EUROPEAN
COMMISSION

Brussels, 26.11.2026
COM(2026) 638 final

# REPORT FROM THE COMMISSION

# ANNUAL REPORT 2025

# ON THE APPLICATION OF THE PRINCIPLES OF SUBSIDIARITY AND PROPORTIONALITY AND ON RELATIONS WITH NATIONAL PARLIAMENTS

# 2025 ANNUAL REPORT ON THE APPLICATION OF THE PRINCIPLES OF SUBSIDIARITY AND PROPORTIONALITY AND ON RELATIONS WITH NATIONAL PARLIAMENTS

## EXECUTIVE SUMMARY

This is the 33rd report on the application of the principles of subsidiarity and proportionality submitted under Article 9 of the Protocol on the application of the principles of subsidiarity and proportionality (Protocol No 2)[1]. Since 2018, the report also covers the Commission's relations with national Parliaments, which play a pivotal role in the application of these principles.

Following the 2024 institutional transition, national Parliaments' EU-related activities picked up pace in 2025: they submitted 453 opinions to the Commission, more than in any year of the first von der Leyen Commission. Direct personal exchanges also intensified in parallel with the written dialogue. Members of the Commission participated in 137 visits to national Parliaments and 34 meetings with parliamentary delegations. Direct personal exchanges helped frame the new institutional cycle and provided opportunities to explain priorities, discuss national concerns and deepen the dialogue on major cross-cutting initiatives. The first full year of a Commission mandate, with its increased legislative pace, usually tends to trigger a rise in parliamentary activity. In 2025, this rise was intensified by the simplification flagship initiative and the proposals for the next multiannual financial framework (MFF), accounting for a significant share of parliamentary attention. Another noteworthy development in 2025 was that national Parliaments used the channels of scrutiny and dialogue in more varied ways than ever before.

Three main trends were observed in 2025. First, subsidiarity scrutiny continued to be a major form of engagement. More than half of all opinions submitted (258 out of 453) were on legislative proposals in the area of shared competence and therefore subject to subsidiarity scrutiny. Of these, the large majority (240 or 93%) considered that the proposal complied with the subsidiarity principle – either after an analysis focused on subsidiarity, or alongside broader comments on proportionality and practical implementation. By contrast, in only 18 cases, national Parliaments signalled formal subsidiarity objections in the form of reasoned opinions (7% of opinions on proposals subject to subsidiarity scrutiny or 4% of all opinions). Moreover, subsidiarity objections, submitted by 9 chambers, were spread across different themes, with no proposal triggering more than 2 reasoned opinions. National Parliaments were less concerned with whether EU action was needed, but rather with how that action was designed.

Second, national Parliaments used political dialogue intensively as a channel to engage with the Commission's legislative and political choices. Their opinions often focused on proportionality, administrative burden, specific national circumstances, implementation feasibility and the flexibility left to Member States and regional and local authorities. This was evident in the input received on key political Commission files in 2025. On the proposed 2028-2034 MFF, national Parliaments acknowledged the need to adapt the EU budget to new geopolitical, economic and security challenges, while scrutinising the proposed architecture, predictability, governance, and implications for cohesion policy, agriculture and regional involvement. On simplification and the

[1] EUR-Lex - 12008E/PRO/02 - EN - EUR-Lex.

Omnibus packages, national Parliaments broadly recognised the need to reduce administrative burden, while stressing the importance of evidence-based decisions, legal certainty and preserving policy objectives. This pattern confirms that implementation concerns have a central role in shaping parliamentary scrutiny: national Parliaments pay attention not only to whether the EU has the power to act, but also to how proposed rules will work in practice in national contexts.

Third, own-initiative opinions played an increasingly important role in 2025. With 71 own-initiative opinions, several of them co-signed by multiple chambers, national Parliaments used political dialogue more intensively not only to react to Commission documents, but also to raise issues proactively. These opinions provide an early indication of shared thematic or regional concerns and show that national Parliaments are interested in contributing to policy development upstream, certainly before the Commission adopts specific legislative proposals. Moreover, in addressing shared regional concerns, national Parliaments moved beyond thematic cooperation by increasingly organising themselves collectively along regional lines, making regional cooperation a distinct and notable feature of 2025.

Taken together, these trends show that 2025 was a year of both quantitative rebound and qualitative consolidation. National Parliaments made targeted use of the reasoned opinion procedure under the subsidiarity control mechanism, while using political dialogue with the Commission extensively, issuing own-initiative opinions more proactively, and engaging in direct exchanges more intensively. In addition, the contributions from the European Parliament, the Council and the European Committee of the Regions show that, in the application of the principles of subsidiarity and proportionality, simplification was high on all institutional actors' agenda in 2025.

## PART I – 2025 IN REVIEW

### 1. VOLUME AND DISTRIBUTION OF OPINIONS

The Commission sends the proposals it adopts to national Parliaments at the same time as to the co-legislators. National Parliaments can react by issuing opinions on these documents or proactively send own-initiative opinions with suggestions for topics and initiatives on which the Commission has the power to act. In 2025, national Parliaments submitted 453 opinions to the Commission. This is a considerable increase compared with 2024, which was a year of institutional transition. It was also higher than in any year of the first von der Leyen Commission, when the Commission received 402 opinions in 2023. Under the subsidiarity control mechanism, the Commission received 18 reasoned opinions[2] from national Parliaments, corresponding to around 4% of all opinions submitted in 2025 and 7% of opinions on proposals subject to subsidiarity scrutiny.

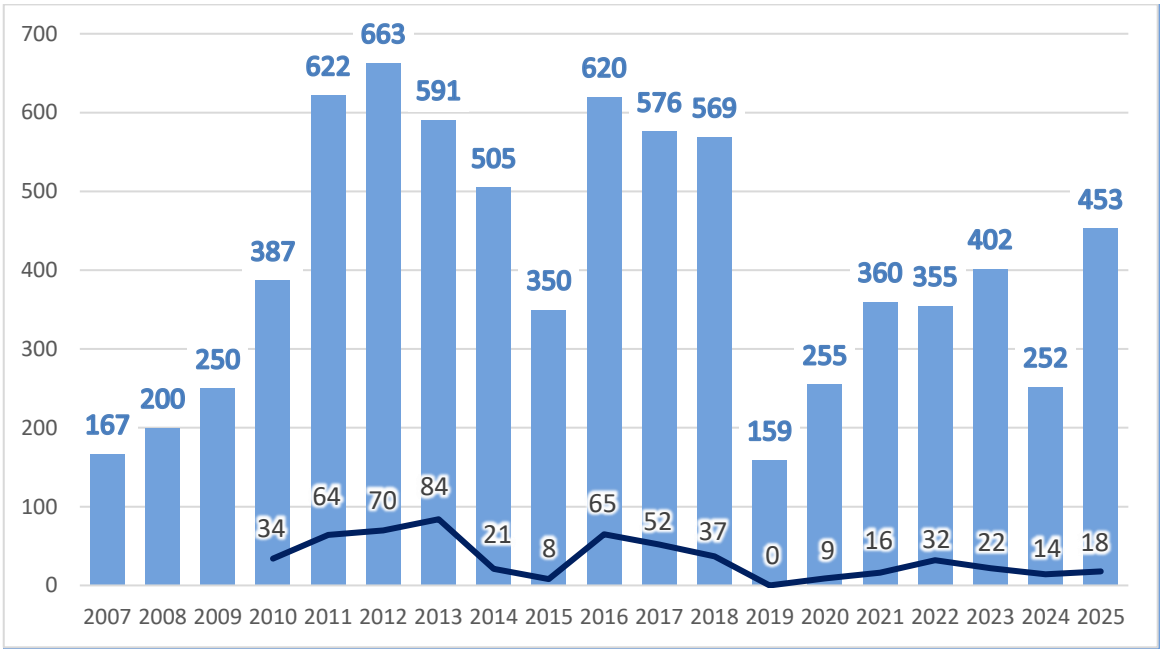
More than half of all opinions concerned legislative proposals in the area of shared competences subject to subsidiarity control. The remaining opinions concerned non-legislative initiatives or were own-initiative opinions in the framework of political dialogue.

[2] This number refers to the total number of reasoned opinions received from parliamentary chambers under Protocol No 2 in 2025. See Annex 1 for the list of Commission documents on which the Commission received reasoned opinions.

The composition of the opinions merits attention. While proposals subject to subsidiarity control continued to generate most opinions, formal subsidiarity objections (in the form of reasoned opinions) remained targeted and limited in number. National Parliaments used political dialogue to comment more broadly on the substance, proportionality and practical effects of EU action.

