

An aerial photograph of a wind farm. Several white wind turbines are scattered across a vast, rolling green landscape. In the far distance, a large body of water is visible under a clear blue sky. The overall scene is bright and open, representing renewable energy in a natural setting.

RESCOOP.EU

Briefing

Community proof?

**REScoop.eu's analysis of the
2028-2034 EU budget proposal**

Summary of Key Recommendations

General

- Competitiveness and defence objectives are risking a distraction from the -necessary- investments in societal welfare, the environment, and the renewable energy transition. REScoop.eu calls for a two trillion EU budget (in constant prices), coupled with progressive new own-resources and a new joint borrowing instrument.
- The Partnership Principle should be upheld and enhanced in the next EU budget, ensuring that stakeholders have a meaningful say in the design and implementation of the programs that will shape their regions. Permanent and structured civil society dialogues should be set up at Member State and EU levels.
- The 2028-2034 EU budget proposal currently does not ringfence any funds for energy communities. REScoop.eu calls for more earmarking of funds for energy communities and the social economy in general.

National and Regional Partnership Plans (NRPPs)

- The NRPPs should ringfence funding for energy communities, particularly for actions in rural and just transition regions. Amend Article 3(1)(a)(iii), to specifically reference energy communities.
- Networks of energy communities (e.g., federations) have a key role to play in the design and implementation of the NRPPs, including in the identification of beneficiaries, provision of technical assistance, and broader dissemination of the different programs.
- In the context of the 'reforms for investments' framework, the Commission should leverage the European Semester to steer Member States to create national enabling frameworks for energy communities

European Competitiveness Fund (ECF)

- As the LIFE CET program (including the ENERCOM strand) will be subsumed under the ECF, it's crucial that earmarked funding for energy communities remains. Amend Articles 29 and 33 (1b) to include specific references to energy communities. Earmark at least 500 million euros for energy communities under the clean transition and decarbonisation window.
- The ECF should only fund large private companies upon fulfillment of certain social and environmental conditionalities. This may include a clear plan for fair benefit sharing.

Horizon Europe

- The Horizon program should support energy communities in researching and trialling new business models. The co-financing and indirect costs in the current Horizon framework should remain unchanged

Connecting Europe Facility

- The Connecting Europe Facility should promote cross-border energy communities, including in electricity and heating projects.

AgoraEU

- In a context of democratic backsliding across the EU, it's crucial that civil society organisations are structurally supported. REScoop.eu calls for long-term, predictable, and accessible funding to civil society organisations, particularly encouraging collaborations between environmental and social NGOs.

Introduction

In a world beset by a polycrisis, the EU's social economic model is a cornerstone for community welfare and environmental sustainability. Social (economy) actors are prefiguring an economic model whose premise is built on healthy competition through cooperation. By prioritising environmental and social outcomes over profit, social actors, including energy communities, have a key role to play in maintaining cohesion and democratic trust.

Due to their not (only) for profit nature, social economy actors like energy communities are sidelined by traditional financiers. Their unique social value proposition, and democratic governance model is perceived as 'risky', often locking them out of conventional financing instruments, such as bank loans.

Energy communities can significantly contribute to the achievement of many of the European Union's key priorities. From offshore wind, to large-scale district heating and cooling projects, energy communities, which bring together citizens, oftentimes with SMEs and local authorities, are already taking up an active role in driving the EU's decarbonisation and green industrialisation objectives. They efficiently mobilise local capital, generating 2-8 euros for local economies for every euro invested, compared to projects by private developers. Supporting energy communities is also an efficient use of public money: for every euro of public money invested, community energy projects can crowd-in up to 40 euros in private capital.

The 2028-2034 EU budget should thus mainstream support for the social economy, including for energy communities and their secondary structures (e.g., federations, coalitions).

The present briefing takes stock of the European Commission's 2028-2034 budget proposal¹ and its implications for energy communities. REScoop.eu's Vision paper for the next EU budget² summarises the federation's priorities for the upcoming budgetary cycle. This vision, coupled with the high level

¹ [The 2028-2034 EU budget for a stronger Europe](#). (European Commission 2025).

² [Fit for communities: Ensuring the next EU budget can support citizen energy projects effectively](#) (REScoop.eu, 2025)

recommendations presented in this paper, should act as a compass to the EU institutions as they craft the next budget, in order to empower local communities to take ownership of the energy transition.

