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Proposal for a

REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

**suspending the application of the rules on the appointment of an authorised
representative for extended producer responsibility for batteries and waste batteries and
packaging and packaging waste**

(Text with EEA relevance)

EXPLANATORY MEMORANDUM

1. CONTEXT OF THE PROPOSAL

• Reasons for and objectives of the proposal

Union legislation should deliver its policy objectives efficiently, effectively and transparently. These longstanding principles can be traced back to the 2001 White paper on Governance ⁽¹⁾ which put better regulation and stakeholder engagement at the heart of European policymaking. The Competitiveness Compass ⁽²⁾ continues the promotion of responsible law-making. It announced unprecedented efforts to simplify legislation to reignite the competitiveness of European business. Moreover, the Commission has since strengthened targets to reduce administrative costs for business (together with public authorities) and Small and Medium sized Enterprises by 25% and 35% respectively ⁽³⁾.

A mature body of Union environmental law now exists. The Commission takes seriously its duty to manage these laws effectively and invests heavily in reviewing ⁽⁴⁾ their application to ensure that they deliver as intended and that problematic issues are tackled early. Moreover, the Commission is committed to ‘stress-test’ all EU laws under its current term of office. The content of this proposal (and others in the ‘omnibus’ package) represents the initial fruits of the Commission’s ongoing ‘stress-testing’ in the environment area ⁽⁵⁾ built on extensive dialogue and inputs from civil society. The omnibus package addresses legislation related to the circular economy, the operation of industrial installations, the management of geospatial data, and environmental permitting.

The above legislation are crucial parts of delivering the Union’s commitment to a fair green, and digital transition and the shift towards a circular economy in particular. It is important that this legislation works well, mobilises the Union’s assets like the single market and avoids imposing unnecessary costs on business, public authorities and citizens.

This specific proposed Directive aims to reduce the administrative burden for producers established in one Member State of the Union selling their products in other Member States, in relation to the participation of these producers in the extended producer responsibility schemes in those other Member States, set up under Regulation (EU) 2023/1542 on batteries and waste batteries (the Batteries Regulation)⁽⁶⁾ and under Regulation (EU) 2025/40 on packaging and packaging waste (the Packaging Regulation)⁽⁷⁾.

The producer of a product placed on the market of a Member State has the responsibility to cover the costs of managing the product at its end of life (so called ‘Extended Producer Responsibility or EPR’). The Waste Framework Directive sets out the minimum general

¹ COM(2001) 428 final of 12 October 2001, *European governance - A white paper*.

² COM(2025) 30 final of 29 January 2025, *A Competitiveness Compass for the EU*.

³ COM(2025) 47 final of 11 February 2025, *A simpler and faster Europe: Communication on implementation and simplification*.

⁴ COM(2025) 420 final of 7 July 2025, *2025 Environmental Implementation Review - Environmental implementation for prosperity and security*.

⁵ Announced by President von der Leyen in her political guidelines 2024-2029 ‘Europe’s Choice’.

⁶ Regulation (EU) 2023/1542 of the European Parliament and of the Council of 12 July 2023 concerning batteries and waste batteries, amending Directive 2008/98/EC and Regulation (EU) 2019/1020 and repealing Directive 2006/66/EC; OJ L 191 28.7.2023, p.1.

⁷ Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC; OJ L, 2025/40, 22.1.2025, p.1.

requirements for extended producer responsibility while specific rules for different product groups exist in other legislation such as the Regulation on packaging and packaging waste, the Regulation on batteries and waste batteries, the Directive on electronic and electrical waste, and the Single Use Plastics Directive, as well the Directive on end-of-life vehicles (currently subject to revision under an ongoing ordinary legislative procedure) ⁽⁸⁾. Member States may also establish national rules on extended producer responsibility for other products, provided these rules comply with the minimum requirements set out in Article 8 and 8a of the Waste Framework Directive.

An authorised representative for EPR acts on behalf of an economic operator (producer) selling products in a Member State where the producer is not established or if it is established in a third country. The purpose is to ensure that producers making available products on the territory of a Member State comply with the rules on EPR so that the costs of the management of waste generated in that Member State are covered.

In the May 2025 Communication on a strategy for the single market⁽⁹⁾, the Commission highlighted the complexity of EPR rules as a major barrier in the internal market, in particular as regards the possibility or obligation for a producer to have an authorised representative for EPR in each Member State where the producer makes its products available.

This proposal would provide additional flexibility by allowing producers established in the Union and selling products in another Member State to choose whether they appoint an authorised representative for EPR. Provisions regarding the appointment of authorised representatives for EPR for producers based in third countries should remain as they currently are contained in sectoral legislation.

This proposal suspends certain provisions of two Regulations in the area of environment, waste management. Further possible modifications of those Regulations or further suspensions of their provisions are entirely outside of the scope and aims of the present proposal. The need for such modifications may be assessed, as appropriate, in the context of further stress-testing of EU environmental legislation announced in the [Chapeau Communication] and in Commission work programme 2026. The Commission will constructively engage with the co-legislators, in order to ensure that the legislative process on the present proposal fully preserves its essential object and does not distort it.

- **Consistency with existing policy provisions in the policy area**

The current proposal promotes a similar approach across circular economy/waste legislation regarding the operation of schemes for extended producer responsibility. This will facilitate the functioning of the internal market while aiding business operations.

- **Consistency with other Union policies**

This proposal is part of a package of measures aimed primarily at cutting red tape for economic operators. It is entirely consistent with the Commission's policies on better

⁸ Directive 2000/53/EC of the European Parliament and of the Council of 18 September 2000 on end-of life vehicles; OJ L 269, 21.10.2000, p. 34.

⁹ COM(2025) 500 final of 21 May 2025, *The Single Market: our European home market in an uncertain world - A Strategy for making the Single Market simple, seamless and strong*.

regulation, and the objectives of the Competitiveness compass to promote greater competitiveness and economic resilience in the Union. The rationalisation introduced by these measures will not affect the achievement of the objectives in the concerned policy area nor the rationale of the legislative acts.

2. LEGAL BASIS, SUBSIDIARITY AND PROPORTIONALITY

- **Legal basis**

The legal base of the proposal is 192(1) TFEU in relation to batteries and 114 TFEU in relation to packaging. This reflects the underlying legal base of the Regulations containing provisions on authorised representatives for extended producer responsibility that the proposal suspends.