**Figure 1. Opinions and reasoned opinions compared, 2007-2025**

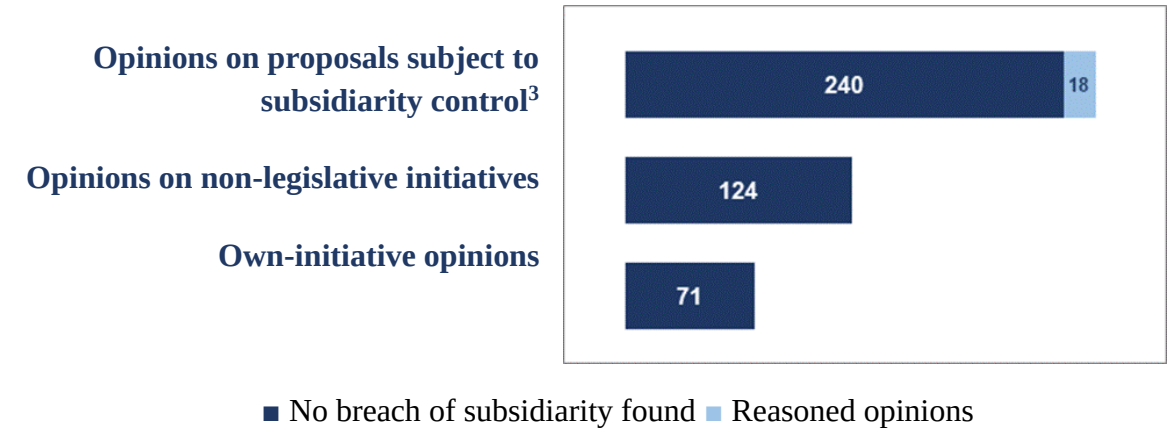
*Number of opinions*




*Source: European Commission data.*

**Figure 2. Composition of opinions received in 2025**

*Total opinions in 2025: 453*




*Source: European Commission data.*

[3] Reasoned opinions (18) are a subset of opinions on proposals subject to subsidiarity control (258) and are shown here as a distinct segment within that bar, not as a separate category.

## 2. WHAT DROVE PARLIAMENTARY ACTIVITY IN 2025

A considerable number of opinions was received on two packages of proposals: the Omnibus packages and the next MFF.

Simplification was one of the flagship initiatives of the Commission's 2025 work programme. During the year, the Commission presented 10 Omnibus proposals[4] aiming to simplify EU rules and reduce recurrent administrative costs by an estimated EUR 11.9 billion. These initiatives attracted considerable attention from national Parliaments.

National Parliaments examined 6 of the 10 Omnibus packages and submitted 38 opinions on them, including one reasoned opinion. Omnibus I on sustainability reporting and sustainability due diligence[5] and Omnibus V on Defence[6] each triggered 10 opinions, with Omnibus V[7] also accounting for the reasoned opinion. Omnibus IV on small mid-caps[8] triggered 9 opinions.

The opinions on the Omnibus packages showed broad support for the objective of simplification but also raised questions about the way in which simplification was pursued. One of the most frequently raised concerns was the absence of a comprehensive impact assessment. Although the Commission produces a staff working document, some national Parliaments considered that this made it more difficult to assess the implications of the proposed changes at national level. Some chambers considered that the simplification effort could go further, while others expressed concern that simplification could weaken standards already in place, including in areas such as environmental protection.

Direct exchanges between Members of the Commission and national Parliaments also addressed simplification, although this topic generated fewer meetings than the MFF. In 2025, 4 visits and meetings specifically addressed the Commission's simplification approach and the Omnibus packages.

In the second half of 2025, national Parliaments' attention turned to the Commission's proposals for the 2028-2034 MFF. They submitted 90 opinions on the whole MFF package, including 7 reasoned opinions[9], focusing on the MFF's proposed new architecture and its implications for the common agricultural policy (CAP), cohesion policy and own resources. More specifically, the proposals on the Own Resources Decision[10], MFF Regulation[11], the National and Regional Partnership Plan Regulation[12], the new CAP Regulation[13], the Regulation amending the Common

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4 Simplification - European Commission.

5 Omnibus package - European Commission.

6 Defence Readiness Omnibus - Defence Industry and Space

7 On proposal COM(2025) 823 final.

8 Omnibus IV - Internal Market, Industry, Entrepreneurship and SMEs

9 The French *Sénat* on COM(2025) 548, the Romanian *Senat* and the French *Sénat* on COM(2025) 553, the Romanian *Senat* on COM(2025) 560, the German *Bundesrat* on COM(2025) 565, the Swedish *Riksdag* on COM(2025) 574, and the Italian *Camera dei Deputati* on COM(2025) 580 and 581.

10 COM(2025) 574 final.

11 COM(2025) 571 final.

12 COM(2025) 565 final.

13 COM(2025) 560 final.

Market Organisation on Agricultural Products[14] and the Cohesion Policy Regulation[15] triggered the most intense scrutiny – 40 opinions, including 5 reasoned opinions. Within the broader MFF package, national Parliaments also paid particular attention to the proposal on the new Union Civil Protection Mechanism and the Union support for health emergency preparedness and response[16], submitting 8 opinions, including 1 reasoned opinion[17]. Several chambers supported the inclusion of health emergency preparedness and called for clear roles and full respect for Member States' competences.

National Parliaments generally supported the need for a simpler, more flexible and more impactful budget and acknowledged the need for a modernised EU budget that can respond to new geopolitical, economic and security challenges. At the same time, several opinions underlined that financing new priorities should not come at the expense of traditional policies, such as the common agricultural policy and cohesion policy. Moreover, national Parliaments generally highlighted the importance to maintain the partnership principle and guarantee the involvement of regional and local authorities in National and Regional Partnership Plans.

National Parliaments also warned that greater flexibility should not reduce predictability or accountability.

On own resources, national Parliaments generally supported the link between own resources and EU priorities, the simplification of value added tax own resources and the discontinuation of rebates. However, they expressed diverging views about moving away from contributions based on gross national income (GNI)[18] and raised varying concerns about the five new own resources proposed[19] and the higher budgetary ceiling[20].

The MFF proposals also triggered direct exchanges between Members of the Commission and national Parliaments. In 2025, 24 visits and meetings addressed the MFF, including Commissioner Serafin's exchanges with national Parliaments on 19 occasions as part of his *Tour d'Europe*.

## 3. THE COMMISSION'S DIRECT ENGAGEMENT WITH NATIONAL PARLIAMENTS

Direct engagement between Members of the Commission and national Parliaments was particularly prominent in 2025. It marked a clear strengthening of political dialogue at the start of the new mandate and complemented the written opinions received from national Parliaments during the year. Exchanges extended well beyond the initiatives announced in the Commission

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[14] COM(2025) 553 final.

[15] COM(2025) 552 final.

[16] COM(2025) 548 final.

[17] The Italian *Senato della Repubblica*, the Czech *Senát*, the Romanian *Senat*, the German *Bundesrat*, the Portuguese *Assembleia da República* and the Spanish *Cortes Generales* sent political dialogue opinions. The French *Sénat* sent a reasoned opinion.

[18] The Romanian *Senat* supported reducing the dependence on GNI-based contributions, while the Czech *Senát*, the German *Bundesrat* and the Irish *Houses of the Oireachtas* reaffirmed their support to GNI-based contributions.

[19] The Czech *Senát* on the Corporate Resource for Europe, the tobacco excise duty based, the Emission Trading System based and the non-collected e-waste own resource, the German *Bundesrat* on the Corporate Resource for Europe, the Romanian *Senat* on the tobacco excise duty-based own resource, the Portuguese *Assembleia da República* on the corporate resource for Europe and the tobacco excise duty own resource.

[20] The German Bundesrat and the Irish Houses of the Oireachtas.

work programme, reflecting a more strategic and forward-looking approach in political dialogue with national Parliaments.

In 2025, Members of the Commission participated in 171 visits to national Parliaments and meetings with parliamentary delegations. This is a substantial increase compared with 57 visits and meetings in 2024, which was a transitional year between two institutional cycles, and a marked increase compared with the corresponding first year of the first von der Leyen Commission. The exchanges covered the Commission work programme and its strategic priorities, including the MFF and the simplification agenda. Commissioners also participated in 12 interparliamentary meetings, including exchanges on specific policy priorities. The Commission was represented at plenary meetings of the Conference of Parliamentary Committees for Union Affairs (COSAC) by Commissioner Hansen and Commissioner Šefčovič.

Overall, 2025 stood out as a year of intensified and substantive direct engagement with national Parliaments. These exchanges helped frame the new institutional cycle and confirmed the role of national Parliaments as crucial partners in the EU's policy dialogue. Further details are provided in Part III of this report.

# PART II – THE INSTRUMENTS: SUBSIDIARITY SCRUTINY AND POLITICAL DIALOGUE

## 1. SUBSIDIARITY CONTROL MECHANISM

### 1.1 OVERVIEW

More than half of the 453 opinions (258) the Commission received in 2025 concerned legislative proposals in the area of shared competences subject to subsidiarity control. The result of national Parliaments' scrutiny can lead to two outcomes: (i) confirming compliance with the principle of subsidiarity (by issuing an opinion confirming compliance or/and giving further suggestions on the content of a proposal); or (ii) alleging a breach of subsidiarity principle (by issuing a reasoned opinion).

Of the 258 opinions on proposals subject to subsidiarity control, national Parliaments did not find any breach of the principle of subsidiarity in 240 of them (93%). Although they were formally considered as political dialogue opinions, the subsidiarity scrutiny process was concluded without alleging any breach of the subsidiarity principle.