The briefing is structured as follows:

- [Overarching comments on the Proposed Budget](#)
- [National and Regional Partnership Plans](#)
- [European Competitiveness Fund](#)
- [Horizon Europe](#)
- [Connecting Europe Facility](#)
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Overarching Comments on the Proposed Budget

Budget Size and Climate Earmarking

The Commission's 7 year budget proposal stands at €1,761 billion (in 2025 prices and excluding the NextGenEU debt repayments). Given all the priorities contained within the budget, this falls short of real green and social investment needs.³ REScoop.eu endorses the call by civil society, and certain progressive Member States such as Spain, to double the EU budget to €2 trillion (in constant prices), as well as institutionalise a permanent joint borrowing mechanism.⁴ A permanent EU-level investment instrument, based on new own resources and joint borrowing, is essential to finance the EU's joint priorities, such as grids development and the completion of the Energy Union.

To finance this increase in the EU budget, civil society has presented concrete, realistic and effective proposals, including a tax on wealth and the profits of fossil fuel companies.⁵

Moreover, the 35% climate earmarking for the whole budget⁶ is a step in the right direction. Yet, a more ambitious 50% target would provide a clear signal to citizens, local communities, and markets for the overall course of the European economy.

Key EU funds for energy communities and nature under threat

Worryingly, the 2028-2034 budget proposal includes the scrapping, or merging of key funds that have been instrumental for the growth of energy communities. This includes the Just Transition Fund, and the LIFE program (as a standalone program, and particularly the LIFE ENERCOM strand). As it stands today, there is no earmarked funding for energy communities in the next EU budget. This comes in contrast with the European Economic and Social Committee's (EESC) opinion

³ Up to 477 billion euros annually. European Commission. (2023). [Investment needs assessment and funding availabilities to strengthen EU's Net-Zero technology manufacturing capacity](#).

⁴ [Public Statement: A Social and Green Investment Plan for a prosperous and just transition](#) (CAN EU, 2024). The massive public spending programmes observed in major countries such as China and the US have

⁵ [Progressive Taxation Options as EU Own Resources](#). (CAN EU, 2025).

⁶ Excluding defence

on the Citizen Energy Package, which calls for dedicated funding for energy communities in the next budgeting period.⁷

REScoop.eu recalls that LIFE is the EU's only dedicated instrument to fund environment, climate and nature activities. LIFE is also one of the few EU programs directly linked with the implementation of existing EU policies. If the program indeed gets scrapped, its activities should be continued, with earmarked funding, under other programs (e.g., Competitiveness Fund).

As previously highlighted,⁸ REScoop.eu believes that nature and (community) renewables should be developed in tandem. Member States are currently drafting their Nature Restoration Plans, as well as designating Renewables Acceleration Areas. These synergistic mapping exercises should guide investment over the next years in nature positive, community-inclusive renewables. Regulatory certainty and adequate funding will underpin investor and community confidence. Therefore it's crucial to maintain ringfenced funding for nature and the environment in the next EU budget.⁹

Competing spending priorities

REScoop.eu notes with concern the fivefold increase in defence expenditure in the 2028-2034 budgetary cycle proposal (131 billion euros).¹⁰ Changing geopolitical conditions necessitate greater preparedness. However, this need not come at the expense of green and social welfare spending, which represent intrinsic European values. The return of the Stability and Growth Pact puts in place strict public spending rules, which severely constrain the fiscal space for Member States to invest in climate and public services.¹¹ This means that to boost defence spending, under a new wave of austerity, Member States will have to cut social and environmental spending. Energy is at the heart of security and preparedness. In that sense, investments in grids, decentralised renewables,

⁷ [Citizens' Energy Package: citizens' engagement, energy communities and prosumerism](#). (European Economic and Social Committee, 2025)

⁸ [Open Letter: Nature Restoration Law: a nature-positive renewable energy transition is the only sensible way forward](#). (REScoop.eu, 2024).

⁹ [The future of LIFE in the next EU budget](#) (WWF, 2025).

¹⁰ This figure is likely very conservative, as it does not take into account the money that Member States will spend on defence through their National and Regional Partnership Plans.

¹¹ [New EU fiscal rules jeopardise investment needed to combat the climate crisis](#). New Economics Foundation (2023).

energy efficiency and energy communities can ensure local security of supply and resilience. Support for local and regional ownership of renewables production can also help reduce the Union's dependencies on third countries.

Transparency and Multi-level governance

The centralisation of multiple EU funds and programs under single funding envelopes (National and Regional Partnership Plans - see more below) will give more power to Member States to shape the exact budgetary architecture. To avoid the mistakes of the Recovery and Resilience Facility,¹² which suffered from severe lack of public participation and transparency, it's essential that the Partnership Principle is upheld and enhanced in the next EU budget. This should include broad, early and meaningful consultations for the different programs, as well as accountability on the side of Member States and Managing Authorities on how stakeholders' comments are taken into account. Diverse stakeholders should contribute to the monitoring committees of different programs. Most importantly, the reforms that Member States will implement to access EU funds (more below) should encompass actions to strengthen democratic participation and accountability at all levels. Permanent and structured civil society dialogues should be set up at Member State and EU levels, including for example through citizens assemblies.

