



FICSIMM - Federation for Innovation and Sustainable Competitiveness in SMEs

Observations and proposals on the Social Consensus Note

(World Bank, September 2026)

Contribution to the preparation of the National and Regional Partnership Plan 2028 - 2034

Table of Contents

1. General remarks and the framework of our observations	2
2. The analytical framework: territorial scale and underpinning indicators	4
3. Education and skills: the employer as a partner, not merely a respondent.....	6
4. Labour market and employment: the sustainability of supported enterprises	9
5. Health, social services and inclusion: the care economy as an SME sector.....	12
6. Territorial cohesion: the risk of financing the polarisation we want to reduce	14
7. Institutional strengthening: simplification, partnership and conditionality fit for the territory	16
8. Summary of FICSIMM's 33 proposals for the NRPP 2028 - 2034.....	20
9. Availability for the next stages	24

1. General remarks and the framework of our observations

FICSIMM welcomes the initiative of the Ministry of European Investments and Projects (MIPE) to submit to partner consultation the needs analysis of the social sectors prepared with the support of the World Bank. The Note is a solid, well-documented piece of work and, in many respects, bolder than the programming analyses we have grown used to: it explicitly acknowledges that **Romania's allocations for innovation, inclusion, employment and education (PO1 and PO4) remain below the EU-27 average** (para. 28), that an infrastructure-centred portfolio **may constrain long-term convergence unless it is rebalanced** (para. 29) and that, despite remarkable contracting rates, **verified results at programme exit are almost entirely missing** as of mid-2025 (paras. 85 - 88). We also appreciate the demographic and skills-adequacy "lens" applied across the six dimensions; it is the first time a Romanian programming document treats demographic decline not as statistical scenery but as a design variable for investment.

Our observations start from a simple finding: **social consensus cannot be built without the real economy that finances it**. SMEs account for over 97% of companies in Romania and for more than two thirds of private-sector jobs, and in most of the less developed counties they are the only significant private employer. In the Note, enterprises appear almost exclusively in two roles: as a data source for occupational barometers (employer surveys) and as contracted beneficiaries of grants (paras. 89, 96). What is missing is the role that matters most for the sustainability of social investment: **the SME as a design and delivery partner** for skills, employment, care services and local development. We propose that the final version of the Note and, above all, the NRPP chapters that will flow from it, correct this asymmetry.

We formulate our observations in the context of the ongoing European negotiations. The Commission's proposal for the NRPP Regulation (COM(2025) 565) sets a **minimum threshold of 14% for social objectives**, calculated, however, after excluding agricultural allocations and the Social Climate Fund, which, according to some estimates, leaves the resulting social envelope more than 15% below the current ESF+. FICSIMM's position, expressed in its April and July 2025 papers on the MFF and reiterated at the Working Group meeting of 25 March 2026, remains unchanged: **Cohesion Policy must keep its own identity, governance and funding logic, and the social component must be identifiable and traceable within the NRPP, not diluted in a single bilaterally negotiated plan**. The



Social Consensus Note can become the instrument through which Romania argues, with data, its need for a social envelope above the minimum threshold.

We have argued publicly that **the social dimension is not the “soft chapter” of the budget but the infrastructure on which everything else is built**: the factory financed through the European Competitiveness Fund will stand idle without the technicians trained through the social fund, and the machinery bought with European money does not come with the people to switch it on. The five principles FICSIMM defends in this debate are simple:

- **a distinct social fund, with a protected budget;**
- **social partners structurally involved in programming and monitoring;**
- **multiannual, predictable funding for training, not sporadic calls;**
- **explicit targeting of young people from vulnerable backgrounds and of depopulating communities;**
- **results measured in hires, wages and productivity, not in diplomas issued and course attendance.**

We find that the Note converges, on many points, with these principles; the observations that follow concern the places where that convergence must be carried through to the end.

2. The analytical framework: territorial scale and underpinning indicators

Our first observation concerns **the scale at which the analysis is built**. The Note works, by its nature, at national level and, where it disaggregates, at NUTS 2 regional level. Footnote 1 acknowledges that **a more detailed correlation of national and regional diagnostics falls outside the scope of the document** and recommends it as a subsequent exercise, in dialogue with the RDAs. FICSIMM asks that this exercise be an integral part of NRPP preparation, not an optional annex. We showed, in the contributions submitted to the European Commission in July 2026 for the 10th Cohesion Report, that NUTS 2 analysis systematically masks county-level divergence: several Romanian regions display an apparent convergence generated almost entirely by a single growth pole, while the surrounding counties stagnate or regress, forming **“pockets of underdevelopment” inside statistically advancing regions**. The maps in Figures 6 and 7 of the Note say exactly this: the localities that develop are the dynamic cities and those connected to them; the rest fall behind regardless of the regional average. The Note records, at para. 3, that Bucharest - Ilfov has exceeded 150% of the European average while **the North-East remains below 50%**; Eurostat data for 2024 in fact indicate **187.7% for Bucharest-Ilfov**, which makes **the gap between the two regions the widest within any Member State of the Union**. This is not a difference of pace but of structure: in rural regions, around 31% of the active population works in agriculture, at a value added per worker of about EUR 6,700, against a national average of almost EUR 37,300. Uniform policies are administratively comfortable and deliver least precisely where most is needed.