Of these 240 opinions, 103 analysed compliance with the subsidiarity principle exclusively. In 85 cases, following their analysis, national Parliaments explicitly stated that the proposal in question complied with the principle of subsidiarity. This approach was mostly used by two Parliaments: the Portuguese *Assembleia da República* and the Spanish *Cortes Generales*. The Commission gave a courtesy reply to these opinions confirming compliance with the subsidiarity principle. In 18 cases, this analysis resulted in a claim of breach of the subsidiarity principle and the issuing of a reasoned opinion.

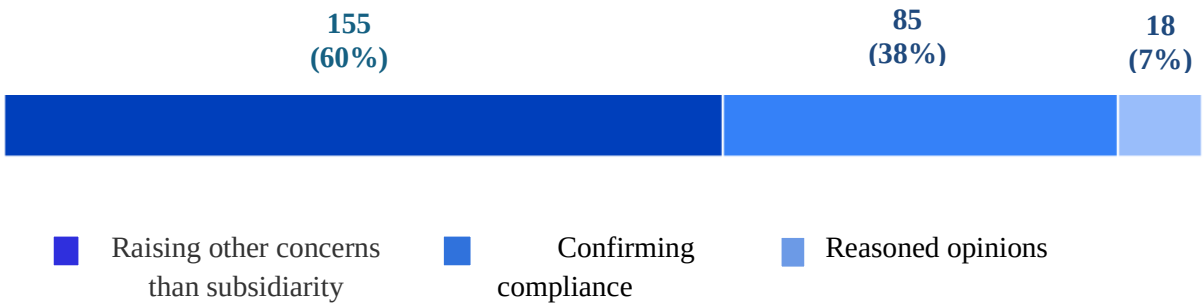
In 60% of cases on legislative proposals subject to subsidiarity control, national Parliaments conducted a broader examination. In 155 opinions concluding the scrutiny without alleging any breach of subsidiarity principle, national Parliaments focused on other aspects such as the proportionality of measures, administrative burden, implementation, legal design, financing,

impacts at national level allegedly not covered in impact assessments or the interaction between the proposed EU action and existing national systems. By issuing these opinions, national Parliaments thus shared with the Commission the findings of their scrutiny in the spirit of 'active subsidiarity'[21].

The main drivers of parliamentary activity in 2025 illustrate the pattern described above. Of the 90 opinions on the MFF package, 26 explicitly confirmed compliance with the principle of subsidiarity, whereas 7 alleged there to be a breach. For the Omnibus packages, of the 38 opinions, 17 explicitly confirmed compliance with the principle of subsidiarity, and 1 alleged a breach. The largest share of opinions on these two packages raised questions about the proposed measures without contesting their compliance with the subsidiarity principle.

**Figure 3. Opinions on proposals subject to subsidiarity control in 2025**

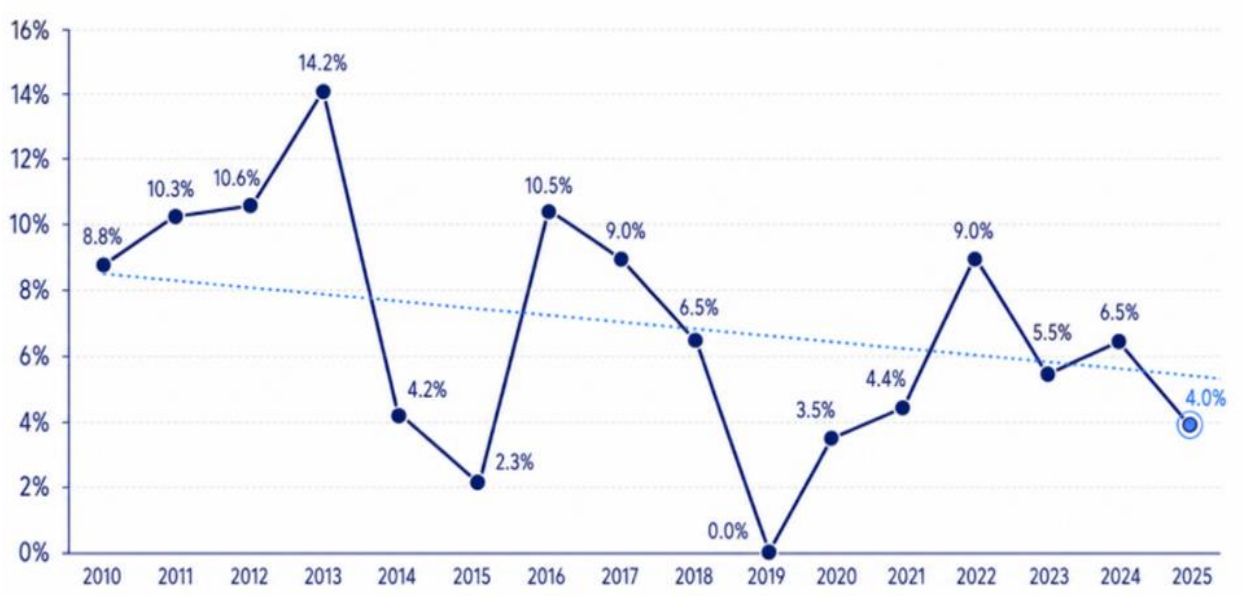
*Number of opinions on proposals subject to subsidiarity control: 258*




*Source: European Commission data.*

**Figure 4. Share of reasoned opinions in all opinions received, 2010-2025**

*Dotted line=linear trend*




*Source: European Commission data.*

[21] The final report of the Task Force on Subsidiarity, Proportionality and 'Doing less more efficiently'.

As regards reasoned opinions, the absolute number in 2025 appears higher than in previous years; however, the proportion of reasoned opinions relative to the total number of opinions provides a more meaningful basis for comparison. Over the past decade, the share of reasoned opinions in the total number of opinions submitted by national Parliaments has followed a broad downward trend. This pattern continued in 2025.

### 1.2 KEY CASES IN 2025

**Case 1: Critical Medicines Act**

The Swedish *Riksdag* and the French *Sénat* considered that there was no need either for EU action in areas where Member States had well-functioning mechanisms or for any binding rules that would limit Member States' margin of manoeuvre. The Commission's replies pointed out that its primary objective was to promote the security of supply and did not limit Member States' decisions to plan and grant financial support.

The 18 opinions alleging a breach of the subsidiarity principle (reasoned opinions), represented 7% of opinions on proposals subject to subsidiarity control and around 4% of all opinions received from national Parliaments. These 18 reasoned opinions originated from 9 chambers[22] and concerned 15 different proposals under 4 Commission priorities. No proposal received more than two reasoned opinions. Compared with previous years, this indicates scrutiny was more widely spread across topics, with less focus on a single topic.

The distribution of reasoned opinions across the chambers also showed a wider spread than in several previous years. In 2025, 9 of 39 chambers issued reasoned opinions, 1 more than in 2024. In addition, 5 chambers issued 1 reasoned opinion each, 3 chambers issued 3 each, and the French *Sénat* issued 4, corresponding to just over one fifth of the total. No single chamber therefore dominated the overall number of reasoned opinions, as had been the case in previous years.

The highest number of reasoned opinions concerned the 2028-2034 MFF package, which received 7 reasoned opinions under the priority 'Delivering together and preparing our Union for the future'. Even within that package, however, only one proposal – on the common organisation of the markets in agricultural products – received more than one reasoned opinion. This shows that even for a topic attracting considerable attention, subsidiarity concerns were spread across the various proposals of the package, rather than focusing on a single legislative text that several chambers identified as problematic.

**Case 2: Markets in agricultural products**

The Romanian *Senat* and the French *Sénat* criticised the proposal for infringing Member States' crisis preparedness and response prerogatives and for not taking account of Member States' needs. The Commission's replies argued that the proposal introduced a flexible framework leaving full autonomy to Member States in designing their crisis plans and reserves.

The following proposals in 2025 were notable in that they triggered two reasoned opinions: (i) the Critical Medicines Act[23]; (ii) phasing out Russian natural gas imports[24]; (iii) the Regulation amending the Common Organisation of the Markets in

[22] See counting rules described in Chapter 2.2.

[23] COM(2025) 102 final.

[24] COM(2025) 828 final.

Agricultural Products[25] (part of the MFF package); and (iv) fisheries and aquaculture statistics[26]. The most frequent concern raised in the reasoned opinions was the lack of consideration for specific national circumstance and needs (see text boxes for more details).

**Case 3: Fisheries and aquaculture statistics**

The Spanish *Cortes Generales* and the Romanian *Senat* argued that the proposal infringed national competences and conflicted with Regulation (EC) No 223/2009 that mandates Eurostat and national authorities to jointly produce European statistics. In the Commission's view, the proposal respected Member States' competences and left them full control over their data.

Overall, the 2025 data point to a broader spread of subsidiarity concerns. National Parliaments looked at a range of issues rather than focusing on a small number of high-profile cases, and there was no single proposal or chamber dominating the subsidiarity debate.