EU public funds should be protected against misuse: Studies show that cohesion funds often benefit wealthier households¹³ or larger-scale SMEs disproportionately compared to vulnerable households and microenterprises. This is due to an asymmetry in information and resource access. Broad participation in the design and implementation of the different Programs will prevent corporate capture by large and well-connected industries. During the 2021-2027 period, many instances were observed whereby funds for energy communities were siphoned by corporate entities (e.g., Hungary, Greece, Germany and Spain¹⁴). This not only decreases citizen's trust in bottom-up transition initiatives, but it's also an ineffective use of public funding. In Spain alone, 30% of funds from the Recovery Facility intended for energy communities

¹² [Review 02/2025: Performance-orientation, accountability and transparency – lessons to be learned from the weaknesses of the RRF](#) (European Court of Auditors, 2025).

¹³ [Fixing Cohesion How to Refocus Regional Policies in the EU](#) (Jacques Delors Centre 2024)

¹⁴ [Report on the corporate capture of energy communities](#). (Friends of the Earth Europe, 2025).

were awarded to fossil fuel giant Repsol.¹⁵ The new EU budget must protect itself against abuses, by setting stringent criteria, for instance by setting a 50% citizen ownership criteria for energy communities to access EU funds.

National and Regional Partnership Plans (NRPPs)

Key programs, amongst them Cohesion and Agricultural funds, will be merged into 27 National envelopes named *National Regional Partnership Plans* (NRPPs)¹⁶ with a total budget of €783 billion, of which €218 billion is earmarked for less developed regions, and €100 billion is earmarked for social objectives and investments. To access the funds, Member States will have to fulfill certain reforms (or milestones), akin to the process implemented under the Recovery and Resilience Facility. According to the draft NRPP Regulation social partners, including “*environmental partners, non- governmental organisations, youth organisations, and bodies responsible for promoting social inclusion*” shall be included in the preparation, implementation, and evaluation of the NRPPs, including through monitoring committees.

One of the general objectives of the NRPPs (Article 2(b)) is “*to contribute to a socially fair transition towards climate neutrality.*” This objective links strongly with supporting energy communities.

The NRPPs will be separated into various chapters, covering different topics such as migration, agriculture, and security. It is at the discretion of the Member States to draft specific regional or territorial chapters (e.g., for Just Transition Areas). This means that under the current proposals, place-based funding and policies are not, which is also underscored by the scrapping of the Just Transition Fund. It should be noted that in the 2021-2027 period, the Just Transition Fund has been used by several Member States (e.g., Ireland, Czechia, Greece, Romania) to promote measures that tackle energy poverty, including through energy communities.¹⁷

¹⁵ [El negocio privado, a la caza de las subvenciones de la energía comunitaria](#). (Publico, 2024).

¹⁶ [Regulation of the European Parliament and of the Council establishing the European Fund for economic, social and territorial cohesion, agriculture and rural, fisheries and maritime, prosperity and security for the period 2028-2034 and amending Regulation \(EU\) 2023/955 and Regulation \(EU, Euratom\) 2024/2509](#). (European Commission, 2025)

¹⁷ [Greece - Cohesion and Regional Development Funds](#) (REScoop.eu, n/d)

The NRPP Regulation (Article 80) also foresees that as of 2028 National Social Climate Plans will be subsumed as separate chapters under the broader National Regional and Partnership Plans. This means that measures and investments for energy communities in the existing Social Climate Plans need to be better integrated into the NRPPs, maximising synergies and increasing funding.

Lastly, the NRPPs are complemented by the EU Facility: an EU-level instrument with a €63.2 billion budget. The main purpose of the EU Facility is to promote coordination between individual NRPPs to respond to shared EU policy priorities. REScoop.eu welcomes that the EU Facility may be used for operational grants towards environmental civil society organisations. Annex XV 1(n) states that the EU Facility shall: “...support and empower networks and civil society organisations as well as other projects of Union interest contributing to the implementation of environmental law and policies.”¹⁸

Basis to support Energy Communities

Energy communities can be a vehicle to boost regional cohesion and tackle energy poverty. Energy communities boost local economic growth: they create local jobs, and generate two¹⁹ to eight²⁰ more economic benefits for local economies when developing renewable energy projects than by traditional market actors. This makes them ideal vehicles for cohesion policy. They often undertake actions to promote social inclusion in the energy transition, such as offering tailored advice through 'energy cafés', home visits, or One Stop Shops. Energy communities may also offer free shares for vulnerable households to join collective self consumption schemes, or may set up revolving funds for energy efficiency actions.²¹ In the 2021-2027 programming period certain Member States made use of the Just Transition Fund to support energy communities.²²

¹⁸ [ANNEXES to 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](#) (European Commission, 2025)

¹⁹ [Local Economic Benefits of Citizen Renewable Energy](#) (in French) (Energie Partagée, 2019).

