

European Association of Service providers  
for Persons with Disabilities

## EASPD's contribution

to the Proposal for a regulation - COM(2025)565

REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security for the period 2028-2034 and amending Regulation (EU) 2023/955 and Regulation (EU, Euratom) 2024/2509

## European Commission Public Consultation

November 2025

The European Association of Service providers for Persons with Disabilities (EASPD) is the leading voice of disability services across Europe. Representing over 20,000 services in 50 different countries, we promote human rights and equal opportunities for people with disabilities through effective and high-quality support. Our work focuses on key areas essential to quality support provision. This includes inclusive living, employment, education, early childhood intervention, person-centred technology, workforce development and human resources, arts, culture & sport, and policy impact.

This contribution is primarily based on the [joint statement](#) “100 Billion for Social Spending? The Devil’s in the Details”, which assesses the EU’s funding proposal with a particular focus on the **National and Regional Partnership Plans (NRPP) Regulation**. The statement was coordinated by EASPD and supported by over 50 organisations representing civil society, social economy actors, social services, organisations active in education, training and youth, and trade unions. Together, we call for stronger safeguards, dedicated social funding, and the empowerment of local actors to ensure that the EU’s social ambitions translate into tangible impact on the ground.

Our analysis builds on [8 success factors](#) that have made the European Social Fund Plus (ESF+) an effective tool to address local needs and foster collaboration between public authorities, civil society, and the disability support sector to advance social inclusion. Among the main concerns:

- **The centralisation of funding** for social action, infrastructure, home, border and migration policies, fisheries, agriculture, and climate under national frameworks, which risks:
  - Weakening regional participation and civil society involvement;
  - Undermining the partnership principle through broader and less targeted negotiations;
  - Prioritising political will over human rights-based action and commitments;

- Favouring large-scale infrastructure investments over smaller, local, and innovative initiatives, thus penalising smaller beneficiaries.
- **The downgrading of the ESF+** from a stand-alone fund with a dedicated budget line and governance structure to a general “social spending” target of 14%, which:
  - Represents a *de facto* reduction compared to the current budget when inflation and infrastructure spending are considered;
  - Features weaker regulation, mainly integrated into the NRP framework;
  - Removes earmarking for social inclusion, child poverty, and material deprivation, eliminating guaranteed investments for excluded or disadvantaged groups.
- **The removal of enabling conditions**, which previously ensured that Member States had effective strategies and safeguards in place before EU funds were disbursed, leaving investments less accountable and potentially less effective.

Based on this assessment, that you can read in section 1 of this document, we urge the European Commission and Member States to:

- **Keep the ESF+ as a stand-alone and stronger fund**, with a dedicated budget line ensuring that the EU’s commitment to people remains a top priority, with safeguarded funding for social inclusion, the fight against child poverty, and support for those most at risk of material deprivation;
- **Strengthen binding safeguards and monitoring mechanisms** linking investments to EU-wide social policy objectives;
- **Empower regional and local actors, including civil society and social economy** through meaningful partnerships, and capacity building.

EASPD, as a member of the [Social Platform](#), supports its Position Paper on the EU budget submitted in response to this consultation. EASPD also joins [Care Alliance's call](#) to incorporate the ambitions of the European Care Strategy into the new budget through a set of specific tracking and performance indicators aligned with the Strategy’s objectives; a clear reference to the European Care Strategy in Annexe VI of the NRP regulation; and explicitly mention the European Care Strategy in Article 5 of the European Social Fund Plus regulation

Section 2 presents content focused on **social services and disability support**, with an emphasis on accessibility, inclusion, and social objectives. We identified gaps in the NRPs social objectives, such as limited attention to inclusive education, social protection, work–life balance, and support for marginalised groups. The section also provides concrete recommendations to strengthen accessibility, mainstream disability inclusion, broaden social goals, and ensure minimum funding levels for key social priorities.

## 1. Joint Statement: 100 Billion for Social Spending? The Devil’s in the Details

In September 2025, the President of the European Commission, Ursula von der Leyen, announced the ambition to “help eradicate poverty by 2050”. This continues the commitment made in 2021, when the EU pledged to lift 15 million people out of poverty by 2030, reducing the number from 94.2 million at risk in 2019. Reaching the 2030 target would mark important progress; achieving the 2050 ambition would mean ensuring that **no one in Europe is left in poverty within a generation**.