**Case 4: Phasing out Russian natural gas imports**

The Slovak *Národná Rada* and the Hungarian *Országgyűlés* considered that the proposal was based on an inappropriate legal basis and disregarded national energy choices and specific circumstances. The Commission replied that the measures were consistent with the EU's strategy to reduce fossil fuel import dependence and with the principle of sincere cooperation.

## 2. POLITICAL DIALOGUE: OPINIONS ON COMMISSION PROPOSALS

### 2.1 PARTICIPATION BY CHAMBER

Parliamentary participation in political dialogue remained concentrated among only a few national Parliaments in 2025. This trend has been consistent over the last 10 years where most opinions (around 70-80%) came from the 10 most active chambers

In 2025, activity was rather concentrated[27] among the 10 most active chambers. Although 2024 saw a new broader trend of involvement (similar to other transition years as Figure 5 shows), this did not continue in 2025. This confirms that national Parliaments' overall level of engagement continues to be shaped primarily by a stable core of highly active chambers. At the same time, the rise in co-signed own-initiative opinions resulting from some Parliaments acting as 'entrepreneurs' and mobilising other Parliaments shows that broader participation is possible. National Parliaments can make use of several types of participation, especially where chambers cooperate around shared thematic or regional concerns. This is also reflected in the types of opinions submitted: in 2025, the number of opinions on non-legislative proposals or own-initiative opinions reached 195, which was higher than in recent years.

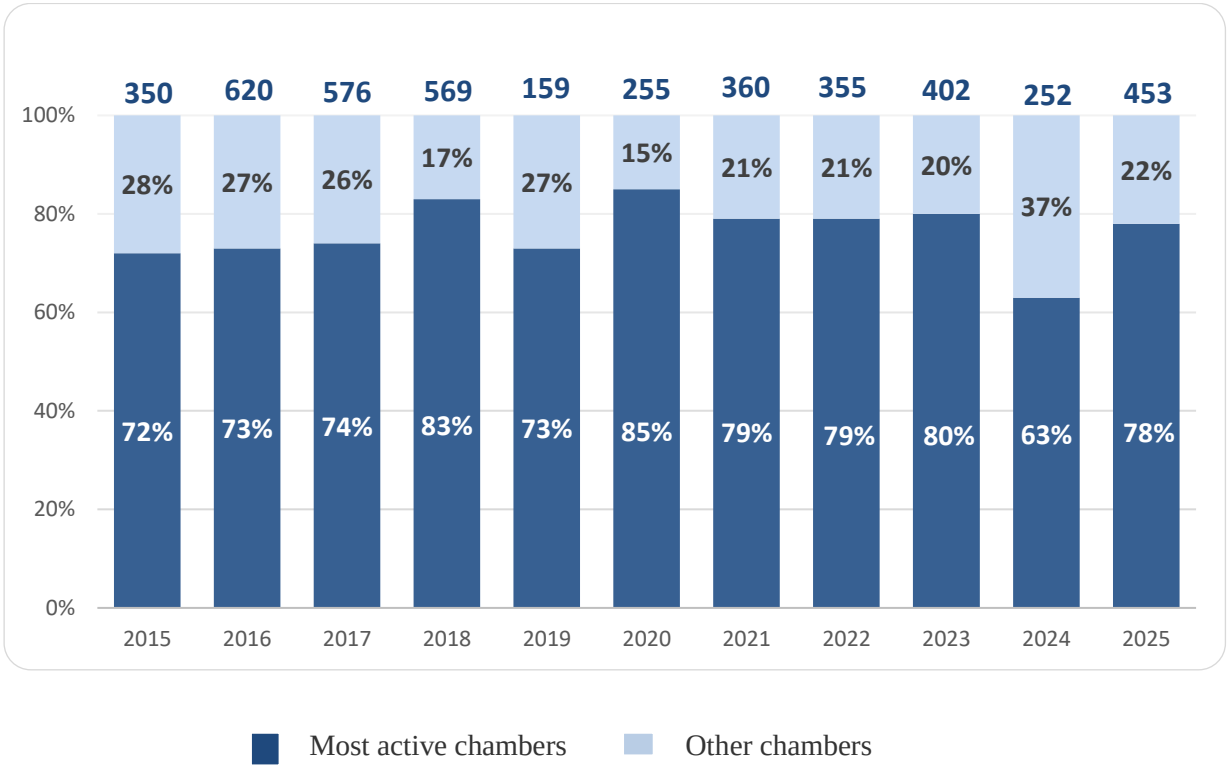
[25] COM(2025) 553 final.

[26] COM(2025) 435 final.

[27] The 10 most active chambers in 2025 (from the most active to the least active): (i) the Spanish *Cortes Generales*; (ii) the Italian *Camera dei Deputati*; (iii) the German *Bundesrat*; (iv) the Czech *Senát*; (v) the Romanian *Senat*; (vi) the Romanian *Camera Deputaților*; (vii) the Portuguese *Assembleia da República*; (viii) the Italian *Senato della Repubblica*; (ix) the French *Sénat;* and (x) the French *Assemblée nationale*.

**Figure 5. Concentration in parliamentary participation, 2015-2025**

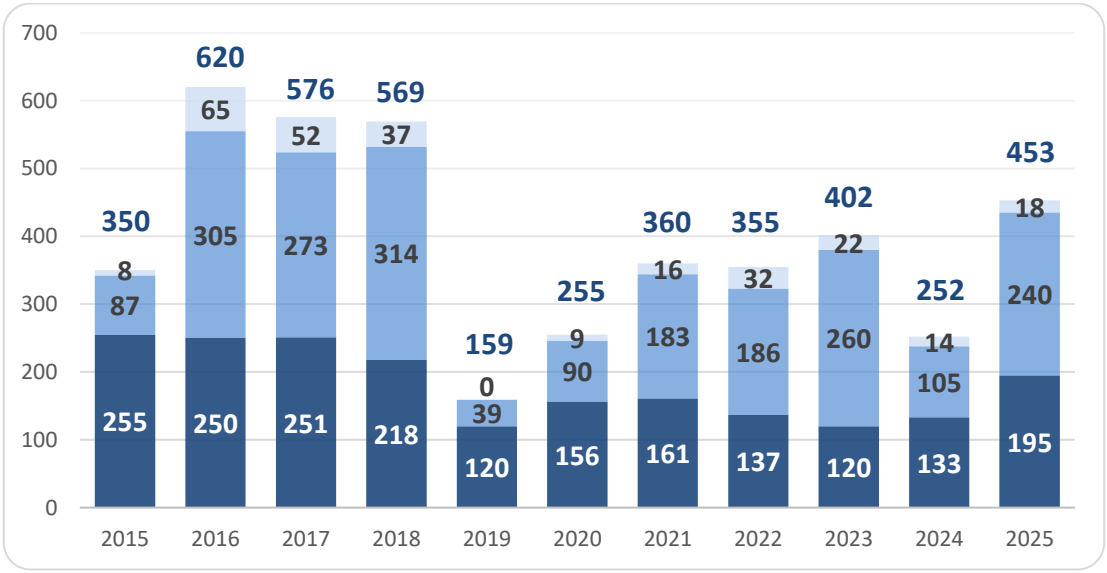
*Share of total opinions / Total number of opinions*




*Source: European Commission data*

**Figure 6. Types of opinions of national Parliaments, 2015-2025**

*Number of opinions*




*Source: European Commission data.*

Political dialogue opinions on other Commission initiatives or own-initiative opinions

Political dialogue opinions on proposals subject to subsidiarity control

Reasoned opinions on proposals subject to subsidiarity control

## 2.2 KEY CASES OF COMMISSION PROPOSALS

**Case 1: 2025 Commission work programme**

The broad and more strategic nature of the 12 opinions submitted show that national Parliaments used the work programme as an early opportunity to signal political expectations for the EU's priorities. Particular attention was paid to competitiveness and simplification, defence and security, migration and asylum, energy and climate, and social and democratic resilience.

The increase in the number of opinions on Commission proposals compared with 2024 should be considered in the context of the institutional cycle. 2024 was a transition year, while 2025 was the first year of renewed legislative and policy activity under the new Commission's mandate. The first year of the previous Commission's mandate, 2020, was marked by the COVID-19 pandemic and is therefore a less meaningful point of comparison. A more telling comparison is 2023 where the Commission received the highest number of opinions in the previous mandate: 402 in total, with 22 reasoned opinions, 260 political dialogue opinions on proposals subject to subsidiarity control, and 120 political dialogue opinions on other Commissions initiatives or own-initiative opinions.

**Case 2: Critical Medicines Act**

The 11 opinions submitted supported the objective of strengthening the availability and security of supply of medicines. The main concerns were related to proportionality, financing, public procurement rules, the use of non-price criteria, the interaction with State aid rules, and the possible implications for national health systems.

Compared with 2023, scrutiny linked to proposals subject to subsidiarity control declined slightly in 2025, from 282 opinions to 258. By contrast, the number of political dialogue opinions on other Commission initiatives or own-initiative opinions increased significantly, from 120 in 2023 (30% of all opinions) to 195 in 2025 (43% of all opinions). This was the highest number recorded in both the first and second von der Leyen Commission.

