

**Positive preliminary assessment of the satisfactory fulfilment of milestones and targets related to the fourth payment request submitted by Romania on 19 December 2025, transmitted to the Economic and Financial Committee by the European Commission**

**Executive summary**

In accordance with Article 24(2) of Regulation (EU) 2021/241, on 19 December 2025, Romania submitted a request for payment for the fourth instalment of the non-repayable support. The payment request was accompanied by the required management declaration and summary of audits.

To support its payment request, Romania provided due justification of the satisfactory fulfilment of the 62 milestones and targets of the fourth instalment of the non-repayable support, as set out in Section 2.1.3 of the Council Implementing Decision of 29 December 2021 on the approval of the assessment of the recovery and resilience plan for Romania.<sup>1</sup>

For six targets and one milestone covering a large number of beneficiaries, in addition to the summary documents and official listings provided by Romania, the Commission services have assessed a statistically significant sample of individual files. The sample size has been uniformly set at 60, with additional units for one specific case, which corresponds to a confidence level of 95% or above in all cases.

In its payment request, Romania has confirmed that measures related to previously satisfactorily fulfilled milestones and targets have not been reversed. The Commission does not have evidence of the contrary. Upon receipt of the payment request, the Commission has assessed on a preliminary basis the satisfactory fulfilment of the relevant milestones and targets. Based on the information provided by Romania, the Commission has made a positive preliminary assessment of the satisfactory fulfilment of all 62 milestones and targets.

The milestones and targets positively assessed as part of this payment request demonstrate significant steps in the implementation of Romania's Recovery and Resilience Plan. They notably highlight the continuation of the reform momentum in key policy areas. This includes, among others, the reform of forest management, decarbonising the transport and energy sectors, the review of the tax framework and ensuring the independence of judiciary. The milestones and targets also confirm progress towards the completion of investment projects related to deploying the Government cloud, improving tax administration and public procurement processes, pre-hospital medical infrastructure and community services for persons with disabilities.

By the transmission of this positive preliminary assessment and in accordance with Article 24(4) of Regulation (EU) 2021/241, the Commission asks for the opinion of the Economic and Financial Committee on the satisfactory fulfilment of the relevant milestones and targets.

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<sup>1</sup> ST 12319/21; ST 12319/21 ADD; as amended by ST15833/23; ST 15833/23 ADD 1; ST 14452/25; ST 14452/25 ADD1, not yet published.

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## Non-repayable support

**Number and name of the Milestone:** RO-C[C2]-R[1]-M[24] Entry into force of the legislative acts amending and supplementing the existing legislation on forests

**Related Measure:** RO-C[C2]-R[1] Reform of forest management and governance systems through a new National Forest Strategy and subsequent legal acts

**Qualitative Indicator:** Provision in the law indicating the entry into force of the legislative acts

**Time:** Q4 2025

### 1. Context:

The objective of the reform is to ensure a regulatory framework for sustainable forest policies that support climate change mitigation and adaptation. The reform consists of the adoption of strategies and legal acts for afforestation and reforestation, combatting illegal logging and improving forest management.

Milestone 24 concerns the entry into force of legal acts to combat, determine damage from and define penalties for illegal logging and other forest-related crimes and to reorganise forest management.

Milestone 24 is the third and last milestone of the reform, and it follows the completion of milestone 22, related to the adoption of the National Forest Strategy 2020-2030, and milestone 23, related to amended ministerial ordinances laying down the rules for afforestation and reforestation required by that strategy.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                        | Short description                                                                                                       |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                                  | Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled. |
| 2 | Copy of Law No. 331/2024 on the Forestry Code, published in the Official Journal No. 7 of 9 January 2025.                                                                                                                   | The new Forestry code, legislation regulating forests and forest management in Romania.                                 |
| 3 | Copy of Government Emergency Ordinance No. 119/2021 for amending and completing Law No. 171/2010 on establishing and sanctioning forest-related infringements, published in the Official Journal No. 925 of 5 October 2021. | Government Emergency Ordinance sanctioning forest offences.                                                             |
| 4 | Copy of Law No. 257/2023 amending and supplementing regulatory acts to establish specific measures to ensure the integrity of the forest endowment, published in the Official Journal No. 678 of 24 July 2023.              | Legislation to combat illegal logging through changes to the organisation and functioning of the Romanian Gendarmerie.  |
| 5 | Copy of Government Decision No. 512/2022 amending and supplementing                                                                                                                                                         | Government Decision regulating the provenance, movement and marketing of                                                |

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|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | the Rules on the provenance, movement and marketing of timber, on the arrangements for storing timber and processing facilities for round timber, on the origin and movement of timber for the owner's own consumption and on certain measures for the application of Regulation (EU) No. 995/2010 of the European Parliament and of the Council of 20 October 2010 laying down the obligations of operators who place timber and timber products on the market, approved by Government Decision No. 497/2020, published in the Official Journal No. 386 of 20 April 2022. | timber with the aim of combating illegal logging.                                                                                                                                                                                                                   |
| 6 | Copy of Government Decision No. 77/2021 on the establishment of the National Forest Guard, published in the Official Journal No. 645 of 30 June 2023.                                                                                                                                                                                                                                                                                                                                                                                                                      | Government Decision defining the tasks of the National Forest Guard.                                                                                                                                                                                                |
| 7 | Copy of Government Decision No. 46/2023 regarding the organisation, operation and distribution of the number of posts for the National Forest Guard and the Forest Guards, published in the Official Journal No. 58 of 20 January 2023.                                                                                                                                                                                                                                                                                                                                    | Government Decision amending the organisation and tasks of the National Forest Guard.                                                                                                                                                                               |
| 8 | Copy of Government Emergency Ordinance No. 63/2025 amending certain legislative acts in the field of forestry, published in the Official Journal No. 1076 of 21 November 2025.                                                                                                                                                                                                                                                                                                                                                                                             | Government Decision reorganising National Forest Administration Romsilva.                                                                                                                                                                                           |
| 9 | Copy of Government Decision No. 123/2026 approving organisational and operational measures, as well as for the reorganisation of the Romsilva National Forest Administration, published in the Official Journal No. 191 of 2026.                                                                                                                                                                                                                                                                                                                                           | Government decision to further reorganise National Forest Administration Romsilva and repeal Government Decision No. 229/2009 on the reorganisation of the National Forest Administration - Romsilva and the approval of the rules of organisation and functioning. |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

#### Entry into force of legal acts:

The Council Implementing Decision states that the milestone carries the name "Entry into force of the *legislative* acts amending and supplementing the existing legislation on forests" and defines the qualitative indicator as "Provision in the law indicating the entry into force of the legislative acts".

The Council Implementing Decision also states, in the measure description, that “The reform consists of the adoption of [...] *legal* acts for afforestation and reforestation [...]”, and the milestone description requires the “Entry into force of *legal* acts [...] including provisions for combatting illegal logging and reorganizing forest management (*Government Decision No. 229/2009*)”. Under the Romanian legal system, Government decisions are not legislative acts adopted by Parliament, but they are legally binding acts adopted by the Government for the organisation of the execution of laws.

In light of the contextual interpretation of this requirement from the Council Implementing Decision, it is interpreted that the milestone requires the entry into force of legal acts necessary for the implementation of the reform that this milestone represents, rather than only legislative acts in the strict sense of acts adopted by Parliament. Romania adopted and brought into force laws, Government decisions and Government emergency ordinances which meet the requirements in the milestone, as explained below. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

**(i) setting out amendments to the criminal penalty system;**

Law No. 331/2024 on the Forestry Code (*Lege nr. 331/2024 - Codul silvic*, hereinafter referred to as the “*New Forestry Code*”) was published in the Official Journal No. 7 of 9 January 2025 (Evidence No. 2). According to the provisions in Article 12(1) of Law No. 24/2000 on legislative technique rules for drafting legal acts (*Lege nr. 24/2000 privind normele de tehnică legislativă pentru elaborarea actelor normative*), the law entered into force three days after its publication in the Official Journal.

Article 167 of the New Forestry Code repeals and replaces the old Law No. 46/2008 on the Forestry Code (*Legea nr. 46/2008 - Codul silvic*, hereinafter referred to as the “*Old Forestry Code*”). The New Forestry Code amends the criminal penalty system set out in the Old Forestry Code as follows:

- Article 142 of the New Forestry Code, concerning the offence of destruction of National Forest Fund vegetation, lowers the minimum damage thresholds triggering imprisonment as compared to Article 107 of the Old Forestry Code.
- Article 143 of the New Forestry Code introduces and sanctions the unlawful felling of trees as a separate offence, whereas the Old Forestry Code did not define this conduct as a separate offence.
- Article 145 of the New Forestry Code introduces aggravating forms of several forestry-related offences, which were not defined in the Old Forestry Code.
- Article 146 of the New Forestry Code defines and specifies sanctions offences concerning the integrity of the National Forest Fund, which were not defined as an offence in the Old Forestry Code.
- Article 150 of the New Forestry Code defines and specifies sanctions for tree theft. Compared to Article 109 of the Old Forestry Code, this Article 150 lowers the threshold for the application of the penalty of 2 to 7 years’ imprisonment from 50 times to 20 times the average price one cubic metre of timber.
- Article 151 of the New Forestry Code defines and specifies sanctions for offences concerning the storage and movement of timber by increasing the maximum penalty from one year to five years of imprisonment, compared to Article 68 of the Old Forestry Code.

Furthermore, Article 165 of the New Forestry Code amends Law No. 171/2010 on establishing and sanctioning forest-related infringements (*Lege nr. 171/2010 privind stabilirea și sancționarea contravențiilor silvice*, hereinafter referred to as “*Law No. 171/2010*”), by classifying several forms of

illegal transport or possession of wood timber materials as forestry infringements, punishable by a fine and the confiscation of the timber.

**(ii) establishing the methods for assessing damage to forest vegetation in forests and beyond;**

Article 167 of the aforementioned New Forestry Code repeals Government Emergency Ordinance No. 85/2006 laying down detailed rules for assessing damage to forest vegetation in forests and elsewhere (*Ordonanța de urgență a Guvernului nr. 85/2006 privind stabilirea modalităților de evaluare a pagubelor produse vegetației forestiere din păduri și din afara acestora*).

Through its Title VIII, *Assessment of damage and forest injury*, the New Forestry Code establishes methods for assessing damage to forest vegetation:

- Article 157 sets out the general procedure for assessing damage and forest injury.
- Article 158 establishes calculation methods for damage caused to the trees by cutting without right, breaking, rooting and destruction.
- Article 159 establishes calculation methods for damage caused by damage to seedlings and/or shoots.
- Article 160 establishes calculation methods for damage caused by tree theft.
- Article 161 establishes calculation methods for forest damage.

In addition, Title VIII establishes damage assessment methods both in forests and outside forests; for example, Articles 157(1) and 157(4)(a) of the New Forestry Code apply to forest vegetation inside and outside National Forest Fund land as defined Article 1(1) of the Code.

**(iii) sanctioning of forest offences, establishing calculation methods for the environmental and financial damage caused by illegal logging and other forest crime;**

**Government Emergency Ordinance No. 119/2021** for amending and completing Law No. 171/2010 on establishing and sanctioning forest offenses (*Ordonanță de urgență nr. 119/2021 pentru modificarea și completarea legii nr. 171/2010 privind stabilirea și sancționarea contravențiilor silvice*, hereinafter referred to as “*Government Emergency Ordinance No. 119/2021*”) was published in the Official Journal No. 925 of 5 October 2021 (evidence 3). According to Article II, the provisions of Articles I 5(6)(d), 8, 10(c), 12, 15 (1), 16(1)(h) to (i) and 30(8) entered into force 10 days after the date of publication. According to the provisions in Article 12(3) of Law No. 24/2000 on legislative technique rules for drafting legal acts, the remaining provisions of the Ordinance entered into force on the day of its publication in the Official Journal.

Government Emergency Ordinance No. 119/2021 sanctions forest offences in its Article I as follows:

- Article I 11 amends Article 7 of the aforementioned Law No. 171/2010 to add *change of land use category without approval* as a forest offence sanctionable by a fine as defined in Article 7 of Law No. 171/2010.
- Article I 13(1) to (2) amends Article 8 Law No. 171/2010 to establish and sanction several forest offences falling under illegal logging.
- Article I 13(3) establishes tree theft as a forest offence.
- Article I 13(5) defines fines for forest offences.

In addition, Title VIII of the aforementioned New Forestry Code, *Assessment of damage and forest injury*, establishes calculation methods for the environmental and financial damage caused by illegal

logging and other forest crime, such as damage to seedlings and/or shoots and tree theft in the following articles:

- Article 157 sets out the general procedure for assessing damage and forest injury.
- Article 158 establishes calculation methods for (financial) damage caused to the trees by cutting without right, breaking, rooting and destruction (illegal logging).
- Article 159 establishes calculation methods for (financial) damage caused by damage to seedlings and/or shoots.
- Article 160 establishes calculation methods for (financial) damage caused by tree theft, which is labelled a forest crime according to its Article 150.
- Article 161 establishes calculation methods for (environmental) damage.
- Article 162 establishes calculation measures for damage from works and/or sites located in the National Forest Fund land without legal approval.

**(iv) including provisions for combatting illegal logging and reorganising forest management (Government Decision No. 229/2009).**

**Law No. 257/2023** amending and supplementing regulatory acts to establish specific measures to ensure the integrity of the forest endowment (*Lege nr. 257/2023 privind modificarea și completarea unor acte normative pentru instituirea unor măsuri specifice în vederea asigurării integrității fondului forestier*, hereinafter referred to as “*Law No. 257/2023*”) was published in the Official Journal No. 678 of 24 July 2023 (evidence 4). According to the provisions in Article 12(1) of Law No. 24/2000 on legislative technique rules for drafting legal acts, the law entered into force three days after its publication in the Official Journal.

Law No. 257/2023 includes provisions combatting illegal logging, such as Article II, which amends Law No. 550/2004 on the organisation and functioning of the Romanian Gendarmerie (*Lege nr. 550/2004 privind organizarea și funcționarea Jandarmeriei Române*), to give the Gendarmerie the task to ensure or participate in the supervision, control, protection and conservation of the forest fund, through specific measures to prevent and combat any breaches of the legal provisions.

**Government Decision No. 512/2022** amending and supplementing the Rules on the provenance, movement and marketing of timber, on the arrangements for storing timber and processing facilities for round timber, on the origin and movement of timber for the owner’s own consumption and on certain measures for the application of Regulation (EU) No. 995/2010 of the European Parliament and of the Council of 20 October 2010 laying down the obligations of operators who place timber and timber products on the market, approved by Government Decision No. 497/2020 (*Hotărâre nr. 512/2022 pentru modificarea și completarea normelor referitoare la proveniența, circulația și comercializarea materialelor lemnoase, la regimul spațiilor de depozitare a materialelor lemnoase și al instalațiilor de prelucrat lemn rotund, precum și a celor privind proveniența și circulația materialelor lemnoase destinate consumului propriu al proprietarului și a unor măsuri de aplicare a prevederilor Regulamentului (UE) nr. 995/2010 al Parlamentului European și al Consiliului din 20 octombrie 2010 de stabilire a obligațiilor care revin operatorilor care introduc pe piață lemn și produse din lemn, aprobate prin Hotărârea Guvernului nr. 497/2020*, hereinafter referred to as “*Government Decision No. 512/2022*”) was published in the Official Journal No. 386 of 20 April 2022 (evidence 5). According to the provisions in Article 12(3) of Law No. 24/2000 on legislative technique rules for drafting legal acts, the decision entered into force on the day of its publication in the Official Journal.

Article 26 of Government Decision 512/2022 expands the requirements for registering timber through the SUMAL 2.0 system and requires notification of any differences in volume of timber being

transported, thus creating more transparency on the provenance of timber, thus disincentivising illegal logging.

**Government Decision No. 77/2021** on the establishment of the National Forest Guard (*Ordonanță de urgență nr. 77/2021 privind înființarea gărzii forestiere naționale*, hereinafter referred to as “Government Decision No. 77/2021”) was published in the Official Journal No. 645 of 30 June 2023 (evidence 6). According to the provisions in Article 12(3) of Law No. 24/2000 on legislative technique rules for drafting legal acts, the decision entered into force on the day of its publication in the Official Journal.

Article 1 of Government Decision No. 77/2021 establishes the National Forest Guard. Article 5 of Government Decision No. 77/2021 defines the tasks of the National Forest Guard organisation as a whole in section (1). These tasks include, among others, to control the application of the forestry regime and to check the traceability of timber materials. Article 5 of Government Decision No. 77/2021 defines the tasks of individual Forest Guards in section (2). These tasks include, among others, to implement, monitor and control the application of the forestry regime and to monitor and control the traceability of timber materials, thus combatting illegal logging.

**Government Decision No. 46/2023** regarding the organisation, operation and distribution of the number of posts for the National Forest Guard and the Forest Guards (*Hotărâre nr. 46/2023 privind organizarea, funcționarea și repartizarea numărului de posturi pentru garda forestieră națională și gărzile forestiere*, hereinafter referred to as “Government Decision No. 46/2023”) was published in the Official Journal No. 58 of 20 January 2023 (Evidence No. 7). According to the provisions in Article 12(3) of Law No. 24/2000 on legislative technique rules for drafting legal acts, the decision entered into force on the day of its publication in the Official Journal.

Government Decision No. 46/2023 further reorganises the National Forest Guard and replaces, through Article 16, Government Decision No. 743/2015 on the organisation and functioning of the Forest Guards (*Hotărâre nr. 743/2015 privind organizarea și funcționarea Gărzilor forestiere*, hereinafter referred to as “Government Decision No. 743/2015”).

Article 1 of Government Decision No. 46/2023 defines the National Forest Guard as a public institution which has under its authority the forest guards, whereas Article 1 of Government Decision No. 743/2015 defined forest guards as public institutions, without one National Forest Guard under whose authority they fall.

Furthermore, Article 9(e) assigns to the National Forest Guard the responsibility of imposing sanctions for contraventions in the field of forestry and confiscate the timber involved. Accordingly, the National Forest Guard also plays an active role in combating illegal logging.

**Government Emergency Ordinance No. 63/2025** amending certain legislative acts in the field of forestry (*Ordonanță de urgență nr. 63/2025 pentru modificarea și completarea unor acte normative din domeniul silviculturii*, hereinafter referred to as “Government Emergency Ordinance 63/2025”) was published in the Official Journal No. 1076 of 21 November 2025 (evidence 8). According to the provisions in Article 12(3) of Law No. 24/2000 on legislative technique rules for drafting legal acts, the Ordinance entered into force on the day of its publication in the Official Journal.

Government Emergency Ordinance No. 63/2025 organises the National Forest Administration Romsilva in several articles:

- Article I 1 requires competitions for the selection and appointment of management.
- Article I 4 specifies the conditions required for the function of director, including, among others, a) a bachelor’s degree in forestry, b) having no convictions for an administrative

offence in connection with the forestry authority and c) having no conflicts of interest. It further describes the procedure for selection and appointment of directors, including a written phase and interview.

- Article I 10(4) describes the conditions required for main management positions including, among others, Director-General and Deputy Director-General, setting minimum years of experience in forestry.

The Government Emergency Ordinance therefore provides for professional requirements and procedures for appointments, reforming the management of the Forest Administration.

**Government Decision No. 123/2026** approving organisational and operational measures, as well as for the reorganisation of the National Forest Administration – Romsilva (*Hotărâre nr. 123-2026 privind aprobarea măsurilor de organizare și funcționare, precum și de reorganizare ale Regiei Naționale a Pădurilor — Romsilva*, hereinafter referred to as “Government Decision No. 123/2026”) was published in the Official Journal No. 191 of 2026 (Evidence No. 9). According to the provisions in Article 12(3) of Law No. 24/2000 on legislative technique rules for drafting legal acts, the decision entered into force on the day of its publication in the Official Journal.

Government Decision No. 123/2026 further reorganises the National Forest Administration Romsilva in several articles, repealing Government Decision No. 229/2009 on the reorganisation of the National Forest Administration - Romsilva and the approval of the rules of organisation and functioning (*Hotărâre nr. 229/2009 privind reorganizarea Regiei Naționale a Pădurilor — Romsilva și aprobarea regulamentului de organizare și funcționare*, hereinafter referred to as “Government Decision No. 229/2009”).

- Chapter I, Article 2 provides for a central structure and forestry directorates.
- Chapter III, Article 6 defines Romsilva’s main tasks and powers, including “a) to apply the National Forest Strategy” and “c) to ensure the integrity of the forest managed and for which it provides forestry services through technical and organisational measures leading to the prevention of illegal logging”. These tasks are absent from Government Decision No. 229/2009.
- Chapter IV, section 1 sets up the central structure, including Director-General and directors. Article 11 establishes the main tasks of the central structure, including to “(w): organise annual thematic audits on preventing and combating illegal logging and, on the basis of the findings made, engage administrative, disciplinary, administrative or criminal liability”. The tasks of the central structure were not defined in Government Decision No. 229/2009.
- Chapter IV, section 2 sets up the forestry directorates with directors and technical directors. Article 14 establishes the main tasks of the regional forestry directorates, including to “(i): coordinate the identification of high-risk areas for illegal logging in the subordinated forest districts and organise prevention actions, especially in these areas”. The tasks of the forestry directorates were not defined in Government Decision No. 229/2009.
- Chapter V sets up Romsilva’s management structure consisting of the Management Board and Director-General.
- Article 35 provides for annual evaluations of staff.
- Article 39 repeals Government Decision No. 229/2009.
- Annex 1 lists the forestry directorates with the counties they include. There are 19 directorates compared to the 42 defined in Government Decision No. 229/2009.

**Furthermore, in line with the description of the measure, the reform consists of the adoption of (...) legal acts (...) combatting illegal logging and improving forest management.** The legal acts –

laws, government decisions, government emergency ordinances – that are part of M24 are described above. They combat illegal logging by fixing sanctions, at times higher than in earlier legislation, establishing damage calculation methods, tasking the Romanian Gendarmerie with the protection of forests and augmenting transparency on the provenance of timber. They improve forest management by reorganising the National Forest Guard and National Forest Administration Romsilva, defining their tasks, consolidating forestry directorates and introducing professional requirements and competitions for appointments to key management positions and providing for annual evaluations of staff.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C2]-I[5]-M[41] Approval of project design

**Related Measure:** RO-C[C2]-I[5] Integrated flood risk mitigation systems in forest river basins

**Qualitative Indicator:** Approval of project design

**Time:** Q1 2023

### 1. Context:

The objective of this investment is to reduce flood risk to protect people, infrastructure and socio-economic objectives in risk areas, as well as to protect the environment and biodiversity through environmental measures, in particular those relating to ensuring fish migration and ensuring ecological flow. The investment consists of modernisation works for flood protection.

Milestone 41 concerns the approval of the project design for the modernisation works for flood protection.

Milestone 41 is the first step of the implementation of the investment, and it will be followed by milestone 42, related to the construction of the modernisation works for flood protection.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                            | Short description                                                                                                                                                                                      |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                      | Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled.                                                                                |
| 2 | Copy of financing contract COD C2/I5 of 1 September 2022.                                                                                                                       | Signed contract between the Ministry of the Environment, Water Resources and Forestry and the Romanian National Forest Authority Romsilva for the task to carry out the torrential correction project. |
| 3 | Endorsement report ( <i>aviz</i> ) () approving the design for the sub-project "Correction of torrents for the river basin Măieruş, Bacău County".                              | Endorsement report approving the design for the sub-project, issued by the Technical and Economic Committee for Opinion of Romsilva and dated 26 October 2020.                                         |
| 4 | Endorsement report ( <i>aviz</i> ) approving the design for the sub-project "Correction of torrents for the river basin Grozea, stage III, Bacău County".                       | Endorsement report approving the design for the sub-project, issued by the Technical and Economic Committee for Opinion of Romsilva and dated 26 October 2020.                                         |
| 5 | Endorsement report ( <i>aviz</i> ) approving the design for the sub-project "Correction of torrents for the river basin Izvorul Negru, stage II, Bacău County".                 | Endorsement report approving the design for the sub-project, issued by the Technical and Economic Committee for Opinion of Romsilva and dated 24 November 2022.                                        |
| 6 | Endorsement report ( <i>aviz</i> ) approving the design for the sub-project "Correction of torrents for the river basin Pârâul Negru, Bacău County".                            | Endorsement report approving the design for the sub-project, issued by the Technical and Economic Committee for Opinion of Romsilva and dated 24 November 2022.                                        |
| 7 | Endorsement report ( <i>aviz</i> ) approving the design for the sub-project "Correction of torrents for the river basin and stabilization of the slope Strâmtura Scaune, pârâul | Endorsement report approving the design for the sub-project, issued by the Technical and Economic Committee for Opinion of Romsilva and dated 24 November 2022.                                        |

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|    | Asău”.                                                                                                                                                                            |                                                                                                                                                                 |
| 8  | Endorsement report ( <i>aviz</i> ) approving the design for the sub-project “Correction of torrents for the river basin Martinu”.                                                 | Endorsement report approving the design for the sub-project, issued by the Technical and Economic Committee for Opinion of Romsilva and dated 26 November 2021. |
| 9  | Endorsement report ( <i>aviz</i> ) approving the design for the sub-project “Correction of torrents for the river basin stream Casele Bisocii”.                                   | Endorsement report approving the design for the sub-project, issued by the Technical and Economic Committee for Opinion of Romsilva and dated 7 March 2023.     |
| 10 | Endorsement report ( <i>aviz</i> ) approving the design for the sub-project “Correction of torrents for the river basin stream Tisău-Cheia”.                                      | Endorsement report approving the design for the sub-project, issued by the Technical and Economic Committee for Opinion of Romsilva and dated 7 March 2023.     |
| 11 | Endorsement report ( <i>aviz</i> ) approving the design for the sub-project “Correction of torrents for the river basin Fetița Mare”.                                             | Endorsement report approving the design for the sub-project, issued by the Technical and Economic Committee for Opinion of Romsilva and dated 24 November 2022. |
| 12 | Endorsement report ( <i>aviz</i> ) approving the design for the sub-project “Correction of torrents for the river basin between Grefeniș Stream and Schitu Stream, Neamț County”. | Endorsement report approving the design for the sub-project, issued by the Technical and Economic Committee for Opinion of Romsilva and dated 11 October 2022.  |
| 13 | Endorsement report ( <i>aviz</i> ) approving the design for the sub-project “Correction of torrents for the river basin Valea Rea stage II”.                                      | Endorsement report approving the design for the sub-project, issued by the Technical and Economic Committee for Opinion of Romsilva and dated 21 December 2022. |
| 14 | Endorsement report ( <i>aviz</i> ) approving the design for the sub-project “Correction of torrents for the river basin Bucșoița”.                                                | Endorsement report approving the design for the sub-project, issued by the Technical and Economic Committee for Opinion of Romsilva and dated 23 February 2023. |
| 15 | Endorsement report ( <i>aviz</i> ) approving the design for the sub-project “Correction of torrents for the river basin Pârâul Leșului”.                                          | Endorsement report approving the design for the sub-project, issued by the Technical and Economic Committee for Opinion of Romsilva and dated 23 February 2023. |
| 16 | Endorsement report ( <i>aviz</i> ) approving the design for the sub-project “Correction of torrents Scânteia”.                                                                    | Endorsement report approving the design for the sub-project, issued by the Technical and Economic Committee for Opinion of Romsilva and dated 11 October 2022.  |
| 17 | Endorsement report ( <i>aviz</i> ) approving the design for the sub-project “Correction of torrents Valea Lungă”.                                                                 | Endorsement report approving the design for the sub-project, issued by the Technical and Economic Committee for Opinion of Romsilva and dated 11 October 2022.  |
| 18 | Endorsement report ( <i>aviz</i> ) approving the design for the sub-project “Correction of torrents Izvorul Govorei”.                                                             | Endorsement report approving the design for the sub-project, issued by the Technical and Economic Committee for Opinion of Romsilva and dated 26 October 2020.  |
| 19 | Endorsement report ( <i>aviz</i> ) approving the design for the sub-project “Correction of torrents Bistricioara, stage II”.                                                      | Endorsement report approving the design for the sub-project, issued by the Technical and Economic Committee for Opinion of Romsilva and dated 23 February 2023. |
| 20 | Endorsement report ( <i>aviz</i> ) approving the                                                                                                                                  | Endorsement report approving the design                                                                                                                         |