- **Subsidiarity (for non-exclusive competence)**

The Batteries Regulation was adopted in recognition of the expected demand for batteries in the coming years, the strategic role of batteries in the global transition towards decarbonised economies and the need to establish a functioning internal market and to avoid market distortions. As such the Batteries Regulation sets out common rules on the sustainability, performance, safety, collection, recycling and second life of batteries as well as on information about batteries for end-users and economic operators. For these reasons, the suspension of provisions of the Regulation is similarly justified on subsidiarity grounds.

Products need appropriate packaging to be protected and easy to transport from where they are produced to where they are used or consumed. Prevention of barriers on the internal market for packaging is key to promote the efficient functioning of the internal market for products. Fragmented rules and vague requirements cause uncertainty and additional cost to economic operators. For these reasons, the suspension of provisions of the Regulation is similarly justified on subsidiarity grounds.

- **Proportionality**

In the case of the circular economy legislation, the proposal would introduce alternative means to deliver the policy objectives of ensuring that waste products, batteries or packaging are appropriately managed at the end of their useful life. These respond to the concerns of producers operating across Member States.

- **Choice of the instrument**

A proposal for Regulation is the appropriate choice of instrument given that the underlying legislation that the proposal suspends are Regulations.

3. RESULTS OF EX-POST EVALUATIONS, STAKEHOLDER CONSULTATIONS AND IMPACT ASSESSMENTS

- **Ex-post evaluations/fitness checks of existing legislation**

Revisions of the Batteries Regulation and the Packaging Regulation were recently adopted by the Legislator based on Commission's proposals that were supported by impact assessments. An evaluation cannot be carried out at this stage as too little time has passed, and too little practical experience was gained for a standard evaluation to be useful at this point in time.

- **Stakeholder consultations**

The staff working document accompanying this proposal provides more information on the various consultation activities that have been undertaken to support the preparation of this proposal. The key consultation activities are summarised below.

The following consultation activities have been carried out to prepare this omnibus proposal:

- A call for evidence¹⁰ for the environmental omnibus open for feedback from 22 July 2025 to 10 September 2025.
- A high-level roundtable on simplifying environmental laws on 2 October 2025.

The call for evidence on environmental simplification drew a lot of attention. The Commission published a call for evidence on the environmental simplification package on the Have-Your-Say website: [Simplification of administrative burdens in environmental legislation](#). The feedback period was from 22 July 2025 till 10 September 2025. All feedback is published on the Have-Your-Say website.

There were 190 998 contributions to the call for evidence, of which 189 751 (99.3%) came from citizens. 1 247 (0.7%) contributions came from organisations other than citizens, including businesses and business associations, non-governmental organisations (environmental and other), public authorities and academics. 622 attachments, mainly position papers, were attached to these submissions, which often included specific suggestions.

From a business perspective, there is support for less burdensome regulation that leaves business with flexibility to deliver both growth and sustainable production. There is a perception of administrative obligations that are too prescriptive, and do not provide value added.

On the side of civil society, there is support for a simplification that makes it easier to protect the environment and social standards and avoid deregulation, for example by removing redundancies and avoiding excessively detailed regulations. There is however concern that efforts to simplify regulations could undermine environmental protections. Citizens urged the EU to focus on enforcing existing laws rather than creating new simplifications.

The Commission is currently preparing an impact assessment to support the preparation of the Circular Economy Act in 2026. This assessment will utilise ongoing consultation activities that will also cover simplification of existing (waste and circular economy-related) legislation, and particularly EPR related legislation.

- **Collection and use of expertise**

The Commission contracted an external service provider to provide expertise related to this proposal. In particular, the contractor has screened the known body of environmental laws to identify reporting and other administrative obligations together with potential to simplify these obligations. In addition, the contractor has provided assistance in quantifying the reductions in costs of possible measures to simplify provisions in the omnibus package. All information provided by the contractor will be published.

- **Impact assessment**

An impact assessment has not been prepared primarily because the proposal is highly specific with little choice available to remedy the underlying issues. A staff working document does

¹⁰ [Simplification of administrative burdens in environmental legislation](#)

however accompany this proposal. It justifies the content of the proposal and presents quantitative information about the expected impacts. It also presents the views and inputs of stakeholders which the Commission has received.

- **Regulatory fitness and simplification**

Under the regulatory fitness and performance programme (REFIT), the Commission ensures that its legislation is fit for purpose, targeted to the needs of stakeholders, and minimises burdens while achieving its objectives. This proposal is therefore part of, and fully coherent with, the REFIT programme in so far as it attempts to simplify administrative procedures related to the appointment of authorised representatives for extended producer responsibility and reduce unnecessary costs for producers.

- **Fundamental rights**

The proposal has no adverse impact on fundamental rights as enshrined in the EU Charter of Fundamental Rights as it solely impacts the appointment of an authorised representative for extended producer responsibility.

4. BUDGETARY IMPLICATIONS

Not applicable.

5. OTHER ELEMENTS

- **Implementation plans and monitoring, evaluation and reporting arrangements**

Given the very specific nature of the proposal, there is no need for implementation plans to guide the application of the new provisions. Existing monitoring and reporting provisions in the affected Regulation will continue.

- **Explanatory documents (for directives)**

Not applicable.

- **Detailed explanation of the specific provisions of the proposal**

Article 1 suspends the application of Article 56(3) of Regulation (EU) 2023/1542 until January 2035.

Article 2 suspends the application of Article 45(3) of Regulation (EU) 2025/40 until January 2035.

Proposal for a

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suspending the application of the rules on the appointment of an authorised representative for extended producer responsibility for batteries and waste batteries and packaging and packaging waste

(Text with EEA relevance)

THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty on the Functioning of the European Union, and in particular Articles 192(1) and 114 thereof,

Having regard to the proposal from the European Commission,

After transmission of the draft legislative act to the national parliaments,

Having regard to the opinion of the European Economic and Social Committee¹,

Having regard to the opinion of the Committee of the Regions²,

Acting in accordance with the ordinary legislative procedure,

Whereas:

- (1) The political guidelines for the Commission's 2024-2029 term³ point to the goal of simplifying, consolidating and codifying legislation to eliminate any overlaps and contradictions while maintaining high standards and staying the course on the goals set out in the European Green Deal.
- (2) In its Communication entitled 'A simpler and faster Europe: Communication on implementation and simplification',⁴ the European Commission set out a vision for an implementation and simplification agenda that delivers fast and visible improvements for people and business on the ground. That requires more than an incremental approach and the Union is to take bold action to achieve that goal. The European Parliament, the Council, the Commission, the Member States' authorities at all levels and stakeholders need to work together to streamline and simplify Union, national and regional rules and implement policies more effectively.