²⁰ [Regionale Wertschöpfung in der Windindustrie am Beispiel Nordhessen II- Kurzstudie zur Aktualisierung der Daten](#) (In German). (Wilkins, I, and Wetzel, H. 2023).

²¹ [Community Energy for Energy Solidarity toolkit](#). (n/d)

²² REScoop.eu [Financing Tracker. Cohesion and Regional Development Funds](#). Greece. (n/d).

Energy communities are well suited to support rural and peripheral areas. Article 75 of the NRPP regulation mentions that *“Support for territorial development shall be based on integrated territorial development strategies, including via community-led local development, focused on urban areas, rural areas, islands, coastal areas, or any appropriate territorial area as well as smart specialisation or territorial just transition strategies”*. The Community-Led Local Development approach, and in particular the LEADER program, has been used in the current programming period to support energy communities in countries such as Germany and France. Such projects (e.g., agrivoltaics), can offer an additional, predictable financial support to farmers, diversifying revenue streams, building resilience, and garnering support for the climate transition.

Indicator 191 of the Performance Regulation specifically mentions energy communities with a 100% climate and 40% social co-efficient.²³ This means that investments in energy communities can be counted towards the 14% social earmarking and the 43% climate earmarking in the NRPPs.

Overall, dedicated funding for energy communities in the 2028-2034 EU budget is in line with the EESC's opinion on the Citizen Energy Package.²⁴

The LIFE ENERCOM Facility [Box 1](#) provides a useful blueprint for how funding from the NRPPs can effectively reach beneficiaries.

Ensuring funds reach the ground: the case of the ENERCOM Facility program

The LIFE ENERCOM Facility program (hereby 'Facility') will distribute a total of €7 million to at least 140 energy communities between 2024 and 2027, in two separate calls for proposals (June 2025 and May-June 2026). The Facility's unique approach is that it mobilises a network of national experts in all EU Member States to help raise awareness about the funding opportunity, answer basic questions about the application procedure, and then provide tailored capacity building to applicants.

As of September 2025, the results of the Facility's first call show a significant

²³ Regulation of the European Parliament and of the Council [establishing a budget expenditure tracking and performance framework and other horizontal rules for the Union programmes and activities](#) (European Commission, 2025).

²⁴ [Citizens' Energy Package: citizens' engagement, energy communities and prosumerism](#). (European Economic and Social Committee, 2025)

oversubscription in terms of total applications compared to the eligibility of funds (691 applications, with funding earmarked for 73, i.e., an almost 10:1 ratio). This marks a stark juxtaposition with other EU funds that are more centrally managed (e.g., European Regional Development Fund, Recovery and Resilience Facility), where calls for energy communities have observed low absorption rates, or lack of efficient targeting of end-beneficiaries.

The three key features that made the call successful:

- Involvement of national expert organisations (often federations or 'secondary structures'). They provided strong dissemination and technical assistance, reaching communities on the ground. These experts were paid dedicated staff costs for this work.
- Provision of development stage lump sum grants that the community can use flexibly
- Easy, centralised (single website) and accessible application process

Recommendations

- The NRPPs should ringfence funds for energy communities. *As highlighted in [REScoop.eu's Vision for the next EU budget](#), a national funding scheme for energy communities should be created in every Member State.*
 - Funding should be in the form of lump sums, and cover project development costs, but also overheads and personnel costs. While developing the first project is a key growth milestone for an energy community, the ability to maintain paid personnel is instrumental for long term organisational development.
 - Social economy actors, including energy communities, should be able to access funds from the NRPPs through simple, fast, accessible single contact points.²⁵
- Secondary structures of energy communities (coalitions/federations/Local Action groups) have a key role to play in the NRPPs. These networks primarily consist of energy communities, and in

²⁵ This approach aligns with the position of the European Parliament's Report on the next EU budget, which calls for single contact points for EU funding. [Resolution of 7 May 2025 on a revamped long-term budget for the Union in a changing world](#) (2024/2051(INI)).

some cases supporting entities (e.g., energy agencies, municipalities). Their role is to provide capacity building, technical assistance, and funding to bottom-up community initiatives.