This is exactly the type of ambitious vision Europe needs. But ambition alone is not enough: it must be matched with the **right mix of policies, coordinated action, and sufficient funding at all levels** to turn this vision into reality. Over the years, the EU budget has been a crucial tool for helping policymakers promote economic development and tackle poverty and social exclusion. The **European Social Fund (ESF)**, in particular, has been a cornerstone of EU investment that has addressed territorial disparities, responded to local needs, and supported innovation and reforms, always in partnership with **local stakeholders, social partners, civil society, and the social economy**.

The Commission has proposed a new Multiannual Financial Framework 2028-2034 in July 2025 which introduces **technical improvements** such as fewer and more harmonised regulations, simplified monitoring, and greater flexibility, opening up opportunities for cross-sectoral reforms. A significant development is the proposal to create the **National and Regional Partnership (NRP) Plans** which bring together, inter alia, the European Social Fund + (ESF+), European Regional Development Fund (ERDF), and Common Agricultural Policies (CAP), and asylum, migration and integration, and border management under single national frameworks. The Plans are established under the [NRPP Regulation](#), which also includes EU Facility and Interreg funds for crisis response and transnational cooperation.

Our **coalition** brings together European networks of social services, NGOs, public service providers, trade unions, lifelong learning actors, and social economy actors to help the EU budget to meet the EU social targets. In **March 2025**, we led the “[Time for Ambition: A Strengthened ESF+ in the Next EU Budget](#)” statement endorsed by over **250 EU and national organisations**, calling on reinforcing ESF+ as the backbone of social investment in Europe. Later, in **July 2025**, we rallied behind the “[Keep What Works: 8 Success Factors for a Future ESF+](#)”

statement, co-signed by **60 EU networks**, reinforcing the need to preserve ESF+’s proven strengths in any new financial architecture.

It is in this context that the Coalition has assessed the European Commission’s recent proposal for the next long-term EU budget, based on these 8 success factors, with a specific **focus on the NRP Plans** – the primary instrument with direct impact on poverty reduction and social policy objectives. This analysis also addresses the monitoring framework, which tracks progress towards the social target. Other programmes will also play a role, especially if they too align with these success factors.

Overall, the NRPP and related instruments, as currently designed, risk being a **step backwards compared to the existing Cohesion Policy framework**. This is particularly concerning in light of the proposed financial envelope: the **€100 billion guaranteed for social spending** could appear, at first glance, to be an increase. Yet in practice, it represents **less in real terms** once inflation is considered, and it would need to cover not only “traditional” ESF+ investments, which had a budget of **€95.8 billion in the current period**, but also additional areas under its social target.

Concretely, the proposal represents a **shift away from the guarantees that previously protected investment in people**. There is **no longer a dedicated budget line** for the European Social Fund, **no earmarking for social inclusion**, and **no binding direction on how Member States should allocate their social spending, and no more direct connections between the regions’ Managing Authorities and the European Commission**. Provisions that once secured social funding, such as the 25% minimum for social inclusion or the 5% for the Child Guarantee, and 3% material deprivation measures are not maintained. **The 14% target is spread across many different priorities, and up to 40% of infrastructure investments (such as schools, hospitals, or housing) can be counted towards it. These costs were previously covered by the ERDF, not the ESF, which means that the actual guaranteed resources available for direct investment in people and social inclusion will be even smaller.** This creates the risk of having to **achieve more with fewer resources**, without clear safeguards to ensure that those most in need will benefit, at a time when many social actors continue to face chronic underfunding.

As it stands, funding for social rights, local initiatives, and social inclusion risk becoming **weaker, more fragmented, and dependent on the immediate priorities of national governments** rather than protected by EU-wide rules. In this new framework, the role and consultation of **key contributors to local vitality**, such as social services and social economy actors, is less visible. While the proposal maintains a reference to the partnership principle, the **stronger focus on centralised planning** may limit the influence of public authorities and civil society at regional

level. In the past regional planning, allowed ESF+ to respond to regional and local social needs, which was one of its key success factors. While closer coordination between the various funds is certainly beneficial, the proposal provides no clear budgetary guidelines on how much funding should be allocated to each priority. This creates a substantial risk that **Member States might increasingly use EU funds to cover their own budget gaps, with social priorities determined more by national political will than by enforceable EU safeguards or locally defined needs.**

At the same time, the framework is not inherently limiting. Member States with a commitment to social inclusion could use this flexibility to go far beyond the 14% target, mobilising additional resources, engaging local actors, and achieving transformative impacts for communities. **The problem lies in the absence of binding safeguards: those unwilling to prioritise social investment can still do the bare minimum, leaving vulnerable populations at risk.**