¹ OJ C , , p. .

² OJ C , , p. .

³ Europe's Choice, Political Guidelines for the next European Commission 2024–2029, Ursula von der Leyen.

⁴ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions of 11 February 2025, 'A simpler and faster Europe: Communication on implementation and simplification', COM/2025/47 final.

- (3) In its Communication on a Strategy for the Single Market⁵, the Commission identified as a barrier to the internal market that businesses face inconsistent national regulations which make it harder to sell, scale or move goods and services across borders. The Commission committed to focus on the ten most harmful barriers as a priority. The Communication identified certain features of extended producer responsibility schemes as one of the barriers most frequently reported by companies operating cross-border in the Union. While extended producer responsibility schemes are derived from Union legislation, a lack of uniformity of principles and requirements has led to a large diversity of extended producer responsibility schemes set up in Member States as well as to regulatory complexity and high administrative burden for companies. This Regulation is a first stepping stone to more profound simplification of the extended producer responsibility schemes in the area of waste, while the upcoming Circular Economy act should provide for further simplification.
- (4) In particular, due to that lack of harmonisation, in particular regarding the current provisions in sectoral legislation for the appointment of an authorised representative for extended producer responsibility, the fulfilment of the obligations related to the appointment may result in an unnecessary administrative burden on producers operating in multiple Member States where they are not established. Particularly for small and medium-sized enterprises, the obligation to appoint authorised representatives separately in every Member State where the producer places products on the market poses a significant challenge in terms of costs. With a view to ensuring equal conditions for producers established in the Union, it is important that producers are subject to the same rules in all Member States for appointing an authorised representative for extended producer responsibility. The currently fragmented legal framework for different products and the administrative burden associated with fulfilling the requirement to appoint an authorised representative for extended producer responsibility in up to 26 Member States is hampering the competitiveness of producers established in the Union. It is thus crucial to harmonise the existing rules effectively and promptly, reducing the associated burdens on such producers. To this effect, the Commission is currently reviewing the effectiveness, the administrative burden and the unintended barriers for the internal market, of the obligation to appoint authorised representatives as a safeguard for the producers' compliance with the 'polluter pays' principle. This review is likely to lead to alternative solutions which are more effective and less burdensome.
- (5) With a view to simplifying requirements on producers, and reducing the administrative burden, battery producers and producers of packaging or packaged products ('packaging producers') should be able to choose whether they appoint an authorised representative for extended producer responsibility when making available products on the market of another Member State where they are not established, but the appointment should not be mandatory. This allows those producers who have already appointed an authorised representative for extended producer responsibility to retain their existing arrangements, while immediately alleviating the costs and administrative burden for producers who wish to not appoint an authorised representative for extended producer responsibility.

⁵ Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions 'The Single Market: our European home market in an uncertain world A Strategy for making the Single Market simple, seamless and strong', COM(2025) 500 final.

- (6) Ensuring traceability and enforcement with regard to battery producers and packaging producers established in third countries is more challenging compared to those operating within the Union, as such producers fall outside the territorial scope of Member States' enforcement powers and are not covered by the Union administrative and judicial cooperation mechanisms that enable the enforcement of obligations and judgments within the internal market. The existing provisions on the appointment of an authorised representative for extended producer responsibility for producers established in third countries should therefore be maintained in their current form. Thus, the provision in Regulation (EU) 2025/40 of the European Parliament and of the Council⁶ which sets out that Member States may provide that producers established in third countries are to appoint an authorised representative for extended producer responsibility when making packaging or packaged products available on their territory for the first time should remain applicable. However, Member States should be allowed to ensure traceability and enforcement with regard to packaging producers established in third countries through alternative means. Similarly, the provision in Regulation (EU) 2023/1542 of the European Parliament and of the Council⁷ which sets out that battery producers that are established in the Union or in third countries and that are making available batteries within the territory of a Member State by means of distance contracts are to appoint an authorised representative should remain applicable to the extent that it covers producers established in third countries. However, Member States should be required to ensure traceability and enforcement with regard to battery producers established in third countries through alternative means.
- (7) The provision in Regulation (EU) 2023/1542 that makes the appointment of an authorised representative for extended producer responsibility for producers established in the Union and selling batteries by means of distance contracts directly to end-users in another Member State mandatory should be suspended until 1 January 2035.
- (8) The provision in Regulation (EU) 2025/40 that makes the appointment of an authorised representative for extended producer responsibility for producers established in the Union and making packaging or packaged products available for the first time on the territory of another Member State, directly to end users, mandatory should be suspended until 1 January 2035.
- (9) The Commission is preparing a legislative proposal for a comprehensive reform of the extended producer responsibility system. The proposal is expected to be tabled by the Commission, in accordance with its Work Programme, in 2026. The legislative proposal will be subject to the ordinary legislative procedure and, if adopted by the European Parliament and by the Council, the Member States and the producers will have to take the necessary measures to align their regulatory and organisational measures with regard to the extended producer responsibility, as well as their conduct to the new rules.

⁶ Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC (OJ L, 2025/40, 22.1.2025, ELI: <http://data.europa.eu/eli/reg/2025/40/oj>).

⁷ Regulation (EU) 2023/1542 of the European Parliament and of the Council of 12 July 2023 concerning batteries and waste batteries, amending Directive 2008/98/EC and Regulation (EU) 2019/1020 and repealing Directive 2006/66/EC OJ L 191, 28.7.2023, p. 1, ELI: <http://data.europa.eu/eli/reg/2023/1542/oj>).