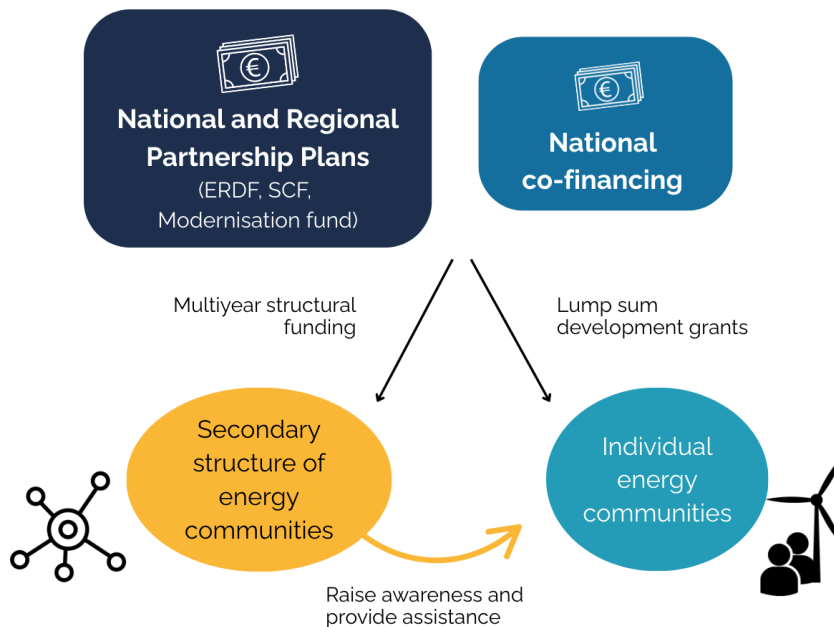
- They should be included in the preparation of the NRPPs, as well as in the monitoring committees, given their close connection with local initiatives.
- Secondary community energy structures can work closely with managing authorities and help implement the Plans. Such structures often offer One Stop Shop services, assisting members of the local community to access funding opportunities (e.g., grants for home renovations or rooftop PV), and can guide stakeholders on how to create or join an energy community. Experience from France,²⁶ the Netherlands,²⁷ and Belgium (Wallonia)²⁸, shows that secondary structures can leverage public funds to set up citizen energy revolving funds, implement capacity building programs, and broadly support the social economy.

²⁶ Four French regions provide structural funding to regional nodes of Energie Partagee, the national federation of energy communities, through the European Regional Development Fund (ERDF). Energie Partagee has been using this money to support capacity building programs for emerging energy communities.

²⁷ Energie Samen, the national federation of energy communities in The Netherlands, has partnered with the Dutch Government to create a 'Development Fund' which provides loans-to-grants to cover community energy project development costs.

²⁸ Wallonia (Belgium) has allocated a 3 year grant of 300.000 euros to the regional federation of energy communities (REScoop Wallonie). The money will be used for capacity building and networking activities related to the social economy.

Ensuring EU funds reach the ground



- Energy communities should be used as a vehicle for a just transition in the NRPPs. Managing authorities of the NRPPs should leverage the €218 billion earmarked for less developed regions to promote such bottom-up actions.
 - Provide grants for energy communities that implement actions to tackle energy poverty. This is in line with the recent European Parliament resolution on cohesion policy and a just transition (paragraph 45).²⁹ (Relevant Article of NRPP Regulation: 75)
 - Several Member States are using their Social Climate Plans to support energy communities as a vehicle to tackle energy poverty.³⁰ The NRPPs should plan for additional resources (e.g., financial, technical assistance) to build on and expand these measures. This may include mobilisation of broader ETS1 and ETS2

²⁹ [European Parliament resolution of 10 September 2025 on the role of cohesion policy in supporting the just transition \(2024/2121\(INI\)\)](#) (European Parliament, 2025).

³⁰ This includes, inter alia, Poland and Bulgaria. [Social Climate Fund Tracker](#) (REScoop.eu, n/d)

revenues, redirection of fossil fuel subsidies, as well as fiscal measures such as luxury taxes. (Relevant Article of NRPP Regulation: 80)

- NRPPs should promote energy communities in rural areas, particularly as a means to support farmers.³¹ (Relevant Articles of NRPP Regulation: 75 & 76)
- The 'reforms for investments' governance framework in the NRPPs presents an important opportunity to make funding for energy communities contingent on dedicated enabling reforms. This would be particularly relevant for Central and Eastern European countries, where EU funds make up to 80% of climate and energy investments. At the moment, many remain laggards in the transposition and implementation of rules to guarantee the rights of citizens to form and participate in Renewable and Citizen Energy Communities under the Clean Energy Package.
 - As highlighted in a joint briefing by REScoop.eu and Climate Action Network (EU),³² the Commission should leverage the European Semester to steer Member States to create national enabling frameworks for energy communities. This will ensure a horizontal and coordinated implementation of the Clean Energy for all Europeans package of Directives.
 - The NRPPs should also address the challenges and opportunities identified through the National Energy and Climate Plans (NECPs). All 27 NECPs now include dedicated references to energy communities, with some (e.g., Spain, Portugal) including ambitious goals and policies.³³ The Commission should thus guide Member States on how to leverage the NRPPs as 'investment plans' to implement the community energy policies outlined in the NECPs.