Our second observation concerns **the indicators**. The Note rightly uses GDP per capita, the employment rate, AROPE and participation in learning. To underpin NRPP allocations, we consider it indispensable to complete this set with **indicators of the local productive fabric**, which we have consistently proposed since our April 2024 position paper on intra-regional disparities: **SME density and business demographics (birth, survival and de-registration rates, by county), the digital connectivity gaps of firms, energy dependence and the exposure of the productive base to energy costs, labour-market vulnerability and depopulation, and, for the counties on the eastern border, exposure to hybrid and security risks**.

A territory that loses its entrepreneurs loses, within a few years, its school, its clinic and its bus as well. **SME density and resilience are indicators of social cohesion**, not only of economic cohesion, and we ask that they enter the NRPP territorial allocation formula alongside GDP per capita.



We also ask that **depopulation become an explicit programming criterion**: the Note rightly treats it as a cross-cutting lens (para. 19), but a lens does not allocate money. **Interventions must be concentrated in communities at the tipping point, where a school kept open, a functioning clinic and ten jobs can still reverse the trend.**

The demographic lens must, however, be completed with a phenomenon the Note does not address: **return from the diaspora**. Romania talks a great deal about how to reduce departures, but almost not at all about what happens to those who choose to come back and about the conditions under which they can stay. The Note itself recommends, at para. 105, “return migration measures” as part of the workforce strategy, without detailing them. We ask that the NRPP include an **explicit dimension for the reintegration of people returning from the diaspora, with priority for communities affected by depopulation**: recognition of skills acquired abroad, vocational and entrepreneurial guidance, simplified access to information and public services, and support for the reintegration of families. Demographic policy has two questions to answer, not one: how do we stop people leaving and, respectively, how do we help them stay once they have come back.

3. Education and skills: the employer as a partner, not merely a respondent

FICSIMM supports without reservation the central thrust of section IV.1: **the shift from a “supply-driven” training offer to “demand-informed” pathways** (para. 61), the national and regional skills-intelligence mechanism (paras. 61, 65) and the funding of providers on the basis of certification and placement rather than enrolment (paras. 62, 97). Recent data confirm the urgency: according to Eurostat, in 2025 only 72.7% of Romanian graduates aged 20 to 34 were in employment, against an EU average of 83%, and for **vocational education graduates the employment rate was 63.4%, against 80.2% in the EU**. In a country that laments its shortage of skilled labour, one in three vocational-school graduates is not working. This is the clearest proof that the problem is not the number of pupils enrolled but the link between school and employer.

Here we make our first concrete proposal. The Note provides for **employers’ organisations to be “consulted” and “surveyed”** within the occupational barometer and the regional consortia for vocational education (paras. 61, 65, 94). We ask for one further step: **the relevant SME associations**, alongside the social partners, should be **full members, with a vote, in the governance of the regional skills observatories** (para. 102) **and of the regional consortia for vocational education and training**, and the data produced should be published in open format, at county level. An SME organisation that fills in a questionnaire once a year is not a partner; one that validates the county’s annual training plan is.

Our second proposal concerns **dual education**. The Note rightly treats it as a bridge to employment (para. 60), but does not address **the reason why SMEs are absent from it: for a firm with 15 employees, the cost of the in-company tutor, the red tape of partnership contracts and the absence of an intermediary structure make participation unattractive**, whatever the good intentions. We propose that the NRPP explicitly fund **SME consortia for dual education**, with an intermediary operator (employers’ structure, cluster, chamber of commerce) that takes over the administrative burden, together with **an incentive per student hosted**, calibrated to the size of the enterprise. The model works in Austria and in the German Länder precisely for small firms; there is no need to invent it.

Our third proposal concerns **adult learning within the firm**. The Note finds participation to be minimal and not demand-driven (paras. 41, 79) and proposes community centres, micro-credentials and employer co-financing (para. 62). We support all three elements, with one condition: **the main**

instrument for training employed adults must be the enterprise-managed training voucher, with simplified procedures for micro-enterprises and a catalogue of accredited providers, not the classic grant project, with application, procurement and reporting, which an SME never writes. Specific objective ESO4.4 (adaptation of workers and enterprises to change) is the least used in the current ESF+ precisely because the form of the support does not fit the beneficiary.