- (10) Suspending the application of the requirement for battery producers and packaging producers established in one of the Member States to appoint authorised representatives for extended producer responsibility when making batteries or packaging or packaged products available in another Member State serves as a preliminary measure to immediately alleviate burdens for producers, paving the way for the implementation of a comprehensive reform of the extended producer responsibility system.
- (11) Since the objectives of this Regulation, namely to provide flexibility to producers established in the Union as to whether they appoint an authorised representative for extended producer responsibility, cannot be sufficiently achieved by the Member States but can rather, by reason of the scale and effects of the action, be better achieved at Union level, the Union may adopt measures, in accordance with the principle of subsidiarity as set out in Article 5 of the Treaty on European Union. In accordance with the principle of proportionality as set out in that Article, this Regulation does not go beyond what is necessary in order to achieve those objectives,

HAVE ADOPTED THIS REGULATION:

Article 1

Suspension of Article 56(3) of Regulation (EU) 2023/1542

The application of Article 56(3) of Regulation (EU) 2023/1542 shall be suspended until 1 January 2035.

As regards battery producers established in third countries, where Member States do not require the appointment of an authorised representative for extended producer responsibility, they shall ensure traceability and enforcement with regard to battery producers established in third countries through alternative means.

Article 2

Suspension of Article 45(3) of Regulation (EU) 2025/40

The application of Article 45(3) of Regulation (EU) 2025/40 shall be suspended until 1 January 2035.

Member States may either provide that producers established in third countries shall appoint, by written mandate, an authorised representative for the extended producer responsibility when making packaging or packaged products available on their territory for the first time or ensure traceability and enforcement with regard to packaging producers established in third countries through alternative means.

Article 3

Entry into force

This Regulation shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Brussels,

For the European Parliament
The President

For the Council
The President

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1. FRAMEWORK OF THE PROPOSAL/INITIATIVE

1.1. Title of the proposal/initiative

Proposal for a Regulation of the European Parliament and of the Council suspending the application of the rules on the appointment of an authorised representative for extended producer responsibility for batteries and waste batteries and packaging and packaging waste

1.2. Policy area(s) concerned

Environment
European Green Deal

1.3. Objective(s)

1.3.1. General objective(s)

The general objective pursued by this legislative proposal is to simplify elements of Regulations (EU) 2023/1542 and (EU) 2025/40 with regard to the appointment of an authorised representative for extended producer responsibility.

1.3.2. Specific objective(s)

By suspending the application of the provisions in Regulation (EU) 2023/1542 and (EU) 2025/40 that mandate the appointment of an authorised representative for extended producer responsibility for producers established in the Union, packaging and battery producers will be able to choose whether they appoint an authorised representative for extended producer responsibility when making available products on the market of another Member State where they are not established, but the appointment will not be mandatory. This allows those producers who have already appointed an authorised representative for extended producer responsibility to retain their existing arrangements, while immediately alleviating the costs and administrative burden for producers who wish to not appoint an authorised representative for extended producer responsibility.

Specify the effects which the proposal/initiative should have on the beneficiaries/groups targeted. The proposed suspension of the application of the mandatory appointment of an authorised representative for extended producer responsibility for producers established in the Union will alleviate administrative burden and costs from the producers of packaging and batteries. Especially SMEs will benefit from not having to appoint an authorised representative.

1.3.4. Indicators of performance

Specify the indicators for monitoring progress and achievements.

To monitor progress towards achieving the proposal's specific objectives, the Commission will explore the possibility of organising exchanges with Member States in different formats, including by using the existing fora.

1.4. The proposal/initiative relates to:

☐ a new action

- ☐ a new action following a pilot project / preparatory action¹⁸
- ☐ the extension of an existing action
- ☒ a merger or redirection of one or more actions towards another/a new action

1.5. Grounds for the proposal/initiative

1.5.1. Requirement(s) to be met in the short or long term including a detailed timeline for roll-out of the implementation of the initiative

The suspension should apply until 1 January 2035.

1.5.2. Added value of EU involvement (it may result from different factors, e.g. coordination gains, legal certainty, greater effectiveness or complementarities). For the purposes of this section 'added value of EU involvement' is the value resulting from EU action, that is additional to the value that would have been otherwise created by Member States alone.

The proposal will create a harmonised approach across sectoral legislation. To ensure uniform conditions for producers within the Union, it is essential that the same provisions are applied across Member States for appointing an authorised representative for extended producer responsibility. The existing fragmented legal framework for various products and the administrative challenges linked with appointing an authorised representative in up to 26 Member States are hindering the competitiveness of Union-based producers. It is necessary to efficiently and swiftly harmonise the current rules, thereby alleviating the burdens faced by these producers.

1.5.3. Lessons learned from similar experiences in the past

N/A

1.5.4. Compatibility with the multiannual financial framework and possible synergies with other appropriate instruments

N/A

1.5.5. Assessment of the different available financing options, including scope for redeployment

N/A

¹⁸ As referred to in Article 58(2), point (a) or (b) of the Financial Regulation.

1.6. Duration of the proposal/initiative and of its financial impact

☒ **limited duration**

- ☐ in effect from date of application to 1 January 2035
- ☐ financial impact from YYYY to YYYY for commitment appropriations and from YYYY to YYYY for payment appropriations.

unlimited duration

- Implementation with a start-up period from YYYY to YYYY,
- followed by full-scale operation.

1.7. Method(s) of budget implementation planned

☐ **Direct management** by the Commission

- ☐ by its departments, including by its staff in the Union delegations;
- ☐ by the executive agencies

☐ **Shared management** with the Member States

☐ **Indirect management** by entrusting budget implementation tasks to:

- ☐ third countries or the bodies they have designated
- ☐ international organisations and their agencies (to be specified)
- ☐ the European Investment Bank and the European Investment Fund
- ☐ bodies referred to in Articles 70 and 71 of the Financial Regulation
- ☐ public law bodies
- ☐ bodies governed by private law with a public service mission to the extent that they are provided with adequate financial guarantees
- ☐ bodies governed by the private law of a Member State that are entrusted with the implementation of a public-private partnership and that are provided with adequate financial guarantees
- ☐ bodies or persons entrusted with the implementation of specific actions in the common foreign and security policy pursuant to Title V of the Treaty on European Union, and identified in the relevant basic act
- ☐ bodies established in a Member State, governed by the private law of a Member State or Union law and eligible to be entrusted, in accordance with sector-specific rules, with the implementation of Union funds or budgetary guarantees, to the extent that such bodies are controlled by public law bodies or by bodies governed by private law with a public service mission, and are provided with adequate financial guarantees in the form of joint and several liability by the controlling bodies or equivalent financial guarantees and which may be, for each action, limited to the maximum amount of the Union support.