³¹ [Smart Villages and Renewable Energy Communities](#). (European Network for Rural Development, n/d).

³² [Energising the Semester](#) (REScoop.eu, 2025)

³³ [National energy and climate plans](#) (European Commission, 2025).

European Competitiveness Fund

The European Competitiveness Fund (ECF) is another major stand-alone program of the 2028-2034 budget, with a hefty €234 billion allocation. The ECF is separated into four policy windows (clean transition and decarbonisation; digital transition; health, biotech, agriculture and bioeconomy; defence, and space), each with a dedicated budget allocation. Worryingly, the LIFE Clean Energy Transition program (of which LIFE ENERCOM is a part) has now been subsumed into the ECF clean transition and decarbonisation window.

The modest budget allocated to this window (€26.1 billion) is not sufficient to match the scale of investment needed for the clean energy transition, and particularly for industrial decarbonisation.³⁴ It should be noted that the ECF Work Programs (including the clean transition and decarbonisation window), will be implemented in “coherence with the types of actions planned to be implemented under the Innovation Fund” (Recital 10 of the ECF Regulation). The Innovation Fund’s budget is set at €40 billion for the 2020-2030 period.

While support for SMEs and social enterprises falls within the goals of the ECF (Article 28), the lack of dedicated earmarking raises serious concerns. Social economy actors, including energy communities, are effectively placed on the same footing as industrial actors and corporations, even though they face much more difficult market conditions.

Article 21 of the ECF Regulation foresees the creation of an InvestEU Instrument with a minimum budget of €17 billion (lower than the current InvestEU budget of €26 billion). The goal of the ECF InvestEU is to “*address market failures or suboptimal investment situations*”, leveraging financial instruments such as loans, guarantees, and counter-guarantees.

Lastly, the ECF will be governed by a “General Committee” composed of Member State representatives. A “Strategic Stakeholder Board” will provide advice for the overall direction of the fund.

³⁴ This is why it's essential that ECF investments are driven by real-world, granular data on real industrial decarbonisation needs. The European Climate Neutrality Observatory has developed a [relevant methodology](#) (ECNO, nd).

Basis to support Energy Communities

The EU has steadfastly supported energy communities in the past years. Just between 2024 and 2025 applications for the LIFE-CET program grew by 20%, largely driven by organisations working on community energy. This shows that the community energy sector keeps scaling in numbers, and diversifying its activities (e.g., district heating, collective housing renovations, and storage). Throughout the 2021-2027 programming period the LIFE ENERCOM program is projected to directly support energy communities with at least €51.5 million.³⁵

Considering that the LIFE-CET program (including ENERCOM) will be subsumed under the ECF, it's imperative that support for energy communities is maintained. The basis for this support can be found in the following articles:

- Article 29 of the ECF Regulation explicitly mentions specific support for SMEs, to “*foster innovation, business acceleration, commercialisation and scaling-up.*” As a player between industry and the social economy, energy communities often face the same challenges as SMEs in accessing capital to scale.
- Article 33 (1a) of the ECF Regulation mentions “support to bottom-up projects for the demonstration, testing and market uptake of innovative solutions and best practices in clean transition and industrial decarbonisation and awareness raising on climate to relevant governance levels.” This provides the basis for local energy communities to contribute to the ECF’s objectives.
- Furthermore, Article 22 of the ECF Regulation regarding the ECF InvestEU instrument, mentions SMEs and mid-caps as the primary targets.

Recommendations

- The ECF should ringfence money for social economy actors, and particularly energy communities. It should set an ambitious target of €500 million for energy communities in the 2028-2034 period, considering the

³⁵ Considering that 7million euros will again be mobilised in 2026 and 2027. It should be noted that other LIFE program strands, such as, inter alia, LIFE OSS, LIFE PRIVAFIN, and LIFE LOCAL have also been used to support energy communities.

growing maturity of the movement.³⁶ An EU-level funding tool for energy communities will be essential, to ensure that even in the absence of Member State action, the sector can continue to grow.

