CPMR analysis on the National Recovery and Resilience Plans

With the submission of the National Recovery and Resilience Plans (NRRPs), Member States fulfill the need to present a detailed list of investment and reforms to put in place via the Recovery and Resilience Facility, the main instrument of the EU Recovery Plan “Next Generation EU”.

This note looks at the national recovery and resilience plans presented by Member States, the extent to which territorial dimension and CPMR policy areas of interest are addressed. As previously stated by the CPMR, the NRRPs will be the guiding document that will shape national, regional and European economic policy in the coming years.

In the document we look at:

• Territorial analysis
  – Territorial challenges and disparities considered.
  – Specific types of territories represented in the CPMR membership (islands, outermost regions, northern sparsely populated areas) and their specific investment needs.

• Policy analysis
  – Policy areas of core strategic interest for CPMR Members (cohesion policy, transport and accessibility, climate and energy, maritime issues, migration management)
  – Complementarity with other EU programmes
  – Cross-border and multi-country projects
  – Fulfilment of the requirement to set out a summary of the consultation process held to draft the plans.

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Overall considerations from the CPMR General Secretariat

1- The territorial dimension of the plans varies considerably among Member States and across the policy sectors addressed. The focus on territorial cohesion and references to specific regions as target of investments in some Member States NRRPs are a step in the right direction to enhance the potential of the RRF funding and braces the need for place-based recovery strategies. However, we regret that territorial cohesion is not systematically considered in all plans despite being one of the Facility’s six investment priorities. Moreover, it is difficult to ascertain in several plans the share of funding which will be allocated to place-based measures.

2- The Recovery and Resilience Facility prominently targets green and digital transition investments which makes both policies to become the focal point of a large majority of measures. From a territorial perspective, this should be paired with the objective of addressing disparities on digital connectivity and broadband infrastructure in a post-COVID world as has been noticeably addressed in the plans.

3- The certain territorial dimension attributed to investments supporting the energy transition and the climate adaptation is welcome. Specific support accompanied by appropriate funding should be provided to the most vulnerable territories in the transition. However, it could be strengthened across Member States to ensure that all regions can benefit from and contribute to the energy transition.

4- Climate adaptation is a major problem for CPMR members significantly affected by the increasing severity and frequency of climate related disasters. In this sense, extensive reference to coastal areas within the plans as the territories in the front line to address adaptation and mitigation measures is welcome. Maritime policy and blue economy are also essential for coastal areas recovery, which makes the lack of a maritime approach in the plans regrettable.

5- The prevalence given in some Member States to complete the TEN-T European network chimes well with the CPMR focus on strengthening territorial accessibility. The measures reinforce territorial cohesion and enhance the role of transport supporting the digital and energy transition.

6- Specific measures to overcome the obstacles faced by territories beset by geographical and demographic handicaps are foreseen distinctly. For instance, islands tend to be identified as targets for specific investments to promote energy transition. NSPAs are referred to as beneficiaries for measures supporting broadband connectivity. Specific measures for outermost regions have been foreseen in the concerned plans.

7- The CPMR has strongly demanded Member States to put in place a fully-fledged consultation with local and regional authorities on the definition of the national recovery plans. It is regrettable that a sizeable number of Member States give an insufficient explanation as to how regional and local authorities have been involved in the design and implementation. Only few fulfil the requirement with merit.

8- The CPMR has also urged for strong coordination and complementarity between NGEU and other Union programmes. Our analysis confirms that this is only addressed to a small extent. This is all the more surprising looking at the legal requirement to set up optimal coordination mechanisms and ensure the additionality of the RRF in relation to the other EU funds. In relation to the strategic links between the RRF and Cohesion Policy, we welcome those Member States that have carefully established a strategic articulation. In light of making EU funding delivery effective, we consider the European Commission should examine in detail this point as part of its assessment.

9- Member States have framed their investment and reforms in line with their Country Specific Recommendations for the years 2019-2020. The strong impact that the recommendations have had on the definition of the plans, is a strong reminder of the need for a meaningful ‘territorialisation’ of the European Semester framework and the full involvement of local and regional authorities as relevant partners of the Semester’s dialogue. This is key to increase the legitimacy of the European Semester process.
1. Introduction and context

The European Commission presented the EU Recovery Plan “Next Generation EU” (NGEU) to tackle the consequences of the pandemic by delivering a sustainable and future-proof economic growth. Its main instrument the Recovery and Resilience Facility (RRF) offers the possibility to deploy a significant number of resources (EUR 672.5bn to be distributed via grants - EUR 312.5 bn - and loans -EUR 360 bn) in the EU territories.