Taken together, the EU Commission's proposals thus raise serious concerns about its capacity to deliver on its social ambitions. **The European Pillar of Social Rights cannot be fully realised with diluted funding, weak safeguards, and diminished local empowerment.**

At present, the proposal could **leave behind the people and communities** the EU has pledged to support. Yet, with **targeted adjustments**, it has the potential to **strengthen social rights, reduce inequalities, and reinforce Europe's social and territorial cohesion**, and progresses toward the 2030 and 2050 poverty reduction targets. To achieve this so, it must **increase and not dilute its social spending**, safeguard **dedicated funding for social inclusion and child poverty**, strengthen **binding safeguards and monitoring** linking investments to broader EU policy objectives, and **empower local and regional actors**. With these adjustments, the next financial framework can reduce inequalities, protect vulnerable populations, and make Europe fairer and more inclusive.

Below we present our analysis of the current budget, based on the proven success factors of the ESF+.

### Assessment of the European Commission Social Spending Proposals

- **Green** = Strong alignment with the success factor / adequate support in the proposal
- **Orange** = Partial alignment with the success factor / some weaknesses in the proposal
- **Red** = Weak alignment with the success factor / significant gaps in the proposal

**Success factor 1: Guaranteed funding for delivering on Europe’s quality jobs, skills, and social targets and policies**, as highlighted in the European Pillar of Social Rights.

**Assessment:** ● Red

**Rationale:** There is no specific budget allocated for the ESF, unlike in previous editions. Instead, a **minimum allocation for social objectives** is calculated as **14% of the funding envelope of NRPP** (excluding the Common Agricultural Policy), which corresponds to approximately €100 billion. For comparison, the actual ESF+ budget was €95.8 billion at the start, and when adjusted for inflation, it would exceed €110 billion. This indicates a relative **reduction** of dedicated funding for social objectives compared with previous ESF+ allocations.

Moreover, the coefficient system used to track social spending counts, within the 14% mentioned above, **40% of social infrastructure costs**, including construction and renovation of schools, hospitals, student accommodations, and social housing, previously covered by the ERDF. This effectively **reduces the funds available to achieve social objectives**, meaning that the system is attempting to **cover more with less**.

The tracking system does include actions linked to the implementation of the Pillar; however, the regulation states that National and Regional Plans are required to address only the **Country-Specific Recommendations**, including those related to the Pillar. This means the possibility for the Member States to limit themselves to these actions.

**Success factor 2: Multi-level governance & shared management**

**Assessment:** ● Red

**Rationale:** While Article 6 formally enshrines the principles of multi-level governance and a bottom-up approach, in practice it risks being **largely procedural rather than substantive**.

The shift under the NRPP toward centralised agreements between the European Commission and Member States significantly **weakens the role of regional and local authorities** in the planning, implementation, and use of EU funds, and can also impact the involvement of civil society, usually better targeted by regional authorities.

Additionally, centralised negotiations tend to **create barriers for locally driven initiatives**, favouring instead large-scale, infrastructural investments, a pattern already observed under the Recovery and Resilience Facility (RRF).

The requirement for “balanced representation” and annual consultation with EU-level partners provides a **formal framework**, but the discretion granted to Member States and derogations allowed for certain policy areas means genuine shared management is compromised.

As a result, the regulations ensure participatory governance on paper, but **the practical empowerment of regional actors could be minimal**, potentially reducing accountability, responsiveness to local needs, and the overall impact of funds.

### Success factor 3: Horizontal earmarking for social inclusion

**Assessment:** ● Red

**Rationale:** Unlike the ESF+, the **NRPP regulation does not maintain any earmarking** for social objectives, such as the 25% allocation for social inclusion, the 5% for the Child Guarantee, and 3% for material deprivation measures. Earmarking was established in previous ESF+ programmes to ensure investments were also guaranteed for the inclusion of disadvantaged groups. Significant questions remain as to how the NRPP will guarantee any investment at all for social inclusion initiatives of disadvantaged groups.