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|    | design for the sub-project "Correction of torrents for the river basin Maghernița".                                                              | for the sub-project, issued by the Technical and Economic Committee for Opinion of Romsilva and dated 23 February 2023.                                                                                                                                         |
| 21 | Endorsement report ( <i>aviz</i> ) approving the design for the sub-project "Correction of torrents Fetig, stage III".                           | Endorsement report approving the design for the sub-project, issued by the Technical and Economic Committee for Opinion of Romsilva and dated 23 February 2023.                                                                                                 |
| 22 | Feasibility study for the sub-project "Correction of torrents for the river basin Măieruș, Bacău County".                                        | Feasibility study including the project design for the project, issued by Tim Wald Consult to the beneficiary Romsilva and dated 30 September 2019.                                                                                                             |
| 23 | Feasibility study for the sub-project "Correction of torrents for the river basin Grozea, stage III, Bacău County".                              | Feasibility study including the project design for the project, issued by Tim Wald Consult to the beneficiary Romsilva and dated 15 April 2019.                                                                                                                 |
| 24 | Feasibility study for the sub-project "Correction of torrents for the river basin Izvorul Negru, stage II, Bacău County".                        | Feasibility study including the project design for the project, issued by Tim Wald Consult to the beneficiary Romsilva and dated 15 February 2022.                                                                                                              |
| 25 | Feasibility study for the sub-project "Correction of torrents for the river basin Pârâul Negru, Bacău County".                                   | Feasibility study including the project design for the project, issued by Tim Wald Consult to the beneficiary Romsilva and dated 30 September 2019.<br><br>Romania provided this document together with Evidence No. 44, the DNSH analysis for the sub-project. |
| 26 | Feasibility study for the sub-project "Correction of torrents for the river basin and stabilization of the slope Strâmtura Scaune, pârâul Asău". | Feasibility study including the project design for the project, issued by Alfrid srl to the beneficiary Romsilva and dated 31 October 2022.                                                                                                                     |
| 27 | Feasibility study for the sub-project "Correction of torrents for the river basin Martinu".                                                      | Feasibility study including the project design for the project, issued by Alfrid srl to the beneficiary Romsilva and dated 31 October 2021.                                                                                                                     |
| 28 | Feasibility study for the sub-project "Correction of torrents for the river basin stream Casele Bisocii".                                        | Feasibility study including the project design for the project, issued by Alfrid srl to the beneficiary Romsilva and dated 28 December 2022.                                                                                                                    |
| 29 | Feasibility study for the sub-project "Correction of torrents for the river basin stream Tisău-Cheia".                                           | Feasibility study including the project design for the project, issued by Alfrid srl to the beneficiary Romsilva and dated 28 December 2022.                                                                                                                    |
| 30 | Feasibility study for the sub-project "Correction of torrents for the river basin Fetița Mare".                                                  | Feasibility study including the project design for the project, issued by Alfrid srl to the beneficiary Romsilva and dated 29 June 2022.                                                                                                                        |
| 31 | Feasibility study for the sub-project "Correction of torrents for the river basin between Grefeniș Stream and Schitu Stream, Neamț County".      | Feasibility study including the project design for the project, issued by S.C. DENDRO PROJECT S.R.L to the beneficiary Romsilva and dated 30 December 2021.                                                                                                     |
| 32 | Feasibility study for the sub-project                                                                                                            | Feasibility study including the project design                                                                                                                                                                                                                  |

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|    | "Correction of torrents for the river basin Valea Rea stage II".                                                                  | for the project, issued by NCDS "Marin Drăcea" to the beneficiary Romsilva and dated 10 November 2022.                                                                                                                                                   |
| 33 | Feasibility study for the sub-project "Correction of torrents for the river basin Bucșoița".                                      | Feasibility study including the project design for the project, issued by NCDS "Marin Drăcea" to the beneficiary Romsilva and dated 3 February 2023.                                                                                                     |
| 34 | Feasibility study for the sub-project "Correction of torrents for the river basin Pârâul Leșului".                                | Feasibility study including the project design for the project, issued by NCDS "Marin Drăcea" to the beneficiary Romsilva and dated 3 February 2023.                                                                                                     |
| 35 | Feasibility study for the sub-project "Correction of torrents Scânteia".                                                          | Feasibility study including the project design for the project, issued by Alfrid srl and to beneficiary Romsilva and dated 31 August 2022.                                                                                                               |
| 36 | Feasibility study for the sub-project "Correction of torrents Valea Lungă".                                                       | Feasibility study including the project design for the project, issued by Alfrid srl to the beneficiary Romsilva and dated 13 September 2022.                                                                                                            |
| 37 | Feasibility study for the sub-project "Correction of torrents Izvorul Govorei".                                                   | Feasibility study including the project design for the project, issued by Alfrid srl to the beneficiary Romsilva and dated 18 January 2019.                                                                                                              |
| 38 | Feasibility study for the sub-project "Correction of torrents Bistricioara, stage II".                                            | Feasibility study including the project design for the project, issued by Alfrid srl to the beneficiary Romsilva and dated 16 June 2022.                                                                                                                 |
| 39 | Feasibility study for the sub-project "Correction of torrents for the river basin Maghernița".                                    | Feasibility study including the project design for the project, issued by Sursa Com srl to the beneficiary Romsilva and dated February 2023.<br><br>Romania provided this document together with Evidence No. 59, the DNSH analysis for the sub-project. |
| 40 | Feasibility study for the sub-project "Correction of torrents Fetig, stage III".                                                  | Feasibility study including the project design for the project, issued by NCDS "Marin Drăcea" to the beneficiary Romsilva and dated 3 February 2023.                                                                                                     |
| 41 | Do No Significant Harm analysis for the sub-project "Correction of torrents for the river basin Măieruș, Bacău County".           | Do No Significant Harm analysis for the sub-project including analysis of its potential impact on water bodies, issued by Tim Wald Consult to the beneficiary Romsilva and dated 3 August 2022.                                                          |
| 42 | Do No Significant Harm analysis for the sub-project "Correction of torrents for the river basin Grozea, stage III, Bacău County". | Do No Significant Harm analysis for the sub-project including analysis of its potential impact on water bodies, issued by Tim Wald Consult to the beneficiary Romsilva and dated 4 April 2022.                                                           |
| 43 | Do No Significant Harm analysis for the sub-project "Correction of torrents for the river basin Izvorul Negru, stage II, Bacău    | Do No Significant Harm analysis for the sub-project including analysis of its potential impact on water bodies, issued by Tim Wald                                                                                                                       |

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|    | County”.                                                                                                                                                       | Consult to the beneficiary Romsilva and dated 24 October 2022.                                                                                                                                                                                                                                                     |
| 44 | Do No Significant Harm analysis for the sub-project “Correction of torrents for the river basin Pârâul Negru, Bacău County”.                                   | Do No Significant Harm analysis for the sub-project including analysis of its potential impact on water bodies, issued by Tim Wald Consult to the beneficiary Romsilva and dated 15 February 2022.<br><br>Romania provided this document together with Evidence No. 25, the feasibility study for the sub-project. |
| 45 | Do No Significant Harm analysis for the sub-project “Correction of torrents for the river basin and stabilization of the slope Strâmtura Scaune, pârâul Asău”. | Do No Significant Harm analysis for the sub-project including analysis of its potential impact on water bodies, issued by Alfrid srl to the beneficiary Romsilva and dated 8 September 2022.                                                                                                                       |
| 46 | Do No Significant Harm analysis for the sub-project “Correction of torrents for the river basin Martinu”.                                                      | Do No Significant Harm analysis for the sub-project including analysis of its potential impact on water bodies, issued by Alfrid srl to the beneficiary Romsilva and dated January 2022.                                                                                                                           |
| 47 | Do No Significant Harm analysis for the sub-project “Correction of torrents for the river basin stream Casele Bisocii”.                                        | Do No Significant Harm analysis for the sub-project including analysis of its potential impact on water bodies, issued by Alfrid srl to the beneficiary Romsilva and dated 14 October 2022.                                                                                                                        |
| 48 | Do No Significant Harm analysis for the sub-project “Correction of torrents for the river basin stream Tisău-Cheia”.                                           | Do No Significant Harm analysis for the sub-project including analysis of its potential impact on water bodies, issued by Alfrid srl to the beneficiary Romsilva and dated 14 October 2022.                                                                                                                        |
| 49 | Do No Significant Harm analysis for the sub-project “Correction of torrents for the river basin Fetița Mare”.                                                  | Do No Significant Harm analysis for the sub-project including analysis of its potential impact on water bodies, issued by Alfrid srl to the beneficiary Romsilva and dated 2022.                                                                                                                                   |
| 50 | Do No Significant Harm analysis for the sub-project “Correction of torrents for the river basin between Grefeniș Stream and Schitu Stream, Neamț County”.      | Do No Significant Harm analysis for the sub-project including analysis of its potential impact on water bodies, issued by S.C. DENDRO PROJECT S.R.L to the beneficiary Romsilva and undated.                                                                                                                       |
| 51 | Do No Significant Harm analysis for the sub-project “Correction of torrents for the river basin Valea Rea stage II”.                                           | Do No Significant Harm analysis for the sub-project including analysis of its potential impact on water bodies, issued by NCDS “Marin Drăcea” to the beneficiary Romsilva and dated 10 November 2022.                                                                                                              |
| 52 | Do No Significant Harm analysis for the sub-project “Correction of torrents for the river basin Bucșoița”.                                                     | Do No Significant Harm analysis for the sub-project including analysis of its potential impact on water bodies, issued by NCDS “Marin Drăcea” to the beneficiary Romsilva and dated 3 February 2023.                                                                                                               |
| 53 | Do No Significant Harm analysis for the sub-project “Correction of torrents for the river                                                                      | Do No Significant Harm analysis for the sub-project including analysis of its potential                                                                                                                                                                                                                            |

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|    | basin Pârâul Leșului”.                                                                                                          | impact on water bodies, issued by NCDS “Marin Drăcea” to the beneficiary Romsilva and dated 3 February 2023.                                                                                                                                                                                                 |
| 54 | Do No Significant Harm analysis for the sub-project “Correction of torrents Scânteia”.                                          | Do No Significant Harm analysis for the sub-project including analysis of its potential impact on water bodies, issued by Alfrid srl to the beneficiary Romsilva and dated 2022.                                                                                                                             |
| 55 | Do No Significant Harm analysis for the sub-project “Correction of torrents Valea Lungă”.                                       | Do No Significant Harm analysis for the sub-project including analysis of its potential impact on water bodies, issued by Alfrid srl to the beneficiary Romsilva and dated 2022.                                                                                                                             |
| 56 | Do No Significant Harm analysis for the sub-project “Correction of torrents Izvorul Govorei”.                                   | Do No Significant Harm analysis for the sub-project including analysis of its potential impact on water bodies, issued by Alfrid srl to the beneficiary Romsilva and dated 2022.                                                                                                                             |
| 57 | Do No Significant Harm analysis for the sub-project “Correction of torrents Bistricioara, stage II”.                            | Do No Significant Harm analysis for the sub-project including analysis of its potential impact on water bodies, issued by Alfrid srl to the beneficiary Romsilva and dated 2022.                                                                                                                             |
| 58 | Do No Significant Harm analysis for the sub-project “Correction of torrents for the river basin Maghernița”.                    | Do No Significant Harm analysis for the sub-project including analysis of its potential impact on water bodies, issued by Sursa Com srl to the beneficiary Romsilva and dated February 2023.<br><br>Romania provided this document together with Evidence No. 39, the feasibility study for the sub-project. |
| 59 | Do No Significant Harm analysis for the sub-project “Correction of torrents Fetig, stage III”.                                  | Do No Significant Harm analysis for the sub-project including analysis of its potential impact on water bodies, issued by NCDS “Marin Drăcea” to the beneficiary Romsilva and dated February 2023.                                                                                                           |
| 60 | Water management permit for the sub-project “Correction of torrents for the river basin Măieruș, Bacău County”.                 | Water management permit ( <i>aviz de gospodărire a apelor</i> ) for the sub-project, issued by the Water Basin Administration ( <i>Administrația Bazinală de Apă</i> ) Andret and dated 16 March 2020.                                                                                                       |
| 61 | Water management permit for the sub-project “Correction of torrents for the river basin Grozea, stage III, Bacău County”.       | Water management permit ( <i>aviz de gospodărire a apelor</i> ) for the sub-project, issued by the Water Basin Administration ( <i>Administrația Bazinală de Apă</i> ) Andret and dated 16 March 2020.                                                                                                       |
| 62 | Water management permit for the sub-project “Correction of torrents for the river basin Izvorul Negru, stage II, Bacău County”. | Water management permit ( <i>aviz de gospodărire a apelor</i> ) for the sub-project, issued by the Water Basin Administration ( <i>Administrația Bazinală de Apă</i> ) Siret and dated 27 July 2022.                                                                                                         |
| 63 | Water management permit for the sub-project “Correction of torrents for the river basin Pârâul Negru, Bacău County”.            | Water management permit ( <i>aviz de gospodărire a apelor</i> ) for the sub-project, issued by the Water Basin Administration ( <i>Administrația Bazinală de Apă</i> ) Siret and                                                                                                                             |

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|    |                                                                                                                                                        | dated 27 July 2022.                                                                                                                                                                                                 |
| 64 | Water management permit for the sub-project "Correction of torrents for the river basin and stabilization of the slope Strâmtura Scaune, pârlul Asău". | Water management permit ( <i>aviz de gospodărire a apelor</i> ) for the sub-project, issued by the Water Basin Administration ( <i>Administrația Bazinală de Apă</i> ) Siret and dated 5 September 2022.            |
| 65 | Water management permit for the sub-project "Correction of torrents for the river basin Martinu".                                                      | Water management permit ( <i>aviz de gospodărire a apelor</i> ) for the sub-project, issued by the Water Basin Administration ( <i>Administrația Bazinală de Apă</i> ) Siret and dated 8 September 2021.            |
| 66 | Water management permit for the sub-project "Correction of torrents for the river basin stream Casele Bisocii".                                        | Water management permit ( <i>aviz de gospodărire a apelor</i> ) for the sub-project, issued by the Water Basin Administration ( <i>Administrația Bazinală de Apă</i> ) Siret and dated 3 April 2023.                |
| 67 | Water management permit for the sub-project "Correction of torrents for the river basin stream Tisău-Cheia".                                           | Water management permit ( <i>aviz de gospodărire a apelor</i> ) for the sub-project, issued by the Water Basin Administration ( <i>Administrația Bazinală de Apă</i> ) Buzău – Ialomita and dated 11 April 2023.    |
| 68 | Water management permit for the sub-project "Correction of torrents for the river basin Fetița Mare".                                                  | Water management permit ( <i>aviz de gospodărire a apelor</i> ) for the sub-project, issued by the Water Basin Administration ( <i>Administrația Bazinală de Apă</i> ) Jiu and dated 4 November 2022.               |
| 69 | Water management permit for the sub-project "Correction of torrents for the river basin between Grefeniș Stream and Schitu Stream, Neamț County".      | Water management permit ( <i>aviz de gospodărire a apelor</i> ) for the sub-project, issued by the Water Basin Administration ( <i>Administrația Bazinală de Apă</i> ) Siret and dated 3 October 2022.              |
| 70 | Water management permit for the sub-project "Correction of torrents for the river basin Valea Rea stage II".                                           | Water management permit ( <i>aviz de gospodărire a apelor</i> ) for the sub-project, issued by the Water Basin Administration ( <i>Administrația Bazinală de Apă</i> ) Buzău – Ialomita and dated 10 February 2023. |
| 71 | Water management permit for the sub-project "Correction of torrents for the river basin Bucșoița".                                                     | Water management permit ( <i>aviz de gospodărire a apelor</i> ) for the sub-project, issued by the Water Basin Administration ( <i>Administrația Bazinală de Apă</i> ) Siret and dated 24 March 2023.               |
| 72 | Water management permit for the sub-project "Correction of torrents for the river basin Pârlul Leșului".                                               | Water management permit ( <i>aviz de gospodărire a apelor</i> ) for the sub-project, issued by the Water Basin Administration ( <i>Administrația Bazinală de Apă</i> ) Siret and dated 24 March 2023.               |
| 73 | Water management permit for the sub-project "Correction of torrents Scânteia".                                                                         | Water management permit ( <i>aviz de gospodărire a apelor</i> ) for the sub-project, issued by the Water Basin Administration ( <i>Administrația Bazinală de Apă</i> ) Olt and dated 15 July 2022.                  |

|    |                                                                                                                                                  |                                                                                                                                                                                                                                                       |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 74 | Water management permit for the sub-project "Correction of torrents Valea Lungă".                                                                | Water management permit ( <i>aviz de gospodărire a apelor</i> ) for the sub-project, issued by the Water Basin Administration ( <i>Administrația Bazinală de Apă</i> ) Olt and dated 1 August 2022.                                                   |
| 75 | Water management permit for the sub-project "Correction of torrents Izvorul Govorei".                                                            | Water management permit ( <i>aviz de gospodărire a apelor</i> ) for the sub-project, issued by the Water Basin Administration ( <i>Administrația Bazinală de Apă</i> ) and dated 31 January 2020.                                                     |
| 76 | Water management permit for the sub-project "Correction of torrents Bistricioara, stage II".                                                     | Water management permit ( <i>aviz de gospodărire a apelor</i> ) for the sub-project, issued by the Water Basin Administration ( <i>Administrația Bazinală de Apă</i> ) Olt and dated 22 May 2023.                                                     |
| 77 | Water management permit for the sub-project "Correction of torrents for the river basin Maghernița".                                             | Water management permit ( <i>aviz de gospodărire a apelor</i> ) for the sub-project, issued by the Water Basin Administration ( <i>Administrația Bazinală de Apă</i> ) Siret and dated 24 March 2024.                                                 |
| 78 | Water management permit for the sub-project "Correction of torrents Fetig, stage III".                                                           | Water management permit ( <i>aviz de gospodărire a apelor</i> ) for the sub-project, issued by the Water Basin Administration ( <i>Administrația Bazinală de Apă</i> ) Siret and dated 24 March 2024.                                                 |
| 79 | Environmental Protection Agency decision for the sub-project "Correction of torrents for the river basin Măieruș, Bacău County".                 | Environmental Protection Agency decision ( <i>decizia etapei de încadrare</i> ) for the sub-project, issued by the National Environmental Protection Agency ( <i>Agenția Națională pentru Protecția Mediului</i> ) Bacău and dated 18 May 2020.       |
| 80 | Environmental Protection Agency decision for the sub-project "Correction of torrents for the river basin Grozea, stage III, Bacău County".       | Environmental Protection Agency decision ( <i>decizia etapei de încadrare</i> ) for the sub-project, issued by the National Environmental Protection Agency ( <i>Agenția Națională pentru Protecția Mediului</i> ) Bacău and dated 18 May 2020.       |
| 81 | Environmental Protection Agency decision for the sub-project "Correction of torrents for the river basin Izvorul Negru, stage II, Bacău County". | Environmental Protection Agency decision ( <i>decizia etapei de încadrare</i> ) for the sub-project, issued by the National Environmental Protection Agency ( <i>Agenția Națională pentru Protecția Mediului</i> ) Bacău and dated 6 September 2022.  |
| 82 | Environmental Protection Agency decision for the sub-project "Correction of torrents for the river basin Pârâul Negru, Bacău County".            | Environmental Protection Agency decision ( <i>decizia etapei de încadrare</i> ) for the sub-project, issued by the National Environmental Protection Agency ( <i>Agenția Națională pentru Protecția Mediului</i> ) Bacău and dated 16 September 2022. |
| 83 | Environmental Protection Agency decision for the sub-project "Correction of torrents for the river basin and stabilization of the                | Environmental Protection Agency decision ( <i>decizia etapei de încadrare</i> ) for the sub-project, issued by the National                                                                                                                           |

|    |                                                                                                                                                                    |                                                                                                                                                                                                                                                         |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | slope Strâmtura Scaune, pâraul Asău”.                                                                                                                              | Environmental Protection Agency ( <i>Agenția Națională pentru Protecția Mediului</i> ) Bacău and dated 3 October 2022.                                                                                                                                  |
| 84 | Environmental Protection Agency decision for the sub-project “Correction of torrents for the river basin Martinu”.                                                 | Environmental Protection Agency decision ( <i>decizia etapei de încadrare</i> ) for the sub-project, issued by the National Environmental Protection Agency ( <i>Agenția Națională pentru Protecția Mediului</i> ) Buzău and dated 27 December 2021.    |
| 85 | Environmental Protection Agency decision for the sub-project “Correction of torrents for the river basin stream Casele Bisocii”.                                   | Environmental Protection Agency decision ( <i>decizia etapei de încadrare</i> ) for the sub-project, issued by the National Environmental Protection Agency ( <i>Agenția Națională pentru Protecția Mediului</i> ) Buzău and dated 21 March 2023.       |
| 86 | Environmental Protection Agency decision for the sub-project “Correction of torrents for the river basin stream Tisău-Cheia”.                                      | Environmental Protection Agency decision ( <i>decizia etapei de încadrare</i> ) for the sub-project, issued by the National Environmental Protection Agency ( <i>Agenția Națională pentru Protecția Mediului</i> ) Buzău and dated 21 March 2023.       |
| 87 | Environmental Protection Agency decision for the sub-project “Correction of torrents for the river basin Fetița Mare”.                                             | Environmental Protection Agency decision ( <i>decizia etapei de încadrare</i> ) for the sub-project, issued by the National Environmental Protection Agency ( <i>Agenția Națională pentru Protecția Mediului</i> ) Hunedoara and dated 5 December 2022. |
| 88 | Environmental Protection Agency decision for the sub-project “Correction of torrents for the river basin between Grefeniș Stream and Schitu Stream, Neamț County”. | Environmental Protection Agency decision ( <i>decizia etapei de încadrare</i> ) for the sub-project, issued by the National Environmental Protection Agency ( <i>Agenția Națională pentru Protecția Mediului</i> ) Neamt and dated 14 November 2022.    |
| 89 | Environmental Protection Agency decision for the sub-project “Correction of torrents for the river basin Valea Rea stage II”                                       | Environmental Protection Agency decision ( <i>decizia etapei de încadrare</i> ) for the sub-project, issued by the National Environmental Protection Agency ( <i>Agenția Națională pentru Protecția Mediului</i> ) Prahova and dated 10 February 2023.  |
| 90 | Environmental Protection Agency decision for the sub-project “Correction of torrents for the river basin Bucșoița”.                                                | Environmental Protection Agency decision ( <i>decizia etapei de încadrare</i> ) for the sub-project, issued by the National Environmental Protection Agency ( <i>Agenția Națională pentru Protecția Mediului</i> ) Suceava and dated 18 April 2023.     |
| 91 | Environmental Protection Agency decision for the sub-project “Correction of torrents for the river basin Pârâul Leșului”.                                          | Environmental Protection Agency decision ( <i>decizia etapei de încadrare</i> ) for the sub-project, issued by the National Environmental Protection Agency ( <i>Agenția Națională pentru Protecția Mediului</i> ) Suceava and dated 18 April 2023.     |
| 92 | Environmental Protection Agency decision                                                                                                                           | Environmental Protection Agency decision                                                                                                                                                                                                                |

|    |                                                                                                                                                                     |                                                                                                                                                                                                                                                                                                                                                                               |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | for the sub-project "Correction of torrents Scânteia".                                                                                                              | ( <i>decizia etapei de încadrare</i> ) for the sub-project, issued by the National Environmental Protection Agency ( <i>Agenția Națională pentru Protecția Mediului</i> ) Vâlcea and dated 4 August 2022.                                                                                                                                                                     |
| 93 | Environmental Protection Agency decision for the sub-project "Correction of torrents Valea Lungă".                                                                  | Environmental Protection Agency decision ( <i>decizia etapei de încadrare</i> ) for the sub-project, issued by the National Environmental Protection Agency ( <i>Agenția Națională pentru Protecția Mediului</i> ) Vâlcea and dated 8 August 2022.                                                                                                                            |
| 94 | Environmental Protection Agency decision for the sub-project "Correction of torrents Izvorul Govorei".                                                              | Environmental Protection Agency decision ( <i>decizia etapei de încadrare</i> ) for the sub-project, issued by the National Environmental Protection Agency ( <i>Agenția Națională pentru Protecția Mediului</i> ) Vâlcea and dated 22 June 2020.                                                                                                                             |
| 95 | Environmental Protection Agency decision for the sub-project "Correction of torrents Bistricioara, stage II".                                                       | Environmental Protection Agency decision ( <i>decizia etapei de încadrare</i> ) for the sub-project, issued by the National Environmental Protection Agency ( <i>Agenția Națională pentru Protecția Mediului</i> ) Vâlcea and dated 31 May 2023.                                                                                                                              |
| 96 | Environmental Protection Agency decision for the sub-project "Correction of torrents for the river basin Maghernița".                                               | Environmental Protection Agency decision ( <i>decizia etapei de încadrare</i> ) for the sub-project, issued by the National Environmental Protection Agency ( <i>Agenția Națională pentru Protecția Mediului</i> ) Suceava and dated 18 April 2023.                                                                                                                           |
| 97 | Environmental Protection Agency decision for the sub-project "Correction of torrents Fetig, stage III".                                                             | Environmental Protection Agency decision ( <i>decizia etapei de încadrare</i> ) for the sub-project, issued by the National Environmental Protection Agency ( <i>Agenția Națională pentru Protecția Mediului</i> ) Vrancea and dated 10 April 2023.                                                                                                                           |
| 98 | Rectifying decisions for Environmental Protection Agency decisions for the sub-projects "Correction of torrents Scânteia" and "Correction of torrents Valea Lungă". | Rectification correcting a clerical error in the Environmental Protection Agency decisions for the sub-projects "Correction of torrents Scânteia" (Evidence No. 92) and "Correction of torrents Valea Lungă" (Evidence No. 93), issued by the National Environmental Protection Agency ( <i>Agenția Națională pentru Protecția Mediului</i> ) Vâlcea and dated 18 March 2026. |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

**The project design for the modernisation works for flood protection shall be approved.**

The project consists of 19 sub-projects for the different river basins. The overarching project design is approved through financing contract COD C2/I5 of 1 September 2022 (Evidence No. 2). In this, the Ministry of the Environment, Water Resources and Forestry tasks the Romanian National Forest Authority Romsilva with carrying out the project "Works to correct torrents to reduce the risks arising from torrential floods in basins located in the national forest estate administered by National Forest Authority ROMSILVA in Bacău, Buzău, Suceava, Neamț counties, Hunedoara, Prahova, Valcea, Vrancea". The document is signed by both parties (chapter XXII). Pursuant to Article 1(2), the beneficiary (Romsilva) undertakes to implement the project in accordance with the provisions of the contract and is responsible for carrying out the project proposal included in the annex.