Comments

N/A

2. MANAGEMENT MEASURES

2.1. Monitoring and reporting rules

N/A

2.2. Management and control system(s)

2.2.1. *Justification of the budget implementation method(s), the funding implementation mechanism(s), the payment modalities and the control strategy proposed*

N/A

2.2.2. *Information concerning the risks identified and the internal control system(s) set up to mitigate them*

N/A

2.2.3. *Estimation and justification of the cost-effectiveness of the controls (ratio between the control costs and the value of the related funds managed), and assessment of the expected levels of risk of error (at payment & at closure)*

N/A

2.3. Measures to prevent fraud and irregularities

N/A

3. ESTIMATED FINANCIAL IMPACT OF THE PROPOSAL/INITIATIVE

3.1. Heading(s) of the multiannual financial framework and expenditure budget line(s) affected

- Existing budget lines

In order of multiannual financial framework headings and budget lines.

Heading of multiannual financial framework	Budget line	Type of expenditure	Contribution			
	Number	Diff./Non-diff. ¹⁹	from EFTA countries ²⁰	from candidate countries and potential candidates ²¹	From other third countries	other assigned revenue
	N/A	Diff./Non-diff.	YES/NO	YES/NO	YES/NO	YES/NO

- New budget lines requested

In order of multiannual financial framework headings and budget lines.

Heading of multiannual financial framework	Budget line	Type of expenditure	Contribution			
	Number	Diff./Non-diff.	from EFTA countries	from candidate countries and potential candidates	from other third countries	other assigned revenue
	N/A	Diff./Non-diff.	YES/NO	YES/NO	YES/NO	YES/NO

¹⁹ Diff. = Differentiated appropriations / Non-diff. = Non-differentiated appropriations.

²⁰ EFTA: European Free Trade Association.

²¹ Candidate countries and, where applicable, potential candidates from the Western Balkans.

3.2. Estimated financial impact of the proposal on appropriations

3.2.1. Summary of estimated impact on operational appropriations

- ☒ The proposal/initiative does not require the use of operational appropriations
- ☐ The proposal/initiative requires the use of operational appropriations, as explained below

3.2.1.1. Appropriations from voted budget

EUR million (to three decimal places)

Heading of multiannual financial framework		Number					
DG: <.....>			Year	Year	Year	Year	TOTAL MFF
			2024	2025	2026	2027	2021-2027
Operational appropriations							
Budget line	Commitments	(1a)					0.000
	Payments	(2a)					0.000
Budget line	Commitments	(1b)					0.000
	Payments	(2b)					0.000
Appropriations of an administrative nature financed from the envelope of specific programmes							
Budget line		(3)					0.000
TOTAL appropriations for DG <.....>	Commitments	=1a+1b+3	0.000	0.000	0.000	0.000	0.000
	Payments	=2a+2b+3	0.000	0.000	0.000	0.000	0.000
DG: <.....>			Year	Year	Year	Year	TOTAL MFF
			2024	2025	2026	2027	2021-2027
Operational appropriations							
Budget line	Commitments	(1a)					0.000
	Payments	(2a)					0.000
Budget line	Commitments	(1b)					0.000

Payments		(2b)					0.000
Appropriations of an administrative nature financed from the envelope of specific programmes							
Budget line		(3)					0.000
TOTAL appropriations for DG <.....>	Commitments	=1a+1b+3	0.000	0.000	0.000	0.000	0.000
	Payments	=2a+2b+3	0.000	0.000	0.000	0.000	0.000
			Year	Year	Year	Year	TOTAL MFF 2021-2027
			2024	2025	2026	2027	
TOTAL operational appropriations	Commitments	(4)	0.000	0.000	0.000	0.000	0.000
	Payments	(5)	0.000	0.000	0.000	0.000	0.000
TOTAL appropriations of an administrative nature financed from the envelope for specific programmes		(6)	0.000	0.000	0.000	0.000	0.000
TOTAL appropriations under HEADING <....> of the multiannual financial framework	Commitments	=4+6	0.000	0.000	0.000	0.000	0.000
	Payments	=5+6	0.000	0.000	0.000	0.000	0.000

Heading of multiannual financial framework	Number	
---	--------	--

DG: <.....>			Year 2024	Year 2025	Year 2026	Year 2027	TOTAL MFF 2021-2027
Operational appropriations							
Budget line	Commitments	(1a)					0.000
	Payments	(2a)					0.000
Budget line	Commitments	(1b)					0.000

	Payments	(2b)					0.000
Appropriations of an administrative nature financed from the envelope of specific programmes							
Budget line		(3)					0.000
TOTAL appropriations for DG <.....>	Commitments	=1a+1b +3	0.000	0.000	0.000	0.000	0.000
	Payments	=2a+2b+3	0.000	0.000	0.000	0.000	0.000

DG: <.....>			Year 2024	Year 2025	Year 2026	Year 2027	TOTAL MFF 2021-2027
Operational appropriations							
Budget line	Commitments	(1a)					0.000
	Payments	(2a)					0.000
Budget line	Commitments	(1b)					0.000
	Payments	(2b)					0.000
Appropriations of an administrative nature financed from the envelope of specific programmes							
Budget line		(3)					0.000
TOTAL appropriations for DG <.....>	Commitments	=1a+1b +3	0.000	0.000	0.000	0.000	0.000
	Payments	=2a+2b+3	0.000	0.000	0.000	0.000	0.000

			Year 2024	Year 2025	Year 2026	Year 2027	TOTAL MFF 2021-2027
TOTAL operational appropriations	Commitments	(4)	0.000	0.000	0.000	0.000	0.000
	Payments	(5)	0.000	0.000	0.000	0.000	0.000
TOTAL appropriations of an administrative nature financed from the envelope for specific programmes		(6)	0.000	0.000	0.000	0.000	0.000