Our fourth proposal concerns **the recognition of skills acquired through experience**. The Note rightly asks that training be measured by certification and employment rather than enrolment (paras. 62, 97) and mentions the recognition of prior learning as an instrument of structural transitions (para. 69). We ask that this instrument become operational and accessible. There are people who have practised the same trade for 20-30 years, people who learned directly on the job and Romanians who built their skills abroad, without any of this being reflected in a recognised qualification. **In an economy that complains of a skills shortage, we cannot afford to treat as “unskilled” a person who knows a trade merely because they do not hold the document that proves it.** We propose that the NRPP fund **a simple, fast and accessible mechanism for assessing, validating and certifying skills acquired through work, including abroad, and through non-formal or informal learning**, linked to the shortage occupations identified through the occupational barometer and with assessment centres in every county, not only in the large cities.

Our fifth proposal concerns what we might call **the “analogue generation”**: people aged 45-55 and over, who built most of their working lives before accelerated digitalisation and who hold decades of experience, but now face rapid change in recruitment, training and access to services. We are not talking about a generation lacking skills, but about a highly competent one, formed in an analogue world, which needs support to transfer its experience into a digital society. The Note takes stock of the shortage of welders, CNC operators, electricians and technicians (paras. 42, 98); the reverse perspective is missing: **which skills do we already have and risk losing?** In an ageing society, one person’s retirement can mean the exit from the economy of 30-40 years of craft. We propose that the NRPP fund, under ESO4.4 and in connection with dual education, **mechanisms for professional mentoring, inter-generational skills transfer and digital upskilling for people aged 45+/55+, by involving experienced professionals and seniors in preparing the younger generations, with priority for shortage**

occupations. We cannot simultaneously find that Romania has run out of tradespeople and let the skills of those we still have disappear.

Two additions concern **the basic conditions of access to education in rural areas**, where early school leaving reaches 27.5% (para. 37). First: for a rural child, access to education does not mean merely a school on the map, but **a hot meal provided daily and, where the school is far away, decent boarding accommodation**. A hungry child does not learn, and one who commutes three hours a day drops out, however many interactive whiteboards we buy. **“Healthy Meal”-type programmes and the network of school boarding facilities**, left to decay after 1990, are the minimum infrastructure of equal opportunity, financeable from European funds, and we ask that they appear explicitly among the recommendations of section IV.1.

Second: we support the prioritisation of transversal skills (para. 68), with a clarification we have also made publicly: **digital literacy does not mean knowing how to use a device, but being able to take part actively, critically and safely in a digital society**. We financed tablets and laboratories, and they were needed, but equipment without pedagogy produces faster consumers of content, not more capable professionals. Machinery depreciates over years; critical thinking never does.

A third addition concerns **the effects of migration on children and the family**, a dimension absent from section IV.1. We have children left in Romania with one or both parents working abroad and, increasingly, children raised in other countries who return with their families and must integrate or reintegrate into the Romanian education system. Both categories are concentrated precisely in the counties with high early school leaving. We ask that the NRPP include **a component dedicated to families affected by migration: prevention of educational and social risks for children with parents abroad and, for returning children, educational assessment, language support where needed, counselling, family support and early intervention to prevent drop-out**. The early-warning mechanism developed under PNRAS, which the Note proposes to extend (paras. 57-58), can integrate these indicators at no additional system cost.

Finally, we ask that **entrepreneurial education appear explicitly in the Education and skills dimension**. The Note speaks of digital, green and transversal skills (para. 68), but does not mention the competence to start and run a business, the only one that creates, in counties without large investors, the jobs that the other skills presuppose as already existing.

4. Labour market and employment: the sustainability of supported enterprises

The Note contains, at para. 96, the most important acknowledgement in the entire document for SMEs: **“a recognised risk is that many of these enterprises cannot sustain themselves financially once the contractual sustainability period ends”**, a risk described as “a broader challenge affecting EU support for enterprises”. FICSIMM confirms this from its members’ experience and adds the diagnosis the Note leaves implicit: **low absorption and weak sustainability of enterprise measures are, as a rule, a design problem, not a demand problem**. Pure grants for business start-ups, with obligations to maintain jobs for three years, inevitably select projects built to obtain the grant, not to survive the market. **We propose that post-2027 “start-up” and “diaspora” schemes combine microfinance with a public guarantee, mandatory mentoring and a reduced, results-based grant, and that the success indicator be the survival rate 36 months after support ends, not at the end of the monitoring period.**

Also at para. 96, the Note proposes **results-based grants** rewarding verified job creation, business survival and employee upskilling. We support the principle, with two conditions.

First: **for micro-enterprises and for firms in counties with “thin” labour markets, the result target must be calibrated to the starting point, and non-achievement for objective reasons (loss of a client, energy shock, bankruptcy in the supply chain) must not trigger full recovery of the support**; otherwise, precisely the firms in the territories the Note calls “contracting” will stop applying.

