



# 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, as referred to in Article 77 of Regulation (EU) 202X/XXXX [CAP Regulation] beneficiary means any natural or legal person established in the Union and carrying out activities in rural areas aimed at fostering the development of those areas"

# 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. Classify LEADER-CLLD as contributing to the EU's social objectives

- **Issue:** The annex of the performance regulation classifies LEADER/CLLD as contributing 0% to social expenditure. This is technically incorrect and politically harmful. LEADER works in rural areas with the highest social vulnerability: ageing population, youth leaving, service shortages, long distances, unemployment, and social isolation. Every year, LEADER projects deliver: community services, social innovation, inclusion initiatives, support for vulnerable groups, skills development, job creation... Yet none of that "counts" in social expenditure tracking.
- Implication: LEADER-CLLD results are not officially counted as contributing to social targets, and the added value of the approach remains hidden to general policies.
- Amendment request: Raising the classification for LEADER to 40% social. This would strengthen the EU's credibility when it says the rural dimension is central to the European Pillar of Social Rights, and incentivise national governments to allocate more funds to LEADER, because it helps them meet EU social targets.

### 6. 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.





# 7. 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 and art 22 (2) (h) (i) remove "as well as LEADER as referred to in Article 77 [LEADER]"

### 8. 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.