TOTAL appropriations under HEADING <....> of the multiannual financial framework	Commitments	=4+6	0.000	0.000	0.000	0.000	0.000
	Payments	=5+6	0.000	0.000	0.000	0.000	0.000
			Year 2024	Year 2025	Year 2026	Year 2027	TOTAL MFF 2021-2027
• TOTAL operational appropriations (all operational headings)	Commitments	(4)	0.000	0.000	0.000	0.000	0.000
	Payments	(5)	0.000	0.000	0.000	0.000	0.000
• TOTAL appropriations of an administrative nature financed from the envelope for specific programmes (all operational headings)		(6)	0.000	0.000	0.000	0.000	0.000
TOTAL appropriations Under Heading 1 to 6 of the multiannual financial framework (Reference amount)	Commitments	=4+6	0.000	0.000	0.000	0.000	0.000
	Payments	=5+6	0.000	0.000	0.000	0.000	0.000

Heading of multiannual financial framework	7	‘Administrative expenditure’					
DG: <.....>			Year 2024	Year 2025	Year 2026	Year 2027	TOTAL MFF 2021- 2027
• Human resources			0.000	0.000	0.000	0.000	0.000
• Other administrative expenditure			0.000	0.000	0.000	0.000	0.000
TOTAL DG <.....>	Appropriations		0.000	0.000	0.000	0.000	0.000

DG: <.....>			Year 2024	Year 2025	Year 2026	Year 2027	TOTAL MFF 2021- 2027
• Human resources			0.000	0.000	0.000	0.000	0.000
• Other administrative expenditure			0.000	0.000	0.000	0.000	0.000

TOTAL DG <.....>	Appropriations	0.000	0.000	0.000	0.000	0.000
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TOTAL appropriations under HEADING 7 of the multiannual financial framework	(Total commitments = Total payments)	0.000	0.000	0.000	0.000	0.000
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EUR million (to three decimal places)

		Year 2024	Year 2025	Year 2026	Year 2027	TOTAL MFF 2021-2027
TOTAL appropriations under HEADINGS 1 to 7	Commitments	0.000	0.000	0.000	0.000	0.000
of the multiannual financial framework	Payments	0.000	0.000	0.000	0.000	0.000

3.2.1.2. Appropriations from external assigned revenues

EUR million (to three decimal places)

Heading of multiannual financial framework	Number	
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DG: <.....>			Year 2024	Year 2025	Year 2026	Year 2027	TOTAL MFF 2021-2027
Operational appropriations							
Budget line	Commitments	(1a)					0.000
	Payments	(2a)					0.000
Budget line	Commitments	(1b)					0.000
	Payments	(2b)					0.000
Appropriations of an administrative nature financed from the envelope of specific programmes							
Budget line		(3)					0.000
TOTAL appropriations	Commitments	=1a+1b+3	0.000	0.000	0.000	0.000	0.000

for DG <.....>		Payments	=2a+2b+3	0.000	0.000	0.000	0.000	0.000
DG: <.....>				Year	Year	Year	Year	TOTAL MFF
				2024	2025	2026	2027	2021-2027
Operational appropriations								
Budget line	Commitments	(1a)						0.000
	Payments	(2a)						0.000
Budget line	Commitments	(1b)						0.000
	Payments	(2b)						0.000
Appropriations of an administrative nature financed from the envelope of specific programmes								
Budget line		(3)						0.000
TOTAL appropriations for DG <.....>	Commitments	=1a+1b+3	0.000	0.000	0.000	0.000	0.000	0.000
	Payments	=2a+2b+3	0.000	0.000	0.000	0.000	0.000	0.000
				Year	Year	Year	Year	TOTAL MFF
				2024	2025	2026	2027	2021-2027
TOTAL operational appropriations	Commitments	(4)	0.000	0.000	0.000	0.000	0.000	0.000
	Payments	(5)	0.000	0.000	0.000	0.000	0.000	0.000
TOTAL appropriations of an administrative nature financed from the envelope for specific programmes		(6)	0.000	0.000	0.000	0.000	0.000	0.000
TOTAL appropriations under HEADING <....> of the multiannual financial framework	Commitments	=4+6	0.000	0.000	0.000	0.000	0.000	0.000
	Payments	=5+6	0.000	0.000	0.000	0.000	0.000	0.000
Heading of multiannual financial framework		Number						
DG: <.....>				Year	Year	Year	Year	TOTAL MFF

			2024	2025	2026	2027	2021-2027
Operational appropriations							
Budget line	Commitments	(1a)					0.000
	Payments	(2a)					0.000
Budget line	Commitments	(1b)					0.000
	Payments	(2b)					0.000
Appropriations of an administrative nature financed from the envelope of specific programmes							
Budget line		(3)					0.000
TOTAL appropriations for DG <.....>	Commitments	=1a+1b+3	0.000	0.000	0.000	0.000	0.000
	Payments	=2a+2b+3	0.000	0.000	0.000	0.000	0.000
DG: <.....>			Year	Year	Year	Year	TOTAL MFF 2021-2027
			2024	2025	2026	2027	
Operational appropriations							
Budget line	Commitments	(1a)					0.000
	Payments	(2a)					0.000
Budget line	Commitments	(1b)					0.000
	Payments	(2b)					0.000
Appropriations of an administrative nature financed from the envelope of specific programmes							
Budget line		(3)					0.000
TOTAL appropriations for DG <.....>	Commitments	=1a+1b+3	0.000	0.000	0.000	0.000	0.000
	Payments	=2a+2b+3	0.000	0.000	0.000	0.000	0.000
			Year	Year	Year	Year	TOTAL MFF 2021-2027
			2024	2025	2026	2027	
TOTAL operational appropriations	Commitments	(4)	0.000	0.000	0.000	0.000	0.000
	Payments	(5)	0.000	0.000	0.000	0.000	0.000

TOTAL appropriations of an administrative nature financed from the envelope for specific programmes		(6)	0.000	0.000	0.000	0.000	0.000
TOTAL appropriations under HEADING <....> of the multiannual financial framework	Commitments	=4+6	0.000	0.000	0.000	0.000	0.000
	Payments	=5+6	0.000	0.000	0.000	0.000	0.000
			Year 2024	Year 2025	Year 2026	Year 2027	TOTAL MFF 2021-2027
• TOTAL operational appropriations (all operational headings)	Commitments	(4)	0.000	0.000	0.000	0.000	0.000
	Payments	(5)	0.000	0.000	0.000	0.000	0.000
• TOTAL appropriations of an administrative nature financed from the envelope for specific programmes (all operational headings)		(6)	0.000	0.000	0.000	0.000	0.000
TOTAL appropriations under Headings 1 to 6 of the multiannual financial framework (Reference amount)	Commitments	=4+6	0.000	0.000	0.000	0.000	0.000
	Payments	=5+6	0.000	0.000	0.000	0.000	0.000