Second: at para. 101, the Note states that, after 2027, **EU funding for enterprises “should require commitments” on fair labour standards, investment in training and the green or digital transformation**. We ask that these commitments be framed as **differentiated incentives, not cumulative preconditions**. A micro-enterprise that must simultaneously demonstrate compliance with four cross-cutting conditionalities before receiving a EUR 40,000 grant will not apply; the large firm, which has a department for that, will. The net effect would be the opposite of the one intended.

Our third observation concerns **women’s and young people’s entrepreneurship**. The Note addresses the employment gap between women and men, 18 percentage points against 10 in the EU (para. 5), almost exclusively through the lens of care services and flexible work (paras. 95, 106). Both are necessary; neither is sufficient. In the counties of the North-East, South-East and South-West, where

large employers are absent, the activation of inactive women often runs through their own business: services, agri-food, care, crafts, rural tourism. FICSIMM and the Organisation of Women Entrepreneurs (OFA) ask that the NRPP include **dedicated schemes for women's and youth entrepreneurship in the less developed and border counties, with funding, mentoring and access to markets, treated as cohesion instruments in the full sense**, as we also asked in our sixth contribution to the Cohesion Report. Regions in which half of the potential entrepreneurs never start a business lose their economic resilience and, with it, social consensus.

We welcome, by contrast, the recommendation to set up **territorial employer-relations units within the PES** (para. 93) and ask that they be designed together with SME organisations, with performance indicators measured from the employer's perspective (response time to a recruitment request, fill rate of notified vacancies). Local employment partnerships (para. 93) must name the SME associations explicitly among their members, not subsume them under the generic category "employers".

We also support directing reskilling resources towards sectors with a verified shortage (para. 98), with the clarification that the list must explicitly include **technical occupations in small and medium-sized manufacturing**, welders, CNC operators, maintenance electricians, energy-efficiency technicians, without whom the retooling of industrial SMEs remains on paper.

On **informal work**, the Note finds that almost one in five jobs is informal, particularly in small firms and in rural areas (para. 76). The proposed response is formalisation and job quality (para. 101). We complete it: **formalisation is achieved when the cost of compliance for a micro-enterprise falls below the cost of informality**. We ask that the NRPP fund, under PO1 or PO4, **digital simplification of reporting obligations for micro-enterprises and "first-time compliance" mechanisms, whereby the firm entering the formal economy receives assistance, not sanction**. A state that digitalises control but not compliance gets more informality, not less.

As regards the **just transition**, we support strengthening the employment ecosystem in the six counties (para. 99) and **ask that the county transition coordination groups include the SME associations as members, not as guests**.



We also recall, as we showed in our fourth contribution to the Cohesion Report, that **the rule requiring existing equipment to be kept in operation during implementation and the durability period makes cohesion funds unusable for the industrial SME that wants precisely to replace an old, energy-intensive line.** This barrier of rules, not of allocation, must be removed in the NRPP, and support for energy efficiency must be offered predominantly through guarantees and blended finance, with grants refocused on audits and transformation plans, in line with the portfolio guarantee instrument developed by FICSIMM with the Investment and Development Bank.

5. Health, social services and inclusion: the care economy as an SME sector

Sections IV.3 and IV.4 of the Note are built almost entirely from the public provider's perspective. Deinstitutionalisation (para. 155), integrated community services (para. 154), home and long-term care, nurseries and day services are, however, across Europe, **sectors in which SMEs and social enterprises deliver a substantial share of capacity**, at lower cost and with greater proximity to the beneficiary. We ask that the NRPP explicitly treat **the care economy as an economic sector in which small private providers and social enterprises are eligible for infrastructure investment, staff training and multiannual service contracts, with uniform quality standards and payment on time**. The new European Public Procurement Regulation, published by the Commission on 9 September 2026, keeps the light regime for social services and reserved contracts; the NRPP must prepare local authorities to use them.

We support without reservation the integrated service hubs proposed at paras. 227 and 235, in which **employment, social and health services operate under a single entry point and a single digital file**. This is also the conclusion we reached at the Local Communities Summit, co-organised by FICSIMM at the Palace of the Parliament on 16 July 2026: **a person from a vulnerable community does not have the resources, in time, money or trust, to run between five institutions that do not talk to each other. The mother who brings her child to after-school must be able to attend, in the same building, a qualification course**. We ask, however, that **these integrated community centres be financed as standard infrastructure of rural and small-town Romania, with stable staff paid from regular budgets, not as projects that die at the end of the sustainability period**, precisely the risk the Note flags at paras. 154 and 161.

These centres also have a function the Note mentions only in passing, at paras. 224 and 234: **assisted and safe access to digitalised services for citizens who cannot use the digital channel on their own**. We ask that this function be designed explicitly, with staff and procedures, so that the citizen is not forced to hand over informally to a third person passwords, authentication codes or personal data in order to exercise a right, and without creating permanent dependence on an intermediary. We detail the principle in section 7.