- Amend Article 29 to explicitly include language on energy communities.
 - Amend Article 33 (1b) to include a reference on energy communities.
- The ECF should only fund large private companies upon fulfillment of certain social and environmental conditionalities.³⁷ When renewable energy companies receive support it should be preconditioned on a plan that demonstrates how they will engage in fair benefit sharing.³⁸ This should ideally centre around an offer to the local community of co-ownership in the project, but may also include share offerings in renewable projects, donations to local energy communities, or the set-up of revolving community energy funds, with local stakeholder governance. At the political level, citizen participation should be mandated in all renewable projects. This is in line with the EESC's opinion on the Citizen Energy Package calling on "*Member States [to] link any public funding scheme for energy projects to the participation of local communities as shareholders in energy projects and other forms of benefit-sharing.*"³⁹
 - Additional conditionalities for benefitting companies include upholding workers' rights and banning stock buy-backs.
 - The Clean Industrial Deal State Aid Framework, adopted in June 2025, provides a precedent for social conditionalities: it specifically encourages Member States to include such conditionalities (developed together with social partners) in national state aid schemes (Section 3, paragraph 22).⁴⁰

³⁶ Energy communities have been taking up offshore wind, district heating, and even data center projects. "[Not \(just\) for hippies: Energy communities should be the drivers of the EU's re-industrialisation](#)". (Euronews, 2024).

³⁷ [Vital conditions to support businesses towards a stronger, fairer and more sustainable economy](#) (Fiscal Matters, 2024).

³⁸ [Community Engagement and Fair Benefit Sharing of Renewable Energy Projects](#). (CAN EU 2025).

³⁹ [Citizens' Energy Package: citizens' engagement, energy communities and prosumerism](#). (European Economic and Social Committee, 2025)

⁴⁰ [C/2025/3602. Framework for State Aid measures to support the Clean Industrial Deal](#). (European Commission, 2025)

- Social economy actors, including secondary structures of energy communities, should take part in the Strategic Stakeholder Board of the ECF. In turn, these stakeholders should be able to provide meaningful advice to the implementation of the fund's work programs, including the identification of end-beneficiaries, and the choice of financial instruments. This will ensure a more balanced representation of industry and social partners.
- REScoop.eu calls for a dedicated "InvestEU for Energy Communities"⁴¹ that will help de-risk lending by commercial banks to larger scale community energy projects (e.g., wind, district heating and cooling). An EIB-backed guarantee scheme for energy communities is in line with the EESC's opinion on the Citizen Energy Package.⁴²
 - Amend Article 22 to explicitly include energy communities as eligible targets of the ECF InvestEU instrument.
 - To cover the equity part of project development, the EIB may also establish complementary 'equity funds' that can cover the riskier, own-capital costs for energy communities. Energie Samen, the national federation of energy communities in the Netherlands, is currently creating such a fund, and the idea has received broad support from across the political spectrum.⁴³
 - Similarly, the European Investment Bank should work together with Member States to create guarantee schemes to facilitate community energy actors entering into PPAs with suppliers (or end consumers (e.g., an industrial facility). This would contribute to price stabilisation, while further allowing energy communities to contribute to reindustrialisation objectives.⁴⁴
- REScoop.eu calls for the inclusion of the United Kingdom, the Western

⁴¹ [Fit for communities: Ensuring the next EU budget can support citizen energy projects effectively](#) (REScoop.eu, 2025)

⁴² [Citizens' Energy Package: citizens' engagement, energy communities and prosumerism](#). (European Economic and Social Committee, 2025)

⁴³ [Amended motion by Member Kröger et al. on a facilitating framework and a guarantee fund for heat communities](#) - in Dutch (2025).

⁴⁴ The newly [announced counter-guarantee scheme](#) of the EIB and partner banks for energy-intensive mid-caps to enter into PPAs and stabilise prices, can offer a blueprint for this.

Balkans, Moldova, Turkey and Ukraine as eligible countries of the European Competitiveness Fund. As the continuation of the LIFE-Clean Energy Transition program, the ECF must ensure that all existing partner countries can continue to benefit, building cross-border synergies and thus increasing scale and competitiveness.

Horizon Europe

The EU's flagship research program will be strongly enhanced in the 2028-2034 period with a proposed €175 billion budget. The program will be broken down into four pillars (Excellent Science, Competitiveness and Society, Innovation, and European Research Area), each with their own allocated budget. Arguably the most relevant pillar for energy communities will be "Competitiveness and Society", which also commands the biggest budget (€75.87 billion) and includes the "Clean Transition and Industrial Decarbonisation" window (similar to the ECF). Horizon Europe will be implemented in close coordination with the ECF, with the goal of transforming research into applied practices and market breakthroughs.

In its "Second Generation Legislation for Energy Communities" analysis, REScoop.eu takes stock of how the revision of the FitFor55 Directives⁴⁵ creates new opportunities for energy communities to participate in cutting edge activities such as offshore wind, housing renovations, and heating and cooling.