For each of the 19 sub-projects, the design is approved by the Technical and Economic Committee for Opinion of Romsilva in endorsement reports (Evidence No. 3 to 21) in accordance with Article 9 of Government Decision No. 907/2016 on the stages of preparation and the framework content of the technical and economic documents relating to investment objectives/projects financed by public funds (*Hotărârea privind etapele de elaborare și conținutul-cadru al documentațiilor tehnico-economice aferente obiectivelor/proiectelor de investiții finanțate din fonduri publice*). The details of the project design for each sub-project are included in the feasibility studies (Evidence No. 22 to 40), which are a preliminary step towards achieving this milestone. The endorsement reports are the actual achievement of the milestone, approving the actions proposed in the feasibility studies. Where the feasibility study includes multiple scenarios, the endorsement report selects one of these scenarios to approve.

Each sub-project was approved individually in the respective endorsement report, as follows:

- For the sub-project **Măieruș**, the endorsement report (Evidence No. 3) on page 5 approves scenario I in the feasibility study (Evidence No. 22).
- For the sub-project **Grozea**, the endorsement report (Evidence No. 4) on page 3 approves scenario I in the feasibility study (Evidence No. 23).
- For the sub-project **Izvorul Negru**, the endorsement report (Evidence No. 5) on page 4 approves scenario I in the feasibility study (Evidence No. 24).
- For the sub-project **Pârâul Negru**, the endorsement report (Evidence No. 6) on page 5 approves scenario I in the feasibility study (Evidence No. 25).
- For the sub-project **Strâmtura Scaune**, the endorsement report (Evidence No. 7) on page 4 approves scenario I in the feasibility study (Evidence No. 26).
- For the sub-project **Martinu**, the endorsement report (Evidence No. 8) on page 5 approves scenario I in the feasibility study (Evidence No. 27).
- For the sub-project **Casele Bisocii**, the endorsement report (Evidence No. 9), approves scenario I in the feasibility study (Evidence No. 28) on page 5.
- For the sub-project **Tisău-Cheia**, the endorsement report (Evidence No. 10), approves the feasibility study (Evidence No. 29) on page 5.
- For the sub-project **Fetița Mare**, the endorsement report (Evidence No. 11), approves the feasibility study (Evidence No. 30) on page 5.
- For the sub-project **Grefenis and Schitu**, the endorsement report (Evidence No. 12), approves the feasibility study (Evidence No. 31) on page 1.
- For the sub-project **Valea Rea**, the endorsement report (Evidence No. 13), approves the feasibility study (Evidence No. 32) on page 1.
- For the sub-project **Bucșoița**, the endorsement report (Evidence No. 14), approves scenario I in the feasibility study (Evidence No. 33) on page 6.
- For the sub-project **Pârâul Leșului**, the endorsement report (Evidence No. 15), approves scenario I in the feasibility study (Evidence No. 34) on page 6.

- For the sub-project **Scânteia**, the endorsement report (Evidence No. 16), approves the feasibility study (Evidence No. 35) on page 4.
- For the sub-project **Valea Lungă**, the endorsement report (Evidence No. 17), approves the feasibility study (Evidence No. 36) on page 4.
- For the sub-project **Izvorul Govorei**, the endorsement report (Evidence No. 18), approves scenario I in the feasibility study (Evidence No. 37) on page 4.
- For the sub-project **Bistricioara**, the endorsement report (Evidence No. 19), approves scenario I in the feasibility study (Evidence No. 38) on page 5.
- For the sub-project **Maghernița**, the endorsement report (Evidence No. 20), approves scenario I in the feasibility study (Evidence No. 39) on page 4.
- For the sub-project **Fetig** torrent correction, the endorsement report (Evidence No. 21) approves scenario I in the feasibility study (Evidence No. 40) on page 5.

**It shall include actions for the:**

**Restoration of at least six damaged alluvium retention structures to install longitudinal measures, among others, fish ladders;**

Romania submitted feasibility studies (Evidence No. 22 to 40) including planned actions for the restoration of 25 damaged alluvium retention structures, of which 20 include the installation of fish ladders, thus exceeding the target. These works are undertaken through four sub-projects. The Commission verified that the target of the restoration of at least six damaged alluvium retention structures to install longitudinal measures, among others, fish ladders, has been achieved, by verifying the evidence for the sub-project Fetig, as this one sub-project contains 13 actions, enough to meet the target.

For this sub-project, the feasibility study (Evidence No. 40) on page 24 sets out the details of the approved scenario, which is called “carrying out works to correct concrete strands (transversal works) and longitudinal works (bank defences) in dry masonry.” On page 26, it is proposed to **restore 13 structures in the Fetig river basin.**

These restoration works consist of: i) removal of damaged masonry or concrete parts and cleaning of remaining surfaces; ii) restoration of radiation and replacement of parts of support walls; iii) terminal bed restoration; iv) recovery of the discharge; v) restoring the downstream ground of the works by concrete shackling reinforced with welded net.

In addition, the design proposes to install **fish ladders in six of the restored structures** in table 10 on page 27.

**Construction of at least 30 new alluvial structures, including fish ladders and ecological flow, with a maximum height of 5m;**

Romania submitted feasibility studies (Evidence Nos. 22 to 40) including planned actions for the restoration of 204 new retention works with maximum height of 5m, including 59 with fish ladders, thus exceeding the target. These works are undertaken through 18 sub-projects. The Commission verified that the target of 30 new alluvial structures, including fish ladders and ecological flow, with a maximum height of 5m, has been achieved, by verifying the evidence for the sub-projects Casele Bisocii, Bucsoita, Fetig and Izvorul Negru, as these four sub-projects contain 30 actions, enough to meet the target. The table below references where confirmation of the number of works with fish ladders can be found in the evidence.

| Sub-project | No. of new alluvial structures including fish | Evidence No. | Page |
|-------------|-----------------------------------------------|--------------|------|
|-------------|-----------------------------------------------|--------------|------|

|                             |         |    |       |
|-----------------------------|---------|----|-------|
|                             | ladders |    |       |
| Casele Bisocii              | 10      | 28 | 18    |
| Bucsoita                    | 14      | 33 | 25-26 |
| Fetig                       | 1       | 40 | 26    |
| Izvorul Negru               | 5       | 24 | 20    |
| Total verified sub-projects | 30      |    |       |

The Council Implementing Decision states that the new alluvial structures shall include ecological flow. The Council Implementing Decision also states, in the description of Investment 5. *Integrated flood risk mitigation systems in forest river basins*, that “The objective of the investment is to [...] protect the environment and biodiversity through environmental measures, in particular those relating to ensuring fish migration and ensuring ecological flow.” In water management, ecological flow (also known as *e-flow* or *environmental flow*) refers to “water that is left running in a fluvial ecosystem or the flow that is released within it, with the specific purpose of managing the condition of the ecosystem”<sup>2</sup> or “the dynamic movement of water through a river or stream, and its associated hydrological, geomorphological, and ecological processes.”<sup>3</sup> Therefore, ecological flow is not a physical addition to an individual alluvial structure. In light of the contextual interpretation of this requirement from the Council Implementing Decision, it is interpreted that the new alluvial structures must ensure ecological flow in the river in which they are built. As described in more detail below, the flow rate for the alluvial structures is included in the technical specifications of the project design and was assessed as satisfactory. On this basis, it is considered that this constitutive element of the milestone (ecological flow) is satisfactorily fulfilled.

The feasibility studies of the sub-project include the calculated water flow indicators for each of the alluvial structures with fish ladders from the table above. The table below shows where this evidence is found:

| Sub-project    | Calculated flow rate indicators per alluvial structure found on: |      |
|----------------|------------------------------------------------------------------|------|
|                | Evidence No.                                                     | Page |
| Casele Bisocii | 28                                                               | 46   |
| Bucsoita       | 33                                                               | 40   |
| Fetig          | 40                                                               | 34   |
| Izvorul Negru  | 24                                                               | 43   |

The optimal ecological flow in a river depends on many factors related to the river and its ecosystem and there is no one universal minimal required flow.<sup>4</sup> To verify that the proposed structures support the right flow for the existing ecosystem, the Commission analysed the Do No Significant Harm (DNSH) analysis for the sub-projects (Evidence Nos. 41 to 59). The table below shows where evidence of the works preserving water flow quality for the existing ecosystem is found. On this basis, it is considered that this constitutive element of the milestone, namely that new alluvial structures include ecological flow, is satisfactorily fulfilled.

<sup>2</sup> Rodríguez Tejeda, R.C., Valdés, Y.M. (2021). Environmental and Ecological Flows for Sustainability. In: Leal Filho, W., Azul, A.M., Brandli, L., Lange Salvia, A., Wall, T. (eds) Clean Water and Sanitation. Encyclopaedia of the UN Sustainable Development Goals. Springer, Cham. [https://doi.org/10.1007/978-3-319-70061-8\\_115-1](https://doi.org/10.1007/978-3-319-70061-8_115-1).

<sup>3</sup> [The Science Behind Ecological Flows](#).

<sup>4</sup> Bhuiyan, C. Environmental flows: issues and gaps—a critical analysis. *Sustain Sci* 17, 1109–1128 (2022), <https://doi.org/10.1007/s11625-022-01092-4>.

| Sub-project    | Reference to works preserving water flow quality for ecosystem found on: |      |
|----------------|--------------------------------------------------------------------------|------|
|                | Evidence No.                                                             | Page |
| Casele Bisocii | 47                                                                       | 10   |
| Bucsoita       | 52                                                                       | 5    |
| Fetig          | 59                                                                       | 13   |
| Izvorul Negru  | 43                                                                       | 22   |

#### **The restoration of at least 4ha of land through reforestation, weeding, or building of twig fences;**

Romania submitted feasibility studies (Evidence Nos. 22 to 40) including planned actions for land restoration through reforestation / afforestation of a total surface of 11.06 hectares, as well as 0.23 hectares of land restoration through grassing. In addition, 1 885sqm (=0.1885 ha) of land restored through brush head plugs (twig fences) are included, as well as fences, wattle works, and similar elements with a length of 1 383 meters (without indication how many hectares of land are covered by these works). Thus, the submitted evidence contains actions exceeding the target. These works are undertaken through 16 different sub-projects. The Commission verified that the target of land restoration of at least 4ha of land through reforestation, weeding, or building of twig fences has been achieved, by verifying the evidence for the sub-projects Izvorul Negru, Fetița Mare and Grefeniș and Schitu, as these three sub-projects contain enough actions for forestation to meet the target. The table below references where proof of the achievement of the target can be found in the evidence.

| Sub-project                 | Hectares restored | Evidence No. | Page  |
|-----------------------------|-------------------|--------------|-------|
| Izvorul Negru               | 1.2215            | 24           | 22-25 |
| Fetița Mare                 | 1.5               | 30           | 19    |
| Grefeniș and Schitu         | 1.3065            | 31           | 9     |
| Total verified sub-projects | 4.028             |              |       |

The Council Implementing Decision required that the project design include actions for the restoration of at least 4ha of land through reforestation, weeding or building of twig fences. The project design details in the feasibility studies refer, in certain instances, to both afforestation and reforestation actions. For instance, the Grefeniș and Schitu feasibility study (Evidence No. 31) on page 9 includes *“afforestation/reforestation of land degraded by landslides of slopes and those affected by anthropogenic degradation over an area of 1.3065 ha, land forming part of the forest fund and reconstructing the integrity of stands affected by the aforementioned degradation phenomena”*, without distinguishing between the areas subject to afforestation and those subject to reforestation. Whilst this constitutes a minimal substantive deviation from the requirement of the Council Implementing Decision, allowing both actions of afforestation and reforestation does not affect the progress towards achieving the measure, as its purpose is to reduce flood risk and protect the environment in river basins through a combination of techniques, including planting trees on land degraded by erosion. Both afforestation and reforestation consist of the establishment of tree vegetation on degraded land in order to restore ecologic functions, therefore contributing equally to achieving the objective of the measure. As of this, this minimal deviation does not change the nature of the measure and does not affect the progress towards achieving the investment that the milestone represents. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

#### **The restoration of at least 30km of torrent bed.**

Romania submitted feasibility studies (Evidence Nos. 22 to 40) including planned actions for the restoration of 42.51 kilometers of torrent bed, thus exceeding the target. These works are

undertaken through 19 different sub-projects. The Commission verified that the target of restoration of at least 30 kilometers of torrent bed has been achieved, by verifying the evidence for the sub-projects Izvorul Negru, Fetița Mare, Bistricioara, Casele Bisocii, Fetig, Bucșoița, Pârâul Leșului, Maghernița, Martinu and Tisău-Cheia, as these ten sub-projects contain enough actions to meet the target. The table below references where proof of the achievement of the target can be found in the evidence.

| Sub-project                 | Km of torrent bed restored | Evidence No. | Page |
|-----------------------------|----------------------------|--------------|------|
| Izvorul Negru               | 2.467                      | 24           | 101  |
| Fetița Mare                 | 3.1                        | 30           | 58   |
| Bistricioara                | 4.5                        | 38           | 58   |
| Casele Bisocii              | 4.9                        | 28           | 41   |
| Fetig                       | 3.1                        | 21           | 59   |
| Bucșoița                    | 3                          | 33           | 58   |
| Pârâul Leșului              | 3                          | 34           | 59   |
| Maghernița                  | 1.97                       | 39           | 70   |
| Martinu                     | 2.89                       | 8            | 4    |
| Tisău-Cheia                 | 2.75                       | 29           | 54   |
| Total verified sub-projects | 31.677                     |              |      |

**Any measures identified in the framework of the assessment under Directive 2000/60/EC (Water Framework Directive) as necessary to ensure compliance with the Do No Significant Harm Technical Guidance (2021/C58/01) shall be integrated into the project design and strictly complied with at the stages of construction, modernisation, operation and decommissioning.**

Article 4 of the Water Framework Directive states that “Member States shall implement the necessary measures to prevent deterioration of the status of all bodies of surface water”. In addition, Annex V of the Water Framework Directive defines the general conditions for “good status” for rivers as *“The values of the biological quality elements for the surface water body type show low levels of distortion resulting from human activity, but deviate only slightly from those normally associated with the surface water body type under undisturbed conditions”*. Annex V also defines “good ecological potential” for heavily modified water bodies, setting out the criteria for biological, hydromorphological, physico-chemical elements and pollutants for a water body to be classified as having good ecological potential.

Furthermore, the Do No Significant Harm Technical Guidance states that “The Regulation establishing the Recovery and Resilience Facility (RRF) provides that no measure included in a Recovery and Resilience Plan (RRP) should lead to significant harm to environmental objectives within the meaning of Article 17 of the Taxonomy Regulation,” meaning Regulation (EU) No. 2020/852.

Article 17 of the aforementioned Taxonomy Regulation states that “economic activity shall be considered to significantly harm ... the sustainable use and protection of water and marine resources, where that activity is detrimental: (i) to the good status or the good ecological potential of bodies of water, including surface water and groundwater.” Good status or good ecological potential are defined in the Water Framework Directive as described above.

In line with the Taxonomy Regulation referenced in the DNSH Guidance, the project design is to integrate measures to prevent the deterioration of the status of the affected bodies of water and to maintain their good status or good potential, as defined in the Water Framework Directive. Compliance with this element is assessed in the DNSH analysis of the project design and by the competent Water Basin Administration (*Administrația Bazinală de Apă*) of the National

Administration “Romanian Waters” (*Administrația Națională Apele Române*) and the National Environmental Protection Agency (*Agenția Națională pentru Protecția Mediului*). Where these assessments specify mitigating measures as necessary to ensure compliance, these shall be included in the project design. The Commission verified this through analysis of the following documentary evidence:

The DNSH analysis by sub-project (Evidence No. 41 to 59), which is part of the project design documentation, includes an analysis which specifies that implementation of the project will be subject to obtaining a water permit, includes the measures to avoid or mitigate harm to the good status or good ecological potential of the affected water bodies and concludes that the sub-projects do not do significant harm to water and marine resources.

Furthermore, pursuant to the Water Law No. 107/1996 (*legea apelor*, hereinafter referred to as “*the Water Law*”), which transposes the Water Framework Directive, the competent Water Basin Administration assesses whether the measures in the project design are sufficient to be compliant with the applicable water protection requirements, including the obligation to prevent deterioration of water status under Article 4 of the Water Framework Directive. Accordingly, the competent Water Basin Administration for each river basin has issued a water management permit (*aviz de gospodărire a apelor*) for each sub-project (Evidence No. 60 to 78). The permits summarise the technical elements in the feasibility studies (Evidence No. 22 to 40) and measures to avoid harm in the DNSH analysis (Evidence No. 41 to 59) on the basis of which the Water Basin Administration decided to grant the permit, stating that these must be respected. Finally, pursuant to Law No. 292/2018 on the assessment of the impact of certain public and private projects on the environment (*lege privind evaluarea impactului anumitor proiecte publice și private asupra mediului*), the National Environmental Protection Agency has issued Environmental Protection Agency decisions (*decizia etapei de încadrare*) for each sub-project (Evidence No. 79 to 97). These also include the technical elements and measures to avoid harm on the basis of which the Agency has reached its decision and confirm that no further environmental impact assessment is necessary.

As illustrative examples, the evidence includes, among others, mitigating measures for the following sub-projects:

- For the sub-project Izvorul Negru:
  - The DNSH analysis states that the reduction of potentially floodable areas will be accompanied by measures to retain the volume of water in the river (Evidence No. 43, page 4). This includes, among others, protecting riverbanks from erosion through ecological works.  
In the overview of characteristics of the works set out in the technical documentation on the basis of which the permit is issued, the water permit refers to vegetative works as a measure to stop erosion (Evidence No. 62, page 4), stating that these must be respected.  
The Environmental Protection Agency decision refers to this measure in the overview of characteristics of the project (Evidence No. 81, page 2), which informed the conclusion that the project has no significant impact on the environment.
- For the sub-project Bucșoita:
  - The DNSH analysis states that selective waste collection will be ensured (Evidence No. 52, page 6).  
This is reflected in the water management permit, which requires waste materials removal (Evidence No. 71, page 10).

The Environmental Protection Agency decision also refers to waste collection in its description of characteristics underpinning the conclusion that the project has no significant impact on the environment (Evidence No. 90, page 2).

- For the sub-project Scanteia:
  - The DNSH analysis states specialised containers will be used to avoid accidental oil pollution (Evidence No. 54, page 10).  
The water permit requires that measures be taken to prevent and combat accidental pollution (Evidence No. 73, page 4).  
The Environmental Protection Agency decision includes, as a condition for the decision, that measures be taken to prevent and combat accidental pollution (Evidence No. 90, page 15).

On the basis of the documents referenced above, the Commission considers that the competent authorities have duly assessed and determined that any measures necessary to ensure compliance with the Do No Significant Harm Technical Guidance have been integrated into the project design.

In addition, the Council Implementing Decision states that the measures identified according to the steps described above shall be *“strictly complied with at the stages of construction, modernisation, operation and decommissioning”*. This requirement is embedded in the aforementioned water management permits (*aviz de gospodărire a apelor*) for each sub-project (Evidence No. 60 to 78), which stipulate that the conditions for the issuance of the permit itself form part of the approved project documentation and must be complied with at each stage of the implementation, and that failure to comply is punishable under the aforementioned Water Law. Thus, each sub-project is legally bound to comply with the specific mitigating measures identified as necessary to ensure compliance with the Water Framework Directive and maintain the good status or good ecological potential during construction, modernisation, operation and decommissioning.

The table below references where compliance with DNSH technical guidance is confirmed in the DNSH analysis, water management permits and Environmental Protection Agency decisions (Evidence No. 98).

| Sub-project         | Do No Significant Harm analysis (Evidence No.) | Confirmation on page | Water management permit (Evidence No.) | Confirmation on page | Environmental Protection Agency decision (Evidence No.) | Confirmation on page |
|---------------------|------------------------------------------------|----------------------|----------------------------------------|----------------------|---------------------------------------------------------|----------------------|
| Măieruş             | 41                                             | 21                   | 60                                     | 10                   | 79                                                      | 1                    |
| Grozea              | 42                                             | 21                   | 61                                     | 9                    | 80                                                      | 1                    |
| Izvorul Negru       | 43                                             | 8                    | 62                                     | 6                    | 81                                                      | 1                    |
| Pârâul Negru        | 44                                             | 56                   | 63                                     | 6                    | 82                                                      | 1                    |
| Strâmtura Scaune    | 45                                             | 6                    | 64                                     | 5                    | 83                                                      | 1                    |
| Martinu             | 46                                             | 6                    | 65                                     | 4                    | 84                                                      | 1                    |
| Casele Bisocii      | 47                                             | 6                    | 66                                     | 4                    | 85                                                      | 1                    |
| Tisău-Cheia         | 48                                             | 6                    | 67                                     | 10                   | 86                                                      | 1                    |
| Fetiţa Mare         | 49                                             | 6                    | 68                                     | 5                    | 87                                                      | 1                    |
| Grefeniş and Schitu | 50                                             | 12                   | 69                                     | 5                    | 88                                                      | 1                    |

|                    |    |    |    |    |    |   |
|--------------------|----|----|----|----|----|---|
| Valea Rea          | 51 | 5  | 70 | 5  | 89 | 1 |
| Bucșoița           | 52 | 5  | 71 | 9  | 90 | 1 |
| Pârâul<br>Leșului  | 53 | 5  | 72 | 9  | 91 | 1 |
| Scânteia           | 54 | 5  | 73 | 6  | 98 | 2 |
| Valea Lungă        | 55 | 5  | 74 | 6  | 98 | 1 |
| Izvorul<br>Govorei | 56 | 5  | 75 | 3  | 94 | 1 |
| Bistricioara       | 57 | 6  | 76 | 10 | 95 | 1 |
| Maghernița         | 58 | 78 | 77 | 6  | 96 | 1 |
| Fetig              | 59 | 13 | 78 | 4  | 97 | 2 |

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C4]-R[R1.0]-M[59] Entry into force of the legal act(s) for the implementation of a new distance-based charging system for heavy duty vehicles (trucks) linked to air pollution, and higher ownership taxes for most polluting passengers vehicles (cars/buses/coaches)

**Related Measure:** RO-C[C4]-R[R1.0] Sustainable transport, decarbonisation and road safety

**Qualitative Indicator:** Provision in the legal act(s) indicating the entry into force of the legal act(s)

**Time:** Q2 2023

### 1. Context:

This reform has the objective to support the transition towards sustainable and smart mobility by reforming the transport system in Romania.

Milestone 59 requires the entry into force of legal act(s) for the implementation of a truck charging system based on distance travelled and air pollution, as well as higher vehicles ownership taxes for polluting cars, buses, and coaches.

Milestone 59 is the fourth step of the implementation of the reform and follows the completion of milestones 65, 66, and 69, related to the adoption of the road safety strategy and legislation, as well as the adoption of the railway infrastructure strategy. It is accompanied by milestone 60 related to the entry into force of legal act(s) to boost the use of clean vehicles and fleet renewal in this payment request, and it will be followed by targets 61 and 62, related to, respectively, increasing the share of clean vehicles procured by contracting authorities, and scrapping 250 000 polluting motor vehicles (EURO 3 or below) as well as increasing the zero-emission fleet to 35 500 vehicles in total.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                            | Short description                                                                                                          |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover Note                                                                                                                                                      | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled. |
| 2 | Copy of Law No. 226/2023 on the enforcement of road charges on the national road network in Romania, published in the Official Journal No. 659 on 18 July 2023. | The Law establishes a new distance-based charging system for heavy duty vehicles (trucks).                                 |
| 3 | Copy of Law No. 239/2025 on establishing measures for the recovery and efficiency of public                                                                     | The Law establishes, among others, vehicles ownership tax increasing with the vehicles' pollution norms.                   |

|   |                                                                                                                                                                                                                                            |                                                                                                                                                                      |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | resources and amending and supplementing certain legislative acts, published in the Official Journal No. 1160 on 15 December 2025.                                                                                                         |                                                                                                                                                                      |
| 4 | Copy of Ministerial Order, including its Annex, No. 1925/2025 approving the categories of vehicles and the level of the unit charge, published in the Official Journal No. 940 on 10 October 2025.                                         | The Ministerial Order sets out the unit charge (RON/km) for the distance-based charging system established by Law No. 226/2023.                                      |
| 5 | Copy of Ordinance No. 14/2025 for the extension of time limits provided for by Law No. 226/2023 on the application of road charges on the Romanian network of national roads, published in the Official Journal No. 784 on 22 August 2026. | The Ordinance extends, among other, the operationalisation of the distance-based charging system established by Law No. 226/2023 from 1 January 2026 to 1 July 2026. |
| 6 | Copy of Law No. 14/2026 on the approval of Government Ordinance No. 14/2025, published in the Official Journal No. 27 on 15 January 2026.                                                                                                  | The legal act converts into Law Ordinance No. 14/2025 (Evidence No. 5).                                                                                              |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

- i. **Entry into force of the legal act(s) for the implementation of a new distance-based charging system for heavy duty vehicles (trucks) linked to air pollution (...). Legal act(s) for the implementation of a new distance-based charging system for heavy duty vehicles (trucks), which links charges to air pollution production**

Law No. 226/2023 on the enforcement of road charges on the national road network in Romania (*Lege privind aplicarea unor tarife rutiere pe rețeaua de drumuri naționale din România*, hereinafter referred to as “*Law 1*”, (Evidence No. 2) was published in the Official Journal No. 659 on 18 July 2023, and entered into force three days after publication, in accordance with Article 78 of the Romanian Constitution, as Law 1 does not contain a specific entry into force date.

Article 12(3) and (4) of Law 1 establishes specific levels of distance-based charges and criteria for charging heavy duty vehicles for the carriage of goods, namely trucks (the charging system is called

*TollRo*). The provisions set out that the unit charge, which is linked to the EURO emission norm as defined in Article 2 of Law 1. The EURO emission norm reflects the level of air pollutant emissions of a given vehicle: the lower the EURO class, the more polluting the vehicle. The unit charge is multiplied by the total kilometres driven, to determine the total charge due. Article 12(5) further provides that the categories of vehicles and level of the unit charge will be approved by order of the Ministry of Transport and Infrastructure. The respective Ministerial Order No. 1925/2025 (Evidence No. 4) approving the categories of vehicles and the level of the unit charge (*Ordin pentru aprobarea categoriilor de vehicule și a nivelului tarifului unitar*), was published in the Official Journal No. 940 on 10 October 2025. Article 3 provides that the Ministerial Order will enter into force on 1 July 2026, that is the date when the system will start collecting revenue, as required by the Council Implementing Decision (see also point v below). According to the annex to the Ministerial Order, the lowest unit charge (in RON/km) is applied for EURO VI vehicles, namely the least polluting ones. The unit charge is higher for EURO V and EURO IV vehicles, and is the highest for the most polluting ones, that is vehicles falling within the EURO 0–III categories.

**ii. Entry into force of the legal act(s) for the implementation of a new distance-based charging system for heavy duty vehicles (trucks) linked to (...) higher ownership taxes for most polluting passengers vehicles (cars/buses/ coaches). (...) and higher ownership taxes for most polluting passengers vehicles (cars/buses/coaches)**

Law No. 239/2025 on establishing measures for the recovery and efficiency of public resources and amending and supplementing certain legislative acts (*Lege privind stabilirea unor măsuri de redresare și eficientizare a resurselor publice și pentru modificarea și completarea unor acte normative*, hereinafter referred to as “*Law 2*” (Evidence No. 3), was published in the Official Journal, No. 1160 on 15 December 2025, and entered into force on 1 January 2026 (according to the provisions of Article 4(2) of the Law No. 227/2015 approving the Fiscal Code stipulating that any amendments to the tax rates will enter into force at the beginning of next fiscal year after their approval).

Article 1(43) of Law 2 amends Article 470(2) of Law No. 207/2015 by introducing an ownership tax for passenger vehicles based on engine capacity and EURO pollution norm. For a given engine capacity, the ownership tax in RON/200 cm<sup>3</sup> for passenger vehicles - including motorcycles, tricycles, cars, buses, coaches, minibuses – falling within EURO norm 0 to III is subject to the highest level of taxation. The ownership tax decreases progressively for vehicles complying with EURO 4, EURO 5, EURO 6 standards and is lowest for hybrid vehicles. The latter category has to pay around 20% less than the first category. The tax is calculated based on a two-dimensional matrix, with engine capacity as rows and emission standards as columns.