Heading of multiannual financial framework	7	‘Administrative expenditure’
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EUR million (to three decimal places)

DG: <.....>		Year 2024	Year 2025	Year 2026	Year 2027	TOTAL MFF 2021- 2027
• Human resources		0.000	0.000	0.000	0.000	0.000
• Other administrative expenditure		0.000	0.000	0.000	0.000	0.000
TOTAL DG <.....>	Appropriations	0.000	0.000	0.000	0.000	0.000

DG: <.....>		Year 2024	Year 2025	Year 2026	Year 2027	TOTAL MFF 2021- 2027
• Human resources		0.000	0.000	0.000	0.000	0.000
• Other administrative expenditure		0.000	0.000	0.000	0.000	0.000
TOTAL DG <.....>	Appropriations	0.000	0.000	0.000	0.000	0.000

TOTAL appropriations under HEADING 7 of the multiannual financial framework	(Total commitments = Total payments)	0.000	0.000	0.000	0.000	0.000
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EUR million (to three decimal places)

		Year 2024	Year 2025	Year 2026	Year 2027	TOTAL MFF 2021-2027
TOTAL appropriations under HEADINGS 1 to 7	Commitments	0.000	0.000	0.000	0.000	0.000
of the multiannual financial framework	Payments	0.000	0.000	0.000	0.000	0.000

3.2.2. Estimated output funded from operational appropriations (not to be completed for decentralised agencies)

Commitment appropriations in EUR million (to three decimal places)

Indicate objectives and outputs ↓			Year 2024		Year 2025		Year 2026		Year 2027		Enter as many years as necessary to show the duration of the impact (see Section1.6)						TOTAL	
	OUTPUTS																	
	Type ²²	Average cost	No	Cost	No	Cost	No	Cost	No	Cost	No	Cost	No	Cost	No	Cost	Total No	Total cost

²²

Outputs are products and services to be supplied (e.g. number of student exchanges financed, number of km of roads built, etc.).

SPECIFIC OBJECTIVE No 1 ²³ ...																	
- Output																	
- Output																	
- Output																	
Subtotal for specific objective No 1																	
SPECIFIC OBJECTIVE No 2 ...																	
- Output																	
Subtotal for specific objective No 2																	
TOTALS																	

²³ As described in Section 1.3.2. ‘Specific objective(s)’

3.2.3. Summary of estimated impact on administrative appropriations

- ☒ The proposal/initiative does not require the use of appropriations of an administrative nature
- ☐ The proposal/initiative requires the use of appropriations of an administrative nature, as explained below

3.2.3.1. Appropriations from voted budget

VOTED APPROPRIATIONS	Year	Year	Year	Year	TOTAL 2021 - 2027
	2024	2025	2026	2027	
HEADING 7					
Human resources	0.000	0.000	0.000	0.000	0.000
Other administrative expenditure	0.000	0.000	0.000	0.000	0.000
Subtotal HEADING 7	0.000	0.000	0.000	0.000	0.000
Outside HEADING 7					
Human resources	0.000	0.000	0.000	0.000	0.000
Other expenditure of an administrative nature	0.000	0.000	0.000	0.000	0.000
Subtotal outside HEADING 7	0.000	0.000	0.000	0.000	0.000
TOTAL	0.000	0.000	0.000	0.000	0.000

3.2.3.2. Appropriations from external assigned revenues

EXTERNAL ASSIGNED REVENUES	Year	Year	Year	Year	TOTAL
	2024	2025	2026	2027	2021 - 2027
HEADING 7					
Human resources	0.000	0.000	0.000	0.000	0.000
Other administrative expenditure	0.000	0.000	0.000	0.000	0.000
Subtotal HEADING 7	0.000	0.000	0.000	0.000	0.000
Outside HEADING 7					
Human resources	0.000	0.000	0.000	0.000	0.000
Other expenditure of an administrative nature	0.000	0.000	0.000	0.000	0.000
Subtotal outside HEADING 7	0.000	0.000	0.000	0.000	0.000
TOTAL	0.000	0.000	0.000	0.000	0.000

3.2.3.3. Total appropriations

TOTAL VOTED APPROPRIATIONS + EXTERNAL ASSIGNED REVENUES	Year 2024	Year 2025	Year 2026	Year 2027	TOTAL 2021 - 2027
HEADING 7					
Human resources	0.000	0.000	0.000	0.000	0.000
Other administrative expenditure	0.000	0.000	0.000	0.000	0.000
Subtotal HEADING 7	0.000	0.000	0.000	0.000	0.000
Outside HEADING 7					
Human resources	0.000	0.000	0.000	0.000	0.000

Other expenditure of an administrative nature	0.000	0.000	0.000	0.000	0.000
Subtotal outside HEADING 7	0.000	0.000	0.000	0.000	0.000
TOTAL	0.000	0.000	0.000	0.000	0.000

The appropriations required for human resources and other expenditure of an administrative nature will be met by appropriations from the DG that are already assigned to management of the action and/or have been redeployed within the DG, together, if necessary, with any additional allocation which may be granted to the managing DG under the annual allocation procedure and in the light of budgetary constraints.

3.2.4. Estimated requirements of human resources

- ☒ The proposal/initiative does not require the use of human resources
- ☐ The proposal/initiative requires the use of human resources, as explained below

3.2.4.1. Financed from voted budget

Estimate to be expressed in full-time equivalent units (FTEs)

VOTED APPROPRIATIONS		Year 2024	Year 2025	Year 2026	Year 2027
• Establishment plan posts (officials and temporary staff)					
20 01 02 01 (Headquarters and Commission's Representation Offices)		0	0	0	0
20 01 02 03 (EU Delegations)		0	0	0	0
01 01 01 01 (Indirect research)		0	0	0	0
01 01 01 11 (Direct research)		0	0	0	0
Other budget lines (specify)		0	0	0	0
• External staff (inFTEs)					
20 02 01 (AC, END from the 'global envelope')		0	0	0	0
20 02 03 (AC, AL, END and JPD in the EU Delegations)		0	0	0	0
Admin. Support line [XX.01.YY.YY]	- at Headquarters	0	0	0	0
	- in EU Delegations	0	0	0	0
01 01 01 02 (AC, END - Indirect research)		0	0	0	0
01 01 01 12 (AC, END - Direct research)		0	0	0	0
Other budget lines (specify) - Heading 7		0	0	0	0
Other budget lines (specify) - Outside Heading 7		0	0	0	0
TOTAL		0	0	0	0