In order to access funding, the Recovery and Resilience Facility regulation\(^1\) establishes the prerequisite for each Member State to develop a national recovery and resilience plan (NRRP). Each national recovery and resilience plan lists the reforms and investments to be implemented in the Member State through the RRF funding. The thematic priorities to focus on have shaped by the Regulation itself – establishing six main pillars\(^2\) – and the European Semester framework via the Country specific recommendations for 2019 and 2020 and the Annual Growth Survey (September 2021) where a series of flagship projects were listed.

Member States submitted (April – May 2020) their final national recovery and resilience plan to the European Commission following a structured dialogue with the European Commission Recovery Task Force based on their first draft presented in Autumn 2020.

The European Commission has two months to assess the plans following the established criteria in Article 19 of the RRF Regulation. The assessment will have to be approved by the Council of the EU. As soon as the plans are approved by the Council, Member States will receive an amount of up to 13 % of the total financial contribution. The following disbursements will take place upon the achievement of pre-set targets and milestones identified in the plans. The final targets and milestones must be met by August 2026 to ensure final payments can be made.

In their National Recovery and Resilience Plans, Member States give information on the required elements listed in Article 18 of the RRF Regulation\(^1\) in a different extent and structure. Key RRF\(^1\) priorities are considered distinctively, as specific components or rather through impact dimension sections, which makes comparison somewhat difficult. Even so, the following analysis and messages rely on a careful scrutiny of the National Recovery and Resilience Plans presented by the **17 Member States that gather the CPMR members from EU countries**\(^3\) (see Annex I for detailed information on each NRRP).

This technical note looks rigorously at the national recovery and resilience plans presented by each Member State. Which means that for each section we evaluate the text written down in the NRRPs, independently from the perception and opinion of our members on their national recovery plans content and how the consultation process in each Member State was held.

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2. RRF six pillars: Green transition, Digital transformation, Smart sustainable and inclusive growth, Social and territorial cohesion, Health, economic, social and institutional resilience, and Policies for next generation.
3. The analysis has not considered the plans not submitted or available on June 16th (Malta, The Netherlands, Estonia, Ireland)
2. A closer look at the territorial analysis

This section looks at the territorial dimension and how existing regional disparities are addressed in the national recovery and resilience plans as territorial cohesion is one of the Facility’s prime objectives. It focuses also on specific types of territories represented within the CPMR Membership and the reference to their specific investment needs.

2.1 Territorial cohesion

As the CPMR has highlighted in the last months, the impact of the COVID-19 pandemic has been highly asymmetric and will exacerbate regional disparities. This section aims to see how Member States have addressed the existing territorial disparities at national level and the measures to overcome them. In line with the Facility’s Regulation, Member States have to give an explanation of how the plan’s measures enhance the economic, social and territorial cohesion within the Union in their National Recovery and Resilience plans.

Observations on the investment priorities with a territorial cohesion dimension

- **The extent to which Member States detail how the listed investments and reforms will strengthen territorial cohesion differs widely.** On one hand, territorial cohesion is one of the NRRP’ pillars for Member States such as for Spain and France having specific measures under it. On the other hand, to strength territorial cohesion is presented as one of the outcomes of the policy measure. In this case, the consideration goes from a detailed and extended description of how each component under the Plan contributes to territorial cohesion (e.g., Italy) to Member States that barely address this point when describing the effects of the measures (e.g., Germany).

- The actions and investment measures to support and achieve territorial cohesion fall under different policy sectors but the most common problematics and existing regional disparities referred in the NRRPs are the following ones:
  - **Digital connectivity:** Having the RRF the objective to boost the digital transition, there is a reiterated reference to support and improve high-speed connectivity, and address the territorial imbalances related to the spread of broadband access.
  - **Health infrastructure:** On the wake of the pandemic, Member States acknowledge the divergent state of their health system among its territories. Investment priorities to build up and improve health infrastructure are contemplated in order to guarantee equal health access in all territories (e.g., Greece, France, Italy, Denmark, Finland NRRPs).
  - **Accessibility:** Need to reduce interregional differences within Member States through reinforcing accessibility and road capacity. This is stated in the Portuguese (specific attention to interior and cross-border regions), French (less populated areas), Spanish (urban-rural gap) and Italian (Mezzogiorno) recovery plans.