Moreover, Article 1(45) of Law 2 amends Article 470(3) of Law No. 207/2015 by providing that for hybrid vehicles with CO<sub>2</sub> emission of 50 g/km or less, the tax is further reduced. The exact amount of the extra reduction - compared to the tax for hybrids with CO<sub>2</sub> emission above 50g/km - is up to 30%, subject to a decision of the relevant local council or, in the case of Bucharest, the General Council of the Municipality of Bucharest.

Finally, Article 1(47) of Law 2 introduces a new sub-paragraph to Article 470(3) of Law No. 207/2015, providing that electric vehicles are subject to a flat ownership tax of RON 40 (approximately EUR 8), representing the lowest ownership tax applicable across all vehicle categories.

**iii. The new charging system for vehicles shall include:**  
**- specific level of distance-based charges and clear criteria linked to air pollution for charging heavy duty**

As explained in point i, the system introduces distance-based charges in RON/km, with clear criteria linking them to air pollution, notably through variation in taxation based on the EURO emission norm.

The Commission considers that there is a clerical error in the text of the Council Implementing Decision as regards the description of milestone 59 and has undertaken the assessment on a revised basis. In such description, it is stated that *“The new charging system for vehicles shall include - specific level of distance-based charges and clear criteria linked to air pollution for charging heavy duty [...]”*.

However, both the name of the milestone and the measure description indicate that the milestone concerns the entry into force of legal acts for the implementation of a new distance-based charging system for heavy duty vehicles (trucks). The reference to heavy duty vehicles (trucks) is therefore the one considered relevant for the fulfilment of milestone 59.

Against this background, the justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

**iv. - using revenues to support road maintenance and new investment in sustainable transport**

Article 20(3) of Law 1 establishes that the revenues collected through the new charging system will be used for the design, repair, administration, maintenance, operation and modernisation of roads of national interest as well as investments in sustainable transport.

**v. timetable for the charging system to start collecting revenues no later than July 1, 2026**

Article 29(1) of Law 1 contains the timetable for the application of the new charging system. It had initially established 1 January 2026 as the start for the application of the new charging system, namely the date from which the system would start collecting revenues. The Sole article of Ordinance No. 14/2025 for the extension of time limits provided for by Law No. 226/2023 on the application of road charges on the Romanian network of national roads (*Ordonanță pentru prorogarea unor termene prevăzute de Legea nr. 226/2023 privind aplicarea unor tarife rutiere pe rețeaua de drumuri naționale din România*), published in the Official Journal No. 784 on 22 August 2026 (Evidence No. 5) amends Article 29(1) by postponing the start of the system to 1 July 2026. The Ordinance was then converted into law with Law No. 14/2026 published in the Official Journal No. 27 on 15 January 2026 and entered into force three days after publication, in accordance with Article 78 of the Romanian Constitution, as Law 14/2026 does not contain a specific entry into force date.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C4]-R[R1.0]-M[60] Entry into force of the legal act(s) to boost the use of clean vehicles and fleet renewal programmes

**Related Measure:** RO-C[C4]-R[R1.0] Sustainable transport, decarbonisation and road safety

**Qualitative Indicator:** Provision in the legal act(s) indicating the entry into force of the legal act(s) to boost the use of clean vehicles and fleet renewal programmes

**Time:** Q2 2024

### 1. Context:

The objective of the reform is to support the transition towards sustainable and smart mobility by reforming the transport system in Romania.

Milestone 60 is related to the entry into force of legal acts providing financial and fiscal incentives to increase zero-emission vehicles and scrap polluting vehicles (EURO 3 or below).

Milestone 60 is the fifth milestone of the reform, and follows the completion of milestone 69, milestone 65, milestone 66, related to the adoption of road safety legislation, adoption of the railway infrastructure strategy (which were positively assessed as part of the second payment request) and of milestone 59 concerning the legal acts for the implementation of a new distance-based charging system for heavy duty vehicles linked to air pollution, and higher ownership taxes for most polluting passengers vehicles (included in the fourth payment request).

This milestone will be followed by targets 61 and 62, related to increasing the share of clean vehicles procured by contracting authorities and, scrapping of polluting vehicles (EURO 3 or below) as well as increasing the number of zero-emission vehicles overall, respectively.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                                                                                                   | Short description                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                                                                                                                                                             | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.                                                                                                                                                                                                                                                                                                                                                            |
| 2 | Copy of the Ministerial Order No. 323/2020 approving the Financing Guide for the Programme on reducing greenhouse gas emissions in transport by promoting clean and energy-efficient road transport vehicles, 2020-2024, published in the Official Journal, No. 174/2020, Part I, and entered into force on 3 March 2020 - with subsequent amendments. | The Ministerial Order approved the RABLA PLUS Programme that provided non-reimbursable support in the form of eco-label, for the purchase of new electric vehicles or new hybrid electric vehicles, in exchange for the scrapping of old vehicles.<br>The Ministerial Order entered into force on 3 March 2020 in accordance with Article 12(3) of Law 24/2000 on the rules of legislative technique for the drafting of legislative acts).<br>The order was amended by the following |

|   |                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   |                                                                                                                                                                                                                                                                                                                                                                                                                                                 | normative acts: Order No. 934/2020, Order No. 1347/2020, Order No. 1867/2020, Order No. 110/2021, Order No. 675/2021, Order No. 909/2021, Order No. 179/2022, Order No. 783/2023, Order No. 598/2024, Order No. 2492/2024.                                                                                                                                                                                                                                                                                      |
| 3 | Copy of the Ministerial Order No. 324/2020 approving the Financing Guide for the Programme to stimulate the renewal of the national vehicle fleet 2020-2024, published in the Official Journal No. 175/2020, Part I, and entered into force on 3 March 2020 - with subsequent amendments.                                                                                                                                                       | The Ministerial Order approved the RABLA Programme that provided non-reimbursable financing in the form of a scrappage bonus for the purchase of new/ less polluting vehicles in exchange for scrapping old vehicles.<br>The order was amended by the following normative acts: Order No. 934/2020, Order No. 1347/2020, Order No. 2048/2020, Order No. 110/2021, Order No. 676/2021, Order No. 908/2021, Order No. 1470/2021, Order No. 180/2022, Order No. 784/2023, Order No. 597/2024, Order No. 2491/2024. |
| 4 | Copy of the Ministerial Order No. 2261/2022 approving the Financing Guide of the Programme regarding on the scrapping of used vehicles, published in the Official Journal No. 832/2022, Part I, and entered into force on 24 August 2022 – with subsequent amendments.                                                                                                                                                                          | The Ministerial Order offered support and incentives to the scrapping of old-polluting vehicles older than 15 years old.<br>The order was amended by the Order No. 864/2023.                                                                                                                                                                                                                                                                                                                                    |
| 5 | Copy of Ministerial Order No. 1231/2025 for the approval of the Financing Guide of the Programme on the reduction of greenhouse gas emissions in transport, by promoting non-polluting and energy-efficient road transport vehicles 2025-2030, published in the Official Journal No. 364/2025, Part I, and entered into force on 24 April 2025.                                                                                                 | The Ministerial Order replaces the Ministerial Order No.323/2020 and aims to grant non-repayable subsidies/de minimis aid from the Environment Fund, in the form of eco-labels, for the purchase of new vehicles in exchange for the scrapping and deregistration of used vehicles.                                                                                                                                                                                                                             |
| 6 | Copy of Local Council Decision No. 370/2024 regarding the repeal of paragraph (2) of art. 2 of the Decision of the General Council of the Municipality of Bucharest No. 706/22 December 2022 on the free use of public parking lots of general utility on the territory of the Municipality of Bucharest by the owners of electric and hybrid cars registered in the Municipality of Bucharest, as well as on the repeal of the Decision of the | The Decision approves the free use of public parking lots of general utility in Bucharest by the owners of electric and hybrid cars registered Bucharest.                                                                                                                                                                                                                                                                                                                                                       |

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                            |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | General Council of the Municipality of Bucharest No. 140/26 May 2016 on the free use of public parking lots of general utility on the territory of the Municipality of Bucharest by hybrid and electric cars registered in the Municipality of Bucharest, as well as on the approval of the identification sticker model. This Decision was adopted on 20 December 2024.                                                                                                                                                                                |                                                                                                                                                                                            |
| 7  | Copy of Local Decision No. 196/2025 amending and supplementing the Decision of the Local Council of Tulcea Municipality No. 122/31 May 2022 regarding the approval of the regulation on the organization and operation of public paid parking and residence parking in Tulcea Municipality, amended and supplemented by Decision of the Local Council of Tulcea Municipality No. 78/30 March 2023 and by Decision of the Local Council of Tulcea Municipality No. 306/28 November 2023. The Decision No. 196/2025 entered into force on 27 August 2025. | The decision includes provisions on exemptions from parking fees for electric vehicles with green registration plates within the Tulcea Municipality.                                      |
| 8  | Copy of Local Council Decision No. 40/2022 with Annex 3 approving the Regulation on the organization and functioning of the public service for the administration, maintenance and operation of paid public parking lots as well as the blocking, lifting, transport, storage and release of vehicles that are parked or stopped illegally on public and private property of the Municipality of Piatra-Neamț.                                                                                                                                          | According to Annex 3 of the decision, electric powered and other zero emission powered vehicles (example: hydrogen) are exempted from parking fee within the Municipality of Piatra-Neamț. |
| 9  | Copy of Local Council Decision No. 548/2022 to amend and supplement LCD No. 123/2021 on the approval of the Regulation on the organization and operation of public parking lots in the Municipality of Constanța.                                                                                                                                                                                                                                                                                                                                       | The decision grants a tax exemption for public parking for hybrid and electric vehicles within the Municipality of Constanța.                                                              |
| 10 | Copy of Local Council Decision No. 17/2021 on supplementing the Regulation on the organization and functioning of the public parking management system on the public                                                                                                                                                                                                                                                                                                                                                                                    | The decision stipulates that the owners of electric vehicles can park free of charge in the public parking lots for the first two hours and in the residential parking lots of Buzău.      |

|    |                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                         |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | domain of Buzău municipality approved by Local Council Decision No. 49/6 March 2019. It was adopted on 27 January 2021.                                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                         |
| 11 | Copy of Local Council Decision No. 454/2021 on supplementing the Regulation for the establishment, organization and operation of paid public parking lots located on the public and private domain of the municipality of Ploiești, approved by the Decision of the Local Council of the municipality of Ploiești No. 263 of 26 July 2013, with subsequent amendments and supplements.        | The decision stipulates that the owners of electric vehicles have free access to every parking lot of Ploiești.                                                                                                         |
| 12 | Copy of Local Council Decision No. 252/2023 amending and supplementing the Regulation on the organization and functioning of the public service for the administration, maintenance and operation of parking lots belonging to the public and private domain of Focsani Municipality, approved by Local Council Decision No. 276/11 October 2021, with subsequent amendments and supplements. | The decision mentions that paid parking lots in Focșani Municipality will be used for electric cars without paying the parking fees.                                                                                    |
| 13 | Copy of Local Council Decision No. 236/2025 on amending and supplementing the Regulation on the organization and operation of paid public parking lots in Alba Iulia Municipality approved by Local Council Decision No. 235/2019, with subsequent amendments and supplements. It was adopted on 15 September 2025.                                                                           | The decision adds an extra area of the city where the owners of electric vehicles can use the parking lots free of charge.                                                                                              |
| 14 | Copy of Local Council Decision No. 20/2022 approving the Annex containing the Regulation of the operation of the vehicle parking system in the Municipality of Timișoara. It was adopted on 31 March 2022.                                                                                                                                                                                    | The decision mentions that “Electric powered vehicle” can receive a free subscription for using the parking lots located in three areas of Timisoara free of charge between 8:00 AM and 8:00 PM or 8:00 AM and 5:00 PM. |
| 15 | Copy of the Law No. 239 of 15 December 2025 establishing measures to recover and streamline public resources and for amending and                                                                                                                                                                                                                                                             | The Law amends the Fiscal Code (Law No. 227/2015) and introduces a new taxation system for cars ownership combining engine capacity with polluting norm of the vehicles.                                                |

|  |                                                                                                                                                          |  |
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|  | supplementing certain normative acts, published in the Official Journal, No. 1160 of 15 December 2025, Part I, and entered into force on 1 January 2026. |  |
|--|----------------------------------------------------------------------------------------------------------------------------------------------------------|--|

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

#### **Entry into force of the legal act(s) to boost the use of clean vehicles and fleet renewal programmes** **Provision in the legal act(s) indicating the entry into force of the legal act(s) to boost the use of clean vehicles and fleet renewal programmes**

The following legal acts to boost the use of the clean vehicles and fleet renewal programmes entered into force:

- Ministerial Order No. 323 of 27 February 2020 for the approval of the Funding Guide of the Programme regarding the reduction of greenhouse gas emissions in transport, through the promotion of transport vehicles (hereinafter referred to as "*Rabla Plus Ministerial Order*") was published in the Official Journal No. 174 of 3 March 2020. The Rabla Plus Ministerial Order entered into force on the same date in accordance with Article 12(3) of Law No. 24/2000 establishing rules of legislative techniques. More precisely, the default rule as described in Article 12 (1) establishes that legal acts enter into force 3 days after publication.
- Ministerial Order No. 1231/2025 for the approval of the Financing Guide of the Programme for the reduction of greenhouse gas emissions in transport by promoting non-polluting and energy-efficient road transport vehicles 2025-2030 (hereinafter referred to as "*Programme on the Reduction of Greenhouse Gas Emissions in Transport Ministerial Order*") was published in the Official Journal No. 364 of 24 April 2025. The *Programme on the Reduction of Greenhouse Gas Emissions in Transport Ministerial Order* entered into force on the same day in accordance with Article 12(3) of Law 24/2000 establishing rules of legislative techniques.
- Ministerial Order No. 2261/2022 approving the Financing Guide of the Programme regarding on the scrapping of used vehicles (hereinafter referred to as "*Rabla Local Ministerial Order*") was published in the Official Journal No. 832 of August 24, 2022. The Rabla Local Ministerial Order entered into force on the same day, in accordance with Article 12(3) of Law 24/2000 establishing rules of legislative techniques.
- Ministerial Order No. 324/2020 approving the Financing Guide for the Programme to stimulate the renewal of the national vehicle fleet 2020-2024 (hereinafter referred to as "*Rabla Ministerial Order*") was published in the Official Journal No. 175 of 3 March 2020, Part I. The Rabla Ministerial Order entered into force on the same day, in accordance with Article 12(3) of Law 24/2000 establishing rules of legislative techniques.
- Law No. 239/15 December 2025 establishing measures to recover and streamline public resources and for amending and supplementing certain normative acts (hereinafter referred to as "*Law No. 239/2025*") was published in the Official Journal No. 1160 of 15 December. The Law No. 239/2025 entered into force 1 January 2026 in accordance with Article XIII of the Law and the provisions of Article 4(2) of the Law No. 227/2015

approving the Fiscal Code stipulating that any amendments to the tax rates will enter into force at the beginning of next fiscal year after their approval).

- Nine Local Council Decisions mentioned in the Evidence table (points 6-14) of different municipalities entered into force the date of their publication in accordance with Article 198(1) of the Administrative Code. By exemption, Tulcea Local Council Decision entered into force 30 days after its publication according to Article IV of the decision.

The primary objective of the legal acts is to boost the use of clean vehicles and fleet renewal achieved through increasing the number of zero-emission vehicles and scraping polluting vehicles, EURO 3 and below.

The two objectives are embedded in the legal framework defined by the above-mentioned legal acts (Evidence Nos. 2-15). In particular, the design of the schemes, the eligibility criteria, the financial and fiscal incentives, their structure and differentiated support for electric/hybrid/traditional vehicles and mandatory scrappage conditions attached to these schemes demonstrate that the legislation is aimed at boosting the use of clean vehicles and supporting fleet renewal.

**The legal act(s) shall include financial and fiscal incentives to:**

**- increase the number of zero-emission vehicles;**

**- scrap polluting vehicles (EURO 3 or below)**

|                                                      | <b>Financial incentives</b>                                                                                                                                                                                                                         | <b>Fiscal incentives</b>                                                                                     |
|------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|
| <b>Increase the number of zero-emission vehicles</b> | Ministerial Order No. 323/2020,<br>with all subsequent amendments.<br><br>Ministerial Order No. 1231/2025.                                                                                                                                          | Law No. 239/2025.<br><br>Nine Local Council Decisions<br>of different municipalities, as<br>mentioned above. |
| <b>Scrap polluting vehicles (EURO 3 and below)</b>   | Ministerial Order No. 323/2020,<br>with subsequent amendments.<br><br>Ministerial Order No. 1231/2025.<br><br>Ministerial Order No. 324/2020,<br>with subsequent amendments.<br><br>Ministerial Order No. 2261/2022,<br>with subsequent amendments. | Law No. 239/2025.                                                                                            |

**As regards the financial incentives to increase the number of zero-emission vehicles**, the Romanian authorities implemented two programmes providing financial incentives to increase the number of zero-emissions vehicles, namely the Rabla Plus Programme and the Programme on the Reduction of Greenhouse Gas Emissions in Transport (2025–2030). Both programmes provide financial incentives to purchase zero-emission vehicles and to scrap polluting vehicles (EURO 3 and below).

The Rabla Plus Ministerial Order approved the **Rabla Plus Programme** (Evidence No. 2).

Article 3(1)–(3) establishes the purpose of the programme, namely, to provide financial incentives from the Environment Fund, in the form of an eco-voucher, for the purchase of new electric or hybrid vehicles in exchange for the scrapping of used vehicles.

According to Article 2, letter g) of the Rabla Plus Ministerial Order, electric vehicles are considered zero emission vehicles.

In terms of eligible beneficiaries, Article 8 outlines the rules for individuals (Romanian residents) to receive the eco-voucher. Article 9 This article lists the types of legal entities (e.g., schools, NGOs, businesses, and public institutions) that can apply for the programme. To qualify, they must meet specific conditions, such as deregistering an old vehicle, working with an approved producer, and complying with administrative steps like destruction and registration proof. Article 7(4) provided that all users purchasing new electric or hybrid vehicles would receive an eco-voucher of variable value depending on the type of vehicle purchased. This value varied during the implementation of the programme, as follows:

- for a new electric vehicle or a new vehicle with a hydrogen fuel cell: RON 45 000 in 2020, RON 51 000 from 2022 and RON 25 500 from 2024
- for hybrids or electric motorcycles: RON 20 000 in 2020, RON 26 000 from 2022 and RON 13 000 from 2024.

Based on Article 7(5), during 2022 and 2023, beneficiaries scrapping two used vehicles could benefit from an eco-voucher with an increased value of RON 54 000 for full-electric vehicles and of RON 29 000 for hybrid vehicles, compared to the value of the eco-voucher for one car scraped.

Furthermore, an additional amount equal to RON 1 500 was added to the eco-vouchers for scraping vehicles with manufacturing date older than 15 years with EURO 3 or lower emission standard.

By exemption, according to Article 7(2) of the Rabla Plus Ministerial Order beneficiaries, like public institutions and administrative territorial units, would benefit from an eco-voucher of RON 120 000 when purchasing a new vehicle, without being required to scrap an old vehicle.

The programme was implemented between 2020-2024.

The **Programme on the Reduction of Greenhouse Gas Emissions** in Transport Ministerial Order approved the continuation of the previous Rabla Plus programme, with similar main characteristics (Evidence No. 5). Article 2 defines the objective of the Programme as the renewal of the vehicle fleet by granting non-reimbursable eco-vouchers for the purchase of new vehicles in exchange for the scrapping of older ones.

According to Article 5, letter i) of Programme on the Reduction of Greenhouse Gas Emissions in Transport Ministerial Order electric vehicles are considered zero-emission vehicles.

The financial incentive consists in eco-vouchers offered for the purchase of new vehicles, differentiated by type of vehicle, that strongly favour low and zero-emission vehicles, as provided by Article 8(4): RON 10 000 for internal combustion vehicles, RON 12 000 for hybrids, RON 15 000 for plug-in hybrids, RON 37 000 for pure electric or hydrogen vehicles and RON 120 000 for pure electric or hydrogen vehicles purchased by public institutions/local authorities. According to Article 5, letter f) which defines the new vehicles that can be purchased under this programme, eligibility is strictly conditioned on quantified CO<sub>2</sub> emission thresholds, and diesel vehicles are explicitly excluded from the programme.

**With respect to the financial incentives to scrap polluting vehicles (EURO 3 or below)**, the Rabla Plus Programme and the Programme on the Reduction of Greenhouse Gas Emissions in Transport (2025–2030) also introduced financial incentives to scrap polluting cars, as explained above, since according to the eligibility conditions, the eco-voucher for the purchase of a new vehicle is conditional to the scrapping of an used vehicle (Article 7(1) of the Rabla Plus Programme Ministerial

Order and Article 2(1) of the Programme on the Reduction of Greenhouse Gas Emissions in Transport Ministerial Order).

For both programmes, the used vehicles to be scrapped have to be at least EURO 3 category.

Article 2 point i) iii) of the Rabla Plus Programme Ministerial Order (Evidence No. 2) defines used vehicle as those with a seniority of at least 6 years from the year of manufacture.

Article 2, letter k), point 2 of the Programme on the Reduction of Greenhouse Gas Emissions in Transport (2025–2030) Ministerial Order (Evidence No. 5) defines used vehicle as those with a seniority of at least 8 years from the year of manufacture.

In addition to the Rabla Plus Programme and the Programme on the Reduction of Greenhouse Gas Emissions in Transport (2025–2030), Romania also used the Rabla Programme and the Rabla Local Programme to provide financial incentives to scrap polluting vehicles.

The Rabla Local Ministerial Order approved the Rabla Local Programme providing financial incentives in the form of eco-voucher for scrapping old vehicles (Evidence No. 4). The Ministerial Order was subsequently amended by Order No. 864/2023.

According to Article 2 of the Rabla Local Ministerial Order non-reimbursable financial incentive will be granted for used vehicles that are at least 15 years old with respect to the manufacturing year in exchange for their scrapping. The seniority condition for the used vehicles to be scrapped provided by Article 2 corresponds to vehicles EURO 3 and below, as explicitly mentioned by Article 10 letter c) of the same Order.

Article 8(1) defines the value of an eco-voucher equal to RON 2 400 for each scrapped vehicle. Furthermore, Article 9(1) letter g) requires eligible applicants to agree not to buy the next 3 years a new vehicle with EURO 5 or above.

The programme was implemented in 2022 and 2023.

The Rabla Ministerial Order approved the **Rabla Programme** (Evidence No. 3). Article 3(1) establishes the purpose of the programme, namely, to provide non-reimbursable financing in the form of an eco-voucher, for the purchase of new, less polluting vehicles in exchange for the scrapping of used vehicles.

Differently from the Rabla Plus Programme (whose objective was the purchase of new vehicles – electric and hybrids), this programme allowed the purchase of new vehicles, classics or hybrid vehicles (with a maximum price of EURO 60 000).

According to Article 2, letter f) a vehicle to be scrapped is a used one at least 6 years old with respect to the manufacturing year, which corresponds to EURO 5 and below. Initially, according to Article 6 (1), the value of the eco-voucher was RON 6 500 for scrapping an old vehicle and RON 3 500 for scrapping an old motorcycle, modified in 2022 to RON 6 000 for one scrapped vehicle and RON 9 000 for two scrapped vehicles and increased starting with 2023 to RON 7 000 for one scrapped vehicle and RON 10 000 for two scrapped vehicles.

The programme was implemented starting 2020 until 2024 (included).

**With respect to the fiscal incentives to increase the number of zero-emission vehicles**, the Romanian authorities addressed the milestone requirements concerning the fiscal incentives, by adopting new provisions in the Fiscal Code and several regulations at local level.

In December 2025, Romania adopted Law No. 239/2025 changing the fiscal provisions related to car taxation (Evidence No. 15).

Article XII, point 43 of Law No. 239/2025 amends Article 470(2) of the Fiscal Code, introducing a new formula for the taxes on vehicles' ownership changing the way in which taxes on the ownership of passenger vehicles are designed. In particular, it modifies the criteria and the calculating method of the annual vehicle's ownership tax, differentiating the tax level depending on both cylinder capacity (the only criterion previously considered in the tax calculation) and pollution standards. Lower tax rates are applied to vehicles meeting more stringent pollution norms (electric vehicles with zero-emission and hybrid vehicles with tailpipe emissions above 50 g CO<sub>2</sub>/km), and progressively higher tax for larger engines and lower environmental performance.

With these amendments, resulting in lower tax coefficients for vehicles with improved environmental performance, the differentiated fiscal treatment provides fiscal incentives for the acquisition of zero-emission vehicles, respectively electric vehicles which are taxed the lowest.

Additionally, Article XII, point 46 of Law No. 239/2025 introduces a new article 470(31) in the Fiscal Code providing an additional fiscal incentive: a fixed annual vehicle tax (flat tax) of RON 40 for electrically powered vehicles, representing a preferential tax treatment for zero-emission vehicles directly into the tax system compared to all other vehicles that are taxed in a progressive manner depending on engine capacity and pollution norm. Also, based on Article XII, point 45 of Law No. 239/2025 hybrid cars with CO<sub>2</sub> emissions lower than 50g/km benefit from a tax reduction up to 30%, depending on local authorities' decision.

Furthermore, the Romanian authorities adopted several communal legal acts (nine in total – Bucuresti, Timisoara, Focsani, Ploiesti, Alba-iulia, Piatra-Neamt, Tulcea, Buzau, Constanta) between 2021 and 2025 introducing fiscal incentives to increase the number of electric vehicles (defined by the above specific legal acts as zero-emission vehicles), in addition to the ones provided by the Fiscal Code (Evidence Nos. 6-14).

These local legal acts provide indirect fiscal incentives for the purchase of zero-emission vehicles by granting exemptions or reductions on the parking fee in public spaces for hybrid and/or electric vehicles like allowing them to use public paid parking without paying the parking fee in 9 main cities in Romania.

**With respect to the fiscal incentives to scrap polluting vehicles (EURO 3 and below),** Law No. 239/2025 also introduces fiscal incentives to exchange polluting vehicles with less polluting ones. Article XII, point 45 of the Law provides for a reduction of up to 30% of the tax on vehicles' ownership for hybrid vehicles, combined with the establishment through Article XII, point 46 of the Law of a very low fixed tax (RON 40) for electric vehicles and thus generating a substantial tax differential compared with EURO 3 or below vehicles. Thus, the amendments to Article 470(3) of the Fiscal Code establish a differentiated tax burden based on emission class, age, or environmental impact which provide an incentive for exchanging a polluting vehicle with a less polluting one.

The Law No. 239/2025 reshapes ownership costs to make retaining old polluting vehicles progressively more expensive relative to less polluting ones. By differentiating the level of taxation according to the vehicles' environmental performance, the law increases the total cost of ownership of old polluting vehicles (EURO 3 and below) treating zero-emission and low-emission vehicles more favourably. Through this cost increase for holding old polluting vehicles, the resell value of these vehicles is set to decline as well.

This change in relative and absolute prices although not always sufficient to trigger scrapping, contributes to gradual fleet renewal influencing buyers' choice and ownership of new cars. The

taxes' structure is such to increase the holding cost for old cars, while the scrapping incentive lowers the financial barrier to replace old vehicles.

Together, these measures influence the car owner's cost and benefit.