Recommendations

- Horizon Europe should support energy communities in researching and trialling new business models, such as flexibility, electric mobility, and peer-to-peer trading. The program should take into account *social innovation* criteria, and should assess how breakthrough technological innovations can positively influence society.
- The co-financing and indirect costs in the current Horizon framework should remain unchanged and new programs or program strands should be introduced under the same conditions to ensure the participation of

⁴⁵ Energy Efficiency (EU 2023/1791), Energy Performance of Buildings (EU 2024/1275, and Renewable Energy Directives (EU 2023/2413). [Second Generation Legislation for Energy Communities](#). (REScoop.eu 2024).

energy communities, as well as civil society actors.

- The new Horizon Europe program should actively encourage collaboration between academia/research institutions, and social economy actors such as energy communities. Such collaborations should investigate how 'moonshot' technologies can impact society,⁴⁶ such as for example research on data sovereignty and flexibility in energy communities, or next generation AI and real time P2P energy trading.

Connecting Europe Facility

The Connecting Europe Facility (CEF) is a funding instrument meant to support cross-border projects in the fields of Transport, Energy, and Digitalisation. In the Commission's proposal, the budget for CEF is almost quadrupled to €81.4 billion (€29.9 billion for energy and €51.5 billion for transport infrastructure). This is a welcome step, as greater interconnections across Member States can contribute to the greater integration of renewable energy.

Cross-border flows of energy are becoming increasingly politically important, to further integrate renewables and drive down prices. This includes cross-border energy communities, which are shaping up as an important cohesion policy tool.⁴⁷ The largest energy cooperatives in Europe are already pooling their capital to facilitate cross-border investments.⁴⁸

Recommendations

- Energy communities could benefit from the CEF through the promotion of cross-border community energy projects.
 - CEF cross-border energy community investments should also synergise with the Interreg Plans, developed by each Member State.

⁴⁶ This is already outlined in the relevant Regulation (Article 3), "Improve the Union's position in innovation [...] and address key societal challenges". [Regulation of the European Parliament and the Council establishing Horizon Europe, the Framework Programme for Research and Innovation, for the period 2028-2034 laying down its rules for participation and dissemination, and repealing Regulation \(EU\) 2021/695](#)

⁴⁷ [Cross Border Energy Communities](#). (n/d)

⁴⁸ [Westmill Solar & REScoop MECISE announce global first: cross-border energy co-operative investment](#) (REScoop.eu, 2024).

- Cross border energy communities should also be encouraged between EU Member States and communities in Ukraine, Moldova, the Western Balkans⁴⁹, Turkey and the United Kingdom.
- The Commission should encourage fair benefit sharing in cross-border renewable energy projects. This can take the form of mandatory conditionalities (i.e., benefitting companies should have a binding plan in place to implement benefit sharing), or at least voluntary guidance on how to include local communities in the planning and governance of the cross border projects.

AgoraEU

The new “AgoraEU” program will bring together key funds that relate to media, freedom of speech, fundamental rights and freedoms, and culture (e.g., Creative Europe and the Democracy, Citizens, Equality, Rights and Values -CERV- program). AgoraEU will have a total budget of €9 billion for the 2028-2034 period. One of its key objectives will be to support civil society and defend democracy. Considering the broader democratic backsliding observed in various Member States over the past years, the program’s budget could arguably be considerably increased.

Recommendations

The AgoraEU program should:

- Provide structural, predictable, and accessible funding to civil society organisations. This is especially important considering that under current proposals, the LIFE operating grants will be scrapped in the 2028-2034 period. This would be specifically relevant for the CERV+ strand, and the ‘Rights, Equality, Citizens and Civil Society’ specific objective.
 - Funding should explicitly include organisations that work on environmental and energy issues.

⁴⁹ [Western Balkans energy transition: a new expression of interest for renewable energy community projects](#) (European Commission, 2025).

- Re-granting should also be supported, where a larger organisation (e.g., a secondary structure of energy communities) provides grants to smaller, grassroots organisations enabling them to engage in local democracy actions.
- Actively encourage intersectional collaborations between organisations working on social and climate matters. Energy communities often engage in educational actions that promote civic and democratic engagement. This would be specifically relevant for the CERV+ strand, and the 'Democratic participation and rule of law' specific objective.
- Provide capacity support for civil society organisations to engage with EU policy, its tracking and implementation. Civil society should continue to play a role in protecting and promoting the European Union's values.
- Facilitate cross-border cooperation between European civil society/social economy organisations, and organisations in Ukraine, Moldova, the Western Balkans, Turkey, and the United Kingdom.

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