



Safeguarding LEADER-CLLD in the 2028–2034 MFF

Do 90% of rural residents no longer Count?

The European Commission's legislative package for the Multiannual Financial Framework (MFF) 2028–2034 introduces a new *European Fund for Economic, Social and Territorial Cohesion, Agriculture and Rural, Fisheries and Maritime, Prosperity and Security* ("the Fund"), consolidating CAP, Cohesion, ESF+, EMFAF and other instruments into single *National and Regional Partnership Plans (NRP Plans)*.

While simplification and flexibility are welcome, several elements of the draft Fund Regulation, CAP Regulation and ERDF/Cohesion Fund Regulation risk undermining the effectiveness of LEADER and Community-Led Local Development (CLLD). The following advocacy points identify necessary amendments.

1. Ensure broad eligibility of beneficiaries under LEADER-CLLD

- **Issue:** Article 4(3)(c) of the Fund Regulation limits CAP beneficiaries to "farmers", defined narrowly as agricultural operators. Non-agricultural actors (SMEs, NGOs, municipalities) would be excluded from LEADER-CLLD strategies financed only under CAP.
- **Implication:** Breaks with LEADER-CLLD's integrated, multi-sectoral character and contradicts Article 76(3)(c) Fund Regulation (no single interest group dominance).
- **Amendment request:** Add a new clause in Article 4(3) of the Fund Regulation: "*In the case of LEADER-CLLD, beneficiaries shall include natural and legal persons residing or established in the area covered by the local development strategy.*"

2. Broaden the scope of LEADER interventions under CAP

- **Issue:** Article 18 CAP Regulation frames LEADER-CLLD narrowly around "added value for farmers and forest holders."
- **Implication:** Excludes services, infrastructure, cultural life, youth and social innovation. Only 10% of rural residents (farm households) would benefit.
- **Amendment request:** Amend Article 18 CAP Regulation to explicitly include "*improving quality of life, local infrastructure and services, social innovation, cultural and youth initiatives, and SME development.*"

3. Guarantee CLLD across cohesion, social and maritime policies

- **Issue:** The proposed ERDF and Cohesion Fund Regulation (Recital 9, Art. 5) emphasises integrated *urban* development, omitting rural areas beyond urban–rural linkages. The ESF Regulation likewise makes no provision for community-led approaches in employment, skills or social inclusion policy, and the Maritime/Fisheries Regulation is silent on participatory territorial tools for coastal communities.





- **Implication:** In all three cases, the application of LEADER-CLLD is left to Member State discretion, creating risks of fragmented and unequal territorial coverage. Rural, coastal and peripheral regions could be excluded from community-led approaches, while funding concentrates in urban and peri-urban areas.
- **Amendment request:** Amend Article 5 ERDF/Cohesion Fund Regulation and the corresponding provisions of the ESF and Maritime/Fisheries Regulations to include a binding obligation for Member States to apply LEADER-CLLD in rural, coastal and disadvantaged areas, modelled on Article 18 of the CAP Regulation.

4. Secure ring-fenced resources for LEADER-CLLD

- **Issue:** Unlike the 2021–2027 period (Art. 92 Reg. 2021/2115: 5% EAFRD for LEADER), the proposed regulations contain no ring-fencing. Consolidated funding under the new Fund increases the risk of LEADER-CLLD being underfinanced.
- **Implication:** Without guaranteed allocations, Member States could deprioritise LEADER-CLLD in NRP Plans, leading to patchy and unequal territorial coverage.
- **Amendment request:** Reinstate a minimum allocation for LEADER-CLLD in the Fund Regulation. This allocation must at least double what is currently allocated to LEADER-CLLD.

5. Apply simplified financing consistently

- **Issue:** Article 77 Fund Regulation introduces mandatory simplified cost options (SCOs) and lump sums, but scope unclear (LEADER only or all CLLD).
- **Implication:** Multi-fund LAGs could face dual rulebooks, undermining simplification.
- **Amendment request:** Clarify that SCOs and lump sums apply across all CLLD instruments, not only CAP-funded LEADER.

6. Clarify the relationship between CLLD and LEADER

- **Issue:** Articles 74, 76 and 77 Fund Regulation inconsistently treat LEADER as either a form of CLLD under CAP or as a separate instrument.
- **Implication:** Risk of divergent national implementation and fragmentation.
- **Amendment request:** Clarify in Article 74(1) Fund Regulation that “*LEADER constitutes the CAP-specific form of CLLD*” to ensure consistency of rules and use the form LEADER-CLLD in all documents.

7. Restore LAG competences

- **Issue:** Article 76(3) Fund Regulation removes key LAG tasks currently listed in Art. 33(3) Reg. 2021/1060 (preparing calls, fixing support levels).
- **Implication:** LAGs reduced to technical intermediaries, losing their strategic leadership role.
- **Amendment request:** Amend Article 76(3) Fund Regulation to restore full LAG competences, identical to those in Art. 33(3) Reg. 2021/1060.

