the same time, sufficient flexibility should be left for specific provisions to be adapted where the specific characteristics of the programme so require;

26. draws the European Commission's attention to the fact that beneficiaries of EU funds – including local and regional authorities, businesses, trade unions and civil society organisations and individuals – often face administrative and regulatory difficulties due to the complexity of the rules. In particular, smaller authorities, SMEs and civil society organisations have limited resources with which to navigate the maze of funding rules. Simplifying procedures, especially with regard to smaller beneficiaries, will increase partners' involvement in programme implementation, make actions more visible and increase trust in European democracy;

27. points out that simplified cost options, including results-based cost accounting, should be promoted. This will make it easier for beneficiaries to access funds, reduce reporting and auditing requirements and make it possible to take a risk-based management approach. At the same time, local authorities and smaller beneficiaries should be given more advice and technical support, especially when it comes to public procurement, audits and reporting. At the same time, the Committee notes that the European Commission's proposals for simplified cost options and performance maintain checks on actual expenditure for projects subject to State aid or public procurement. The future performance management and monitoring system will involve two overlapping but separate management circuits with their own audit and control requirements. In addition to the administrative complexity involved, LRAs fear that these provisions may make it more difficult for beneficiaries to access information;

28. suggests that, for the purpose of monitoring, accountability and other requirements related to the implementation of legislation, intuitive, easily comprehensible and accessible dashboards and platforms need to be put at the disposal of the end-users. If reporting obligations as such are not simplified, a given measure of simplification is at risk of failing its intended outcome. Smart digital tools and artificial intelligence can play a significant role in the reduction of the administrative burden as to the reporting obligations;

Public procurement and State aid

29. strongly underlines the need to revise and simplify all relevant legislation, including sector-specific legislation, on the principles and procedures for public procurement and public aid. Their excessive complexity is often a barrier for smaller local authorities and beneficiaries of EU funds, and creates legal uncertainty too. Simplified procedures will make public procurement more efficient, more transparent and more accessible across the EU, especially for small local and regional authorities, SMEs and civil society organisations. New administrative burdens and overly detailed rules should be avoided as these limit the necessary development, innovation and competition;

30. **also calls for exemptions from State aid rules for selected EU programmes (e.g. Interreg).** There should be a presumption of compliance or exemption from State aid rules for projects under a certain threshold or a legal exemption for all non-economic activities and small grants, eliminating the need for individual assessments or the application of de minimis rules when the administrative burden is disproportionate to the potential market effects. Introducing a clause of exemption or presumption of compliance would significantly reduce red tape for managing authorities, eliminating unnecessary checks on thousands of micro-operations;

Additional remarks

31. points out that the use of modern digital tools, artificial intelligence and data in relation to simplification rules should be harmonised as much as possible across the EU. The EU should play a leading role in digitalisation and in the safe, ethical, smart and efficient use of AI and data, guaranteeing the protection of fundamental rights, privacy and cybersecurity. Digital tools and procedures should be harmonised between Member States and between the EU, national and local levels to ensure consistency and interoperability, ensuring legal certainty of systems and avoiding regulatory fragmentation. In turn, beneficiaries should be able to access and understand these tools and procedures, avoiding digital barriers and additional administrative burdens;

32. believes that it would be worthwhile expanding the debate on simplifying legislation through platforms such as RegHub (Network of Regional Hubs for EU Policy Implementation Review). Is therefore concerned that there is still no clarity on how the F4F platform will be continued or by what it would be replaced and how the full involvement of local and regional representatives through the CoR will be ensured. This clarity is necessary to continuously exchange experiences and jointly develop solutions to improve the law;

33. calls for simplifications to be genuinely impactful and effective in the new EU budget (2028-2034). This means that appropriate institutional and procedural reforms need to be prepared, adopted and implemented as early as 2026 so that they will be fully functional by the new financial cycle.

Brussels, 11 December 2025.

The President
of the European Committee of the Regions
Kata TÜTTŐ