Other problematics are also mentioned significantly but to a lesser extent:

- **Competitiveness:** The need to strengthen economic development via all policy sectors (transport infrastructure, digital connectivity, tourism) to curb existing competitiveness gap between regions within a Member State. Strong emphasis on the existing urban-rural gap. (Sweden, Romania, Denmark, Italy)
- **Depopulation:** The need to address regions with demographic handicaps in order to guarantee territorial cohesion is strongly prioritized in the Spanish (where it is one of the main pillars), Portuguese and Romanian NRRPs.
2.2 Territories beset by permanent and geographical handicaps

2.2.1 Islands

There is a wide range of island territories across the EU, of varying sizes, population, administrative level or distance to the continent. Despite significant differences, islands have faced particular challenges during the pandemic specifically linked to their insularity.

- **Member States with island regions consider their island territories in the plans in varying ways.** Ranges from a constant reference in the Greek NRRP to no consideration even being a significant region within the Member State such as Corsica for France, or Sardinia and Sicily in Italy. The latter are only considered in the NRRP as part of Mezzogiorno not because their island character.

- Investments on island territories are focused on particular sectorial investments. There is a **specific prevalence on the role of islands promoting green transition.** It is the case for Spain, that considers the establishment of a plan to develop sustainable energy on the insular territories, and for Greece, that considers upgrading electricity infrastructure to allow better distribution and interconnection of islands. Italy will hold a pilot action to strength energy connections and energy efficiency in 19 small islands. Other examples are Denmark’s envisage to invest on the green transition of the municipal ferries connecting with its many islands and Swedish consideration of Gotland as one of the territories where to face a just transition energy.

- **Being tourism a key sector for island regions and a sector really hit by the pandemic,** the sector is referred in the Spanish NRRP which envisages the establishment of a plan to modernize and make the tourism sector more competitive in the Balearic and Canary Islands.

2.2.2 Outermost regions

- **Outermost regions are strongly considered in France’s and Portugal’s national recovery and resilience plans.** On the other hand, there is no specific reference to the Canary Islands as outermost regions in the Spanish NRRP.

- The French NRRP considers a series of measures specifically dedicated to the outermost regions such as the modernization of water distribution systems, hospital infrastructures, employment and digital skills policies, and support to transport projects carried out by local authorities. Supporting energy transition, social housing infrastructure and the digitalization of the health and public sector, are specific investments for the Autonomous regions of Madeira and Azores in the Portuguese NRRP. Additionally, specific investments are envisaged for each region such as transport networks in Azores or improving water management and infrastructure in Madeira.

2.2.3 Northern Sparsely Populated Areas

- Facing specific challenges, the **northernmost regions of Finland and Sweden are very little considered in the respective national recovery and resilience plans.**

- When considered, it is linked with **support to enhance digital connectivity across territories.** In the Finnish recovery plan, there is only one specific reference to NSPAs on the investment line promoting high speed broadband. The investment intended to increase the territories competitiveness of this specific territories. When envisaging the need to support broadband expansion, the Swedish NRRP targets sparsely populated areas across the country.
Sweden’s NSPAs are only referred on the section establishing complementarities between the RRF funding and other EU programmes. Respectively, Norrbotten and Västerbotten as JTF eligible territories and how the Northernmost operational programmes within the ERDF can complete broadband expansion in the recovery plan.

3. A closer look at the policy analysis

This section looks at the approach the CPMR policy areas of interest are addressed in the NRRPs across Member States. It also considers the extent to which Member States justify and present and overall strategic approach between all EU funding, the establishment of cross-border and multi-country projects, and the summary of the consultation process held to draft the plans. In essence, we look how Member States approach some of the requirements stated in the RRF Regulation as well as the European Commission “Guidance to Member States Recovery and Resilience Plans”.

3.1 CPMR policy areas of interest

3.1.1 Cohesion policy

Observations on the investment priorities in relation to cohesion policy

– Cohesion Policy has had one main objective for the past 30 years: to overcome regional disparities and divergent levels of development. As reflected in the section 2.1 of this analysis, territorial cohesion is the final aim of different measures and investments under other policy sectors to overcome the beforementioned existing regional disparities.