**Case 3: Common system for returns**

The nine opinions submitted generally acknowledged the rationale for EU action in an area where fragmented national rules may reduce effectiveness. However, the national Parliaments closely scrutinised the balance between harmonisation, practical implementation and safeguards on fundamental rights.

In 2025, the Commission documents that attracted the highest number of opinions in the framework of the political dialogue were: (i) the 2025 Commission work programme[28] (12 opinions[29]); (ii) the proposal for a regulation on critical medicinal products[30] (11 opinions[31]); and (iii) the proposal for

[28] COM(2025) 45 final.

[29] The Greek *Vouli ton Ellinon*, the Dutch *Eerste Kamer* and the *Tweede Kamer*, the Lithuanian *Seimas*, the Slovak *Národná Rada*, the French *Sénat*, the Czech *Poslanecká sněmovna*, the Swedish *Riksdag*, the Croatian *Hrvatski Sabor*, the Romanian *Camera Deputaților* and *Senat* and the Luxembourgish *Chambre des Députés*.

[30] COM(2025) 102 final.

[31] The Romanian *Camera Deputaților* and the *Senat*, 2 opinions from the French *Sénat*, the German *Bundesrat*, the Czech *Senát*, the Italian *Camera dei Deputati*, 2 opinions from the *Senato della Repubblica*, the Swedish *Riksdag* and the Spanish *Cortes Generales*.

a regulation establishing a common system for the return of third-country nationals staying illegally in the Union[32] (9 opinions[33]) (see textboxes for more details).

The increase in the total number of opinions in 2025 was therefore driven primarily by stronger engagement outside the formal subsidiarity control framework. Viewed over the past decade, the number of opinions submitted by national Parliaments remained below the peak levels recorded between 2016 and 2018. However, 2025 marked a clear rebound after the transition year in 2024 and showed a particularly strong increase in political dialogue outside the subsidiarity control framework.

Another feature of 2025 was the difference between the distribution of reasoned opinions and political dialogue opinions. Reasoned opinions were spread widely across proposals. Political dialogue opinions, by contrast, were more concentrated around a limited number of major cross-cutting initiatives with significant budgetary, regulatory or implementation implications. In particular, the MFF package generated 90 opinions, and the Omnibus packages generated 38.

### 2.3 PROACTIVE ELEMENTS OF POLITICAL DIALOGUE: OWN-INITIATIVE OPINIONS

In 2025, the Commission received 71 own-initiative opinions, representing around 15% of all opinions received from national Parliaments and covering a wide range of topics. The largest number concerned ongoing international developments and the EU's external policy, with 18 opinions. Other recurring themes included the EU's digital transition (8 opinions), agriculture (6 opinions), and trade (4 opinions).

A notable development in 2025 was the number of co-signed own-initiative opinions. These opinions reflected wider interparliamentary cooperation, based on either shared thematic interest or common regional concerns.

One example of *thematic* cooperation was the initiative of the Danish *Folketing* during the Danish Presidency, which it called a 'green card', namely a suggestion to the Commission to propose legislation. It aimed to mobilise other chambers around a call for the Commission to propose an action plan for plant-based foods. This resulted in an own-initiative opinion co-signed by three other chambers[34], but it was not supported – and even opposed – by other Parliaments. This is an example of national Parliaments' long-standing demand[35] for a 'green card' (a right to suggest legislative initiatives through the Commission). It illustrates how political dialogue can be used by national Parliaments not only to react to Commission initiatives, but also to raise policy ideas

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[32] COM(2025) 101 final.

[33] The Dutch Eerste Kamer, the Greek Vouli ton Ellinon, the German Bundesrat, the Romanian Camera Deputaților and Senat, the French Sénat, the Italian Camera dei Deputati and Senato della Repubblica and the Spanish Cortes Generales.

[34] The opinion was co-signed by the Dutch *Eerste Kamer* and *Tweede Kamer* and the Portuguese *Assembleia da República*. However, this prompted two counter-own-initiative opinions from the Lithuanian *Seimas*, opposing the initiative of the Danish *Folketing*.

[35] Conclusions COSAC working group role of NP in the EU - EN (June 2022); European Parliament resolution of 27 November 2025 on the application of the Treaty provisions related to the principles of subsidiarity and proportionality and the role of national Parliaments in the EU legislative process (2025/2042(INI)).

within the framework of the Treaties. However, it shows the effectiveness of such action depends on the ability to generate sufficient political support. The instrument of political dialogue offers possibilities to national Parliaments; however, difficulties in achieving collective action are not linked to the instrument itself.

Regional cooperation also played a greater role among Parliaments from Mediterranean Member States. A joint own-initiative opinion on the new Pact for the Mediterranean was co-signed by 10 Chambers[36] and submitted before the Pact was published. The signatories expected a clear and strategic framework for cooperation, covering economic ties, migration, peace and stability, cultural exchange, Mediterranean islands, sustainability, human rights and regional partnerships. A second Mediterranean initiative concerned agricultural development in the Mediterranean region. It was initiated by the Cypriot *Vouli ton Antiprosopon* and co-signed by six chambers[37].

The Commission also received a joint own-initiative opinion from the Parliaments of the *Visegrád* group[38] on AI as a tool for economic development. They called for increased funding for the development of AI. This suggests renewed cooperation in that format after several years of limited activity.

Own-initiative opinions also provided a channel for early-stage engagement. For example, the Lithuanian *Seimas* submitted an own-initiative opinion on the Pact for the Eastern Border Regions as input to the Commission's public consultation.

Overall, the rise in the number of co-signed own-initiative opinions was a notable feature of 2025. It indicates that national Parliaments used political dialogue not only as a channel for reacting to Commission proposals, but also as a way to raise issues proactively, amplify the message by acting together, and contribute to policy development at an early stage.

## PART III – DIRECT ENGAGEMENT AND INTERPARLIAMENTARY COOPERATION

### 1. MEETINGS BETWEEN COMMISSIONERS AND NATIONAL PARLIAMENTS

In 2025, direct engagement between Members of the Commission and national Parliaments intensified significantly compared with 2024. Members of the Commission participated in 171 visits to national Parliaments and meetings with delegations of national Parliaments, covering a large majority of parliamentary chambers across the EU.

Several visits were part of targeted outreach efforts by Members of the Commission on key initiatives of the new institutional cycle. In particular, Commissioner Serafin, responsible for the EU budget, carried out an extensive consultation tour across Member States in 2025 to prepare the next MFF. These visits, organised throughout the year, included meetings with governments,

[36] The Cypriot Vouli ton Antiprosopon, the French Assemblée nationale and Sénat, the Greek Vouli ton Ellinon, the Spanish Cortes Generales, the Croatian Hrvatski Sabor, the Italian Senato della Repubblica, the Portuguese Assembleia da República and the Slovenian Državni zbor.

[37] The Cypriot Vouli ton Antiprosopon, the French Assemblée nationale, the Spanish Congreso de los Diputados and Senado, the Croatian Hrvatski Sabor and the Italian Senato della Repubblica.

[38] The Czech, Hungarian, Polish and Slovak Parliaments.

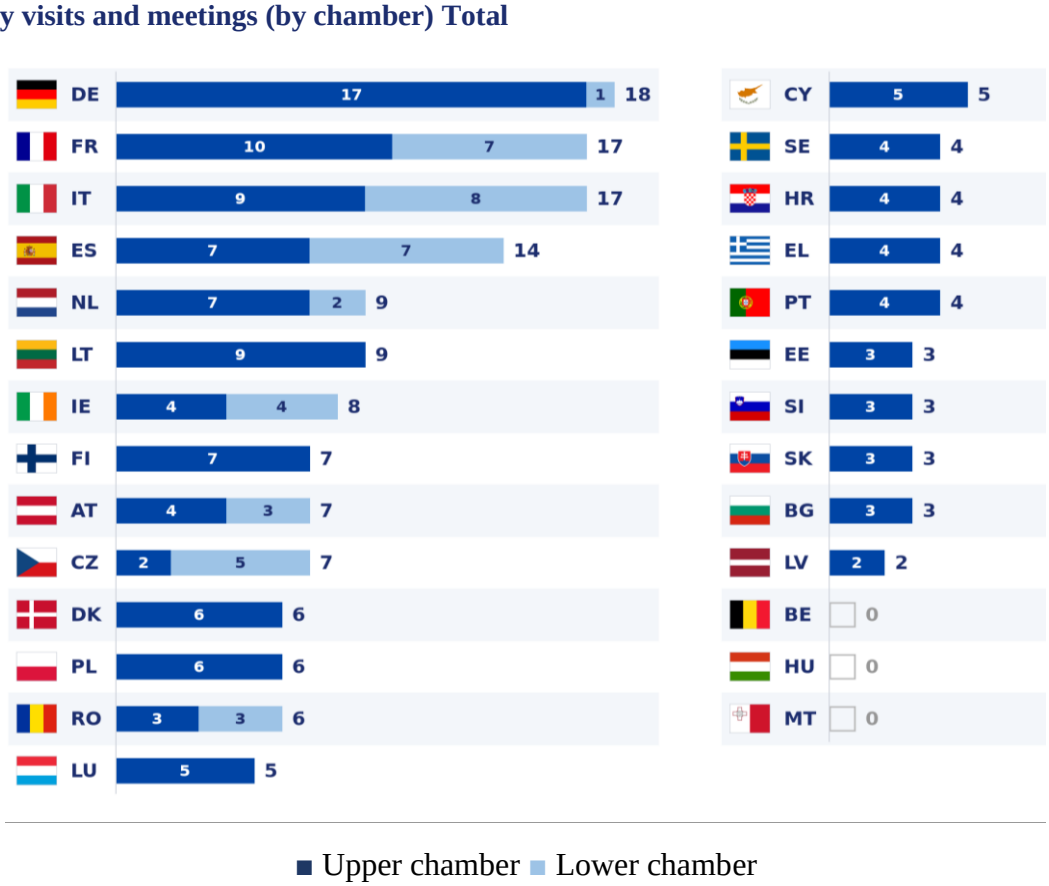
regional bodies, beneficiaries of EU funding and national parliamentarians. They provided an opportunity to gather views and explain the Commission's priorities for the EU's future budget.