We support linking material assistance to activation (para. 157) and the shift from counting beneficiaries to durable results (para. 153), with one addition: the employment outcome for people from marginalised communities is produced, in practice, in a small firm nearby, not in a programme. We propose that **employers who integrate people from vulnerable groups be eligible partners in inclusion projects, with support for workplace mediation and job adaptation, and that integrated community teams have an explicit mandate to work with local employers, not only with beneficiaries.**

6. Territorial cohesion: the risk of financing the polarisation we want to reduce

Section IV.5 is the best-argued in the Note and, at the same time, the one that raises the most serious public-policy question. The diagnosis is correct: **development spreads from dynamic cities to the localities connected to them, and unconnected localities fall behind** (para. 170). **The recommendations, however, are almost entirely built around functional urban areas and metropolitan master plans** (paras. 189-200): territorial pacts at functional-area scale, mobility corridors, metropolitan governance, formula-based transfers. All are necessary for Cluj, Iași, Timișoara or Brașov. **None answers the question of what happens to Vaslui, Botoșani, Mehedinți, Teleorman or Călărași, counties that do not gravitate around any dynamic pole and in which**, according to the Note's own analysis, **most marginalised people are concentrated** (Figure 8). **An NRPP built on the logic of functional areas, without a distinct pillar for structurally disadvantaged counties, will accelerate the very polarisation it claims to combat.**

We therefore welcome the proposal at para. 201 to **reserve a share for small towns and peri-urban areas, and ask that it be quantified in the NRPP and explicitly extended to counties with severe structural disadvantages**, regardless of the NUTS 2 region they belong to. FICSIMM formulated, in its April 2024 paper, thirteen concrete proposals for these territories, including: **county economic development plans, microfinance schemes and support for small businesses, special economic zones with investment incentives, connectivity to urban centres, and decentralised management of funds with greater autonomy for the authorities of underdeveloped counties**. We reiterate them as **elements of the territorial pillar of the NRPP**, with concentration, not dispersion, of resources in the counties with the widest gaps.

We insist on the mechanism, because it, not the allocation, has been the problem of the last two decades. European funds were distributed mostly through competitive calls, and the competition was won, predictably, by the administrations with capacity, the firms with a track record and the territories that already had basic infrastructure: **the money followed capacity, not need**. The Note confirms this at para. 209, when it finds that **“project management capacity is weakest where needs are greatest”**. The conclusion we ask the NRPP to draw is that **a “pocket of underdevelopment” does not need a competitive call, but someone who comes, assesses, designs and implements together with the**

community: with technical assistance paid from the programme, with pre-financing instead of reimbursement and with standardised documentation for small projects. And where the commune does not, on its own, have critical mass, the **micro-regional and inter-communal arrangements** the Note proposes at para. 154 for social services must be extended to the whole investment logic. With over 3,200 administrative-territorial units, many without specialists in procurement, urban planning or European funds, Romania literally has no one to sign the partnership with in its current form.

We support the recommendation at para. 195 **on regional technical-assistance cells for small and medium-sized towns and propose extending it to private beneficiaries.** The one-stop-shop model FICSIMM presented at the meeting of 25 March 2026 is exactly this: **integrated centres for technical assistance, training and pre-financing, managed by the RDAs in partnership with the representative structures of SMEs, local authorities and civil society, offering under one roof advice on identifying funding, support in drafting the application, legal and financial assistance throughout implementation, and applied training programmes in project management, public procurement and financial governance.** The skills stay in the organisation after the project ends; this is the difference between absorption and capacity. We also support para. 197 on **linking territorial investment to partnerships with employers** and ask that **business parks and the regeneration of industrial sites have windows dedicated to local SMEs, not only to the anchor investor.**

Finally, **the Note does not treat the eastern border counties separately**, although MIPE obtained, in the 2026 European Semester, recognition of the challenges generated by geographical position and by developments in the eastern region. For Botoșani, Iași, Vaslui, Galați and Tulcea, depopulation and thin labour markets are compounded by trade disruption and exposure to hybrid risks. We ask that the NRPP take up FICSIMM's February 2026 position on the Commission Communication "Strong regions for a secure Europe": **SMEs in these counties must be primary beneficiaries, with dedicated windows, of any eastern-border facility, not secondary actors in infrastructure or security projects.**

7. Institutional strengthening: simplification, partnership and conditionality fit for the territory

Section IV.6 contains the proposal FICSIMM considers the most valuable in the Note for beneficiaries: **“one set of forms, one reporting cadence, one results protocol”** (para. 228). We support it in full and **ask for its explicit extension to private beneficiaries, together with three measurement elements:**

- **a public time-to-grant indicator for each call;**
- **application of the “once-only” principle for documents the state already holds, as introduced by the new public procurement regulation; and**
- **acceptance of digital registers with sample-based verification** (para. 223) **for all categories of beneficiaries.**

The outcome of the lessons of 2021-2027 must be that an SME submits its tax certificate once in a lifetime, not with every reimbursement claim.