To conclude, the Romanian authorities have adopted legislative measures which cover directly the financial and fiscal incentives. The fiscal incentives complement direct financial incentives schemes, hence should not be considered in isolation, but as a part of a broader policy mix aimed at accelerating the transition to cleaner vehicle fleet. The assessment of compliance was carried out in a comprehensive manner, considering the combined effect of all relevant fiscal and financial incentives.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C6]-R[1.0]-T[119] Decommissioning of coal/lignite-fired power production capacity

**Related Measure:** RO-C[C6]-R[1.0] Electricity market reform, replacement of coal in the energy mix and support for a legislative and regulatory framework for private investment in renewable electricity production

**Quantitative Indicator:** Megawatt (MW)

**Baseline:** 2 025

**Target:** 3 070

**Time:** Q4 2025

### 1. Context:

Target 119 is part of Reform 1, which aims at decarbonising the energy sector, with a focus on power generation. The reform consists in legislative and regulatory acts phasing out coal and enabling increase of renewable electricity generation capacity.

Target 119 is the fourth step of the reform, and it follows the completion of target 113, milestone 114, target 115, which were fulfilled under previous payment requests. It will be followed by target 119a on the decommissioning of additional capacity of coal/lignite-fired power.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                                        | Short description                                                                                                                                            |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                                                                                                  | Summary document duly justifying how the target (including all the constitutive elements) has been satisfactorily fulfilled.                                 |
| 2 | Decision No. 2611 of 11 December 2025 issued by the National Energy Regulator (ANRE) amending License No. 2277 for the commercial operation of electricity and thermal energy production capacities in cogeneration power plants, granted to the Municipality of Iași.                      | 50 MW of coal-fired power unit at CET Iași II Holboca has been removed from the licence.                                                                     |
| 3 | Certification issued by the Transmission System Operator (TSO) in Letter No. 23872 of 16 December 2025 permanently withdrawing and decommissioning from the National Transmission System (NTS) of CET Iași II Holboca.                                                                      | 50 MW of coal-fired power unit at CET Iași II Holboca have been disconnected from the electricity network and removed from the electricity balancing market. |
| 4 | Decision No. 2425 of 18 November 2025 issued by ANRE amending License No. 1085 for the commercial operation of electricity and thermal energy production capacities in cogeneration power plants granted to Complexul Energetic Oltenia S.A.<br>Date of entry into force: 22 November 2025. | 645 MW of lignite fired power units at Turceni Unit 7 (330 MW) and the Ișalnița Unit 7 (315 MW) have been removed from the licence.                          |

|   |                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                        |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5 | Certification issued by the TSO in Letter No. 54878 of 11 December 2025 of permanently withdrawing and decommissioning from NTS of two units at Complexul Energetic Oltenia.<br>Date of entry into force: 21 November 2025.                                                          | 645 MW of lignite fired power units at Turceni Unit 7 (330 MW) and the Işalniţa Unit 7 (315 MW) have been disconnected from the electricity network and removed from the electricity balancing market. |
| 6 | Decision No. 660 of 25 March 2026 issued by ANRE amending License No. 1085 for the commercial operation of electricity and thermal energy production capacities in cogeneration power plants granted to Complexul Energetic Oltenia S.A.<br>Date of entry into force: 27 March 2026. | 330 MW of lignite fired power units at Turceni Unit 4 have been removed from the licence.                                                                                                              |
| 7 | Certification issued by the TSO in Letter No. 1507 of 30 March 2026 of permanently withdrawing and decommissioning from NTS of one unit at Complexul Energetic Oltenia.<br>Date of entry into force: 27 March 2026.                                                                  | 330 MW of lignite fired power units at Turceni Unit 4 have been disconnected from the electricity network and removed from the electricity balancing market.                                           |

### 3. Analysis:

The justification and substantiating evidence provided by the Romania authorities cover all constitutive elements of the target.

**Decision(s) issued by National Energy Regulator withdrawing operating license(s) together with certification(s) from the Transmission System Operator confirming the disconnection of a cumulative 3070 MW of coal and lignite-fired decommissioned electricity production capacity.**

Target 119 follows the satisfactorily fulfilment, under the third payment request, of target 115, which required the decommissioning of 2025 MW of coal and lignite-fired installed electricity production capacity and the mothballing of 330 MW capacity. Therefore, the total amount of electricity production capacity to be decommissioned under target 119 is 1 045 MW to achieve the cumulative 3070 MW decommissioned capacity.

The Romanian authorities provided evidence that CET Iaşi II Holboca (50 MW) and three generating units of Complexul Energetic Oltenia S.A. (Turceni 7 (330 MW) Işalniţa 7 (315 MW), and Turceni 4 (330 MW) have been decommissioned with a total amount of 1 025 MW of decommissioned electricity production capacity. In detail:

First, by Decision No. 2611 of 11 December 2025 the Romanian Energy Regulator (ANRE) revoked Licence No. 2277 granted to CET Iaşi II Holboca for the production of electricity and thermal energy in cogeneration from coal, by removing Iasi II unit with an installed capacity of 50 MW from the licence (Evidence No. 2). In addition, the certification issued by Transelectrica (the Transmission System Operator), in Letter No. 23872/DEN/16 December 2025 sent to the Ministry of Energy (Evidence No. 3), confirms that the unit Iaşi II Holboca, with a coal-fired installed capacity of 50 MW, has been permanently withdrawn from the National Transmission System (NTS). In this letter, Transelectrica also specified that this power unit was no longer producing electricity nor participating in the electricity balancing market.

Second, by Decisions No. 2425 of 18 November 2025 and No. 660 of 25 March 2026, ANRE amended Licence No. 1085 granted to Complexul Energetic Oltenia for the production of electricity from

lignite, by removing Turceni 4 and 7 with an installed capacity of 660 MW and Işalnița 7 with an installed capacity of 315 MW from the licence (Evidence No. 4 and No. 6). In addition, the certification issued by Transelectrica, in Letters No. 54878 of 11 December 2025 and No. 1507 of 30 March 2026 sent to the Ministry of Energy (Evidence No. 5 and No. 7), confirms that the units Turceni 4 and 7 and Isalnita 7 with a combined lignite-fired installed capacity of 975 MW, had been permanently withdrawn from the NTS. Transelectrica also specified that these power units were no longer producing electricity nor participating in the electricity balancing market.

The Council Implementing Decision required “the disconnection of a cumulative 3070 MW of coal and lignite-fired decommissioned electricity production capacity”. As outlined above, the amount of electricity production capacity to be decommissioned specifically under target 119 is 1 045 MW. Romania provided evidence for the decommissioning of 1 025 MW. Whilst this constitutes a minimal numerical deviation of 1.95% from the requirement of the Council Implementing Decision, the overall objective of this target is considered met notwithstanding this minor deviation. On this basis, it is considered that this constitutive element of the target is satisfactorily fulfilled.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C6]-R[R2.0]-M[122] Listing of at least 15% shares of Hidroelectrica on the exchange

**Related Measure:** RO-C[C6]- R[R2.0] Reforming corporate governance of state-owned companies in the energy sector

**Time:** Q2 2023

### 1. Context:

This reform aims at improving the corporate governance reform of state-owned enterprises in the energy sector. The reform consists in selections and appointments of management and supervisory board members on the basis of a transparent and competitive procedure.

Milestone 122 concerns the listing of at least 15% of Hidroelectrica's shares on the stock exchange.

Milestone 122 is the second and last step of the reform concerning the corporate governance of state-owned enterprises (SOEs) in the energy sector. It was preceded by milestone 121 related to the selection and appointment of management boards of SOEs in the energy sector.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                                                        | Short description                                                                                                                                                         |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                                                                                                                  | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.                                           |
| 2 | Copy of Decision No. 3 of 31 March 2022 taken by the Extraordinary General Assembly of Hidroelectrica.                                                                                                                                                                                                      | The decision approves the starting of the listing process of Hidroelectrica shares on the Bucharest Stock Exchange.                                                       |
| 3 | Copy of Decision No. 105 of 22 June 2023 taken by the Supervisory Board of Hidroelectrica.                                                                                                                                                                                                                  | The decision approves the offer prospectus and its submission for approval to the Financial Supervisory Authority.                                                        |
| 4 | Copy of Decision ASF No. 641 of 22 June 2023 taken by the Authority for Financial Supervision.                                                                                                                                                                                                              | The decision approves the prospectus of the initial secondary public offer for the sale of shares of Hidroelectica.                                                       |
| 5 | Copy of the offer prospectus approved by the Authority for Financial Supervision on 22 June 2023, and a link to the Bucharest stock exchange website "bvb.ro/offers/h2o/toprospecth2o".                                                                                                                     | Offer prospectus approved and referring to an offer for the sale by Fondul Proprietatea S.A. of some existing ordinary shares in the share capital of Hidroelectrica S.A. |
| 6 | Copy of Regulation No. 5, published in the Official Journal No. 478 of 11 June 2018, Part I, as amended by Regulation No. 1/2020, Regulation No. 13/2021, Regulation No. 2/2022, Regulation No. 6/2022 and Regulation No. 15/2024, last amended on 21 December 2024. It entered into force on 21 June 2018. | Regulation of the Financial Supervision Authority on issuers of financial instruments and market operations.                                                              |

|   |                                                                                                                                               |                                                                                                                                                  |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| 7 | Copy of the notification of the results of the initial public bid for the sale of 89 708 177 shares issued by Hidroelectrica on 10 July 2023. | The notification is produced by Banca Comercială Română (BCR) and addressed to the Bucharest Stock Exchange.                                     |
| 8 | Copy of the notification of the end of the stabilisation period of Hidroelectrica shares of 19 June 2023.                                     | The notification on the end of the stabilisation period was produced by Hidroelectrica and sent to the Romanian Financial Supervisory Authority. |

### 3. Analysis

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

#### **Listing of at least 15% shares of Hidroelectrica on the exchange**

**Following the publication of the listing prospectus, a stake of at least 15% of Hidroelectrica shall be traded on the exchange after an initial public offer. Completion of the Initial Public Offering.**

On 31 March 2022, the Extraordinary General Assembly of Shareholders of Hidroelectrica S.A. approved the listing of Hidroelectrica's shares held by the minority shareholder Fondul Proprietatea on the regulated market operated by the Bucharest Stock Exchange (the "BVB"), via a secondary public offering of shares (the "Offering") (Evidence No. 2). Subsequently, on 22 June 2023, the Supervisory Board of Hidroelectrica authorised the submission of the prospectus relating to the Offering to the Financial Supervisory Authority ("ASF") for approval (Evidence No. 3).

On the same day, the ASF approved the prospectus relating to the Offering by its Decision No. 641 from 22 June 2023 (Evidence No. 4) published in the ASF digital bulletin, thereby allowing the admission to trading of the Hidroelectrica's shares on the regulated market managed by the BVB. The prospectus relating to the Offering was published on the BVB's website (Evidence No. 5).

According to the approved prospectus, the Offering consisted exclusively of a secondary sale of shares by the minority shareholder Fondul Proprietatea, which held 19.94% of the share capital of Hidroelectrica. The shares were offered to retail and institutional investors. No new shares were issued by Hidroelectrica in the context of the Offering.

The completion of the Initial Public Offering took place on 12 July 2023, when the listing of the shares started, as the shares were admitted to trading on the regulated market of the Bucharest Stock Exchange (Evidence No. 6). The Offering qualifies as a secondary public offering (i.e., involving existing shares sold by a shareholder and not newly issued shares).

Banca Comercială Română, acting as underwriter of the public offering, notified the results of the initial secondary public offering of shares to BVB (Evidence No. 7). According to the notification, a total number of 89 708 177 shares were successfully sold in the offering, representing 19.94% of the total issued share capital of Hidroelectrica.

The settlement of the offering resulted in the transfer of ownership of these shares from the selling shareholder to private and institutional investors. Evidence No. 8 is the notification of the end of the stabilisation period after the Offering of Hidroelectrica shares, produced by Hidroelectrica and sent

to the Romanian Financial Supervisory Authority. Following the completion of the offering, 19.94% of the total issued share capital of Hidroelectrica is held by public investors and has been admitted to trading on the regulated market operated by the Bucharest Stock Exchange under the trading symbol H2O (Evidence No. 7). The Romanian State, acting through the Ministry of Energy, retained an 80.06% shareholding in Hidroelectrica.

Although the sale of shares was carried out by way of a secondary public offering, Romania submits that the Offering qualifies as an initial public offering ("IPO"), as it resulted in the first admission to trading of the shares of Hidroelectrica on the regulated market operated by BVB. This qualification is in line with Article 16(b) of national ASF Regulation No. 5/2018 on issuers of financial instruments and market operations, which treats as an initial public offering a transaction leading to the first admission to trading of an issuer's shares on a regulated market. This concept is distinct from a "secondary issuance" within the meaning of Article 14 of Regulation (EU) 2017/1129 of the European Parliament and of the Council of 14 June 2017 (the Prospectus Regulation), which concerns the simplified disclosure regime applicable to subsequent offers by already listed issuers (Evidence No. 6).

According to the evidence provided, Romania completed the listing of 19.94% of shares of Hidroelectrica, thus exceeding the goal of milestone 122 of 15% of shares required to be traded on the exchange.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Target:** RO-C[C6]-R[R3]-M[123] Establishment and use of a green budgetary planning methodology

**Related Measure:** RO-C[C6]-R[R3] Green budgeting

**Qualitative Indicator:** Establishment and use of a green budgetary planning methodology

**Time:** Q2 2026

**1. Context:**

The objective of the reform is to monitor and assess fiscal policy's impact on climate and environmental objectives.

Milestone 123 requires the development, adoption, publication and application of the green budgeting planning methodology.

Milestone 123 is the only milestone or target of this reform.

**2. Evidence provided:**

|   | Name of the evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | Short description                                                                                                          |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover Note                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled. |
| 2 | Copy of Government Emergency Ordinance No. 75/2024 (hereinafter referred to as “ <i>GEO No. 75/2024</i> ”) on regulating the labelling of budgetary expenditure and tax expenditures for green budgeting, published in the Official Journal No. 594 on 26 June 2024.                                                                                                                                                                                                                                                            | GEO No. 75/2024 establishes the legal and institutional framework for green budgeting.                                     |
| 3 | Copy of Government Decision No. 1074/2024 (hereinafter referred to as “ <i>GD No. 1074/2024</i> ”) for the approval of the Implementing Rules of the provisions of Government Emergency Order No. 75/2024 on the regulation of labelling budgetary and fiscal expenditures for green budgeting, as well as the Regulation on the organisation, operation and tasks of the Inter-ministerial Committee for the labelling of budget expenditure and tax expenditure, published in the Official Journal No. 887 on 28 August 2024. | GD No. 1074/2024 operationalises GEO No. 75/2024 by providing technical and procedural detail.                             |
| 4 | Copy of Annex 1 (Methodological rules implementing Government Emergency Order No. 75/2024 on regulating the labelling of                                                                                                                                                                                                                                                                                                                                                                                                        | Annex 1 defines the six environmental objectives, establishes the scoring system, and sets out precise procedural          |

|    |                                                                                                                                                                                                                                            |                                                                                                                                                   |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|
|    | budgetary expenditure and tax expenditures for green budgeting) (to Government Emergency Ordinance No. 75/2024), published in the Official Journal No. 887 on 28 August 2024 (hereinafter referred to as “ <i>Methodological rules</i> ”). | steps.                                                                                                                                            |
| 5  | A copy of the guidelines for budget expenditure tagging and a link to the website: <a href="https://mfinante.gov.ro/ro/bugetarea-verde-green-budgeting">mfinante.gov.ro/ro/bugetarea-verde-green-budgeting</a> .                           | Guidelines for tagging the budget expenditures in Romania published on the website of the Ministry of Finance.                                    |
| 6  | Copy of Report on the Results of Expenditure Labelling Budget and Tax Expenditures.                                                                                                                                                        | The Report represents the final version of the tagging of fiscal and budget expenditures, available on the dedicated website, see Evidence No. 5. |
| 7  | Copy of Annex B (Labelling of budgetary expenditure in terms of their impact on environmental objectives) to Report on the Results of Expenditure Labelling Budget and Tax Expenditures, see Evidence No. 6.                               | The Annex presents the results of the budgetary expenditures tagging process from the perspective of their impact on environmental objectives.    |
| 8  | Copy of Annex D (Labelling of tax expenditure in terms of their impact on environmental objectives) to Report on the Results of Expenditure Labelling Budget and Tax Expenditures, see Evidence No. 6.                                     | The Annex presents the results of the fiscal expenditures tagging process from the perspective of their impact on environmental objectives.       |
| 9  | List of the measures of the budgetary expenditure.                                                                                                                                                                                         | The list of the measures includes the related costs in the 2026 budget.                                                                           |
| 10 | Copy of Law No. 45/2026 amending Law No. 69/2010 on fiscal and budgetary responsibility, published in the Official Journal on 30 March 2026 (hereinafter referred to as “ <i>Law No. 45/2026</i> ”).                                       | Law No. 45/2026 includes green budget assessment measures such as climate risk analysis.                                                          |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

**The authorities shall apply a methodology for assessing green budget expenditure and the impact of fiscal policy on environmentally sustainable activities, as defined under the EU Taxonomy Regulation, and the “do no significant harm” Technical Guidance (2021/C58/01).** Furthermore, in line with the description of the measure, the reform consists in **applying green budgetary practices to the national budget.**

The methodology was developed by the Ministry of Finance and piloted in 2024, on the budgets of three ministries. It was subsequently formalised through two legislative instruments.

Government Emergency Ordinance No. 75/2024 (hereinafter referred to as “*GEO No. 75/2024*”) on the labelling of budgetary and tax expenditures for green budgeting (Evidence No. 2) was published in the Official Journal on 26 June 2024 and entered into force on the same date, in accordance with

Article 12(2) of Law No. 24/2000 on the rules of legislative technique for the drafting of legislative acts.

Government Decision No. 1074/2024 (hereinafter referred to as “*GD No. 1074/2024*”) approving the Implementing rules and establishing the Inter-ministerial committee for the labelling of budget expenditure and tax expenditure (Evidence No. 3) was published in the Official Journal on 28 August 2024 and entered into force on the same date, in accordance with Article 12(3) of Law No. 24/2000 on the rules of legislative technique for the drafting of legislative acts.

The Methodological Rules annexed to GD No. 1074/2024 (Evidence No. 4) are explicitly aligned with the EU Taxonomy Regulation and the DNSH Technical Guidance. In particular, Article 4(3) of the Methodological Rules establishes a scoring system applying values of -1, 0, 1, 2, and 3 to measures across the six environmental objectives listed in its Annex A, which correspond directly to those defined in Article 9 of EU Taxonomy Regulation (EU) 2020/852: (i) climate change mitigation; (ii) climate change adaptation; (iii) sustainable use and protection of water and marine resources; (iv) transition to a circular economy; (v) pollution prevention and control; and (vi) protection and restoration of biodiversity and ecosystems. Furthermore, Article 4(6) of the Methodological Rules explicitly references to respecting the DNSH Technical Guidance (2021/C 58/01) as an applicable reference framework.

To support implementation and facilitate the application of the green budgeting methodology, the Ministry of Finance published in October 2024 the Guidance on labelling budgetary expenditure in Romania (Evidence No. 5).

In early 2026, the Ministry of Finance published the Report on the results of Expenditure Labelling Budget and Tax Expenditures, for the budgetary years 2025 and 2026, respectively (Evidence No. 6), which includes: Annex B, assessing Romania’s budget expenditures in terms of their impact on environmental objectives (Evidence No. 7); Annex D, assessing the environmental sustainability of fiscal policy through the labelling of tax expenditures (Evidence No. 8), and a comprehensive list of measures with related costs in the 2026 budget (Evidence No. 9). This data applies green budgeting to the national budget and sets a baseline for monitoring the evolution of green spending and enables annual comparisons from the 2027 budget cycle onwards.

As a further step, Romania adopted Law No. 45/2026 (hereinafter referred to as “*Law No. 45/2026*”) amending Law No. 69/2010 on fiscal and budgetary responsibility (Evidence No. 10) which was published in the Official Journal on 30 March 2026 and entered into force three days after its publication in the Official Journal, on 2 April 2026, in accordance with Article 12(1) of Law No. 24/2000 on the rules of legislative technique for the drafting of legislative acts.

Article(10) of Law No. 45/2026 inserts into Law No. 69/2010 the following provisions: Article 29(2)(d) requiring Romania to assess and quantify specifically climate-related fiscal risks; Article 29(2)(g) requiring Romania to take into account the macro-fiscal risks stemming from climate change and their environmental and distributional impacts; and Article 29(2)(h) requiring Romania to track a sustainable growth trajectory which will facilitate the year-on-year assessment whether green objectives are increasingly considered in the budget.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Target:** RO-C[C7]-I[I1.0]-T[154] Public institutions connected through the government cloud

**Related measure:** RO-C[C7]-I[I1.0] Deployment of the Government Cloud Infrastructure

**Quantitative Indicator:** Number

**Target:** 30

**Time:** Q4 2024

### 1. Context:

Target 154 is part of investment C7.I1, which has the objective to deploy the Government Cloud infrastructure, using secure and energy-efficient technologies to ensure the safe, interoperable and standard character of the public data.

Target 154 is related to the connection of public institutions to the Government Cloud and its use.

Target 154 is the second target of the investment, and it follows the completion of milestone 153 related to the signature of the contract for the implementation of Government Cloud infrastructure. It will be followed by target 155 concerning the operationalisation of two Tier III and two Tier IV data centres.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                                                             | Short description                                                                                                                                                                                                                                    |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                                                                                                                       | Summary document duly justifying how the target (including all the constitutive elements) has been satisfactorily fulfilled.                                                                                                                         |
| 2 | Copy of the Emergency Ordinance No. 89/2022, published in the Official Journal No. 638 on 28 June 2022 ( <i>Ordonanță de urgență nr. 89/2022 privind înființarea, administrarea și dezvoltarea infrastructurilor și serviciilor informatice de tip cloud utilizate de autoritățile și instituțiile publice</i> ) | It concerns measures for adopting the governance system for the Government Cloud Platform and establishes the legal framework for the organisation and operation of IT infrastructures and cloud services within the digital transformation process. |
| 3 | Copy of the Government decision No. 112/2023, published in the Official Journal No. 118 of 10 February 2023, Part I ( <i>Hotărâre privind aprobarea Ghidului de guvernare a platformei de cloud guvernamental</i> ).                                                                                             | It approves the governance guide of the Governmental Cloud platform, which explains how governance rules will be applied in practice.                                                                                                                |
| 4 | Copy of Law No. 242 of 20 July 2022, published in the Official Journal No. 752 on 28 July 2022 ( <i>Lege privind schimbul de date între sisteme informatice și crearea Platformei naționale de interoperabilitate</i> ).                                                                                         | It sets up provisions regulating data exchange between information systems and the creation of National interoperability platform.                                                                                                                   |
| 5 | List of the 72 public institutions and related accounts created in PDURo,                                                                                                                                                                                                                                        | The list contains names and usernames of the public institutions for which the Cloud                                                                                                                                                                 |

|    |                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|----|-----------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | connected to the Governmental Cloud.                                        | accounts have been created in the PDURo (Romania's Single Digital Portal), and date of creation.                                                                                                                                                                                                                                                                                                                                |
| 6  | List of 33 institutions participating in the training for the use of PDURo. | It contains names of institutions participating in the trainings for the use of the PDURo, along with their account names and date of the delivery of the training.                                                                                                                                                                                                                                                             |
| 7  | Export log - Keycloak Administration UI (DMS Login).                        | Export log document, indicating that 33 institutions have been activated and are able to use the platform running on the Government Cloud infrastructure.                                                                                                                                                                                                                                                                       |
| 8  | Contract No. 57/09.09.2024, with addendum No. 71/12.11.2024.                | It is a procurement contract, between the Romanian Digitalisation Authority (ADR) and Vodafone Romania SA, for the provision of the dedicated Cloud solution for the supply of IT solutions and products for the dedicated Cloud (Lot 1).                                                                                                                                                                                       |
| 9  | Contract No. 58/09.09.2024, with addendum No. 74/06.12.2024.                | It is a procurement contract, between the Romanian Digitalisation Authority (ADR) and Vodafone Romania SA, for the provision of the dedicated Cloud solution, it regards the supply of SAAS component solutions for the dedicated Cloud (Lot 2).                                                                                                                                                                                |
| 10 | Contract No. 22/19.03.2024.                                                 | Service Provision Contract for the provision of services for the development and implementation of the IT solution, including the delivery of the software for the implementation of the "Romania's Single Digital Portal – PDURo". The contract is between the Romanian Digitalisation Authority (ADR) and an association of companies consisting of S.C. Maguay Computers S.R.L., S.C. Phoenix IT S.R.L., Wisevoice AI S.R.L. |
| 11 | Certificates of completion Nos. 476, 477, 493, 494.                         | They prove the acceptance and installation of equipment, licenses, and software products related to Lot 1 and Lot 2 for the dedicated cloud, carried out under Contracts No. 57 of 09.09.2024 (Addendum No. 71/12.11.2024) and No. 58 of 09.09.2024 (Addendum No. 74/06.12.2024).                                                                                                                                               |
| 12 | Certificates of completion Nos. 311, 312.                                   | They prove the acceptance and commissioning of the software licenses for the implementation of the IT solution of the PDURo, as specified in Contract No. 22/19.03.2024.                                                                                                                                                                                                                                                        |
| 13 | Certificates of completion Nos. 403, 404, 405, 408.                         | They prove acceptance of services delivered under Contract No. 22/19.03.2024. The                                                                                                                                                                                                                                                                                                                                               |

|    |                                                                                                                                                         |                                                                                                                                                                                     |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                                                                                                                                                         | contractor completed the analysis phase and prepared the technical documents needed to design the IT system.                                                                        |
| 14 | Certificate of completion for each of the 33 public institutions, signed by contractor and the competent authority (Romanian Digitalisation Authority). | These documents confirm the official installation and activation of the ASIGNO back-office functionalities for each of the 33 institutions, as based on Contract No. 22/19.03.2024. |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the target.

#### **At least 30 public institutions connected to and using the Government Cloud with the possibility for them to exchange data with each other through the Government Cloud infrastructure.**

Following the signature of contract to implement the Government Cloud (milestone 153, positively assessed in the context of the second payment request), the Romanian authorities continued with the procurement and related services contracts to set-up the Government Cloud. The respective contracts were signed on 9 September 2024 and 19 March 2024 respectively (see Evidence Nos. 8, 9 and 10). Certificates of completion (see Evidence Nos. 11, 12 and 13) confirm the reception and installation of the ICT equipment, licences and software solutions for the Government Cloud.

The physical infrastructure complemented the already existing legal and governance framework of the Government Cloud as set up by Government Emergency Ordinance No. 89/2022 (published in the Official Journal No. 638 on 28 June 2022, Evidence No. 2). A governance guide defines the establishment and administration of the governance system, including the roles of the different authorities involved (in particular the Ministry of Research, Innovation and Digitalisation, the Authority for the Digitalisation of Romania, and the Special Telecommunications Service). In addition, Government Decision No. 112/2023 (published in the Official Journal No. 118 on 10 February 2023) establishes the technical, procedural and operational rules of the Government Cloud, complementing the governance guide.

Furthermore, Law No. 242 of 20 July 2022 (published in the Official Journal No. 752 on 27 July 2022, and according to the provisions in the Article 12(1) of Law No. 24/2000 on legislative technique rules for drafting legal acts, Law No. 242/2022 entered into force three days after its publication in the Official Journal) establishes the National Interoperability Platform, which enables automatic data exchange between information systems of central and local public authorities and institutions. Article 9 (9) stipulates that the National Interoperability Platform operates on the Government Cloud infrastructure.

According to the evidence provided, Romania demonstrated that 33 public institutions are connected to and use the Government Cloud, with the possibility for them to exchange data through its infrastructure. The evidence provided concern the provision of documentation showing the creation of the accounts in PDURo, the export log showing the usage of PDURo by the institutions, the list of the institutions which participated to the trainings and the certificates of completion of the 33 institutions proving they are able to use the Government Cloud and the PDURo, for exchanging data with each other. Therefore, the goal of target 154 has been exceeded by 3 public institutions.