Commissioner McGrath, responsible for Democracy, Justice, the Rule of Law and Consumer Protection, also carried out a series of exchanges with national Parliaments as part of the preparation of and follow-up to the annual Rule of Law Report and work on the European Democracy Shield. These exchanges aimed to present the findings of the rule-of-law cycle, discuss national developments and strengthen dialogue with national legislators on safeguarding democratic institutions and fundamental values across the EU.

Other major topics discussed with national Parliaments included the Commission work programme, the future of agriculture and food policy, economic competitiveness and industrial policy, enlargement, defence and security. Over time, the number of visits and meetings have continued to increase, except during transition years, with 2025 marking a record year for both von der Leyen Commission terms.

**Figure 7. Visits and meetings with national Parliaments by Member State, 2025**

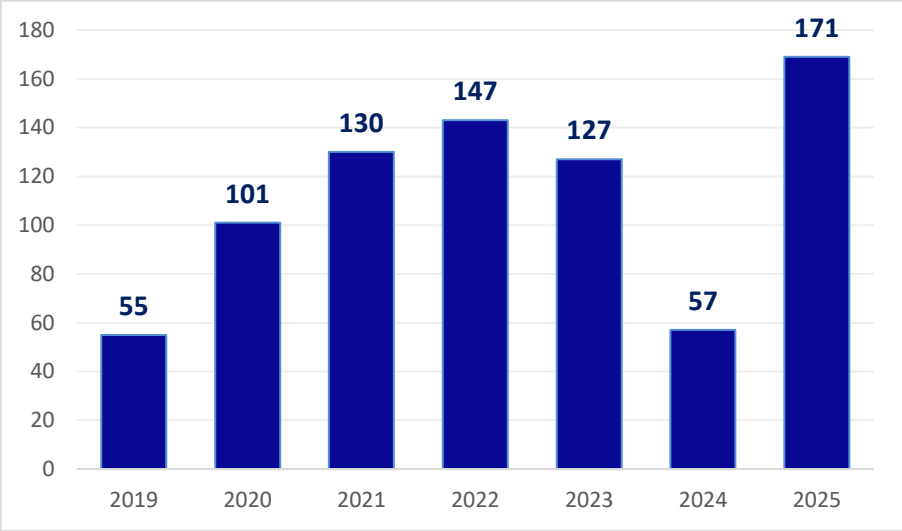
*Number of direct engagements with national Parliaments: 171*




*Source: European Commission data.*

**Figure 8. Visits and meetings 2019-2025**

*Number of visits and meetings 2019-2025: 788*




*Source: European Commission data.*

## 2. INTERPARLIAMENTARY MEETINGS AND CONFERENCES

In 2025, Members of the Commission continued to participate actively in the EU's main interparliamentary fora, including COSAC, the European Parliamentary Week, the EU Parliamentary Democracy Forum, the Inter-Parliamentary Conference on Stability, Economic Coordination and Governance in the European Union (IPC SECG), and thematic conferences hosted by national Parliaments, as well as in interparliamentary committee meetings organised by the European Parliament. Members of the Commission participated in 12 of these meetings, as part of the broader framework for political dialogue between the Commission and national Parliaments.

In 2025, the European Parliament organised 14 interparliamentary committee meetings and 4 interparliamentary conferences. One particular development was the first edition of the EU Parliamentary Democracy Forum, organised by the European Parliament in November 2025. The forum aimed to strengthen the role of Parliaments as defenders of representative democracy and support the renewal of modern parliamentarism. It looked at the growing pressure on democratic governance, including political polarisation and foreign interference. Commissioner McGrath participated in the high-level debate, underlining the forum's relevance for the Commission's wider engagement with national Parliaments on democracy, the rule of law and institutional resilience.

The future of the EU budget and enlargement were prominent themes at both COSAC plenary meetings in 2025. The LXXIII COSAC Plenary in Warsaw from 8 to 10 June 2025 focused on the priorities of the Polish Presidency, the reform of the MFF, enlargement policy and resilience to cyber and information threats. The LXXIV COSAC Plenary in Copenhagen from 30 November to 2 December 2025 addressed trade policy, the green transition of the agri-food sector, sustainable growth and energy, enlargement, internal reforms and the rule of law. Commissioner Šefčovič addressed the Warsaw plenary by video message and participated in person in Copenhagen, where

President Ursula von der Leyen addressed the meeting by video message and Commissioner Hansen also participated in person.

Overall, interparliamentary meetings in 2025 confirmed the continuing importance of structured exchanges between the Commission, the European Parliament and national Parliaments. These meetings contributed to political dialogue by facilitating discussion of current legislative and policy priorities and by providing a forum in which Members of the Commission could engage directly with national parliamentarians on the EU's broader strategic and institutional direction.

## PART IV – PRACTICAL APPLICATION OF SUBSIDIARITY AND PROPORTIONALITY PRINCIPLES BY THE INSTITUTIONS[39]

### 1. THE COMMISSION'S BETTER REGULATION POLICY

The principles of subsidiarity and proportionality are essential parts of the Commission's approach to better regulation. In recent years, the Commission has renewed its focus on driving competitiveness and growth, including through a renewed competitiveness check[40] as a mandatory annex to impact assessments, and, as of May 2025, a new check on the impact of proposals on small and medium-sized enterprises (SMEs)[41]. At the beginning of 2025, the Commission set out a vision[42] to significantly lighten the regulatory burden on people, businesses and public administrations, committing to simplify EU rules to boost prosperity and resilience. During the year, the Commission took decisive steps and adopted 10 omnibus packages and other simplification proposals. These aim to simplify EU rules, with targeted amendments to existing legislation, and reduce the administrative burden on people, businesses and public administrations, saving approximately EUR 15 billion in administrative costs[43].

The Commission is systematically guided by the principles of subsidiarity and proportionality in its legislative proposals and presents its analysis of the application of those principles in impact assessments or in its staff working documents replacing impact assessments[44] as well as in explanatory memoranda to legislative proposals. As highlighted in the staff working documents accompanying the Omnibus packages, these proposals focus on issues of a cross-border nature, which underpins the added value of the proposed changes at EU level. By limiting the amendments to only what is required, the Commission ensures that these proposals are proportionate to the objectives pursued without compromising the achievement of policy goals. For example, the Omnibus I proposal[45] aims to make sustainability reporting more efficient without going beyond what is necessary for simplification, transparency and investor protection. Without effective EU-level action, the problems identified since the entry into force of the regulation would persist.

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[39] This chapter is based on the annual reviews of each of the institutions and bodies mentioned and on Commission data.

[40] Announced in the Commission's communications on the long-term competitiveness of the EU and on relief for SMEs: COM(2023) 168 final and COM(2023) 535 final.

[41] Simpler and Faster Europe communication – IV. Improving how we make new rules.

[42] Simpler and Faster Europe communication.

[43] Simplification - European Commission.

[44] Better regulation: guidelines and toolbox (europa.eu): p. 30 Chapter IV (SWD(2021) 305).

[45] Omnibus package - European Commission.

Similarly, the amendments proposed in the Omnibus VII proposal[46] seek to cut direct costs for businesses and authorities, while maintaining the proportionality of the rules. The impact assessment accompanying the proposal for a comprehensive package[47] of measures designed to remove barriers in the EU single market for financial services concluded that EU action is necessary. Otherwise, differences in the legal, supervisory and market frameworks across Member States would prevent consistent reforms. Likewise, the impact assessments accompanying the proposal for the 2028-2034 MFF[48] prioritised subsidiarity, aiming to maximise EU budget impacts by investing in areas where EU value added is greatest. This triggers investments that would not happen without EU funding. The MFF proposal targets goals in areas such as defence, security, competitiveness and innovation, all of which require EU-level action due to their cross-border nature. Member States cannot tackle these challenges alone.