The digitalisation we ask for beneficiaries must, however, respect, for citizens, a principle the Note intuites (paras. 210, 234) but does not state: **formal access is not real access**. A right or a service does not become accessible merely because a platform exists through which it can be exercised. A service moved online can become more accessible for the majority and, at the same time, more inaccessible for those who already faced the highest barriers: functional illiteracy, age, disability, lack of devices or connectivity, geographical isolation, reduced mobility. We ask that the NRPP impose, for all investments in the digitalisation of public and social services, five design conditions:

- **indicators of accessibility and effective use** alongside the technical ones (the citizen can find the information, understand it and complete the operation on their own);
- **testing with real users from different categories**, not only technical validation;
- **safe assisted access** in integrated community centres and one-stop shops;
- **protection of the citizen’s autonomy**, who must not hand over credentials to an intermediary; and
- **the cost of accessibility borne by the service provider**, which is also the one that reaps the efficiency gains, not by the user.

Digitalisation must simplify the citizen’s relationship with the state, not move the barrier from the counter to the screen.

We add three elements we have publicly described **as the “invisible tax” of bureaucracy:**

- **unified and binding interpretations of the rules between managing authorities and intermediate bodies, so that the same case does not receive three different, sometimes opposite, answers;**

- **symmetrical liability, in which financial corrections generated by the ambiguity of the guidelines are not transferred in full to the beneficiary;** and

- **abandoning the lists of eligible NACE codes** as an access filter, shifting the focus to the value of the project and its multiplier effect in the economy and the community. NACE lists are central planning by other means.

Our second observation concerns **the partnership principle**. The Note invokes it in the Way Forward (para. 239) and in workforce planning (para. 105, “broad consultations”), but does not treat it as a measurable dimension of governance. FICSIMM proposed, in its fifth contribution to the Cohesion Report, that **the frequency, representativeness and real influence of consultation be tracked as indicators, alongside the quality of regional governance**. We ask that the NRPP codify, in its governance chapter, the participation of social partners and relevant SME organisations in the monitoring committees and coordination structures of the plan, with voting rights, and provide for consultation deadlines compatible with real analysis. We say this with all institutional friendship: a 57-page document, sent on 11 September with a deadline of 21 September, can receive observations from those who read it anyway; it cannot receive the extended contribution of all the members we represent.

Here we also ask for **the strengthening of the role of the social dialogue partners**, whom the Note treats as a source of consultation, not as part of the governance architecture. The experience of 2021 - 2027 shows that formal participation in monitoring committees, without in-house expertise, without timely access to information and without weight in decisions, produces neither real partnership nor shared responsibility. We propose that the NRPP explicitly provide for: **funding the analysis, monitoring and training capacity of the relevant employers’ organisations and trade unions** from the plan’s technical assistance, continuing the ESF+ 2021 - 2027 obligation on capacity building of social partners and civil society; **the involvement of the National Tripartite Council for Social Dialogue and of the**

social dialogue committees in the programming stages and in the annual reviews of the plan, with recorded opinions and a reasoned response to observations not accepted; and **the inclusion of the social partners as signatories of the territorial pacts** for employment and skills, not merely as guests at consultations.

We add a structural requirement without which everything above remains declaratory: **in the future monitoring committees of the programmes financed from the MFF 2028 - 2034, the share of votes held by the relevant non-public actors - employers' organisations, trade unions, civil society, academia, etc. - must be at least 50%. If the majority of voting members represent public entities, whatever their level - ministries, agencies, county or local authorities -, the voice of non-public actors remains purely formal: it can be recorded in the minutes, but it cannot change a decision. Parity is not a concession made to the partners, but the condition for their point of view to carry real weight and for the responsibility for results, which the new framework shares with them, to come with a matching power of decision.**

Institutional partnership must be completed with **the direct participation of citizens who, as a rule, do not reach consultations**. A public consultation is not representative merely because it is open to all: people aged 55+, inactive women, rural citizens, those returned from the diaspora and other categories weakly connected to associative structures or to the digital environment may never reach it. Digitalising consultation widens participation for some and closes it for others. We ask that the NRPP provide for **territorial and participatory consultation mechanisms, through community meetings, local centres, civil society organisations and hybrid offline-online formats, and that the evaluation of consultation measure not only how many took part, but who took part, who was missing, why they were missing and what happened to the proposals received.**

Our third observation concerns **performance-based conditionality**. The Note proposes, for post-2027, **an annual “performance pact” between central and local institutions, in which counties and municipalities that reach the milestones gain priority access to technical assistance and funds** (para. 230). Combined with the NRPP model of payments against milestones and targets, inspired by the Recovery and Resilience Plan, **this mechanism risks structurally disadvantaging precisely the territories with weak administrative capacity and a low socio-economic base, the ones**



Cohesion Policy exists for. FICSIMM asks for a hybrid model: accountability for results, but with territorial flexibility, targets calibrated to capacity and to the starting point, and technical assistance that precedes, rather than follows, performance. The Note itself acknowledges, at para. 209, that “project management capacity is weakest where needs are greatest”; a scheme that rewards performance without first building capacity entrenches this asymmetry.