3.2.4.2. Financed from external assigned revenues

EXTERNAL ASSIGNED REVENUES		Year 2024	Year 2025	Year 2026	Year 2027
• Establishment plan posts (officials and temporary staff)					
20 01 02 01 (Headquarters and Commission's Representation Offices)		0	0	0	0
20 01 02 03 (EU Delegations)		0	0	0	0
01 01 01 01 (Indirect research)		0	0	0	0
01 01 01 11 (Direct research)		0	0	0	0

Other budget lines (specify)		0	0	0	0
• External staff (in full time equivalent units)					
20 02 01 (AC, END from the ‘global envelope’)		0	0	0	0
20 02 03 (AC, AL, END and JPD in the EU Delegations)		0	0	0	0
Admin. Support line [XX.01.YY.YY]	- at Headquarters	0	0	0	0
	- in EU Delegations	0	0	0	0
01 01 01 02 (AC, END - Indirect research)		0	0	0	0
01 01 01 12 (AC, END - Direct research)		0	0	0	0
Other budget lines (specify) - Heading 7		0	0	0	0
Other budget lines (specify) - Outside Heading 7		0	0	0	0
TOTAL		0	0	0	0

3.2.4.3. Total requirements of human resources

TOTAL VOTED APPROPRIATIONS + EXTERNAL ASSIGNED REVENUES		Year 2024	Year 2025	Year 2026	Year 2027
• Establishment plan posts (officials and temporary staff)					
20 01 02 01 (Headquarters and Commission’s Representation Offices)		0	0	0	0
20 01 02 03 (EU Delegations)		0	0	0	0
01 01 01 01 (Indirect research)		0	0	0	0
01 01 01 11 (Direct research)		0	0	0	0
Other budget lines (specify)		0	0	0	0
• External staff (in full time equivalent units)					
20 02 01 (AC, END from the ‘global envelope’)		0	0	0	0
20 02 03 (AC, AL, END and JPD in the EU Delegations)		0	0	0	0
Admin. Support line [XX.01.YY.YY]	- at Headquarters	0	0	0	0
	- in EU Delegations	0	0	0	0
01 01 01 02 (AC, END - Indirect research)		0	0	0	0
01 01 01 12 (AC, END - Direct research)		0	0	0	0
Other budget lines (specify) - Heading 7		0	0	0	0
Other budget lines (specify) - Outside Heading 7		0	0	0	0
TOTAL		0	0	0	0

The staff required to implement the proposal (in FTEs): N/A

	To be covered by current staff available in the Commission services	Exceptional additional staff*		
		To be financed under Heading 7 or Research	To be financed from BA line	To be financed from fees
Establishment plan posts			N/A	

External staff (CA, SNEs, INT)				
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Description of tasks to be carried out by:

Officials and temporary staff	
External staff	

3.2.5. Overview of estimated impact on digital technology-related investments

Compulsory: the best estimate of the digital technology-related investments entailed by the proposal/initiative should be included in the table below.

Exceptionally, when required for the implementation of the proposal/initiative, the appropriations under Heading 7 should be presented in the designated line.

The appropriations under Headings 1-6 should be reflected as “Policy IT expenditure on operational programmes”. This expenditure refers to the operational budget to be used to re-use/ buy/ develop IT platforms/ tools directly linked to the implementation of the initiative and their associated investments (e.g. licences, studies, data storage etc). The information provided in this table should be consistent with details presented under Section 4 “Digital dimensions”.

TOTAL Digital and IT appropriations	Year 2024	Year 2025	Year 2026	Year 2027	TOTAL MFF 2021 - 2027
HEADING 7					
IT expenditure (corporate)	0.000	0.000	0.000	0.000	0.000
Subtotal HEADING 7	0.000	0.000	0.000	0.000	0.000
Outside HEADING 7					
Policy IT expenditure on operational programmes	0.000	0.000	0.000	0.000	0.000
Subtotal outside HEADING 7	0.000	0.000	0.000	0.000	0.000
TOTAL	0.000	0.000	0.000	0.000	0.000

3.2.6. Compatibility with the current multiannual financial framework

The proposal/initiative:

- ☐ can be fully financed through redeployment within the relevant heading of the multiannual financial framework (MFF)
- ☐ requires use of the unallocated margin under the relevant heading of the MFF and/or use of the special instruments as defined in the MFF Regulation
- ☐ requires a revision of the MFF

3.2.7. Third-party contributions

The proposal/initiative:

- ☐ does not provide for co-financing by third parties
- ☐ provides for the co-financing by third parties estimated below:

Appropriations in EUR million (to three decimal places)

	Year 2024	Year 2025	Year 2026	Year 2027	Total
Specify the co-financing body					
TOTAL appropriations co-financed					

3.3. Estimated impact on revenue

- ☒ The proposal/initiative has no financial impact on revenue.
- ☐ The proposal/initiative has the following financial impact:
 - ☐ on own resources
 - ☐ on other revenue
 - ☐ please indicate, if the revenue is assigned to expenditure lines

EUR million (to three decimal places)

Budget revenue line:	Appropriations available for the current financial year	Impact of the proposal/initiative ²⁴			
		Year 2024	Year 2025	Year 2026	Year 2027
Article					

For assigned revenue, specify the budget expenditure line(s) affected.

Other remarks (e.g. method/formula used for calculating the impact on revenue or any other information).

N/A

4. DIGITAL DIMENSIONS

4.1. Requirements of digital relevance

[Requirement 1 (R1): ...]

[Requirement 2 (R2): ...]

Please insert as many requirement lines as needed and identify each requirement distinctly (like R1, R2, etc.) to ease cross-referencing in the following sections.

4.2. Data

²⁴ As regards traditional own resources (customs duties, sugar levies), the amounts indicated must be net amounts, i.e. gross amounts after deduction of 20% for collection costs.

4.3. Digital solutions

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4.4. *Interoperability assessment*

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4.5. Measures to support digital implementation

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