Recital 20 of the regulation highlights that resources should be targeted to those most in need, in line with the European Pillar of Social Rights. However, **these principles are not reflected in binding obligations within the regulation itself.**

While the new budget tracking system allows monitoring of expenditure, it does not enforce minimum allocations, creating a **risk that funds may not adequately reach disadvantaged groups.**

### Success factor 4: Simplification and increase of flexibility for end-beneficiaries

**Assessment:** ● Orange

**Rationale:** **The Commission’s proposal brings opportunities for greater simplification and flexibility in managing EU funds, but also serious risks if not properly safeguarded.** On the positive side, these reforms could ease access for smaller actors, including social economy enterprises and organisations. The monitoring framework, for instance, aims to reduce SMEs’ administrative burden by 35% by the end of the current mandate. A harmonised system covering 543 intervention fields could also make programmes more accessible, particularly for proximity and social economy initiatives, enabling a broader range of organisations to participate, ensuring better alignment between local needs and EU priorities. However, without

clarity on how this performance framework will be implemented, it is hard to identify any potential simplification for end beneficiaries.

**Also, without safeguards, flexibility could become a red light.** Resources risk being diverted away from social inclusion priorities towards other pressing agendas, such as defence. Smaller beneficiaries may face new administrative barriers if processes are not carefully designed. And the shift to result-based payments, moving from strict cost reimbursement to milestone- or outcome-based financing, could disadvantage social projects, where the real impact is often measured in the quality of support rather than in numbers alone.

### Success factor 5: Enabling conditions

**Assessment:** ● Red

**Rationale: The disappearance of enabling conditions marks a major weakening of safeguards in EU funding.** In the past, **enabling conditions acted as an important safeguard for EU funds.** They required Member States to have the right strategies, rules and administrative systems in place before money could be spent. This helped ensure that investments were not only lawful but also effective and well planned. Horizontal enabling conditions promoted respect for EU rights and values, while thematic conditions checked that sector-specific investments complied with specific policy requirements. Among these, the enabling condition on social inclusion was especially important, as it required Member States to establish a national strategic policy framework for social inclusion and poverty reduction, including measures to combat segregation in all fields and to support the transition from institutional to family- and community-based care.

The new regulation shifts the focus almost entirely towards compliance with fundamental rights and the rule of law. While this emphasis is important, it no longer requires Member States to demonstrate that they have the technical and strategic foundations to make investments successful. As a result, the **quality and long-term impact of EU funding may be weakened**, and enforcement may become uneven due to the political sensitivity of value-based conditionality.

### Success factor 6: Partnership Principle

**Assessment:** ● Green

**Rationale:** The regulation **explicitly includes the partnership principle** and makes clear reference to the European code of conduct on partnership, which is a positive signal. These provisions aim to ensure that regional and local authorities, civil society organisations, and social and economic partners are meaningfully involved throughout the preparation, implementation, and evaluation of the NRPPs.

Civil society partners remain formally involved as before, but the **extent of their influence largely depends on the willingness of individual Member States**, rather than being guaranteed by the governance framework.

However, there are two main **risks**. First, while the partnership principle is widely enunciated in regulations, its **practical implementation** often varies across Member States. Second, the **shift in balance between national and regional levels could reduce the influence of local stakeholders**. The Commission's role in monitoring the quality of partnerships is therefore crucial. Moreover, NRPP Regulation Article 6(5) allows derogation from the partnership principle for border management and internal security, which can limit local and civil society involvement, even if such derogations must be duly reasoned and justified.

### **Success factor 7: Funding opportunities for local Initiatives**

**Assessment:** ● Red

**Rationale:** There are significant concerns about whether the NRPPs will effectively reach local initiatives and respond to local needs, particularly compared with the ESF+ approach.

**Centralised funding mechanisms risk limiting the participation of local actors and reducing opportunities for targeted initiatives that directly support specific communities and vulnerable groups.**

Despite their vital role in fostering local resilience and solidarity, notably in rural and deprived areas, there are **limited references to the Social Economy** in the NRPP regulation. It raises the danger that social economy enterprises and organisations, such as cooperatives, mutual benefit societies, non-profit associations, and foundations, may be sidelined from cohesion policies.

The regulations also encourage the **use of private funding** alongside public resources, which could reduce the amount of public funding available for smaller, locally driven projects. While the tracking system provides potential through its coverage of education, skills, employment,

and social inclusion, the lack of earmarking or enforceable thresholds weakens the guarantee that funds will reach the intended social initiatives.