Specifically, public institutions are connected to and use the Government Cloud through the Romanian Single Digital Portal (PDURo), which is a software running on the Government Cloud

infrastructure and functioning as a single platform through which government entities can communicate, and which can be used by citizens and businesses to complete and access online public services and administrative procedures.

Evidence No. 5 contains the list with public institutions with accounts created in PDURo, complemented with certificates of completion (Evidence No. 14) for each of the 33 public institutions, confirming the installation and activation of the ASIGNO back-office functionalities. ASIGNO is the tool (software platform) used by public institutions to handle requests received through PDURo.

As a third step, these 33 public institutions participated in a two-day training (19 and 20 December 2024, see Evidence No. 6) acquiring the knowledge how to use and to exchange data through the platform.

As a final step, Evidence No. 7 is the document containing the export log for 33 institutions with an activated account and a connection to the Government Cloud.

The possibility of exchange of data is also allowed as demonstrated by the export log document (Evidence No. 7), which proves authenticated access to PDURo platform and data usage at a certain time by a specific user and institution. So, it means that institutions connected to PDURo are able to perform exchange data functionalities by using ASIGNO back-office functionalities via PDURo access, for which the respective accounts have been created and institutions can access. The exchange of data feature is a key characteristic of the PDURo platform, as stipulated by Law No. 242 of 20 July 2022 (Evidence No. 4).

Taken together, these documents confirm the accounts' activation and prove the PDURo is usable by the institutions.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C7]-I[I4.0]-M[163] Centralisation of applications

**Related Measure:** RO-C[C7]-I[I4.0] Digitalisation of the Judiciary

**Qualitative Indicator:** National (centralized) Electronic File (e-file) and judicial case management virtualized in fewer location

**Time:** Q2 2023

### 1. Context:

The objective of this investment is to support the transition of the Romanian judicial system to a centralised electronic case management system. The investment consists in the technical transition from local to shared central servers with electronic access of the case files ("e-file"), supporting the finalisation of the ECRIS V system, which is the central element of the digital transformation of the judiciary in Romania, setting up the data centre for the judiciary hosting ECRIS V and other IT systems, and the procurement of Information Technology & Communication (IT&C) equipment, software and services to support the digital transformation in the judicial sector.

Milestone 163 is the first milestone of the investment, followed by milestone 164 (Electronic case record and information system ECRIS V and the digital transformation of the judicial system), and milestone 166 (Data centre set up).

### 2. Evidence provided:

|    | Name of the evidence                                                                                                                                                                                                                                                                                                                                                                        | Short description                                                                                                                                                                     |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1  | Cover note                                                                                                                                                                                                                                                                                                                                                                                  | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.                                                            |
| 2  | <ul style="list-style-type: none"><li>• Copy of the Order of the Minister of Justice No. 3882/C/19 July 2021</li><li>• Copy of the Order of the Minister of Justice No. 3937/C/30 July 2021</li><li>• Copy of the Order of the Minister of Justice No. 536/C/31 March 2023</li></ul>                                                                                                        | Three documents establishing the working group within the judiciary system, responsible for developing the technical solution for the implementation of the National Electronic File. |
| 3a | Framework Agreement No. 147/1512/2022/23 November 2022 concluded by the Ministry of Justice for the hardware and software equipment for network and security (Lot 1) and subsequent contracts: <ul style="list-style-type: none"><li>• Contract No. 1 (162/1512/2022/12 December 2022) for the network and security equipment</li><li>• Contract No. 2 (191/1512/2022/27 February</li></ul> | Contracts concluded between the Romanian Ministry of Justice (beneficiary authority) and contractors, for network and security equipment purchase (Lot 1)                             |

|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                      |
|----|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | <p>2023) for the network and security equipment</p> <ul style="list-style-type: none"> <li>• contract No. 3 (355/1512/2022/15 May 2023) for network and security equipment.</li> </ul>                                                                                                                                                                                                                                                               |                                                                                                                                                                                                                                                                                                                      |
| 3b | <p>Framework Agreement No. 431/1512/2022/04 August 2023 concluded by the Ministry of Justice for the hardware and software equipment for processing and storage (Lot 2) and subsequent contracts:</p> <ul style="list-style-type: none"> <li>• Contract No. 1 (566/1512/2022/24 August 2023) for the processing and storage equipment.</li> <li>• Contract . 2 (645/1512/2022/13 December 2023) for the processing and storage equipment.</li> </ul> | <p>Contracts concluded between the Romanian Ministry of Justice (beneficiary authority) and contractors, for processing and storage equipment purchase (Lot 2).</p>                                                                                                                                                  |
| 4a | <ul style="list-style-type: none"> <li>• Certificates of acceptance corresponding to Framework Agreement No. 147/1512/2022/23 November 2022: <ul style="list-style-type: none"> <li>○ Certificate of acceptance No. 120/1 February 2023.</li> <li>○ Certificate of acceptance No. 796/19 June 2023.</li> <li>○ Certificate of acceptance No. 543/ 21 April 2023.</li> </ul> </li> </ul>                                                              | <p>Certificates of acceptance signed by the Ministry of Justice and the contractors corresponding to the first framework agreement, demonstrating the purchase and delivery of the IT infrastructure technological upgrade.</p>                                                                                      |
| 4b | <ul style="list-style-type: none"> <li>• Certificates of acceptance corresponding to Framework Agreement No. 431/1512/2022/4 August 2023: <ul style="list-style-type: none"> <li>○ Certificate of acceptance No. 4221/29 November 2023.</li> <li>○ Certificate of acceptance No. 4240/20 December 2023.</li> </ul> </li> </ul>                                                                                                                       | <p>Certificates of acceptance signed by the Ministry of Justice and the contractors, corresponding to the second framework agreement, demonstrating the IT infrastructure technological upgrade.</p>                                                                                                                 |
| 5  | <p>Independent expert audit report issued on 23 February 2024, and Certificate of acceptance of the report No. 672/1512/2022/28 February 2024.</p>                                                                                                                                                                                                                                                                                                   | <p>Report issued by an independent expert, including justification that the result of the investment is aligned with the description of the milestone and of the description of the investment in the CID. The report was presented together with a certificate of acceptance issued by the Ministry of Justice.</p> |
| 6  | <p>Print screens from the application.</p>                                                                                                                                                                                                                                                                                                                                                                                                           | <p>Since the access to the National Electronic File platform is restricted to Romanian citizens who are directly involved in ongoing judicial proceedings, it is not publicly accessible for demonstration purposes. Therefore, screenshots of</p>                                                                   |

|  |  |                                                                                                                                                      |
|--|--|------------------------------------------------------------------------------------------------------------------------------------------------------|
|  |  | the application were provided as supporting evidence to illustrate its functionality and user interface, and to substantiate its operational status. |
|--|--|------------------------------------------------------------------------------------------------------------------------------------------------------|

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

**In order to introduce a modern alternative for electronic access of the case files (“e-file”), this investment shall centralize the existing extensions of e-file in a single national “e-file” through which litigants shall be able to easily and securely access documents in court files.**

According to the information provided, the challenges that the Romanian judicial system must overcome concern aspects related to bureaucratic workflows, the predominant use of paper/hardcopy documents, and fragmented/isolated IT systems. In order to reduce the operational risk of the existing case management system (the Electronic System for Recording Judicial Information, ECRIS IV version) and to introduce a modern/digital alternative for electronic access to case files, the implementation of this investment progressed through several stages, according to the information provided (Evidence No. 1 to Evidence No. 4b).

Stage one consisted in the development of the technical architecture for the electronic file application by a working group established within the judiciary (Evidence No. 2). The working group was composed of IT specialists from the judicial system (courts of appeal and tribunals) and was coordinated by the IT Department of the Ministry of Justice. Besides the identification of the optimal technical solution for the implementation of the application, this dedicated working group was also assigned to address: (1) the virtualisation of ECRIS IV informatic system by implementing IT technology that allows multiple virtual servers to run on a single physical machine (moving from fragmented, locally hosted infrastructure to centralized, cloud-like environment), to support the transition to ECRIS V; and (2) the optimization and testing of the judicial informatic system ECRIS IV, at the end of the installation.

Stage two consisted of the procurement, installation (together with the working group presented in stage 1) and configuration of the hardware and software equipment for the implementation of the application. Based on the evidence provided (Evidence Nos. 3a, 3b, and Evidence Nos. 4a, 4b), the hardware and software equipment necessary for the investment was procured, installed, and deployed in a central manner at the Ministry of Justice. The technical and functional transition of the case management system enabled centralized administration of the ECRIS IV judicial information system. This approach aimed to reduce the number of servers (from approximately 270 locations to 63 locations), thus supporting the technical transition from local to shared central servers, and optimizing the management and usage of technical resources (central servers), for the use of the national e-file. Moreover, this technical upgrade contributed to the improvement of communication capabilities and capacities by installing the newly acquired network and security equipment, which facilitates data transmission in a secure environment. Evidence Nos. 4a and 4b present certificates of acceptance signed by the Ministry of Justice and the contractors, enumerating the acquired hardware and software equipment and demonstrating the technological upgrade of the IT infrastructure of the judiciary for use of applications’ virtualisation and centralisation and the national judiciary e-file.

Stage three consisted of security testing (Evidence No. 2). Following the installation and configuration of the equipment, the working group continued with the testing of the central components (e.g., the databases management system, the core application). As such, security testing was conducted to verify that the platform performs in line with its intended scope and requirements. After the working group developed and tested the communication module between courts and litigants, the application was also tested in real working conditions, to ensure that the litigants shall be able to securely access documents in court files, in a centralized manner.

Finally, the Final Audit Acceptance Report (Evidence No. 5), issued by an independent auditor, certifies that the application implemented through the documents mentioned as Evidence No. 2 and contracts mentioned as Evidence Nos. 3a and 3b, related to the implementation of the project “Centralization of applications” is functional and accepted by the beneficiary, the Ministry of Justice. According to this report, the application complies with the technical and functional requirements set out in the contracts, namely:

- Reduction of the number of servers from approximately 270 locations to 63 locations.
- Centralization of the previous existing four versions of the electronic file (extensions) to a single centralized one to be used nationally by all litigants
- The technological modernization of the IT infrastructure of the judicial system by: (a) increasing the data transmission capacity in the wide area network WAN (expanding bandwidth) required for the proper functioning of the electronic case management system in a centralized configuration; (b) ensuring adequate processing and storage capacity at the level of courts and courts of appeal, in order to centralize applications within the judicial system and ensure efficient management of IT resources in the courts; (c) enhancing the security and availability of services provided to the public, to guarantee secure access of case files.

Furthermore, according to the Final Audit Acceptance Report (Evidence No. 5), the software and hardware components acquired, installed, and configured, as well as the IT solutions/services newly developed as part of milestone 163 from both a technical and functional perspective are compliant with the requirements set out in the project’s financing documentation.

The single national electronic file (“the application”) can be accessed at the following address: <https://den.just.ro/>, having three main functions:

- centralized electronic access for litigants to their court case files;
- secure filing of documents during legal proceedings;
- communication of procedural documents.

Since access in the application is restricted to Romanian citizens who are directly involved in ongoing legal proceedings, Evidence Nos. 5 and 6 were provided to illustrate the functionality and user interface of the platform, and to substantiate its operational status.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C7]-I[I6.0]-M[169] Functional REGES online system

**Related Measure:** C[C7]-I[I6.0] Digitalisation in employment and social protection

**Qualitative Indicator:** Functional REGES online system

**Time:** Q4 2025

### 1. Context:

The objective of the investment is to increase the level of digitalisation for several services in the field of labour and social protection. The investment consists in the establishment of digital systems and the provision of trainings on digital skills for employees for the National Employment Agency (ANOFM), the Labour Inspectorate (IM), and the National Agency for Payments and Social Inspection (ANPIS).

The milestone concerns the functionality of the REGES-ONLINE IT system, allowing public authorities and institutions to register data at Application Programming Interface (API) level.

Milestone 169 is the first step of the investment. It will be followed by target 170 related to digital services in the field of employment and social protection, and milestone 171 related to trainings on digital skills for employees.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                   | Short description                                                                                                                                                                   |
|---|----------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                             | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.                                                     |
| 2 | Contract No. 612/DE.30.05.2024 between Romania's Labour Inspectorate and Vodafone Romania S.A., dated 30 May 2024.                     | The contract certifies the provision of services and products related to the development and implementation of the REGES-ONLINE system.                                             |
| 3 | Certificate of completion between Romania's Labour Inspectorate and Vodafone Romania S.A., issued by Vodafone and dated 31 March 2025. | The final acceptance report for the implementation of the REGES-ONLINE system.                                                                                                      |
| 4 | Report on the launch and implementation of the REGES-ONLINE system, issued by Vodafone Romania S.A., dated 7 March 2025.               | This report documents the findings and results of the verification and validation activities carried out after the launch and initial operation of the integrated IT system.        |
| 5 | REGES-ONLINE Integration Report issued by Vodafone Romania S.A., dated 24 February 2025.                                               | This report explains the technical architecture of the REGES-ONLINE platform and describes how it connects with external systems, third-party applications and public institutions. |

|   |                                       |                                                                                                                                                        |
|---|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|
| 6 | Webpage of the REGES-ONLINE platform. | A link to the REGES-ONLINE platform <a href="https://reges.inspectiamuncii.ro/">https://reges.inspectiamuncii.ro/</a> , accessible after registration. |
|---|---------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------|

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

#### **The REGES-ONLINE system is functional [...]**

The REGES-ONLINE system was developed and implemented under Contract No. 612/DE.30.05.2024 (Evidence No. 2), signed on 30 May 2024 between Romania's Labour Inspectorate and Vodafone Romania SA. Article 4 of the contract defines the scope of the engagement, which includes the provision of hardware and software infrastructure, as well as warranty, maintenance, and technical support services for the use of the REGES-ONLINE system. The REGES-ONLINE system is a real-time, centralised online General Register of Employees, run by the Labour Inspectorate, where employers enter and manage official employment contract data, and employees can check their contract details digitally. It also provides general information on legal and practical aspects of employment.

The Certificate of completion (Evidence No. 3), related to Contract No. 612/DE.30.05.2024, certifies that the REGES-ONLINE system has been implemented correctly and accepted by the beneficiary, the Labour Inspectorate. It confirms that all contractual obligations and requirements outlined in the contract were met. The REGES-ONLINE system's source code and documentation have been handed over, and hardware and software products have been received. The Labour Inspectorate has accepted the system and rated it "very good".

The REGES-ONLINE system is functional, which is proved by the availability of the mobile application "Inspectia Muncii" downloadable from the Google Play Store and App Store, as well as by the accessibility of the webpage "Authenticate in REGES" where any citizen can obtain his/her REGES-ONLINE statement.

In addition, any employer, through an employee or service provider who holds a digital signature or is identified by RoEID, can operate in the REGES-ONLINE system. The Commission services accessed the webpage link provided by the Romanian authorities on 24 February 2026 to verify that the platform is accessible online. This check was completed successfully, confirming that the REGES-ONLINE platform system is functional and accessible online following registration. To perform this check, the Commission services were able to log into the REGES-ONLINE system using an identification credential, confirming that the platform is operational and accessible online following registration.

The Report on the launch and implementation of the REGES-ONLINE system (Evidence No. 4) further confirms that the implementation of the integrated IT system has been successfully completed. The verification procedures carried out included hardware checks, software setup, data initialisation, and a preliminary testing of system functions. The test results indicate that all components are operating correctly, within expected performance limits, and without any significant alerts or identified security vulnerabilities.

**The REGES-ONLINE system is [...] interoperable, ensuring access by public authorities and institutions to register data at Application Programming Interface (API) level**

The REGES-ONLINE system provides two separate interoperability Application Programming Interfaces (APIs). As explained on page 5 of the REGES-ONLINE Integration Report (Evidence No. 5), the “REGES-ONLINE system exhibits a separate interoperability API”, covering two categories of external systems: third-party systems and partner systems. Third-party systems refer to employers’ systems, which are used to submit employment-related data, such as employment contracts, employee records, and contract amendments, to the register through the dedicated API component. Partner systems refer to the systems of public authorities and institutions that have concluded cooperation protocols with the REGES-ONLINE system operator, the Labour Inspectorate. Romanian public authorities and institutions can access the register through a separate API, where such access is granted on the basis of legal obligations and established cooperation protocols. This access enables the extraction of employment-related data as well as the electronic submission, registration, and updating of the data in the system.

The Integration report (pages 4-5) states that the platform was “developed on the basis of an API ready strategy”, enabling communication between the IT systems of the Romanian public administration. This includes the systems of the National Agency for Fiscal Administration, the National Institute of Statistics, the National Agency for Payments and Social Inspection, the National Agency of Civil Servants and the National Public Pension House. The REGES-ONLINE platform therefore enables communication and data exchange between different IT systems of Romania’s public administration, thereby confirming its interoperability.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C7]-I[I7.0]-T[172] Entry into use of standard electronic forms in public procurement procedures

**Related Measure:** RO-C[C7]-I[I7.0] Introduction of electronic forms (eForms) in the field of public procurement

**Qualitative indicator:** Standard electronic forms for procurement procedures in use

**Time:** Q2 2023

### 1. Context:

The objective of this investment is to introduce standard electronic forms for the publication of public procurement notices. The investment consists in analysing the established standards to introduce standard electronic forms in the field of public procurement.

Milestone 172 concerns the use and integration of standard electronic forms in the Romanian public procurement service.

Milestone 172 is the sole milestone under this investment.

### 2. Evidence provided:

|   | Name of the evidence                                                             | Short description                                                                                                                                                                                                                                                           |
|---|----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover Note                                                                       | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.                                                                                                                                                  |
| 2 | Electronic Public Procurement System - Subsequent Contract No. 7 of 6 June 2023. | Document signed by the administrator of the Sistemul Electronic de Achizitii Publice (SEAP) platform (Autoritatea pentru Digitalizare Romaniei – ADR) and the contractor (S.C. Altime S.A) detailing the software requirement specifications for electronic standard forms. |
| 3 | Commissioning report No. 11346 of 3 July 2023.                                   | Document signed by ADR Reception Committee and Altime S.A approving the technical tests of the products related to the capacity for normal operation and product quality assurance (stage two).                                                                             |
| 4 | Receipt report No. 11345 of 3 July 2023.                                         | The document signed by ADR Reception Committee certifies that the eForms functionalities (stage two) were developed and that they will be integrated in the SEAP platform.                                                                                                  |
| 5 | Certificate of acceptance No. 11340 of 30 June 2023.                             | The document signed by the ADR Acceptance Committee confirms that the committee verified the provision of services related to eForms (stage two).                                                                                                                           |
| 6 | Receipt report No. 12651 of 15 December                                          | The document signed by ADR Reception                                                                                                                                                                                                                                        |

|    |                                                          |                                                                                                                                                                                                                                                                                                             |
|----|----------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | 2022.                                                    | Committee certifies that the eForms functionalities (stage one) were developed and that they will be integrated in the SEAP platform.                                                                                                                                                                       |
| 7  | Certificate of acceptance No. 12650 of 15 December 2022. | The document signed by the ADR Acceptance Committee confirms that the committee verified the provision of services related to eForms (stage one).                                                                                                                                                           |
| 8  | Commissioning report No. 12652 of 15 December 2022.      | This document signed by ADR Reception Committee and Altimate S.A certifies that the technical tests of the products related to the capacity for normal operation and product quality assurance, according to the technical-economic documentation and approved technical-economic indicators are operating. |
| 9  | Annex No. 1 with screenshots from SEAP.                  | Screenshots No. 1.1-1.4 regarding the notifications published by the SEAP Operator in the News of Interest section of SEAP, accompanied by the eForms User Guide regarding the implementation of eForms-format notices.                                                                                     |
| 10 | Annex No. 2 with screenshots from SEAP.                  | Screenshots Nos. 2.1-2.5 taken from the search page and search results for Romania on the European TED platform and on SEAP platform.                                                                                                                                                                       |
| 11 | Annex No. 3 with screenshots from SEAP.                  | Screenshots nos. 3.1-3.4 taken from the public contracting authority manuals section of SEAP.                                                                                                                                                                                                               |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the target.

#### Entry into use of standard electronic forms in public procurement procedures.

The Electronic Public Procurement System (Sistemul Electronic de Achiziții Publice - SEAP) is Romania's mandatory electronic public procurement system, operated by the Authority for Digitalisation of Romania (ADR). Subsequent Contract No. 7 of 6 June 2023 (hereinafter referred to as "*the Subsequent Contract No. 7*") (Evidence No. 2) sets the technical requirements and implementation steps for integrating EU-standard eForms as established in the Commission Implementing Regulation (EU) 2019/1780. The implementation took place in two stages due to technical requirements. ADR verified, accepted and put into operation through the relevant acceptance certificates, receipt reports and entry-into-operation reports the implementation of the contract, which are detailed below. TED (Tenders Electronic Daily) is the online version of the Supplement to the Official Journal of the European Union (OJEU), specifically dedicated to public procurement. TED has implemented a system for publishing notices in OJEU in electronic form, providing contracting authorities two ways of completing them. Romania uses one of the methods,

with SEAP being the only eSender. Annex No. 1 with screenshots from SEAP (Evidence No. 9) presents the notifications published in the News of Interest section of SEAP, accompanied by the eForms User Guide regarding the implementation of eForms-format notices which are also available on the website and can be accessed by any interested natural or legal person. Annex No. 2 with screenshots from SEAP document (Evidence No. 10), and more specifically screenshots 2.1. and 2.2. show that during the period 4 December 2023 – 9 April 2026 Romanian contracting authorities submitted 92.602 notices through SEAP in the new eForms format, which were published in TED (OJEU). Moreover, screenshots 2.3, 2.4 and 2.5 of the same document present the SEAP notice no. CN1064978 – TED notice No. 80546-2024 which was published in TED and in SEAP on 7 February 2024. These screenshots attest the use of standard eForms, following the requirements established in the Commission Implementing Regulation (EU) 2019/1780 of 23 September 2019. Annex No. 3 with screenshots from SEAP (Evidence No. 11) presents the screenshots of section Contracting Authority Manuals in SEAP platform, showing a series of user manuals published which address the subject of the functionalities implemented for eForms, including the Award Documentation manual, Initiation Notices, Change notices and Award notices.

**Standard electronic forms for public procurement process are used and integrated in the Romanian Public Procurement service SEAP.**

SEAP is Romania's mandatory electronic public procurement system, used by public institutions to purchase goods, services, and works, being operated by ADR.

The Electronic Public Procurement System - Subsequent Contract No. 7 (Evidence No. 2) defines the technical requirements for implementing the standard European Union electronic forms for public procurement, as established in the Commission Implementing Regulation (EU) 2019/1780 of 23 September 2019 which sets the standard eForms for the publication of public procurement notices in the OJEU.

The Subsequent Contract No. 7 (Evidence No. 2) also defines the steps required to implement the eForms into the SEAP environment, including a complete redesign of the SEAP interface, aligning nomenclature with EU standards, updating system functionalities for data input in tender processes, and managing changes in procedure and contract data. Additionally, the contract specifies modifying how standard notices are displayed and integrated within procurement files to ensure regulatory compliance.

To achieve the implementation of standard eForms aligned with EU standards, Subsequent Contract No. 7 (Evidence No. 2) outlines ten eForms requirements to be fulfilled. These technical eForm requirements were planned to be implemented in two stages: stage 1 comprising six requirements to be completed by 15 December 2022, and stage 2 including four requirements scheduled for completion by 30 June 2023.

The Certificate of acceptance No. 12650 of 15 December 2022 (Evidence No. 7) issued by ADR and signed by ADR Acceptance Committee confirms that the committee verified the functioning of services related to eForms (stage 1). According to Receipt report No. 12651 of 15 December 2022 (Evidence No. 6) issued by the Authority for Digitalization of Romania (ADR) the services have been carried out as stipulated in the Subsequent Contract No. 7 (Evidence No. 2) and the functionalities of stage 1 will be integrated with the stage 2 phase in the SEAP environment. The Report on entry into operation No. 12652 of 15 December 2022 (Evidence No. 8) issued by ADR certifies that the technical tests for normal operation and product quality assurance, according to the technical-economic documentation and approved technical-economic indicators are in accordance with

technical requirements. Therefore, the implementation of stage 1 had been completed, accepted and put into operation in accordance with the contractual provisions and the specifications of the software requirements.

The Certificate of acceptance no. 11340 of 30 June 2023 (Evidence No. 5) issued by ADR is signed by the appointed Acceptance Committee within the institution, confirming the functioning of services related to eForms (stage 2). Furthermore, the Receipt report No. 11345 of 03 July 2023 (Evidence No. 4) issued by ADR and signed by the reception committee of ADR attests that the functionalities developed under stage 2, as per the Subsequent Contract No. 7 (Evidence No. 2) have been provided in accordance with the contract and are accepted without objection. The Report on entry into operation No. 11346 of 3 July 2023 (Evidence No. 3) attests that implementation of stage 2 had been successfully completed, accepted, and put into operation in line with the contractual provisions and software requirements specifications as mentioned in the Subsequent Contract No. 7 (Evidence No. 2).

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Target:** RO-C[C7]-I[I14.0]-T[182] Hubs that shall allow access to Internet Service Provider (ISP) services for public-interest institutions and entities

**Related Measure:** RO-C[C7]-I[I14.0] Increase of the resilience and cybersecurity of Internet Service Provider infrastructure services provided to public authorities in Romania

**Quantitative Indicator:** Number

**Baseline:** 0

**Target:** 41

**Time:** Q4 2024

### 1. Context:

The objective of this investment is to increase the resilience of the Internet Service Provider (ISP) infrastructure for the public authorities, while ensuring their cybersecurity. The investment consists in updating and expanding the gigabit internet access network for the public administration, upgrading the cybersecurity capabilities and securing the ISP services (DNS, web, e-mail, hosting).

Target 182 is the sole target under this investment and refers to hubs providing access to ISP services for public-interest institutions and entities.

### 2. Evidence provided:

|    | Name of the evidence                                                                                                                                                                                                  | Short description                                                                                                                                                                                                                                     |
|----|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1  | Cover Note                                                                                                                                                                                                            | Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled.                                                                                                                               |
| 2  | Justification Document No. 75209 of 4 February 2025 on the Implementation of Investment 14.                                                                                                                           | This justification document issued by the Service Telecommunication Services (STS) provides details on the implementation of the investment in compliance with the description of the target.                                                         |
| 3  | Report No. 1 of 6 December 2025 on the entry into operation of hardware and software procured under investment 14.                                                                                                    | Official certificate of completion issued by STS in accordance with national legislation highlighting that all purchased hardware and software products have been put into service.                                                                   |
| 4. | Financing Contract No. 760002 of 19 October 2022 for increasing the resilience and cybersecurity of the ISP infrastructure provided for the Romanian public authorities with Special Telecommunication Service (STS). | Financing contract concluded between the Ministry of Research, Innovation and Digitalization (MCID) (now Ministry of Economy, Digitalisation, Entrepreneurship and Tourism - MEDAT) and the Special Telecommunication Services (STS) for the project. |
| 5  | On-site Inspection Report No. 183613 of 8 December 2025.                                                                                                                                                              | On-site Inspection report between the Ministry of Economy, Digitalisation, Entrepreneurship and Tourism (MEDAT)                                                                                                                                       |

|  |  |                                                                                                                                        |
|--|--|----------------------------------------------------------------------------------------------------------------------------------------|
|  |  | and the Special Telecommunication Services (STS) with the conclusions of the verification team for investment 14 of Digital component. |
|--|--|----------------------------------------------------------------------------------------------------------------------------------------|

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the target.