Coherence and Complementarity

Partnership Agreements and operational programmes

As the CPMR has voiced, the coherence and complementarity between cohesion policy and the Facility is key to avoid conflict and double funding between instruments. Its four main funds eligible actions fall under relatively similar objectives than the Recovery and Resilience Facility.

– The references on how Structural Funds and the RRF will complement each other varies across Member States recovery plans. In a large majority, the description is not revealed.

– The Least Common Denominator among all Member States is the acknowledgement that Cohesion Policy Funds (ERDF, ESF+, REACT-EU) have been taken into consideration when drafting the plans to avoid double funding.
Some Member States do provide a comprehensive scenario on the strategic articulation in the years to come\(^4\). For example:

- Portugal provides a full strategic alignment between the Portuguese strategy for 2030 and how the funding via NGEU and Operational Programmes at national and regional level will support the strategy pillars, signalling the coherence between actions under the RRF and cohesion policy.

- The French plan establishes precise criteria to decide funding allocation between the RRF and ESIF programmes (ERDF, ESF+, REACT-EU). The four criteria are: temporality (short term RRF vs medium term ESIF), thematic (RRF has a larger scope), according to who the beneficiaries are, and territorial (depending on priority investment for geographical areas).

- Belgium: Each region details how the regional ESIF operational programmes are in line with the Belgian NRRP pillars.

- The consideration of synergies and coherence with other EU funds is effectively addressed in the Swedish and Finnish recovery plans. A detailed description of differences between measures in the recovery plan and those under ERDF, JTF and REACT-EU at national and regional level is provided.

### 3.1.2 Transport and accessibility

Observations on the investment priorities in relation to transport policy

Transport policy can have a strong related climate and digital approach in order to help regions to achieve a just and fair transition. The policy is addressed in the following way:

- **Focus on climate friendly mobility and sustainable transport.** All Member States consider the development of high-quality, multimodal, climate-resilient, smart, and sustainable infrastructure and transport systems. Even it is in a different extent, a significant number of Member States consider investment measures to support the development of the electric vehicle.

- **Key investments to favour the principle of accessibility** ensuring connectivity between specific areas of the territory and strengthening territorial competitiveness.

- **Strong reference to the promotion of rail infrastructure.** Rail infrastructure becomes an investment target for a large amount of Member States (Italy, France, Portugal, Spain, Bulgaria, Germany, Sweden). Railway transport will be supported through different approaches: to be modernized and digitalized (Bulgaria, Spain), expansion of night trains (France) or to strength territorial cohesion (Italy for the Mezzogiorno).

- **Investments to promote the development of the TEN-T networks.** For example, the Spanish NRRP aims to employ RRF funding to boost the Atlantic and Mediterranean corridors. Also, Italy aims to strength the connection of its territories with the high European networks as well as Romania and Bulgaria that as part of the modernization of its rail and road infrastructure will focus on developing key TEN-T networks.

\(^4\) NB. The consideration of coherence and complimentarities between EU programmes and the RRF funding in paper does not guarantee an effective coordination while implementing. The objective of this note is not to analyse implementation – this will be done in the years to come- rather than to analyse how Member States adress this point in the plans.
Port infrastructures are identified as direct beneficiaries of specific investment measures. Greening ports and making them more sustainable and competitive, is the objective of several investment measures in the Italian and French NRRPs. Germany aims to strength the ports resilience on promoting health services. The transhipment to maritime transport is an indirect target of the railway investment measure in the Swedish plan while Cyprus envisages overcoming reliance on roads for inland transport and congestion to and from ports.

Coherence and Complementarity

Connecting Europe Facility

The Connecting Europe Facility is presented as the funding source to develop key transport infrastructures that will complement and support the objectives set in the plans but will not be funded by the RRF. For example, the CEF will support the Lyon-Turin rail connexion as stated in the French NRRP or rail infrastructure promoting accessibility in Portugal’s cross-border regions.

3.1.3 Climate and Energy

Climate and energy policy measures are at the core of all NRRPs. All Member States have a green transition pillar. This is mostly due to the fact that at least 37% of NRRPs expenditure has to support climate objectives as established in the Regulation. The NRRPs include a vast number of climate and energy policy issues, from energy efficiency buildings and mobility to industry decarbonisation or circular economy, among others. Acknowledging this fact, this section focuses on the investment and reforms of specific relevance for CPMR member regions.

