



European Committee
of the Regions

CIVEX

8th term of office

6th meeting of the Better Regulation and Active Subsidiarity Steering Group (BRASS-G)

Brussels, 1 July 2025, 10:30–12:30

Item 6

For decision

ANNUAL SUBSIDIARITY WORK PROGRAMME 2025

The Better Regulation and Active Subsidiarity Steering Group (BRASS-G) is invited to approve this document.

1. Introduction

The Subsidiarity Work Programme (SWP) is based on a priority list of proposed initiatives preselected on the basis of the available information from the European Commission Work Programme 2025¹ (ECWP), taking into account the following cumulative criteria²:

- initiatives should present a clear political interest for local and regional authorities;
- initiatives should touch on competences of local and regional authorities;
- initiatives should have a potential subsidiarity dimension;
- preference should be given to legislative proposals.

Moreover, the preselection takes account of the European Committee of the Regions' (CoR) priorities and initiatives included in its commissions' work programmes.

The Subsidiarity Work Programme provides guidelines for the work to be carried out in 2025 and aims to ensure strategic planning of subsidiarity monitoring activities while also allowing the necessary flexibility to adapt to changes in the institutional and political agenda. It also provides a basis to seek synergies with the CoR's tools in the area of better regulation, such as territorial impact assessments, rural proofing, *ex post* evaluation, strategic foresight and, where appropriate, the work of the RegHub initiative, in the spirit of promoting 'active subsidiarity' and in line with the activities under the remit of the Better Regulation and Active Subsidiarity Steering Group (BRASS-G).

The SWP is therefore an integral part of the CoR better regulation and active subsidiarity activities, carried out under the oversight of BRASS-G and with a view to operationalise the recommendations on '*Developing and enhancing the CoR's policy and toolbox on better regulation*'³ adopted by BRASS-G in September 2024. The SWP takes also into account the conclusions of the 11th CoR Subsidiarity Conference on '*Better regulation and active subsidiarity: keys for an EU that delivers*'⁴.

2. Priority Subsidiarity Initiatives for 2025

Following the process outlined above and in application of Rule 55(2) of the CoR's Rules of Procedure which enlarges the scope of the CoR's subsidiarity scrutiny to legal acts⁵, **three priority initiatives** have been identified for subsidiarity monitoring.

Moreover, **three additional files are considered to be potentially relevant** and are also recommended for subsidiarity monitoring.

¹ The 2025 European Commission work programme and annexes [Commission work programme 2025 - European Commission](#).

² Criteria established by the SEG at its first meeting on 25 October 2012.

³ Recommendations on *Developing and enhancing the CoR's policy and toolbox on better regulation*, COR-2024-03580-00-00-TCD-REF and annex on *Ensuring the sustainability and upgrade of the CoR better regulation activities*, COR-2024-03581-00-00-TCD-REF, both available in the [section of the CoR website dedicated to Better Regulation and Active Subsidiarity](#).

⁴ Conclusions of the 11th CoR Subsidiarity Conference, Warsaw, 25 October 2024, COR-2024-03670-00-00-TCD-REF-EN, <https://cor.europa.eu/en/our-work/commissions/civex/better-regulation-and-active-subsidiarity>.

⁵ [CoR Rules of Procedures](#) (August 2024), Rule 55.2 '*Committee opinions on proposals for legal acts in areas not falling within the Union's exclusive field of competence shall express a view on the proposal's compliance with the principles of subsidiarity and proportionality. Committee opinions may refer to the application of the active subsidiarity and proportionality principles whenever appropriate, as well as to the application of the principle of multilevel governance.*'

The priority list could be subject to change depending on institutional and political developments, and may be re-assessed once the precise content of the European Commission initiatives is known, or if the Commission proposes other initiatives outside its work programme that could be relevant in terms of subsidiarity.

Furthermore, the CoR will continue to closely follow the subsidiarity monitoring activities carried out by regional and national parliaments, particularly via its Subsidiarity Expert Group (SEG). Additionally, calls for applications of two of the CoR better regulation networks have been launched with a view to establishing the new memberships under the current CoR mandate 2025–2030: the Regional Hub Network (RegHub) and the SEG.

Any change in priority files or any additions of relevant dossiers will be proposed for validation to the BRASS-G, taking account of the work programmes of the relevant CoR commissions.

The three priority initiatives proposed for subsidiarity scrutiny are:

- **Post-2027 Multiannual Financial Framework (MFF) proposals** (ECWP no. 44, legislative, Q3 2025)

ECWP: *'The Commission will present a new EU Long Term Budget (Multiannual Financial Framework). It will be better aligned with EU priorities and objectives, targeted to where EU action is most needed in a flexible way. It will be simpler in the way it works and more impactful and will make better use of our budget to leverage further national, private and institutional financing.'*

Justification: The Post-2027 MFF proposals will be simpler and more flexible and will directly impact local and regional investment and funding opportunities to deliver the EU strategic agenda on the ground. Particular attention will be paid to cohesion policy funding including territorial cooperation. Depending on the final format of the package (both in respect of timing and content) adopted by European Commission, it might prove necessary to select specific pieces of proposals among the many that are likely to be tabled.