#### **Hubs that shall allow access to Internet Service Provider (ISP) services for public interest institutions and entities.**

Article 1 of the Financing Contract No. 760002 of 19 October 2022) for increasing the resilience and cybersecurity of the ISP infrastructure provided for the Romanian public authorities signed with Special Telecommunication Service (STS) (hereinafter referred to as *"the Financing Contract"*) (Evidence No. 4) stipulates that the contractor will ensure that hubs provide access to ISP services for public interest institutions and entities at central and local level. Furthermore, Report No. 1 of 6 December 2025 on the entry into operation (Evidence No. 3) of hardware and software procured under the Investment 14 (hereinafter referred to as *"Report No. 1 on the entry into operation"*) details the hardware and software equipment provided for each hub. On-site Inspection Report No. 183613 of 8 December 2025 (Evidence No. 5) (hereinafter referred to as *"On-site Inspection Report"*) confirms that the verification team from the Ministry of Economy, Digitalisation, Entrepreneurship and Tourism (MEDAT) had performed on-site checks certifying that all hardware and software were functioning and the project was completed by 28 December 2024 as per the Financing Contract (Evidence No. 4), including that hubs have access to ISP services for public interest institutions and entities.

#### **Every county in Romania shall have a hub.**

According to Law No. 290 of 29 November 2018, published in the Official Journal No. 1052 of 12 December 2018, Romania is administratively organized at county level, comprising 41 counties and the Municipality of Bucharest. Article 1 of the Financing Contract (Evidence No. 4) sets the target of 41 hubs to be delivered by the contractor. Report No. 1 of 6 December 2025 on the entry into operation (Evidence No. 3) confirms that equipment and technologies for the respective hubs are located in multiple locations within the 40 counties of Romania and several locations in Bucharest. According to Annex of Law No. 290 of 29 November 2018, published in the Official Journal No. 1052 of 12 December 2018, the headquarters of the Ilfov County are in the Municipality of Bucharest. Therefore, the Special Telecommunication Services (STS) locations serving the Ilfov county are located in the Municipality of Bucharest. This arrangement does not alter the scope, functionality, or coverage of the investment, nor does it reduce accessibility or capacity as every county in Romania is covered by a hub.

#### **Each of these hubs shall be connected to a national Internet distribution network, with multiple Tier I suppliers and associated Security mechanisms.**

##### **Security services which shall be provided:**

- Anti-dos (denial-of-service) protection at multiples of 10Gbps
- Associated Computer Emergency Response Team (CERT) services (security audiences, monitoring of security events throughout the network, response to security incidents)
- Associated Security Operations Centres services (notification and escalation mechanisms for beneficiaries)

- **Reputation and filtering mechanisms for malicious traffic based on reputation and malicious residence at the level of DNS services provided to beneficiaries**
- **Sandbox analysis for the provided services.**

The Financing Contract (Evidence No. 4), Article 1 (1), stipulates that the contractor must ensure that hubs provide ISP services to public interest institutions and entities at both central and local levels. By connecting the central and local level, a national Internet distribution network is created connecting the county hubs with the central hub. According to Law No. 92/1996 of 30 July 1996, published in Official Journal No. 169 of 30 July 1996 the Special Telecommunication Service (STS) is responsible for ensuring secure, reliable and continuous telecommunications services for public authorities. In addition, under Emergency Ordinance No. 104 of 27 June 2021, operators of essential services are required to implement appropriate technical and organisational measures to guarantee the resilience, redundancy, availability and continuity of network and information systems, meaning that they would need to rely on multiple suppliers for their networks. Moreover, the Justification Document No. 75209 of 4 February 2025 (Evidence No. 2) on the Implementation of Investment 14 (hereinafter referred to as "*the justification document*") mention on page 2 that the internet access services are carried out centrally through the Bucharest Hub. The Bucharest Hub is interconnected with several Tier I suppliers The implementation of the required security mechanisms is documented in the Entry-into-Operation Report (Evidence No. 3), which details the activation of the relevant services and the associated subscriptions covering Anti-DDoS protection, Associated Computer Emergency Response Team (CERT) and (Security Operations Centres) SOC support, reputation-based filtering, and sandbox analysis. These software solutions are implemented centrally and the interconnection between the locations allows all hubs to benefit from these services. The On-site Inspection Report (Evidence No. 5) signed by the Ministry of Economy, Digitalisation, Entrepreneurship and Tourism verification committee certifies that all installed hardware and software components were operational and that the project had been completed in accordance with the contractual specifications and technical requirements mentioned in Financing Contract (Evidence No. 4) and the Entry-into-operation report (Evidence No. 3). Hence, the On-site Inspection Report confirms that hubs provide ISP services to public interest institutions and that the security mechanisms, as described in the Entry-into-operation report, are completed and operational.

In addition to the above, the Justification Document (Evidence No. 2) further details the implementation of the investment in compliance with the target description, as follows: Anti-DDoS (denial-of-service) protection at multiples of 10Gbps are presented in a screenshot in figure 1 (page 4). Sandbox analysis for the services provided is presented in figure 14 (page 17-18). On pages 5 - 7 the CERT services implemented at national level are presented in figures 2, 3 and 4. On pages 12 - 13 the SIEM console is presented for detection and escalation of cyberthreats ensuring the Associated Security Operations Centres services (notification and escalation mechanisms for beneficiaries). For the reputation and filtering mechanisms for malicious traffic the screenshots on page 8 and 15 show the DNS filtering while on page 9 the filtering and blocking suspicious domains is shown.

**The investment consists in updating and expanding the gigabit internet access network for the public administration, upgrading the cybersecurity capabilities and securing the ISP services (DNS, web, e-mail, hosting).**

As stated above, the beneficiary, Special Telecommunication Services, is responsible for ensuring secure, reliable and continuous telecommunications services for public authorities and is required to implement appropriate technical and organisational measures to guarantee the resilience, redundancy, availability and continuity of network and information systems. With the installed CISCO and Juniper routers at STS locations, presented in the justification document (Evidence No. 2) and the Report No. 1 on entry into operation (Evidence No. 3) the existing network has been updated and expanded as also confirmed by the verification committee of the Ministry of Economy,

Digitalisation, Entrepreneurship and Tourism in the On-site Inspection Report (Evidence No. 5). The security services provided are shown in the screenshots included in the justification document (Evidence No. 2), Report No. 1 on entry into operation (Evidence No.3) attests the entry into force of the security systems, while the On-site Inspection Report (Evidence No. 5) confirms the completion of software solutions and the project.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C8]-R[R3.0] M[201] Spending review in health and education sectors conducted

**Related Measure:** RO-C[C8]-R[R3.0] Improving the budgetary programming mechanism

**Qualitative Indicator:** Publishing the analysis of spending in the fields of education and health

**Time:** Q2 2023

### 1. Context:

Milestone 201 is part of reform C8.R3, which aims at enhancing the budgetary programming mechanism. This measure consists in the adoption of legal act(s) to ensure multi-annual budgetary planning, enhance the prioritisation of public investment and introduce systematic spending reviews.

Milestone 201 requires that the spending review in the health and education sectors is conducted, and that the analysis is published.

Milestone 201 is the third milestone of the reform, and it is accompanied by milestone 202 in this payment request, related to the adoption of a multi-annual strategy and calendar for a systematic expenditure review across all sectors. Milestone 201 follows the completion of milestone 199 and milestone 200, related to the entry into force of the amended regulatory framework to ensure multiannual budgetary planning for the significant public investment projects and have an ex-post evaluation of expenditure reviews made by the Fiscal Council and to the entry into force of the government decision for the approval of the methodology for drawing up, monitoring and reporting of the budgetary programmes respectively.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                    | Short description                                                                                                          |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                                                                              | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled. |
| 2 | Copy of Memorandum of the Ministry of Finance No. 475742 of 16 June 2022 titled "Memorandum approving the framework for the review of public expenditure and the theme of the analysis in the field of health, 2022-2023", approved by the Government on 3 August 2022. | Memorandum of the Ministry of Finance presenting the spending review on Health.                                            |

|   |                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                                                                                                                                                                                      |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 3 | Copy of Memorandum of the Ministry of Finance No. 478523 of 19 September 2022 titled "Memorandum approving the framework for the review of public expenditure and the theme of the analysis in the field of Education, 2022-2023", approved by the Government on 21 September 2022.                                                                                                                                                             | Memorandum of the Ministry of Finance presenting the spending review on Education.                                                                                                   |
| 4 | Copy of Ministry of Finance Order No. 3245 of 28 September 2022/ Ministry of Health Order No. 2853 of 30 September 2022/ National Health Insurance House Order No. 801 of 30 September 2022, titled "on the establishment and the activity of the Working Group that carry out the public spending review, according to the Memorandum approving the framework and the theme of the public spending review in Health, in the period 2022-2023". | Joint Order of the Ministry of Finance, Ministry of Health, National Health Insurances House, establishing thematic working groups with representatives from the three institutions. |
| 5 | Copy of Ministry of Finance Order No. 3246 of 28 September 2022/ Ministry of Education Order No. 5736 of 29 September 2022, titled "on the establishment and the activity of the Working Group that carry out the public spending review according to the Memorandum approving the framework and the theme of the public spending review in Education, in the period 2022-2023".                                                                | Joint Order of the Ministry of Finance and Ministry of Education establishing thematic working groups with representatives from the two institutions.                                |
| 6 | Copy of Report by the Ministry of Finance, Ministry of Health and the National Health Insurance House titled "Streamlining the Public Expenditure on Health", published in 2023, and a link to the report <a href="https://mfinante.gov.ro/static/10/Mfp/buget/anexamemorandumsanatate_21122023.pdf">https://mfinante.gov.ro/static/10/Mfp/buget/anexamemorandumsanatate_21122023.pdf</a> .                                                     | Report collecting data, finalising analysis and presenting results of spending review in health. The report is also available online.                                                |
| 7 | Copy of Report by the Ministry of                                                                                                                                                                                                                                                                                                                                                                                                               | Report collecting data, finalising analysis                                                                                                                                          |

|    |                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                         |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | Finance and the Ministry of Education titled “Analysis and Efficiency Report Public Spending on Education”, published in 2023, and a link to the report <a href="https://mfinante.gov.ro/static/10/Mfp/buget/anexamemorandum_educatie_21122023.pdf">https://mfinante.gov.ro/static/10/Mfp/buget/anexamemorandum_educatie_21122023.pdf</a> . | and presenting results of spending review in education. The report is also available online.                                                                                                                            |
| 8  | Copy of Letter No. 22295 of 4 August 2022, submitted by the General Secretariat of the Government to the Ministry of Finance.                                                                                                                                                                                                               | Letter No. 22295 of 4 August 2022, confirming the Prime Minister’s approval of Memorandum No. 475742 of 16 June 2022. The letter includes as attachment a copy of the Memorandum signed by the Prime Minister.          |
| 9  | Copy of Letter No. 26835 of 23 September 2022 submitted by the General Secretariat of the Government to the Ministry of Finance.                                                                                                                                                                                                            | Letter No. 26835 of 23 September 2022, confirming the Prime Minister’s approval of Memorandum No. 478523 of 19 September 2022. The letter includes as attachment a copy of the Memorandum signed by the Prime Minister. |
| 10 | Copy of Minutes No. 478905, dated 14 October 2022, of the kick-off meeting of the working groups on spending reviews for education and health, approved by a Secretary of State of the Ministry of Finance.                                                                                                                                 | The minutes of the meeting cover the orders that established the working groups, the meeting’s purpose, participants’ contributions, and the main conclusions.                                                          |
| 11 | Copy of the Minutes of the meetings dated on 5 May 2022, 10 May 2022, 12 May 2022 of the working groups on spending reviews for education and health, approved by a General Director of the Ministry of Finance.                                                                                                                            | The minutes of the meetings include the list of participants, topics of discussion, and main conclusions.                                                                                                               |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

**The spending review in health and education sectors shall be carried out in three main steps:**

- 1. Memorandum in the Government presenting the spending review on Health and Education.**

Memorandum of the Ministry of Finance No. 475742 of 16 June 2022 titled “Memorandum approving the framework for the review of public expenditure and the theme of the analysis in the field of Health, 2022-2023” (Evidence No. 2), approved by the Government on 3 August 2022, as indicated in the letter of the General Secretariat of the Government No. 22295 of 4 August 2022 (hereinafter referred to as “*Memorandum for the spending review in health*”) (Evidence No. 8) and

Memorandum of the Ministry of Finance No. 478523 of 19 September 2022 titled “Memorandum approving the framework for the review of public expenditure and the theme of the analysis in the field of Education, 2022-2023” (Evidence No. 3), approved by the Government on 21 September 2022, as indicated in the letter of the General Secretariat of the Government No. 26835 of 23 September 2022 (hereinafter referred to as “*Memorandum for the spending review in education*”) (Evidence No. 9), present the context, objectives, framework and themes of the spending reviews on health and education.

Both memoranda (Evidence No. 3 and Evidence No. 4) follow the same structure: Chapter 1 presents the context of the spending reviews, Chapter 2 the general objectives and Chapter 3 the main steps in conducting the spending reviews. Chapter 4 contains the respective frameworks and themes of the spending reviews, detailing the context, establishing the themes, objectives, targets, terms of reference, institutions to be involved, setting up of the working groups and a calendar for the reviews.

## **2. Establishment of thematic working groups with representatives of Ministry of Finance, Ministry of Health, National Health Insurances House/Ministry of Education.**

Article 1 of Ministry of Finance Order No. 3245 of 28 September 2022/Ministry of Health Order No. 2853 of 30 September 2022/National Health Insurance House Order No. 801 of 30 September 2022, titled “on the establishment and the activity of the Working Group that carry out the public spending review, according to the Memorandum approving the framework and the theme of the public spending review in Health, in the period 2022-2023” (hereinafter referred to as “*Joint Order on the establishment of the working group in health*”) (Evidence No. 4) establishes the thematic working groups with representatives of the Ministry of Finance, Ministry of Health and National Health Insurance House. Article 1(2) of the Joint Order on the establishment of the working group in health states that the working group consists of senior representatives of the Ministry of Finance, the Ministry of Health and the National Health Insurance Agency. The Annex to the Order lists the names of 16 senior representatives.

Article 1 of Ministry of Finance Order No. 3246 of 28 September 2022/Ministry of Education Order No. 5736 of 29 September 2022, titled “on the establishment and the activity of the Working Group that carry out the public spending review according to the Memorandum approving the framework and the theme of the public spending review in Education, in the period 2022-2023” (hereinafter referred to as “*Joint Order on the establishment of the working group in education*”) (Evidence No. 5) establishes thematic working groups with representatives of the Ministry of Finance and the Ministry of Education. Article 1(2) of the Joint Order on the establishment of the working group in education states that the working group consists of senior representatives of the Ministry of Finance and the Ministry of Education. The Annex to the Joint Order lists the names of the 13 senior representatives participating in the working group.

Article 1(5) of the Joint Order on the establishment of the working group in health (Evidence No. 4) and Article 1(5) of the Order on the establishment of the working group in education (Evidence No. 5) list the tasks of members of the working group, which include participating and engaging actively in meetings of the working group, providing data and analyses, contributing to the identification of areas where public funding is inefficient and proposing options to reallocate it. Article 1(7) of the two orders states that the working groups are to work in meetings organised monthly or whenever necessary. The authorities have provided copies of the minutes of the meetings for both working groups on education and health (Evidence No. 10 and Evidence No. 11).

## **3. Collection of data, finalisation of analyses and presentation of results.**

The 2023 report by the Ministry of Finance, Ministry of Health and Analysing and the National Health Insurance House titled “Streamlining The Public Expenditure On Health” (hereinafter referred to as “*report on spending review in health*”) (Evidence No. 6) and the 2023 report by the Ministry of Finance and the Ministry of Education titled “Analysis And Efficiency Report Public Spending On Education” (hereinafter referred to as “*report on spending review in education*”) (Evidence No. 7) present an assessment of health and education systems respectively, collecting data for the period 2017-2019 (or 2021, where figures were available) from the Ministry of Finance, Ministry of Health, National Health Insurance House, Ministry of Education and Eurostat, and presenting the analyses. Page 1 of the report on the spending review in education lists the team that contributed to the report, including the members of the working group (Evidence No. 7). Similarly, page 7 of the report on the spending review in health notes that the Ministry of Finance prepared this report following the activities of the working group established by the Joint Order on the establishment of the working group in health (Evidence No. 6). Specifically, concerning data collection and the finalisation of analyses: data is summarised in figures and tables, and the source of data is mentioned on the bottom of each 17 figures and 7 tables throughout the report on spending review in health. In the report on spending review in education, data is summarised in tables, charts and figures, and the source of data is mentioned on the bottom of the 61 figures presented throughout the report.

Chapter 7 of the report on spending review in education and Part A II-A of the report on spending review in health finalise the analyses and present recommendations to make spending more efficient in the two sectors.

#### **Publishing the analysis of spending in the fields of education and health**

The Romanian authorities submitted both copies of and hyperlinks to the websites where the report on spending review in health and the report on spending review in education were published. The Commission services accessed the links provided by the authorities on 19 January 2026 to verify that the reports containing the analysis of spending in the fields of education and health have been published. This check was completed successfully, confirming that the analyses of spending in the fields of education and health have been published.

#### **4. Commission Preliminary Assessment: Satisfactorily fulfilled.**

**Number and name of the Milestone:** RO-C[C8]-R[R3.0]-M[202] Adoption of a multi-annual strategy and calendar for a systematic expenditure review across all sectors

**Related Measure:** RO-C[C8]-R[R3.0] Improving the budgetary programming mechanism

**Qualitative Indicator:** Memorandum approved by the Government and published

**Time:** Q2 2024

### 1. Context:

Milestone 202 is part of reform C8.R3, which aims at enhancing the budgetary programming mechanism. This measure consists in the adoption of legal act(s) to ensure multi-annual budgetary planning, enhance the prioritisation of public investment and introduce systematic spending reviews.

Milestone 202 requires the adoption of a multi-annual strategy and calendar for a systematic expenditure review across all sectors.

Milestone 202 is the third milestone of the reform, and it is accompanied by milestone 201, related to the adoption of a multi-annual strategy and calendar for a systematic expenditure review across all sectors. Milestone 202 follows the completion of milestone 199 and milestone 200, related to the entry into force of the amended regulatory framework to ensure multiannual budgetary planning for the significant public investment projects and have an ex-post evaluation of expenditure reviews made by the Fiscal Council, and to the entry into force of the government decision for the approval of the methodology for drawing up, monitoring and reporting of the budgetary programmes respectively. Milestone 202 is the final milestone in the implementation of the reform.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                          | Short description                                                                                                                 |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                    | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.        |
| 2 | Copy of the Memorandum of the Ministry of Finance No. 476724 of 30 June 2023 titled "Approval of the spending review strategy for the period 2024-2030".                                                      | Memorandum of the Ministry of Finance presenting the spending review strategy for the 2024-2030 period.                           |
| 3 | Copy of Law No. 9/2025 on the 2025 State Budget, published in the Official Journal No. 118 of 10 February December 2025 and its Annex 3/01 published in the Official Journal No. 118 bis of 10 February 2025. | Law on the State Budget 2025, reflecting the measures and proposals resulting from the spending reviews for health and education. |

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| 4 | Copy of Law No. 345 of 10 November 2023 for the approval of Government Emergency Ordinance No. 187/2022 <i>“on measures for the fulfilment of milestones in the National Recovery and Resilience Plan in the area of public investment and spending reviews”</i> , published in the Official Journal No. 1030 of 13 November 2023. | Law approving the Government Emergency Ordinance introducing systematic spending reviews and mandating the Fiscal Council to yearly issue an opinion on the outcome of the expenditure analysis starting with the 2024 budget.                |
| 5 | Copy of 2024 Annual Report prepared by the Fiscal Council, adopted by members of the Council on 8 September 2025 and a link to the report <a href="#">EN CF RA 2024.pdf</a> .                                                                                                                                                      | 2024 Annual Report which includes an ex-post evaluation of the spending reviews in the education and health sectors.                                                                                                                          |
| 6 | Copy of the 2024–2030 Multi-Annual Strategy on Spending Reviews and a link to the strategy <a href="#">StrategieAECPEENG.pdf</a> , alongside Annex 1b to the strategy containing the timetable for the spending reviews processes, and a link to the Annex 1b <a href="#">anexa1bSACP2024-2030 2072023.pdf</a> .                   | The strategy sets out the legal framework, the calendar for 2024–2030, the objectives of the spending reviews, and the provisions for implementation, monitoring, and reporting.                                                              |
| 7 | Copy of Law No. 368/2022 on the 2023 State Budget, published in the Official Journal No. 1214 of 19 December 2022, and Annex 3 to Law No. 368/2022, published in the Official Journal No. 1214 of 19 December 2022.                                                                                                                | The law establishes the national budget for 2023, including revenues, expenditures, and the legal framework for budget execution. Annex 3 provides the list of all principal spending units and their respective budget allocations for 2023. |
| 8 | Copy of Education Spending Review Report, and a link to the report <a href="#">DIAGNOZA ÎNVĂȚĂMÂNTULUI PREUNIVERSITAR</a> .                                                                                                                                                                                                        | The report analyses Romania’s education system, including legal framework, institutions, funding, performance, and equity, and presents measures to improve public expenditure efficiency in pre-university education.                        |
| 9 | Copy of Health Spending Review Report, and a link to the report <a href="#">anexamemorandumsanatate 21122023.pdf</a> .                                                                                                                                                                                                             | The report analyses Romania’s health system, including legal framework, institutions, funding, performance, and equity, and presents measures to improve public expenditure efficiency in the health sector.                                  |

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| 10 | <p>Copies of Memoranda of the Ministry of Finance approved by the Government for the following spending reviews:</p> <p>(i) <i>Education</i> – Memorandum No. 478523 of 19 September 2022;</p> <p>(ii) <i>Health</i> – Memorandum No. 475742 of 16 June 2022;</p> <p>(iii) <i>Environment</i> – Memorandum No. 472367 of 23 February 2024;</p> <p>(iv) <i>Transport</i> – Memorandum No. 546543 of 5 August 2025.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>Memoranda of the Ministry of Finance presenting the spending review on (i) Education, (ii) Health, (iii) Environment, and (iv) Transport.</p>                                                                                                                                                                                                                                             |
| 11 | <p>Copies of Ministerial Orders establishing the working groups for the following spending reviews:</p> <p>(i) <i>Education</i><br/>Copy of Ministry of Finance Order No. 3246 of 28 September 2022/ Ministry of Education Order No. 5736 of 29 September 2022 (joint order).</p> <p>(ii) <i>Health</i><br/>Copy of Ministry of Finance Order No. 3245 of 28 September 2022/ Ministry of Health Order No. 2853 of 30 September 2022/ National Health Insurance House Order No. 801 of 30 September 2022 (joint order).</p> <p>(iii) <i>Transport</i><br/>Copy of Ministry of Finance Order No. 1797 of 31 October 2025;<br/>Copy of Ministry of Transport Order No. 2125 of 21 November 2025 (including its Annex).</p> <p>(iv) <i>Environment</i><br/>Copy of Ministry of Finance Order No. 2168 of 19 June 2024 (including its Annex);<br/>Copy of Ministry of Environment, Water and Forestry Order No. 1334 of 12 June 2024 (including its Annex).</p> | <p>These Ministerial Orders establish the working groups for the spending reviews. Each working group comprises representatives from multiple ministries and public institutions. The Orders have been issued either jointly, covering all participating ministries and institutions in a given spending review, or individually at the level of the respective ministry or institution.</p> |

### 3. Analysis:

The justification and substantiating evidence provided by Romanian authorities cover all constitutive elements of the milestone.

**Adoption of a multi-annual strategy and calendar for a systematic expenditure review across all sectors. Furthermore, in line with the description of the measure, this measure consists in the adoption of legal act(s) to [...] introduce systematic spending reviews. Memorandum for approval by the Government shall set out the areas subject of future expenditure reviews, their timetable, the responsible institutions and the setting up of working groups for each area under consideration.**

The 2024–2030 Multi-Annual Strategy on Spending Reviews (Evidence No. 6) was adopted by the Government of Romania on 13 July 2023 through Memorandum No. 476724 of 30 June 2023, titled *“Approval of the spending review strategy for the period 2024-2030”* (Evidence No. 2). Annex 1b to the Strategy contains the planning of public expenditure analyses for the period 2024–2030. The area subject to the spending review are structured in line with the institutional configuration of the state budget. According to the Annex 3 to Law No. 368/2022 on 2023 state budget law (Evidence No. 7), there are 57 Chief Authorising Officers. As indicated on page 18 of the Strategy, these 57 Chief Authorising Officers have been grouped into 10 sectors, which are reflected in the public spending review planning as follows: (i) Education, (ii) Health, (iii) Culture, recreation, and religion, (iv) Public development services, housing, environment, and water, (v) Transport, (vi) Research, (vii) Agriculture, forestry, fisheries, and hunting, (viii) Social insurance and assistance, and (ix) Public order and national security.

Law No. 345 of 10 November 2023 for the approval of the Government Emergency Ordinance No. 187/2022 on measures for the fulfilment of milestones under the National Recovery and Resilience Plan in the area of public investment and spending reviews was published in the Official Journal No. 1030 of 13 November 2023 (Evidence No. 4). According to the provisions in the Article 12(3) of Law No. 24/2000 on legislative technique rules for drafting legal acts, the Ministerial Order entered into force on the date of its publication in the Official Journal. Article II of Law No. 345 establishes that, by 15 July each year, the Government approves through a memorandum the framework, themes, reports, and measures for spending reviews carried out by the Romanian Ministry of Finance and Chief Authorising Officers. The same article underlines that the Ministry of Finance coordinates all analyses, has unrestricted access to necessary documents and information, prepares the multi-annual strategy for spending reviews, conducts periodic analyses with Chief Authorising Officers to identify measures for greater efficiency, requests reports from control and audit bodies, sets expenditure limits and estimates for analysed institutions, and monitors implementation, reporting annually by the end of June.

Annex 1b to the Memorandum contains a table, which sets out the areas subject to expenditure reviews for the period 2024-2030, their timetable, and the responsible ministries and public institutions. For each spending review, the institutions involved are determined according to the specific topic under analysis. According to page 13 of the Strategy, for each of the 10 sectors/areas under review, the Ministry of Finance prepares a draft Memorandum approving the spending review framework and theme. This memorandum formally launches the review and clearly defines the theme, the institutions subject to review, the terms of reference, the working groups, and the timetable. The terms of reference set out key elements such as the objective, scope or sector (including its main characteristics), context, level (strategy, policy, programme, project), and type (investment/infrastructure, institutional reform or social reform).

Out of the 10 spending reviews scheduled for 2024–2030, three (education, health and environment) have been completed, while the transport review is currently ongoing. For these four reviews, the Government approved four memoranda (Evidence No. 10) and the Ministry of Finance together with the other responsible ministries and public institutions issued 6 corresponding Ministerial Orders establishing the respective working groups (Evidence No. 11). For the remaining review areas, working groups will be established prior to the formal launch of each review. As indicated in Annex 1b to the Strategy, certain spending reviews are scheduled for 2028 and 2029. Establishing working groups several years in advance would not be justified, particularly in view of potential staff turnover.