Observations on the investment priorities in relation to climate and energy policy

- Member States do largely focus to support energy transition through a variety of investment measures where the promotion of the electric vehicle or “green” hydrogen notably stand out.

- Unleashing the potential of sea-basins and synergies with the blue economy sector is considered in the Belgium NRRP where an off-shore wind-energy interconnection hub project supporting interconnexion among the North-Sea Member States is considered. We also find the support to offshore wind power energy among the new energy technologies that will be supported via the Finnish recovery plan.

- There is certainly a territorial dimension of those investments in the NRRPs that address the just energy transition, illustrated via the consideration of the territories that will benefit of the measure. It is the case of the Greek NRRP that considers supporting grid interconnexion of islands and energy transition regions or the case of the Belgian NRRP that envisages the promotion of smart grids under its energy transition pillar to support a territorially balanced energy transition.

- Large attention and investments on climate adaptation measures. The measures to adapt to the foreseeable effects of climate change take different approaches in the NRRPs:
  - Management and protection from natural disasters (Greece)
  - Forest restoration and fire resilience (Portugal, Greece, France, Spain, Romania, Finland, Cyprus)
  - Biodiversity (Spain, France, Greece, Belgium, Italy, Sweden, Finland)
  - Artificialisation and agricultural transition (France)
- Hydrogeological risk reduction, flooding mitigation, and drought (Portugal, Greece, Belgium, Spain, Italy, Romania)
- Ecological Defragmentation (Belgium)

- **Specific coastal areas investment needs are certainly considered in relation to climate mitigation and adaptation measures.** Numerous NRRPs acknowledge coastal areas particular vulnerability such as Greece (reference to the entire territory), Spain (for coastal and floodable areas) or Portugal (Algarve, Alentejo and Madeira). Coastal areas are also specifically considered **under investments linked with water management and coastal preservation** in the Spanish, French, Danish and Portuguese NRRPs.

- An explanation of how measures are in compliance with the **“do-not-significant-harm” principle** is taken into particular consideration by some Member States (Finland, Sweden, Germany, Denmark, France). Other countries like Belgium, Italy, and Spain briefly address this point.

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**Coherence and Complementarity**

**National Energy and Climate Plans (NECPs)**

The NECP is the strategic framework under which climate and energy investments are framed in order to reach the climate and energy targets in each Member State. Some Member States (Spain, Portugal, Finland, Belgium, Denmark, Finland, Sweden) effectively address the complementarity and contribution of their envisaged actions with the national targets listed in the NECPs.

**Territorial Just Transition Plans**

In line with the acknowledgement of the territorial dimension of those investments that address the just energy transition, **some Member States do envisage synergies between the NRRP and the JTF for those eligible territories** under the latter. This is the case for Greece for instance that sets up specific investment measures in its NRRP for the JTF eligible territories (Western Macedonia and Megalopoli). This is also the case for France, that details the ongoing discussions to draft the just transition territorial plans for the eligible departments (Nord, les Bouches du Rhône, la Seine Maritime, la Loire Atlantique, la Moselle, la Meurthe et Moselle, le Pas de Calais, l’Isère, le Haut Rhin et le Rhône) in line with the RRF. In relation to sectorial policies that are addressed, Denmark establishes prominent complementarities between the plans and the JTF to support digitalisation and green transition of SME’s and start-ups.

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### 3.1.4 Maritime

**Observations on the investment priorities in relation to maritime policy**

- **Investments on maritime policy and blue economy are mostly not directly addressed** in the National Recovery and Resilience Plans.

- However, **the maritime sector is significantly considered among those economic sectors affected by the investment measures promoting green transition.** For example, the NRRPs for Portugal, Spain, Greece, and Denmark refer to the maritime sector as one of the sectors were envisaged green transition measures should be put in place. Also, it is the target for those **measures boosting digital transition.** It is the case of the Spanish NRRP that envisages the need to digitalise the fisheries sector to boost blue growth competitiveness.
– Very few Member States have a “blue component” in their National Recovery and Resilience plans. The case of Portugal is unique. Under its component called “Mar” includes a series of investments promoting infrastructures for the blue economy, supporting green and digital transition in the fisheries sector, and the development of a blue cluster. Cyprus also has a strong maritime approach with several investment measures supporting maritime clusters, the sustainability of maritime transport and the protection of the marine ecosystem.

– The fisheries and aquaculture supply chains are considered targeted sectors of investments and reforms supporting green transition of agriculture with the aim to modernize and diversify the production (e.g., Italy, Greece, Denmark, Cyprus).