We add a clarification the Note does not make. In a plan paid against milestones, **the private beneficiary is exposed to the consequences of the state’s failure to deliver the reforms it has committed to:** suspended payments, postponed calls, decommitment.

FICSIMM does not ask for the private sector to be shielded from this exposure: if the private sector bore no consequence for the state’s mistakes and for its refusal to carry out systemic reforms, it would have no reason to put pressure on the state, and the state would never feel obliged to deliver them. **Shared exposure is, in the logic of the new framework, the mechanism through which reforms become the direct interest of those who produce.**

We ask, instead, that **this exposure be accompanied by the instruments through which pressure can actually be exerted:**

- **A vote in the NRPP monitoring committee** for the social partners and the representative SME organisations;
- **Real-time access to the reform milestone dashboard;**
- **An early-warning procedure** through which partners can formally request explanations and a remediation plan when a reform enters the risk zone;
- **Quarterly publication of the status of the reforms** on which payments depend;
- **Transparent contractual clauses, known at signature,** not interpreted retroactively.

A partner who bears the consequences but has neither the information nor the vote cannot exert pressure; it can only pay.

8. Summary of FICSIMM's 33 proposals for the NRPP 2028 - 2034

1. Territorial scale of the analysis (paras. 17 - 26, footnote 1). Completing the Note with county-level (NUTS 3) diagnostics, prepared with the RDAs, and explicitly treating “pockets of underdevelopment” as a strategic objective of the NRPP.

2. Underpinning indicators (paras. 20 - 25). Including SME density and business demographics, firms' digital connectivity, energy dependence and depopulation in the territorial allocation formula, alongside GDP per capita.

3. Skills governance (paras. 61, 65, 94, 102). Relevant SME organisations and social partners as voting members of the regional skills observatories and the regional VET consortia; data published openly, at county level.

4. Dual education for SMEs (para. 60). Funding SME consortia with an intermediary operator and an incentive per student hosted, calibrated to firm size.

5. Adult training within the enterprise (paras. 41, 62, 79, 97). An enterprise-managed training voucher, with simplified procedures for micro-enterprises and a catalogue of accredited providers, as the main instrument under ESO4.4.

6. Entrepreneurial education (para. 68). Explicit inclusion of entrepreneurial competence in the Education and skills dimension.

7. Basic conditions of access to school in rural areas (para. 37). A daily hot meal and a network of school boarding facilities financed as infrastructure of equal opportunity; digital literacy understood as critical participation, not as operating devices.

8. Sustainability of supported enterprises (paras. 89, 96). Moving from pure grants to guaranteed microfinance, mentoring and a reduced results-based grant; a survival indicator 36 months after support ends.

9. Proportionality and incentives, not cumulative conditionalities (paras. 96, 101). Result targets calibrated to the starting point for micro-enterprises and contracting territories; commitments on training and the green + digital transition framed as differentiated incentives.

10. Women's and youth entrepreneurship (paras. 5, 95, 106). Dedicated schemes in the less developed and border counties, treated as cohesion instruments, with funding, mentoring and access to markets.

11. PES and local partnerships (paras. 93, 98, 99). Employer-relations units designed with SME organisations, with indicators measured from the employer's perspective; SME associations as full members of local employment partnerships and county transition groups; technical occupations in small and medium-sized manufacturing on the shortage-sector list.

12. Formalisation by lowering the cost of compliance (paras. 76, 101). Digital simplification of reporting for micro-enterprises and "first-time compliance" mechanisms.

13. Removing the equipment rule barrier (PO1 / PO2, just transition). Abandoning the obligation to keep replaced equipment in operation; energy-efficiency support predominantly through guarantees and blended finance, with grants for audits and transformation plans.

14. Depopulation as an explicit programming criterion (paras. 4, 19, 171). Concentrating interventions in communities at the tipping point, with allocation, not only with an analytical lens.

15. The care economy (paras. 154 - 156). Eligibility of small private providers and social enterprises for investment, training and multiannual contracts; preparing local authorities for the light regime and reserved contracts of the new public procurement regulation.

16. Integrated community centres (paras. 154, 161, 227, 235). Financed as standard infrastructure of rural and small-town Romania, with stable staff from regular budgets and an explicit mandate to work with local employers.

17. A distinct pillar for structurally disadvantaged counties (paras. 170, 189-201). Quantifying the reserved share of para. 201 and extending it to counties without a dynamic pole; county economic development plans, microfinance, special economic zones, connectivity.