- **European Water Resilience Strategy** (ECWP no. 37, non-legislative, Q2 2025)

ECWP: *'Sustainable water management is one of the biggest challenges we face in relation to the impact of climate change. Floods and droughts are becoming the norm, as shown by the tragic events that have affected Europe in recent years. On water resilience, we will take a source-to-sea approach and consider the widely different challenges in our regions and in sectors to ensure that sources of water are properly managed, scarcity and pollution are addressed, and to increase the competitiveness of our water industry.'*

Justification: Water supply is always a local or regional issue, as it depends on the locally or regionally available resources. Therefore, water resilience is also a local/regional aspect and priority. Water is clearly a local/regional issue and very often connected to environmental matters for which, in some Member States, the local and regional level is in charge.

- **European Climate Law amendment** (ECWP no. 33, legislative, date of publication tbc)

ECWP: *'The Clean Industrial Deal will also go hand in hand with a proposed 90% emission reduction target for 2040 to be enshrined in the European Climate Law.'*

Justification: Climate targets affect cities and regions and very often have to be implemented on the ground by local and regional authorities. The amended European Climate Law will include a 90% emissions reduction target for 2040, with clear impacts on the energy sector.

The three additional initiatives recommended for observation are:

- **Common Agricultural Policy simplification package** (ECWP no. 35, legislative, Q2 2025);
- **Industrial Decarbonisation Accelerator Act** (ECWP no. 10, legislative, Q4 2025);
- **A new action plan to implement the European Pillar of Social Rights** (ECWP no. 29, non-legislative, Q4 2025).

3. Cooperation with other institutions, organisations, bodies and associations

The CoR and the European Commission cooperate closely based on a bilateral cooperation agreement dating back to 2012 and renewed in March 2024⁶.

Similarly, the CoR renewed its cooperation agreement with the European Parliament in May 2024⁷, a close cooperation aiming at bringing the suggestions from local and regional authorities to the EP's attention as early as possible in the legislative phase. The JURI and AFCO committees are clearly prime interlocutors in this regard, however, in the spirit of a lifecycle approach to EU legislation from a better regulation and active subsidiarity point of view, and under the guidance of the BRASS-G, the strong thematic links between CoR commissions and their EP committee counterparts will also be mobilised in this regard.

The CoR will also continue to pursue close cooperation with Regional Parliaments with legislative powers and the Conference of European Regional Legislative Assemblies (CALRE) in terms of subsidiarity monitoring and better regulation. It will also continue cooperation with the European Commission on its annual report on the implementation of the principles of subsidiarity and proportionality⁸.

4. Adoption procedure and implementation

The 2025 SWP is prepared and submitted for adoption at a later stage of the year than usual, due to the publication of the first ECWP in the new institutional term in mid-February and due to the start of the CoR 2025-2030 term in late February and confirmation of the BRASS-G in April.

Hence, the 2025 SWP was prepared after the adoption of the work programmes of all CoR commissions and it is based on the recommendations made by the Secretariats of the CoR commissions and by the SEG in May 2025.

⁶ Point 22 of the [Protocol on cooperation between the European Commission and the Committee of the Regions](#) signed on 20 March 2024, OJ C, C/2024/2478, 4.4.2024.

⁷ [Cooperation agreement between the European Parliament and the European Committee of the Regions](#), 14 May 2024, COR-2024-00359-07-00-TCD-TRA-EN.

⁸ The reports can be found here: https://commission.europa.eu/law/law-making-process/adopting-eu-law/relations-national-parliaments/annual-reports-application-principles-subsidiarity-and-proportionality-and-relations-national_en.

The SWP was approved by BRASS-G in its constitutive meeting on 1 July, it was presented for information to the CIVEX commission on 1 October and then submitted to the Bureau for adoption. In consideration of this late adoption, due to the circumstances explained above, BRASS-G decided to accept possible subsidiarity assessments on priority files following its approval of the SWP, while pending the adoption by the Bureau.

The CIVEX commission will enhance its contribution to CoR's active subsidiarity approach and will strive to use the better regulation toolbox, such as subsidiarity monitoring, impact assessments, and implementation reports, to strengthen future-proof policies and promote more evidence and place-based European legislation. Additionally, the CIVEX commission will highlight relevant files belonging to its remit to the BRASS-G chair for possible debate within the group, focusing on better regulation and the active subsidiarity perspective, and incorporating insights from better regulation assessments. Overall, CIVEX will be *chef de file*⁹ on the CoR work on better regulation and active subsidiarity as a policy area, with individual commissions or other bodies leading on specific better regulation tools or methodologies.

The subsidiarity team in the CIVEX secretariat ensures communication between BRASS-G, the SEG and the other CoR commissions, with a view to achieving the smooth implementation of the Subsidiarity Work Programme 2025.

⁹

See the Recommendations by the outgoing CoR bureau concerning the new 2025-2030 term-of-office adopted by the CoR Bureau on 19 November 2024 (COR-2024-03185-11-01-NB-TRA): 'The new concept of *chef de file* intends to boost the interaction between the commissions on policies having a horizontal impact or affecting the work of several commissions. This means that the *chef de file* commission leads on the overall topic and reaches out to other commissions.'