### Success factor 8: Long-term priorities, systemic reforms

Assessment: ● Orange

**Rationale:** Compared with the past, the NRPP structure gives Member States greater **flexibility to design interventions across policy areas**, rather than being confined to narrow, fund-specific priorities. By integrating funding streams that were previously separate, the Fund **encourages cross-sectoral reforms**. The EU Facility also allows resources to be mobilised quickly in response to crises or to support transnational projects, which is a significant improvement over ESF+/ERDF, where reprogramming often required lengthy negotiations with the Commission.

**Yet the removal of thematic enabling conditions weakens the EU's leverage to drive systemic reforms in critical areas such as social inclusion, healthcare, and education.** As a result, the nature and success of reforms become increasingly dependent on the political will of national governments, and some reforms may inadvertently disadvantage vulnerable groups.

While Semester **Country-Specific Recommendations** gain importance, their **narrow scope limits their potential impact** compared with Country Reports, which could bring in more elements.

You can find the statement and the list of signatories, by following [this link](#).

## 2. Social services and disability support in the NRPs

### 2.1 Social and cohesion funding merged in national funding

#### Recital 26: Accessibility, Non-Discrimination and the UN CRPD

Recital 26 contains one of the most significant references to disability within the proposed Regulation. It explicitly calls for the Fund to “ensure accessibility, taking into account the Charter of Fundamental Rights of the European Union, including the UN Convention on the Rights of Persons with Disabilities (UN CRPD)”, and further states that the Fund “should not support actions that contribute to any form of segregation, discrimination or exclusion and, when financing infrastructure, should ensure accessibility for persons with disabilities.”

EASPD strongly welcomes this recital as it sets an important political and interpretative benchmark. It reflects the EU’s legal obligations under Article 26 of the Charter and Article 9 of the UN CRPD. However, in its current form, Recital 26 remains **non-binding**: recitals in EU legislation express intent and guide interpretation but have **no direct legal effect** unless their substance is incorporated into operative articles.

At present, the Regulation’s operative provisions make only brief references to accessibility and non-discrimination, without transforming the recital’s commitments into enforceable conditions. This risks leaving accessibility and inclusion as voluntary considerations rather than binding obligations for Member States and managing authorities.

**EASPD therefore calls for Recital 26 to be fully operationalised through concrete articles, including:**

- Establishing accessibility and compliance with the UN CRPD as a **horizontal enabling condition** for all investments;
- Requiring **verification of accessibility standards** during project assessment and monitoring;
- Explicitly referencing relevant EU legislation — the **European Accessibility Act, Web Accessibility Directive, and Construction Products Regulation** — to ensure legal coherence.

Embedding these requirements in the binding part of the Regulation would transform Recital 26 from a statement of principle into an **effective safeguard** guaranteeing that all EU-funded actions advance accessibility, equality and community inclusion for persons with disabilities.

## 2.2 Accessibility as a core condition for inclusion

We welcome the mention of accessibility also in Article 7(2), mentioning that “accessibility for persons with disabilities shall be taken into account throughout the preparation and implementation of the Plans”.

However, the expression “taken into account” does not translate in a binding obligation, and thus fall short of the EU’s obligations under **Article 9 of the UN Convention on the Rights of Persons with Disabilities (UN CRPD)** and **Article 26 of the EU Charter of Fundamental Rights**. Accessibility should be intended as a **foundational condition** for equal participation. EASPD therefore calls for accessibility to be established as a **horizontal enabling condition** applying to all measures supported by the Fund, including digital, built and social infrastructure. This should require compliance with existing EU accessibility legislation, notably the **European Accessibility Act, Web Accessibility Directive**, and relevant **European standards on universal design**. Embedding accessibility as a cross-cutting, verifiable obligation would ensure that EU funds drive inclusion rather than perpetuate exclusion or inaccessibility.

### EASPD recommendations:

1. Amend Article 7(2) to strengthen the language on accessibility, ensuring that it is a consistent and verifiable consideration across all stages of programming, implementation, and evaluation.
2. Encourage systematic alignment with existing EU accessibility legislation, including the European Accessibility Act, the Web Accessibility Directive, and relevant European standards on universal design, to provide clear guidance to Member States.
3. Integrate accessibility indicators and monitoring tools to ensure measurable progress in implementation.
4. Provide technical assistance and capacity-building for managing authorities and project promoters to support compliance and mainstream universal design principles.  
By embedding accessibility as a cross-cutting, verifiable obligation, the Regulation would ensure that EU funds genuinely drive inclusion and equality, rather than inadvertently perpetuating barriers and exclusion.