18. A non-competitive mechanism for “pockets of underdevelopment” (para. 209). Technical assistance paid from the programme, pre-financing instead of reimbursement, standardised documentation for small projects and micro-regional arrangements for local authorities without critical mass.

19. A regional one-stop shop for beneficiaries (paras. 195, 225). Integrated centres for technical assistance, training and pre-financing, managed by the RDAs in partnership with the relevant structures of SMEs, local authorities and civil society.

20. The eastern border. Windows dedicated to SMEs in any facility aimed at the eastern border counties, with SMEs as primary beneficiaries.

21. Measurable simplification (paras. 223, 228). A single set of forms and a single results protocol, extended to private beneficiaries; a public time-to-grant indicator; the “once-only” principle for documents held by the state.

22. Reducing the “invisible tax” of bureaucracy. Unified and binding interpretations, symmetrical liability for corrections generated by ambiguous guidelines, abandoning NACE lists as an eligibility filter.

23. Codified and measured partnership (paras. 105, 239). Voting participation of social partners and SME organisations in the NRPP governance structures; indicators of the frequency, representativeness and influence of consultation; adequate consultation deadlines.

24. Hybrid conditionality (paras. 209, 230). A performance model with territorial flexibility, targets calibrated to capacity and starting point, and technical assistance before, not after, performance.

25. The social envelope of the NRPP (COM(2025) 565 context). Using the Note as the basis for an identifiable, traceable social allocation above the 14% minimum threshold, with Cohesion Policy keeping its own identity and governance.

26. Reintegration of people returning from the diaspora (para. 105). An explicit return and reintegration dimension in demographic policy for territories affected by depopulation: recognition of skills, employment, services and family reintegration.

27. Recognition of skills acquired through experience (paras. 62, 69, 97). A simplified mechanism for assessing, validating and certifying skills acquired through work, including abroad, and through non-formal and informal learning, with assessment centres in every county.

28. The professional capital of the “analogue generation” (paras. 42, 79, 98). Making use of the experience of people aged 45+/55+ through digital upskilling, recognition of professional experience, mentoring and inter-generational transfer of trades, connected with dual education.

29. Digitalisation without exclusion (paras. 210, 224, 234). The principle that “formal access is not real access” in the design of digitalised public services: effective-use indicators, testing with real users, safe assisted access, protection of the citizen’s autonomy, the cost of accessibility borne by the provider.

30. Families affected by migration (paras. 37, 57-58). Measures for children with parents abroad and for children and families returning to Romania: educational assessment, language support, counselling, early intervention to prevent drop-out.

31. Inclusive public participation (paras. 105, 239). Territorial consultations and hybrid offline - online formats that reach under-represented citizens, with measurement of representativeness and of the institutional response.

32. Strengthening the social dialogue partners (paras. 105, 239). Funding the expertise, monitoring and training capacity of the relevant employers' organisations and trade unions from the plan's technical assistance; involvement of the National Tripartite Council for Social Dialogue and the social dialogue committees in programming and in the annual reviews; social partners as signatories of the territorial pacts.

33. Parity in the monitoring committees (para. 239). At least 50% of the votes in the monitoring committees of the programmes financed from the MFF 2028 - 2034 for the relevant non-public actors - employers' organisations, trade unions, civil society, academia -, so that their voice counts in the decision, not only in the minutes.

9. Availability for the next stages

FICSIMM remains at the disposal of MIPE and of the World Bank team to detail any of the proposals above, including by taking part in the technical meetings discussing the sectoral analyses and by making available data and case studies from among our members. **The position papers we refer to, including those on intra-regional disparities (April 2024), the MFF 2028-2034 (April and July 2025), the eastern border regions (February 2026), the guarantee instrument for SME energy efficiency (October 2025 and March 2026), the six contributions to the 10th Cohesion Report (July 2026) and the proposals on the European Public Procurement Regulation (September 2026), are publicly available at ficsimm.eu/resurse/.**

The cross-cutting message of these observations is a single one: in a Romania that is depopulating, ageing and simultaneously reporting shortages of labour and of skills, **the NRPP 2028 - 2034 must pursue not only the formation of new human capital, but also the identification, recognition and use of the human capital Romania already has:** the experience of the "analogue generation", the skills of senior professionals, the trades acquired over a working life, the experience of Romanians returned from the diaspora and the potential of children affected by migration. And in a digital economy and administration, **the citizen's accessibility must be treated as infrastructure:** the success of digitalisation is not measured by the number of services moved online, but by the number of citizens who can actually use them, on their own and safely.



The social consensus the Note proposes as the objective of 2028 - 2034 programming will ultimately be built where jobs are created: in the small and medium-sized enterprises of every county in Romania. We ask that they be treated, in the NRPP, as partners of social policy, not as its residual beneficiaries.