Coherence and Complementarity

European Maritime and Fisheries Fund

In line with the weak maritime approach taken in the recovery and resilience plans, the European Maritime and Fisheries Fund is not considered within the coherence and complementarities sections of the recovery and resilience plans with other EU programmes. However, the no double funding also applies on supporting fisheries and aquaculture sectors. Projects cannot benefit the use of funds from the Facility for projects that can be financed by the EMFF.

3.1.5 Migration

Observations on the investment priorities in relation to migration

- In a very few Member States, migrants are specifically mentioned as the target of a specific priority investment. The strong focus that the RRF has on fixing social cohesion, promoting inclusive growth, and boosting employment, entails that Member States investments could well target specific collectives as migrants or refugees with the aim to implement the European Pillar of Social Rights.

- When referred, migrant population and refugees are potential beneficiaries of those investment measures on the following social policy areas: social services and housing (Portugal), gender equality reforms (Spain), social and employment policies (Germany, Greece).

- Very few investment measures are directly targeted to promote migrant’s integration. Such is the case for Belgium or Sweden that envisage training and employment for vulnerable groups and low educated immigrants’ measures. Linked with the digital transition, both Belgium and Greece consider the digitalisation of the public system for asylum and immigration management which will strength control and faster integration.
3.2 Other features of the national recovery and resilience plans

3.2.1 Cross-border and multi-country projects

The Recovery and Resilience Facility legislative text offers the possibility to put in place projects between several Member States through RRF funding. Not many Member States do consider this opportunity. Cross-border and multi-country projects will be put in place through bilateral projects between neighbouring countries or under the so-called “Important Projects of Common European Interest” (IPCEI), a framework that allows Member States to support large-scale projects addressing important market failures in strategic value chains benefiting of specific state aid rules.

Observations on the investment priorities

- A vast majority of cross-border and multi-country projects that will be put in place aim to support the green and digital transition. Among others:
  - Green hydrogen production and transportation (FR-DE via an IPCEI)
  - Electronics (FR-DE-IT-ES via an IPCEI)
  - Water and biodiversity (PT-ES)
  - Electric vehicle (PT-ES)
  - Energy connexion (FR-ES)
  - 5G digital network and supercomputing (ES-FR-DE via an IPCEI on cloud, EL-CY)
  - Rail decarbonization (FR-ES Atlantic and Med corridors)
  - Climate adaptation (PT-ES)

- Spain and France are the Member States who plan the greatest number of projects with its neighbouring Member States. It is worth to point out, the leading role aimed by Germany and France when establishing some key IPCEI projects in their NRRPs and encouraging other Member States to join.

- There is a lack of consideration to the existing macro-regional and sea-basin strategies on the development of cooperation projects in the concerned Member States. Only Finland frames some actions related to environment and support water and marine management in line with the HELCOM Baltic Sea Action PLAN and the EU Strategy for the Baltic Sea.

3.2.2 Description of the consultation process

The RRF Regulation’ Article 18 requires Member States to provide a summary of the consultation conducted to draft the plans together with local and regional authorities, social partners, civil society, and other stakeholders, as well as how their inputs are reflected in.

The regulation does not evoke the extent and details needed in the summary. Furthermore, the quality of the consultation and explanation in the NRRP is not an assessment criterion for the European Commission when evaluating the plans. Nevertheless, it is worth to see the detail and precision Member States address this point.

- Some Member States, namely Portugal, Germany Belgium, and Bulgaria, explain with detail the consultations held with the different political and economic actors at Member State level (political parties, political institutions, territorial administration, as well as other stakeholders and citizens). These Member States provide a long list of the meetings held, the exact dates as well as all the relevant information on the consultations. In addition, as it is the case of Portugal and Bulgaria, the plan acknowledges the impact of the inputs gathered, referring to the sections the plan was modified in accordance.
- To a lesser extent, there is a reference in Denmark, Spain, and Finland to the actors and how the drafting process was held – mentioning the main meetings - but with no specific detail. Sweden does not present a detailed explanation on the consultations conducted but is relevant that for each measure there is a list of actors that will be consulted in shaping the measure.

- And at last, those Member States that do not expand much on this point and briefly mention the actors consulted without further explanation. It is the case of Romania or Greece.

→ ANNEX 1: Member States’ National Recovery and Resilience Plans main features