## 2.3 Reduced social objectives

Both the **ESF+ regulation** and the **NRP regulation** highlight the importance of supporting quality employment, education, and skills. These elements appear as part of their general objectives (Article 2) and form a clear area of continuity between the two instruments.

NPR regulation Article 3 focuses on the specific objectives of the Fund. Under section a on sustainable prosperity, we find reference to supporting affordable and accessible housing.

The most relevant, in terms of social objectives, is the Section (c) which refers to strengthening **social cohesion** by reinforcing the Union's societies and social model. This includes:

- support for **employment** and equal access to the labour market,
- promotion of **fair working conditions**,
- enhancing labour supply and improving **education and lifelong acquisition of skills**,
- promotion of **equal opportunities for all**, supporting safety nets, fostering **social inclusion**, and **fighting poverty and homelessness**, and supporting investment in the **social infrastructure**,
- facilitating **access to services and associated infrastructure**, including strengthening **quality and resilience of healthcare** and **long-term care** systems, and
- addressing **demographic challenges**, such as labour shortages and disparities between generations and regions.

These objectives are broadly consistent with the ESF+ regulation. However, some important elements are **missing**. Notably, the NRP does not include explicit references to:

- fair **social protection**,
- access to **inclusive** education,
- **work-life balance and childcare** as a means to foster **gender equality** in employment,
- support to **third-country nationals and migrants**, and
- the promotion of **person-centred, quality, sustainable, and affordable** services.

Section (d) of Art 3 refers to “sustaining the **quality of life** of the Union.” However, the framing of quality of life here is narrow, as it associates the concept primarily with **rural areas** and the sectors of **fisheries, agriculture, and forestry**. While this framing partly reflects elements of material living conditions and the natural and living environment, it differs from the broader approach commonly used in EU policy, which also includes access to education and lifelong learning, and opportunities for leisure and social interaction.

Sub-section (iii), on improving the **attractiveness of living standards**, focuses mainly on **access to healthcare, fair working conditions in rural areas, and improving farmers' access to knowledge and innovation**. While these aspects are important for enhancing living standards, additional elements should also be incorporated. In particular, access to long-term care, inclusive education, leisure activities, and sport are essential determinants of quality of life and should be explicitly recognised.

Section (e) addresses the **strengthening of fundamental rights, democracy, the rule of law, and Union values**. This includes measures to **build the capacity of civil society and social partners to uphold Union values, promote citizenship education, and foster youth participation**. These provisions are positive and align with the EU's broader policy objectives. However, they could be further expanded to include the promotion of equal opportunities, social inclusion, and targeted support for marginalised groups, including persons with disabilities.

### EASPD recommendations:

1. Broaden the scope of social objectives in Article 3 to explicitly cover inclusive education, fair social protection, childcare, and person-centred support services.
2. Integrate disability inclusion and equality across all objectives, ensuring alignment with the European Pillar of Social Rights and the UN CRPD.
3. Expand the definition of “quality of life” to include access to lifelong learning, culture, leisure, sport, and community participation.
4. Strengthen Section (e) by explicitly including social inclusion, equality, and targeted support for marginalised groups as part of the Union's fundamental values.

These amendments would restore a balanced and rights-based social dimension to the Regulation, ensuring that economic and territorial cohesion go hand in hand with social progress and inclusion.

### 2.3 Earmarking

Although stressed already in the statement, the **lack of earmarking** is particularly concerning for the disability support sector. Under the current ESF+ regulations, earmarking exist, including:

- **Social Inclusion:** at least 25% of the budget for measures promoting social cohesion and reducing inequalities
- **Aid to the Most Deprived (FEAD):** around 3% dedicated to food and basic material assistance
- **Child Guarantee:** at least 5% in countries with above-average child poverty, ensuring access to healthcare, education, housing, and nutrition.

Although the ESF+ is now streamlined under the NRP regulations, the tracking system still allows measurement of actions and spending in social inclusion, child poverty, and aid to the

most deprived. This creates the possibility of establishing minimum spending levels, helping to secure funding in areas where there is a risk of under-spending.

**EASPD recommendations:**

1. Reintroduce earmarking requirements to secure minimum funding levels for social inclusion, anti-poverty measures, and child well-being.
2. Establish a specific spending target for measures promoting the inclusion and participation of persons with disabilities.
3. Maintain transparent tracking mechanisms to monitor social spending and assess progress toward inclusion objectives.
4. Encourage Member States to allocate a proportion of funds to community-based social services and inclusive housing, aligning with EU commitments to deinstitutionalisation.