The principles of subsidiarity and proportionality are also key aspects of evaluations and fitness checks, which assess whether action at EU level has delivered the expected results in terms of efficiency, effectiveness, coherence, relevance and EU added value. For instance, the 2021-2027 EU4Health programme[49], a policy-driven EU funding programme that provides financial support to implement the priorities of the European Health Union, showed it complements Member States' actions. Pooling resources at EU level can lead to economies of scale in procurement and joint procurement (for vaccines, medical equipment and other medical countermeasures), research and health initiatives. This makes these procurement procedures more cost-effective compared with individual Member State action. The evaluation of the Waste Electrical and Electronic Equipment (WEEE)Directive[50] also shows that due to different waste management policies and practices across Member States, minimum requirements at EU level are needed to ensure consistent environmental protection and resource recovery. At the same time, the directive gives Member States flexibility, particularly with extended producer responsibility schemes and innovation.

## 2. THE EUROPEAN PARLIAMENT

In 2025, the European Parliament received 264 submissions from national Parliaments under Protocol No 2. Of these, 19[51] were reasoned opinions and 245 were other contributions that did not raise concerns about subsidiarity. By contrast, it received 152 submissions in 2024, of which 14 were reasoned opinions. The interparliamentary events organised by the European Parliament are covered in Part III.2. Once the European Parliament receives submissions from national Parliaments, they are sent to the relevant committee(s)[52]. Mr Emil Radev (EPP/BG) and Mr Ton

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46 Digital Package | Shaping Europe's digital future.

47 Market integration package - Finance - European Commission.

48 EU budget 2028-2034.

49 EU4Health programme 2021-2027 – a vision for a healthier European Union - Public Health.

50 Directive - 2012/19 - EN - EUR-Lex.

51 In its total, the European Parliament included a reasoned opinion outside the eight-week subsidiarity scrutiny deadline, which the Commission has not counted. However, neither institution counted that opinion towards the threshold for a yellow card. See rules for counting in Annex IV.

52 According to Rule 43, if a national Parliament sends a reasoned opinion to the President of the European Parliament, it is referred to the committee responsible for the subject matter and is forwarded for information to the Committee on Legal Affairs (JURI), which is responsible for respect of the principle of subsidiarity.

Diepeveen (PfE/NL) were standing rapporteurs for subsidiarity in the Committee on Legal Affairs (JURI) in the first and second half of 2025, respectively. The reasoned opinions received are always included for information in the agenda of the next available committee meeting.

The European Parliamentary Research Service continued to assist the members and committees of the European Parliament in incorporating subsidiarity and proportionality considerations into their work by: (i) systematically scrutinising the subsidiarity and proportionality aspects of Commission impact assessments and drawing attention to any concerns expressed; (ii) ensuring that the European Parliament's own work fully adheres to these principles, for example, by carrying out impact assessments of its own substantial amendments when considered to be appropriate and necessary for the legislative process or by analysing the EU added value of its calls for new legislation[53] and the cost of no EU action; and (iii) scrutinising subsidiarity and proportionality aspects when drafting impact assessments, focusing on EU added value.

On 27 November 2025, the European Parliament adopted a resolution[54] on 'the application of the Treaty provisions related to the principles of subsidiarity and proportionality and the role of national Parliaments in the EU legislative process', in which it stressed the need to continue scrutinising EU legislation and to achieve more active participation by national Parliaments through the mechanisms provided for in the Treaties, including the 'yellow card' and 'orange card' procedures. It encouraged national Parliaments to strengthen their capacity to effectively examine and challenge EU actions under the principles of subsidiarity and proportionality by scrutinising legislative proposals more closely and in a timelier manner.

## 3. THE EUROPEAN COUNCIL AND THE COUNCIL OF THE EUROPEAN UNION

The European Council discussed the simplification agenda and the reduction of administrative burden to enhance EU competitiveness on 20 March[55], 26 June[56] and 23 October 2025[57]. In its Conclusions of 20 March 2025, the European Council called on the Commission and the co-legislators to adhere to the better regulation principles throughout the legislative process, avoiding over-regulation and the introduction of unnecessary administrative burden. The Council underlined the urgent need to ensure a clear, simple, smart and innovation-friendly regulatory framework, requiring efforts at EU, national and regional level. The Council Conclusions of 26 June and 23 October 2025 emphasised the need for regulatory self-restraint and a 'simplicity by design' approach to prevent over-regulation at all stages of the legislative process. The principle of subsidiarity was specifically mentioned in the Council conclusions of 23 October concerning the Commission's plan for affordable housing and the need to respect national competences. In addition, the Council further monitored the effective implementation of the previously adopted Council and European Council conclusions on the principles of subsidiarity and proportionality.

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53 Based on Article 225 of the Treaty on the Functioning of the European Union.

54 European Parliament resolution of 27 November 2025 on the application of the Treaty provisions related to the principles of subsidiarity and proportionality and the role of national Parliaments in the EU legislative process (P10_TA (2025)0309).

55 EUCO doc 1/25, point 13.

56 EUCO doc 12/25, point 30.

57 EUCO doc 18/25, point 36.

The issue of proportionality was directly or indirectly addressed in all meetings of the Council in its Competitiveness configuration. At the policy debate on 'Council as a red tape filter' on 22 May, delegations called for applying the principles of proportionality, subsidiarity and the 'one in, one out' approach to ensure new legal acts are effective and not overly burdensome. On 29 September and 8 December, the Council discussed simplification measures, focusing on striking the right balance between introducing necessary new legislation and avoiding unnecessary burden on businesses. Delegations also reiterated the need to apply better regulation principles, including systematic impact assessments, *ex post* evaluations, stakeholder consultations and reality checks, while respecting the 'one in, one out' approach and making greater use of digital tools to reduce administrative burden.

On 4 December, the General Affairs Council adopted conclusions on 'Simplification and better regulation', calling on the Commission to contribute to a better monitoring of costs and benefits of new legislation and ensuring unjustified burden is reduced, building on the Annual Burden Surveys, the 'one in, one out' approach, and the 'One in, 27 out' principle. The Council also called on the Commission to share all data, assumptions and methodologies used in its impact assessments and the information on third parties involved in the legislative preparatory process, prioritising public consultations over ad hoc consultations[58].

On 12 December, the Economic and Financial Affairs Council adopted conclusions on 'Simplification of financial regulation', calling on all EU institutions, bodies and agencies to ensure its implementation with a particular focus on transparency, proportionality and the positive contribution of impact assessments to evidence-based policymaking in the development and implementation of financial services regulation[59].

On 16 December, the Environment Council underlined the need to respect the overarching principles of subsidiarity and proportionality and the importance of respecting existing national systems, specific national circumstances and best practices as part of its conclusions on 'Europe's Environment 2030'[60].

In addition to its obligations set out in the Treaties and in secondary law, the Council kept Member States informed of national Parliaments' reasoned opinions on legislative proposals and opinions received under the political dialogue, primarily those submitted to the Commission and with the involvement of other EU institutions[61]. The Council also received 81 opinions from national Parliaments on non-legislative acts.

## 4. THE COURT OF JUSTICE OF THE EUROPEAN UNION

In 2025, the Court of Justice did not deliver any significant judgments directly related to the application of the principles of subsidiarity and proportionality covered in this report.

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58 Council doc 16201/25.

59 Council doc 16463/25.

60 Council doc 16856/25.

61 The General Secretariat of the Council distributed 18 reasoned opinions and 211 other opinions under the political dialogue to Member States.

## 5. THE EUROPEAN COMMITTEE OF THE REGIONS

In 2025, the European Committee of the Regions (CoR) continued its work on subsidiarity, proportionality and better regulation, guided by the priorities of its 2025-2030 term of office[62]. Throughout the year, the CoR promoted an active subsidiarity culture across its activities. The CoR adopted 42 opinions and 7 resolutions, with nearly half of all CoR opinions[63] and resolutions[64] containing specific references to and/or recommendations on the application of the principles of subsidiarity and proportionality.

In the context of the EU's simplification agenda, the CoR reinforced its contribution through two key opinions adopted in 2025. The opinion on 'A simpler and faster Europe[65]' set out clear objectives to streamline and accelerate EU legislation, reduce administrative burden and avoid overly detailed rules that limit flexibility for local and regional authorities. It called for more coherent EU legislation, better alignment between existing and new laws, and the involvement of local and regional authorities in the European Commission's implementation dialogues and reality checks to ensure that EU legislation reflects realities on the ground. This subsidiarity-driven approach was further strengthened by the opinion on the 'Cities' and regions' contribution to the simplification agenda'[66], which underlined that simplification must strengthen, not undermine, multilevel governance. It warned against using simplification as a pretext for recentralising competences at national or EU level and stressed the importance of maintaining a balanced distribution of responsibilities across EU, national and subnational levels.

Throughout 2025, the Better Regulation and Active Subsidiarity Steering Group (BRASS-G) steered the CoR's better regulation tools, ensuring coherence and fostering synergies among them. This significantly reinforced the contributions of local and regional authorities in the entire policy lifecycle from policy design to *ex post* evaluation. These included activities aiming to explore different possible future scenarios (through strategic foresight), policy development (through subsidiarity and proportionality monitoring, territorial impact assessments, and rural proofing), as well as the evaluation of legislation, focusing on its implementation at local and regional level (via the RegHub network). The CoR's subsidiarity monitoring focused primarily on the 'Post-2027 Multiannual Financial Framework (MFF) proposals'[67] and the 'European Water Resilience

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62 The new term of office began with the 164th Plenary Session held on 19-20 February 2025.

