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FEEDBACK ON THE INITIATIVE "REGIONAL AID MAPS 2028"

CALL FOR EVIDENCE - ARES(2026)2006626

Summary	Based on the Guidelines on regional State aid, EU countries can grant regional aid in assisted areas in the EU, as identified in a regional aid map and in line with the conditions laid down in those guidelines. The current regional aid maps expire on 31 December 2027. This initiative aims to update the statistical data required for creating the new regional aid maps that will be used from 2028 to 2034.
Topic	Competition
Type of act	Communication
Commission adoption	Planned for Fourth quarter 2026

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1. BROADER PUBLIC-INTEREST DIMENSION OF REGIONAL AID

The planned technical revision of the Regional Aid Guidelines for the period 2028–2034 constitutes an important regulatory exercise to ensure that the identification of assisted areas remains aligned with updated socio-economic realities across the Union. However, even where the amendment is presented as technical in nature, it would be appropriate to recognise that the designation of eligible areas for regional aid has direct and indirect implications not only for undertakings, but also for consumers, users and local communities affected by territorial economic disparities.

2. CONSISTENCY WITH TREATY OBJECTIVES ON CONSUMER PROTECTION AND TERRITORIAL COHESION

In this respect, the revision could usefully incorporate a more explicit acknowledgement that regional aid, while primarily aimed at addressing territorial imbalances and supporting regional development under Article 107(3)(a) and (c) TFEU, should also remain coherent with broader Treaty objectives relating to consumer welfare, territorial cohesion and equitable access to essential services.

In particular, reference should be made to Article 169 TFEU, which requires the Union to promote consumer interests across its policies, as well as to Article 174 TFEU, which establishes the objective of reducing disparities between regions and paying particular attention to territories affected by severe structural disadvantages.

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3. Consumer Welfare and Territorial Accessibility as Relevant Outcomes of Regional Aid

Although the current initiative focuses on updating statistical references used for regional aid maps, the practical consequences of territorial designation inevitably influence the distribution of investment incentives, local market structures and service provision conditions in disadvantaged areas. For this reason, a purely technical approach may not fully capture the broader public-interest dimension of regional aid.

A more explicit consumer-oriented perspective would therefore strengthen the framework by recognising that public support granted under regional aid schemes should contribute, directly or indirectly, to measurable improvements in the conditions experienced by final users, including in terms of:

- affordability of essential services;
- accessibility of goods and services in peripheral or structurally weak regions;
- reduction of territorial asymmetries in digital and energy access;
- preservation of effective local market choice;
- continuity of services relevant for social and territorial inclusion.

4. Addressing Market Failures in Disadvantaged Regions

This is particularly important in regions affected by persistent market failures, where limited competition, weak infrastructure and reduced investment attractiveness often result in structural disadvantages for consumers. In such contexts, aid granted to undertakings may not automatically generate welfare gains for local populations unless accompanied by adequate safeguards and monitoring mechanisms.

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5. Regional Aid and Services of General Economic Interest

Particular attention should also be devoted to sectors linked to services of general economic interest (SGEI), including local transport, digital connectivity, energy distribution and access to basic territorial services. In many disadvantaged areas, these sectors represent essential enabling conditions for effective territorial cohesion, and regional aid may have significant indirect effects on their availability and quality.

6. Competition Safeguards in Concentrated Local Markets

Moreover, where regional aid contributes to strengthening incumbent operators in concentrated local markets, there is a need to ensure that such intervention does not unintentionally reduce competitive pressure to the detriment of final users through weaker incentives for price moderation, innovation or service quality.

7. Effective Delivery of Aid to Final Beneficiaries

A further aspect deserving explicit consideration concerns the delivery mechanism of regional aid and its effective transmission to final beneficiaries.

Where regional aid is intended to address structural territorial disadvantages, greater consideration should be given to the use of direct non-repayable grants, particularly in cases where support is designed to facilitate productive investment, territorial inclusion, local service provision or economic resilience in disadvantaged regions.

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8. Preference for Direct Non-Repayable Grants

Direct grant mechanisms may ensure greater legal certainty, administrative simplicity, transparency and immediate usability of public support, especially for smaller operators and local economic actors whose financial capacity may be limited.

9. Limiting Unnecessary Financial Intermediation

By contrast, excessive reliance on banking institutions or financial intermediaries as channels for aid delivery may reduce accessibility, generate additional administrative burdens and weaken the effective transmission of the economic advantage intended by public intervention. In particular, recourse to financial intermediaries may create additional selection filters, transaction costs or financing conditions that are not always aligned with the underlying cohesion objective of the measure.

This may be especially problematic in territories where access to credit remains uneven or where local beneficiaries face structural difficulties in satisfying financial-sector requirements that go beyond the substantive objectives of regional development policy.

10. Proportional Use of Financial Instruments

For this reason, where financial instruments are envisaged, their use should remain proportionate, justified by clear efficiency gains and designed so as to avoid dilution of public support before it reaches the intended beneficiaries.

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11. Suggested Operational Clarifications for the Revised Framework

In this context, the revised framework could usefully clarify that, whenever equivalent policy objectives can be achieved through different aid instruments, Member States should give preference to delivery mechanisms that minimise intermediation costs and maximise direct accessibility for beneficiaries.

It would also be appropriate to encourage Member States to demonstrate, when financial intermediaries are used, that such arrangements provide an added implementation value compared with direct grant-based solutions.

Furthermore, future regional aid implementation could benefit from an explicit recommendation that aid design should avoid unnecessary financial layering capable of reducing the immediate economic effect of public support in disadvantaged territories.

A stronger preference for grant-based mechanisms, whenever compatible with proportionality and State aid principles, would contribute to ensuring that regional aid reaches beneficiaries in a more immediate and effective manner, thereby improving territorial impact and reinforcing consistency with the Union's cohesion objectives.

12. Participation of Consumers and Civil Society in Monitoring

In addition, the consultation and future monitoring framework could benefit from a stronger structured involvement of consumer associations and civil society organisations, whose perspective remains particularly valuable in identifying how regional aid measures affect daily economic conditions in assisted territories.

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13. Monitoring Social and Consumer-Related Outcomes

While annual reporting obligations and State aid scoreboard monitoring remain important instruments, future evaluation exercises could also integrate indicators capable of capturing social and consumer-related outcomes, including affordability trends, territorial accessibility and effective reduction of service gaps.

14. Conclusion: Territorial Aid as an Instrument for Inclusive Welfare

In conclusion, even where limited to updated socio-economic statistics, the revision of regional aid maps offers an opportunity to reaffirm that territorial aid should remain fully aligned with the broader Union objective of ensuring that economic intervention in disadvantaged areas contributes not only to business competitiveness, but also to fairer market outcomes, effective territorial cohesion and improved welfare for consumers and users across the Union.

Particular caution may therefore be warranted where the use of financial intermediaries risks introducing additional layers of implementation that do not demonstrably enhance policy effectiveness, especially where direct support mechanisms could ensure a more immediate territorial impact.

Rome, 23.03.2026

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