63 Of the total of 42 opinions, 7 concerned legal acts; the remaining 35 opinions did not concern legislative proposals.

64 Out of 7 resolutions. The 'Resolution of the European Committee of the Regions in view of the next MFF' emphasises that the post-2027 MFF must reflect the principle of active subsidiarity and take into account better law-making. It warns against any direct or indirect centralisation within cohesion policy and stresses that subsidiarity should guide EU budgetary governance by ensuring the active involvement of government at all levels, particularly local and regional authorities. To block any attempt in this direction, the resolution highlights the CoR's readiness to use legal means under Protocol No 2 on the application of the principles of subsidiarity and proportionality and Article 263 of the Treaty on the Functioning of the European Union.

65 'A simpler and faster Europe'', rapporteur Jelena Drenjanin (SE/EPP), adopted on 3 July 2025.

66 'Cities' and regions' contribution to the simplification agenda', rapporteur Magdalena Czarzyńska -Jachim (PL/EA), adopted on 11 December 2025.

67 The CoR is preparing 20 opinions related to the MFF proposals. Among these, a SEG consultation on the draft opinion 'NRPP Fund Regulation' resulted in 11 subsidiarity assessments. In addition, one spontaneous contribution was received from a REGPEX partner.

Strategy'[68]. In this context, two initiatives were subject to in-depth subsidiarity assessments coordinated through the Subsidiarity Expert Group, in particular: (i) the proposal for a regulation of the European Parliament and of the Council establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security for the period 2028-2034, and amending Regulation (EU) 2023/955 and Regulation (EU, Euratom) 2024/2509[69]; and (ii) the Communication from the Commission on the European Water Resilience Strategy[70].

Despite the end of the European Commission's Fit4Future (F4F) Platform[71] four-year mandate in October 2024, the CoR maintained its *ex post* better regulation activities through its RegHub network. In 2025, the CoR launched a consultation[72] to gather evidence on the implementation of the 2014 public procurement directives at local and regional level, with significant input from RegHub members. This initiative was carried out in response to the Commission's planned revision of the directives and in line with Executive Vice-President Séjourné's call to involve local and regional authorities.

## 6. REGIONAL PARLIAMENTS

The Treaties only give regional Parliaments an indirect role in the subsidiarity control of European legislation – under Protocol No 2, it is for each national Parliament to consult regional Parliaments with legislative powers when carrying out the subsidiarity check. However, there is regular direct interaction between regional Parliaments and the Commission, which takes their contributions into account and replies to them. In 2025, the Commission received 63 resolutions from regional Parliaments[73].

The most active regional Parliament was the Bavarian State Parliament (*Landtag*), which sent 37 resolutions reacting to Commission proposals, including 21 expressing subsidiarity concerns. In particular, the Bavarian State Parliament sent 16 resolutions as input to Commission public consultations. By contrast, the public consultations channel was rarely used by national Parliaments, with just one submitting a contribution in 2025.

Other regional Parliaments also sent their input directly to the Commission on a repeated basis, in particular the Basque Parliament with 5 resolutions and the Thuringian State Parliament with 3.

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[68] A consultation within the SEG on the draft opinion 'Turning the tide – A local and regional roadmap for water resilience' resulted in 12 subsidiarity assessments. In addition, three spontaneous contributions were received from REGPEX partners.

[69] COM(2025) 565 final/2.

[70] COM(2025) 280 final.

[71] In its communication on 'A simpler and faster Europe: Communication on implementation and simplification' (COM/2025/47 final), the Commission mentions its intention to build on the work of the F4F Platform. However, as of January 2026, there was no decision from the Commission about continuing the Platform.

[72] Report on 'The 2025 CoR consultation evaluating the 2014 Public Procurement Directives': the consultation's questionnaire was developed collaboratively with the Commission's Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs and the CoR RegHub network.

[73] Excluding the 9 opinions issued by the Flemish Parliament. Pursuant to Declaration No 51 by the Kingdom of Belgium on national Parliaments, annexed to the Treaty of Lisbon (OJ C 306, 17.12.2007, p. 267), the parliamentary assemblies of the Communities and the Regions act, in terms of the competences exercised by the Union, as components of the national parliamentary system or chambers of the national Parliament.

Figure 9 gives an overview of the interaction between regional Parliaments and the Commission by Member State.

On the topics the regional Parliaments focused on, the next MFF was among the proposals most frequently addressed. Their resolutions focused mainly on concerns about the proposed merger of cohesion and agriculture-related funding and on the need to recognise the specific characteristics of the outermost regions.

**Figure 9. Resolutions from regional Parliaments by Member State, 2025**

*Number of resolutions received: 63*

| Member State | Number of resolutions |
|---|---|
| Germany | 43 |
| Spain | 9 |
| Poland | 5 |
| Portugal | 3 |
| Belgium[74] | 1 |
| Austria | 1 |
| Italy | 1 |

*Source: European Commission data.*

## PART V – CONCLUSIONS: 2025 FINDINGS AND THEIR IMPLICATIONS FOR TRENDS

This report confirms that relations between the Commission and national Parliaments in 2025 entered a more active phase at the beginning of the new institutional cycle, following the transition year in 2024. Beyond the headline figures, three features of the year stand out.

First, subsidiarity scrutiny continued to function as intended, even though this is only partly visible in the number of reasoned opinions. Reasoned opinions are the most visible part of subsidiarity scrutiny, allowing national Parliaments to formally take a position on a proposal's compliance with the subsidiarity principle. In 2025, 18 of these opinions were issued, spread across 15 different proposals and 9 chambers, with no single proposal receiving more than 2 opinions. However, reasoned opinions are only one possible result of a wider scrutiny exercise. Of 258 opinions submitted on proposals subject to subsidiarity control, 240 did not find any breach: national Parliaments examined the proposal against the subsidiarity principle and explicitly confirmed compliance or scrutinised the proposal's substance – proportionality, administrative burden, design choices – without raising a subsidiarity objection.

The subsidiarity scrutiny in 2025 covered the full range: from explicit confirmation of compliance to substantive engagement that stopped short of a formal objection, and, in a limited number of

[74] Excluding 9 opinions issued by the Flemish Parliament in its capacity as a component of the Belgian national parliamentary system, see the previous footnote.

cases, to reasoned opinions. The low number of reasoned opinions spread across proposals is therefore not a sign of a lack of scrutiny. Instead, it reflects that most proposals were found, after scrutiny, to respect the principle. Formal objections were reserved for cases where national Parliaments considered that EU action most directly affected national systems, administrative choices or Member States' room for manoeuvre. Concerns were also raised where they considered that the Commission's assessments underpinning the proposal were not sufficiently detailed to enable them to assess the national impact of proposed EU legislation.

Second, this same distinction – between compliance with subsidiarity and the practical design of EU action – also runs through the wider political dialogue. Across several major files where reasoned opinions were not the chosen instrument (including the MFF, the simplification and Omnibus packages, and other cross-cutting initiatives), national Parliaments commented on proportionality, administrative burden, implementation feasibility, financing, legal certainty, specific national circumstances and the flexibility left to Member States and regional bodies. This confirms, at the level of political dialogue, the same pattern visible in subsidiarity control opinions: national Parliaments distinguish clearly between whether EU action is justified in principle and how it is designed and applied in practice, addressing the two questions through different instruments depending on which issue is at stake.

Third, national Parliaments increasingly organise their input collectively, including along regional lines. This is shown in the rise in the number of own-initiative opinions, especially ones co-signed by several chambers. Beyond thematic cooperation, such as the Danish-led initiative on plant-based foods, regional cooperation was a distinct and notable feature in 2025. A total of 10 chambers from Mediterranean Member States co-signed an opinion on the new Pact for the Mediterranean, a second Mediterranean initiative on agricultural development was co-signed by six chambers, and the *Visegrád* group submitted a joint opinion on AI, marking a revival of cooperation in that format. This regional dimension provides the Commission with early and geographically grounded signals that complement the more broadly spread chamber-by-chamber pattern seen in subsidiarity scrutiny. Some own-initiative opinions, such as the Lithuanian *Seimas'* opinion on the Pact for the Eastern Border Regions, submitted at an early stage ahead of Commission proposals, indicate that national Parliaments seek to engage proactively and shape policies.

Direct engagement strengthened these trends. The increase in visits and meetings in 2025 confirmed that written opinions and direct political exchanges work in parallel. Direct contacts in 2025 provided a much-used channel to complement and contextualise the discussion for both national Parliaments and the Commission at the start of the new mandate.

Overall, 2025 showed that national Parliaments remain major partners in assessing the design and practical effects of EU action. Subsidiarity scrutiny, political dialogue, own-initiative opinions and direct engagement functioned as distinct but complementary channels. Each channel gives the Commission a different type of input: formal objections spread across themes where action affects national systems most directly; broader practical feedback on implementation; proactive, sometimes regionally organised signals ahead of legislative proposals; and direct exchange to explain and discuss priorities.