**The 2024 draft budget shall reflect the measures and proposals resulting from the spending reviews for health and education.**

The Romanian authorities confirmed that recommendations from the spending review were reflected in the 2025 budget (Evidence No. 1), for example:

- On education:
  - Recommendation No. 6 from the Education Spending Review Report (page 101, Evidence No. 8) concerns the operationalisation of the Remedial Learning Programme (pilot) for 2024–2028. This proposal is reflected in the Annex 3/01 to the 2025 budget (Evidence No. 3, programme sheet at pages 7174-7189), under the Pre-University Education Programme – code 2510 – Objective: Increasing access to and participation in equitable and quality education for all children and students in pre-university education. One specific output indicator identified in the spending review is reflected in the Annex 3/01, namely the number of schools that apply the remedial programme – code 8661, mentioned at page 7178.
  - Recommendation No. 5 from the Education Spending Review Report (page 99, Evidence No. 8) concerns the implementation of a centralised public procurement system for goods and services through the National Office for Centralised Procurement (NOCP), applicable to the Ministry of Education and Research (MER) and its subordinated or coordinated institutions. This proposal is reflected in the Annex 3/01 to the 2025 budget (Evidence No. 3, programme sheet at pages 7190-7202), under the Management and Administration Programme – code 2511 – Objective: Increasing the efficiency of planning, implementation, monitoring, and evaluation of managerial and administrative activities at the central level in the field of education. Four monitoring indicators identified in the spending review are reflected in Annex 3/01 (Evidence No. 3): (i) number of goods and services subject to centralised procurement at the level of the MER and its subordinated institutions, identified by the Procurement and Administrative Units within the Ministry – code 8639, page 7183; (ii) number of contract award procedures organised annually by NOCP for MER goods/services procured through the centralised system – code 8640, page 7193; (iii) number of framework agreements concluded annually by NOCP for MER goods/services procured through the centralised system – code 8641, page 7193; (iv) number of subsequent contracts concluded annually by MER and its subordinated or coordinated institutions based on these framework agreements – code 8642, page 7194.
- On health:
  - Recommendation No. 1 from the Health Spending Review Report (page 56, Evidence No. 9) concerns increasing the number of preventive consultations provided by family doctors to patients registered on their lists. This recommendation is reflected in the 2025 budget (Evidence No. 3, programme sheet at pages 257-263), under code 659 – National Programme on the Provision of Medical Services, Medicines, and Medical Devices within the Health System, measure 483 – Services provided by family physicians. One output indicator identified in the spending review is reflected in the Law No. 9/2025 on the 2025 State Budget (Evidence No. 3), namely the number of preventive consultations provided by family physicians for insured persons registered on their lists – code 8602, page 258.
  - Recommendation No. 3 from the Health Spending Review Report (page 59, Evidence No. 9) relates to rationalising medical leave expenditures by setting realistic levels for social health insurance benefits, both for temporary incapacity for work and for

medical leave granted in certain special circumstances. This recommendation is reflected in the 2025 budget (Evidence No. 3, programme sheet at pages 266-270), under code 2435 – Programme on Social Health Insurance Leaves and Allowances, measure Payment of sick leave benefits in case of illness – code 471, page 268. Two output indicators identified in the spending review are reflected in the Law No. 9/2025 on the 2025 State Budget (Evidence No. 3), namely: (i) number of sick leave certificates – code 6996, page 267, (ii) number of days of sick leave – code 8604, page 267, as well as two monitoring indicators: (i) average cost per sick leave certificate – code 6997, page 268, and (ii) Share of expenses with sick leaves – code 8605, page 268.

The Council Implementing Decision required that the 2024 draft budget shall reflect the measures and proposals resulting from the spending reviews for health and education. Due to the complexity of these reviews, more time was needed for the analysis than initially estimated. As a result, these recommendations were incorporated into the 2025 budget. While this represents a minimal substantive deviation from the requirement of the Council Implementing Decision, the recommendations from the spending reviews on education and health are reflected in the budget at the time of the assessment.

**Legal act(s) shall mandate the Fiscal Council to yearly issue an opinion on the outcome of the expenditure analysis starting with the 2024 budget.**

Government Emergency Ordinance No. 187/2022 on measures for the fulfilment of milestones in the National Recovery and Resilience Plan in the area of public investment and spending reviews was published in the Official Journal No. 1271 on 29 December 2022 (Evidence No. 4). According to the provisions in the Article 12(3) of Law No. 24/2000 on legislative technique rules for drafting legal acts, the Government Emergency Ordinance entered into force on the date of its publication in the Official Journal. Article III(1) of the Government Emergency Ordinance mandates the Fiscal Council with preparing and publishing an ex-post evaluation of the expenditure analysis conducted by the Romanian Ministry of Finance in the form of a report. Article III(3) specifies that the annual report is to be published by June each year. Article III(4) further clarifies that the annual report will also include an opinion on the spending reviews. The same article requires that the annual report will include an ex-post evaluation of the analysis of public expenditures.

The 2024 Annual Report prepared by the Fiscal Council, adopted on 8 September 2025 (Evidence No. 5), includes an opinion of the spending reviews in the education and health sectors previously conducted by the Romanian Ministry of Finance (Chapter III.6, pages 80–92). The report is available on the official website of the Fiscal Council. The Commission services accessed the link provided by the authorities on 16 February 2026 to verify the availability of the report, including the dedicated sub-chapter on the evaluation of public expenditure reviews in the education and health sector. The check was completed successfully, confirming that the Fiscal Council issued an opinion on the outcome of the expenditure analysis starting with the 2024 budget.

**5. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C8]-R[R4.0]- M[207] Legal act(s) to reduce and / or eliminate other tax incentives with the objective to simplify and make more efficient the tax system. Legislation to expand the green taxation.

**Related Measure:** RO-C[C8]-R[R4.0] Review of the tax framework

**Qualitative Indicator** Legal act(s) for reducing and/or eliminating tax incentives and expanding the green taxation

**Time:** Q1 2025

### 1. Context:

The objective of this measure is to the review Romania's tax framework. This measure consists in the adoption of legal act(s) to bring a fairer, and more efficient tax system capable of better supporting the economy and facilitating taxpayers' compliance.

Milestone 207 is the third and last milestone of the reform. It follows the completion of milestone 205 and milestone 206, related to the technical assistance report on the tax review and the reform of the tax regime for microenterprises.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                             | Short description                                                                                                                   |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                                       | Summary document justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.          |
| 2 | Copy of Law No. 141/2025 on certain fiscal- budgetary measures. The entered into force on 28 July 2025, i.e. three days after its publication in Official Journal No. 699 of 25 July 2025.                                       | This Law amends the tax code and includes a number of measures related to VAT, health insurance contribution and dividend taxation. |
| 3 | Copy of Law No. 239/2025 on establishing measures to recover and streamline public resources. The Law entered into force on 18 December 2025, three days after its publication in Official Journal No. 1160 of 15 December 2025. | This Law amends the tax code and includes measures related to the area of property taxation.                                        |
| 4 | Copy of Law No. 296 of 26 October 2023 regarding some fiscal-budgetary                                                                                                                                                           | This Law includes measures in the area of green taxation and sectoral tax exemptions and facilities.                                |

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|   | measures to ensure Romania's long-term financial sustainability. The provisions entered into force on 30 October 2023.                                                                       |                                                                                         |
| 5 | Copy of Government Emergency Ordinance No. 156/2024 regarding some fiscal- budgetary measures. The provisions entered into force on 1 January 2025.                                          | This Ordinance includes measures in the area of sectoral tax exemptions and facilities. |
| 6 | Copy of Government Emergency Ordinance No. 124/2024 of 23 October 2024. The provisions entered into force on 24 October 2024, the date of its publication in Official Journal No. 1069/2024. | This Ordinance includes measures in the area of property taxation.                      |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

**Legal act(s) shall implement the recommendations of the tax system review (see milestone 205) to ensure that the tax system contributes to promote and preserve sustainable economic growth.**

In 2025, Romania introduced a number of additional measures that implemented recommendations coming from the tax system review conducted by the World Bank, that aim at significantly increasing tax revenue (by close to 2% of GDP), restore fiscal sustainability, focusing on increasing the efficiency, fairness, and sustainability of the tax system via base broadening, cuts in undue tax incentives, and a strengthening of green taxation. As such, the implementation of these recommendations ensure that the tax system contributes to promote and preserve sustainable economic growth.

The measures that Romania are introduced by Law 141/2025, which was published on 25 July 2025 in the Official Journal No. 699/2025. In line with provisions in Article 12(1) of Law No. 24/2000 on the rules of legislative technique for the drafting of legislative acts, the Law entered into force on 28 July 2025, three days after its publication in the Official Journal (Evidence No. 2).

Article II of Law 141/2025 sets out the legal basis for the following changes in the tax system:

- An increase of the standard VAT rate from 19% to 21%.
- An increase in the VAT rate from 9% to 11% for several products including: the supply of human and veterinary medicines; food and beverages intended for human and animal consumption; irrigation water in agriculture; fertilizers and pesticides; water supply and sewerage services.
- An increase in the VAT rate from 5% to 11% applying to: the supply of thermal energy; the supply of firewood to individuals and legal entities; tickets to access to castles, museums, memorial houses, historical monuments, architectural and archaeological monuments, zoos,

and botanical gardens; school textbooks, books, newspapers, and magazines, in physical and electronic format, except those containing entirely or predominantly video or audio musical content, or those intended exclusively or primarily for advertising.

- An increase in the VAT rate from 9% to 21% VAT rate applying to sales of real estate, the supply and installation of photovoltaic panels, solar thermal panels, heat pumps, and other high-efficiency heating systems; services allowing access to fairs; services allowing access to sports events.
- The introduction of a health insurance contribution (CASS) for all categories of pensioners, applicable only to the portion of the pension exceeding 3 000 RON per month. The measure aims to ensure fiscal equity across income groups, with a limited impact on low and medium pensions, while supporting the sustainability of the public healthcare system.
- An increase in the rate of the supplementary tax on the banking sector from 2% to 4% of turnover, applicable both to Romanian credit institutions as well as branches of foreign credit institutions.
- An increase in the dividend tax rate from 10% to 16%. The new rate applies to all dividend payers, whether individuals or legal entities, resident or non-resident. This provision is introduced by Article II point 1 of Law No. 141/2025.

The combination of articles II and V of Law No. 141/2025 introduced the following change, which will contribute to expand the green taxation:

- An increase of excise duties for energy products (leaded petrol, unleaded petrol and gas oil), alcohol and alcoholic beverages (beer, wine, fermented beverages); manufactured tobacco (cigarettes, cigars and cigarillos, fine-cut tobacco intended for rolling cigarettes, other smoking tobacco); products with high sugar content such as sweetened beverages containing added sugar exceeding 5g/100ml, liquid with or without nicotine for smoking devices; products that contain tobacco intended for inhaling without combustion; products intended for inhalation without combustion, containing tobacco substitutes, with or without nicotine.

Article XII of Law No. 141/2025 introduced the following changes, which will also contribute to expand the green taxation:

- An increase in the annual vignette fee (*rovinieta*) for passenger cars by 75%. This measure aims to update the road charging framework to better reflect infrastructure costs and apply the “user pays” principle. This provision is included in

Additional measures were introduced by Law No. 239/2025, which was published on 15 December 2025 in the Official Journal No. 1160. In line with provisions in Article 12(1) of Law No. 24/2000 on the rules of legislative technique for the drafting of legislative acts, the Law entered into force on 18 December 2025, three days after its publication in the Official Journal (Evidence No. 3):

- An increase in property taxation: starting from 2026, property taxation for individuals will be based on a proxy of the market value of real estate assets. The measure aims to enhance fiscal equity and ensure a fairer correlation between taxable value and actual market conditions. This provision is introduced by Article XII, points 27, 28, 39, 48, 49.
- An increase in green taxation to incentivize environmentally sustainable mobility and better align the taxation system with the “polluter pays” principle. The key measures consist in the

introduction of TollRo, a new electronic tolling system that will replace the current vignette (rovinieta) scheme for certain categories of vehicles. TollRo will apply to all registered vehicles used on national roads that are designed and constructed for the carriage of goods and have a maximum authorized mass (MTMA) exceeding 3.5 tonnes. Simultaneously, the existing motor vehicle taxation framework was revised, by updating the tax brackets based on engine capacity and introducing a supplementary component that reflects the vehicle's pollution class. These provisions were included in Article 470.

These changes in the tax system contribute to strengthening green taxation and to promote and preserve sustainable economic growth.

It is noted for completeness that the completion of milestone 206 on the reduction of the scope of the microenterprises tax regime positively assessed in the context of payment request three further implemented recommendations coming from the tax system review by the World Bank.

**Legal act(s) shall gradually reduce the tax incentives for personnel employed in the construction sector.**

Romania progressively eliminated income tax exemptions and social contribution reliefs for construction workers, fully phasing them out by January 2025.

This was achieved through two distinct steps:

- As of November 2023, new legislation eliminated the exemption from paying income tax and social health insurance contributions for employees in the construction sector, and repealed provisions granting a reduction of the labour insurance contribution rate for this sector. These provisions are included in Article III of Law No. 296/2023, which was published on 27 October 2023 in the Official Journal No. 977. In line with provisions in Article 12(1) of Law No. 24/2000 on the rules of legislative technique for the drafting of legislative acts, the Law entered into force on 30 October 2023, three days after its publication in the Official Journal (Evidence No. 4).
- Finally, new legislation ensured the total elimination of tax incentives granted for individuals who earn income from employers in the construction sector, starting with the income related to January 2025. This provision is included in Article LXIV of Government Emergency Ordinance No. 156/2024, which was published on 31 December 2024 in the Official Journal No. 1334, and entered into force on 1 January 2025 (Evidence No. 5).

**Legal act(s) shall simplify tax rules to facilitate compliance and administration, and elimination of preferential exemptions and treatments; Legal act(s) shall achieve a more efficient tax system and a fairer distribution of the tax burden.**

Romania has introduced reforms aimed at simplifying and broadening the tax base, removing preferential exemptions and treatments, as well as harmonising tax rates. These measures will contribute to a simpler tax system and will therefore facilitate compliance and tax administration and therefore make the tax system more efficient. In particular, the following measures were adopted:

- The reduction of the scope of the microenterprises tax regime (Milestone 206) facilitated compliance and eliminating preferential treatments. This reform implied a large (70%) reduction of the number of firms eligible to the concessionary microenterprises tax regime (which taxes turnover), pushing a large number of entities towards the regular corporate

income tax system (which taxes profits). This will contribute to a fairer distribution of the tax burden and make the tax system more efficient.

- The elimination of preferential exemptions and treatments for several sectors (IT, construction, and food industries), effective starting in January 2025, will simplify the tax system and therefore facilitate tax compliance and administration and make the tax system more efficient.
- Romania moved from a three-rates VAT system (5%, 9% and 19% rates) to a dual rate system (11% and 21% rates). This harmonisation of VAT rates will facilitate tax administration and make the tax system more efficient.

Several measures taken in recent years will contribute to a fairer distribution of the tax burden:

- The reform of the microenterprises tax regime (Milestone 206) will imply, for many entities, a shift towards taxation of profits rather than turnover. This will ensure that loss-making entities do not pay taxes, while profitable ones pay their fair share.
- The increase in excise duties for selected products, including energy products (leaded petrol, unleaded petrol and gas oil) will ensure a distribution of the tax burden that does impose an additional tax burden on polluting activities.
- The introduction of a health insurance contribution (CASS) for all categories of pensioners, applicable only to the portion of the pension exceeding 3 000 RON per month will introduce some progressivity in the tax system, contributing to fiscal equity across income groups.
- The increase in the dividend income tax rate from 10% to 16%, which applies to all dividend payers, whether individuals or legal entities, resident or non-resident, in accordance with the provisions of the Fiscal Code, will reduce the gap between the taxation of labour and the taxation of capital, contributing to a fairer tax system.

**Legal act(s) shall amend property taxation by estimating the tax base as close as possible to the market value of the property. Automatically determine the taxable value of properties subject to local tax, and discontinue the practice of using a taxable base which is not linked to the market value. Furthermore, encourage the free imposition of allowances by local authorities within centrally defined ranges. Eliminate the potential arbitrage between the two tax systems applicable to individuals and legal entities owning non-residential (commercial) real estate.**

As a first step, the Ministry of Finance created a specialised property tax policy structure within the Ministry of Finance and mandated the interconnection of cadastre databases with Finance Ministry systems for market-value data sharing. This provision is included in Article II of Government Emergency Ordinance No. 124/2024, regarding the extension of certain deadlines and the strengthening of administrative capacity in the field of property taxation which was published on 24 October 2024 in the Official Journal No. 1069/2024 and entered into force on the day of its publication in the Official Journal (Evidence No. 6). Once fully operational (in 2027 probably), this system will allow to estimate the tax base for property taxation at a level very close to the actual market values of property.

For 2026, Romania set interim rules using ANEVAR market valuations (ANEVAR is The National Association of Romanian Authorized Valuers, a professional, non-profit body that regulates and represents authorized valuers). ANEVAR organizes, coordinates, and authorizes the practice of the valuation profession, ensuring members follow national and international valuation standards. This allows estimating the tax base “as close as possible” to the market values of the property. In 2026,

this change implies an average 75% increase in the amount of property taxation. The new framework also establishes that the building/land tax rate for 2026 cannot be lower than the rate established for 2025. It also eliminates the possibility to arbitrate between tax systems applying to individuals and legal entities through the unified commercial property taxation. These provisions are included in Article XII points 27, 28, 30, 33, 39, 48, 49 of Law No. 239/2025 (Evidence No. 3).

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C8]- R[R5.0]- M[209] Establishment of the National Development Bank

**Related Measure:** RO-C[C8]- R[R5.0] Establishment of the National Development Bank

**Qualitative Indicator:** Registration of the National Development Bank in the Trade Register

**Time:** Q4 2024

### 1. Context:

The objective of this measure is to set up the Investment and Development Bank (BID) in order to directly address financial market failures by providing financing to eligible beneficiaries whose projects have a high-risk profile but also a high potential to create added value and jobs, and for which the private sector has limited appetite to provide financing.

Milestone 209 represents the first step in the implementation of the reform and concerns the establishment registration of the BID. It will be followed by milestone 210, which relates to the pillar assessment report prepared by an independent external auditor.

This investment is complementary to Investment 11, which foresees an equity injection of EUR 100 million into the BID. The equity injection is subject to the satisfactory fulfilment of milestone 210, which requires the delivery of a pillar assessment report by an independent external auditor.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                | Short description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| 1 | Cover Note                                                                                                                                                                          | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled and links to the three financial products launched by the BID: (i) portfolio guarantees for SMEs - <a href="#">Garanții de portofoliu pentru IMM-uri   Banca de Investiții și Dezvoltare</a> , (ii) direct lending -- <a href="#">Creditare directă   Banca de Investiții și Dezvoltare</a> , (iii) individual guarantees <a href="#">Garanții individuale pentru mediul public   Banca de Investiții și Dezvoltare</a> . |
| 2 | Copy of Government Decision No. 1113 of 16 November 2023 regarding the adoption of the constitutive act of the BID, published in the Official Journal No. 1045 of 17 November 2023. | Government Decision approving the Articles of Association of the BID, including the bank's name, legal form, registered office, purpose, scope of activity, share capital, bank guarantee, governance and management structure, and details on the Audit Committee.                                                                                                                                                                                                                                                                                 |

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| 3  | Copy of Government Decision No. 1204 of 05 October 2022 regarding the establishment, organization and operation of the BID, published in the Official Journal No. 980 of 10 October 2022.                                                            | Government Decision defining the bank's structure and functioning, financial instruments, capital and funding sources, the Romanian State guarantee, audit, and reporting requirements.            |
| 4  | Copy of Government Decision No. 951 of 13 November 2025 amending and supplementing Government Decision No. 1204/2022 on the establishment, organisation, and functioning of the BID, published in the Official Journal No. 1057 of 17 November 2025. | Government Decision clarifying the procedure to be followed in the event of a vacancy of a Supervisory Board member or a Management Board member.                                                  |
| 5  | Copy of Certificate of Registration No. 4845160, issued by the National Trade Register Office on 24 November 2023.                                                                                                                                   | The Certificate of Registration issued by the National Trade Register Office contains information on the bank's registered address, main NACE activity code, and its unique identification number. |
| 6  | Copy of updated Certificate of Registration No. 4878806 issued by the National Trade Register Office on 19 February 2024.                                                                                                                            | The updated Certificate of Registration reflects a change in the bank's registered office.                                                                                                         |
| 7  | Copy of updated Certificate of Registration No. 5028299 issued by the National Trade Register Office on 29 November 2024.                                                                                                                            | The updated Certificate of Registration reflects a further change in the bank's registered office.                                                                                                 |
| 8  | Copy of updated Certificate of Registration No. 5242531 issued by the National Trade Register Office on 24 March 2025.                                                                                                                               | The updated Certificate of Registration reflects a renumbering of NACE codes.                                                                                                                      |
| 9  | Letter No. BID 257 of 22 April 2026 and its Annex, including the list of staff contracts in force as of October 2025 issued by BID's human resources department.                                                                                     | List of the BID's staff, providing details about each employee's department and position.                                                                                                          |
| 10 | Copy of the De minimis Aid Scheme No. 26 of 30 April 2025, in the form of guarantees for investment and working capital loans granted                                                                                                                | De minimis aid scheme in the form of guarantees for investment and working capital loans for SMEs, including liberal professions covers the scheme's purpose and objectives, legal basis, scope of |

|    |                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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|    | to SMEs, including liberal professions, as approved by Decision of the BID Directorate and a link to the scheme <a href="#">Schema de ajutor de minimis LPG.pdf</a> .                                                                                            | application, eligibility criteria for beneficiaries, mandatory requirements for financial intermediaries, eligible expenses, duration and budget of the scheme, as well as reporting and monitoring rules.                                                                                                                                                                                                                                                                                                                                                                                              |
| 11 | Copy of Investment and Lending Strategy of the BID.                                                                                                                                                                                                              | The BID's Investment and Lending Strategy reflects the bank's integrated policy approach, aiming to support Micro, Small, and Medium-sized Enterprises, including newly established start-ups, innovative companies, and those active in agriculture—while also promoting public infrastructure development and the transition to a green economy.                                                                                                                                                                                                                                                      |
| 12 | Copy of Technical Assistance Agreement No. AA-011824 on support for the new BID, signed between the Romanian Ministry of Finance and the European Investment Bank.                                                                                               | The Technical Assistance Agreement covers the following tasks: feasibility and design of financial instruments for the BID, provision of training to build capacity in financial instruments, and DNSH compliance.                                                                                                                                                                                                                                                                                                                                                                                      |
| 13 | Copy of Technical Assistance Agreement No. P502277 of 13 May 2024, signed between the BID and the International Bank for Reconstruction and Development (IBRD).                                                                                                  | The Technical Assistance Agreement defines the technical assistance provided in four main areas: (i) strengthening the bank's risk management framework, including capacity building for the Supervisory Board, Board of Directors, and senior management; (ii) advising on the development of bank's Environmental, Social and Governance (ESG) framework; (iii) supporting the Ministry of Finance in its shareholder role through advisory inputs and capacity building; and (iv) providing targeted technical assistance for operational priorities, including product design and lending strategy. |
| 14 | Copies of certificates of participation for training sessions issued by the International Bank for Reconstruction and Development, the European Investment Bank, the Romanian Banking Institute, the London Stock Exchange Group, and Cassa Depositi e Prestiti. | Certificates of participation and attendance lists for training sessions organised by the International Bank for Reconstruction and Development, the European Investment Bank, the Romanian Banking Institute, the London Stock Exchange Group, and Cassa Depositi e Prestiti.                                                                                                                                                                                                                                                                                                                          |
| 15 | Copy of extract from Supervisory Board Decision                                                                                                                                                                                                                  | Approval of the Rules of Organization and Functioning of the BID.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

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|    | No. 20 of 18 November 2025 approving the Rules of Procedure of the Remuneration Committee, approved by the Chair of the Supervisory Board.                                                    |                                                                           |
| 16 | Copy of extract from Supervisory Board Decision No. 7 of 23 March 2026 approving the Rules of Procedure of the Remuneration Committee, approved by the Chair of the Supervisory Board.        | Approval of the Rules of Procedure of the Remuneration Committee.         |
| 17 | Copy of extract from Supervisory Board Decision No. 3 of 21 December 2023 approving the Rules of Procedure of the Nominating Committee, approved by the Chair of the Supervisory Board.       | Approval of the Rules of Procedure of the Nominating Committee.           |
| 18 | Copy of extract from Supervisory Board Decision No. 13 of 11 August 2025 approving the Rules of Procedure of the Audit Committee, approved by the Chair of the Supervisory Board.             | Approval of the Rules of Procedure of the Audit Committee.                |
| 19 | Copy of extract from Supervisory Board Decision No. 3 of 20 February 2024 approving the Rules of Procedure of the Risk Management Committee, approved by the Chair of the Supervisory Board.  | Approval of the Rules of Procedure of the Risk Management Committee.      |
| 20 | Copy of extract from Management Board Decision No. 81 of 30 December 2024 approving the Rules of Procedure of the Credit Approval Committee, approved by the Chair of the Board of Directors. | Approval of the Rules of Procedure of the Credit Approval Committee.      |
| 21 | Copy of extract from Management Board Decision No. 16 of 14 March 2025 approving the Rules of                                                                                                 | Approval of the Rules of Procedure of the Non-Performing Loans Committee. |

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|    | Procedure of the Non-Performing Loans Committee, approved by the Chair of the Board of Directors.                                                                                               |                                                                          |
| 22 | Copy of extract from Management Board Decision No. 57 of 4 October 2024 approving the Rules of Procedure of the Asset – Liabilities Committee, approved by the Chair of the Board of Directors. | Approval of the Rules of Procedure of the Asset – Liabilities Committee. |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

**The National Development Bank (100% state-owned credit institution) shall be registered in the Trade Register and exempted from the application of Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013.**

According to Article 2(1) of the Annex to Government Decision No. 1113 of 16 November 2023 regarding the adoption of the constitutive act of the BID, published in the Official Journal No. 1045 of 17 November 2023 (Evidence No. 2), the Ministry of Finance holds 100% of the bank's share capital. Article 2(3) of the same Annex further provides that the BID operates as a credit institution. Moreover, according to Article 2(2) of the Annex to Government Decision No. 1113 of 16 November 2023, the BID is exempted from the application of Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms.

According to Article 1(2) of Government Decision No. 1204 of 5 October 2022 on the establishment, organization, and functioning of the BID published in the Official Journal No. 980 of 10 October 2022 (Evidence No. 3), the bank's operations from an administrative perspective begin on the date of its registration with the Trade Register.

Based on the four copies of the Certificate of Registration issued by the National Trade Register Office, the BID has been registered in the Trade Register: (i) Certificate of Registration No. 4845160 of 24 November 2023 (Evidence No. 5); (ii) updated Certificate of Registration No. 4878806 of 19 February 2024 (Evidence No. 6) reflecting a change in the bank's registered office; (iii) updated Certificate of Registration No. 5028299 of 29 November 2024 (Evidence No. 7) reflecting a further change in the bank's registered office; and (iv) updated Certificate of Registration No. 5242531 of 24 March 2025 (Evidence No. 8) reflecting a renumbering of NACE codes.

**It shall be functional, with trained staff (covering critical functions in the Front Office, Back Office and supporting functions) able to provide the first financial instruments.**

The governance of the BID is ensured by the Supervisory and Management Boards. In line with Article 4(6) of Government Decision No. 1204/2022 (Evidence No. 3), members were appointed by the Romanian Ministry of Finance in its capacity as sole shareholder, with initial two-year mandates. These mandates were later extended by six months under Article I of Government Decision

No. 951/2025 (Evidence No. 4), allowing temporary members to exercise their mandate until the selection of new members and their approval by the National Bank of Romania. The Supervisory Board approved the bank's Rules of Organization and Functioning (Evidence No. 15) and established the mandatory committees: Remuneration (Evidence No. 16), Nominating (Evidence No. 17), Audit (Evidence No. 18), and Risk Management (Evidence No. 19). At Management Board level, the bank has established the Credit Approval Committee (Evidence No. 20), Non-Performing Credits Committee (Evidence No. 21), and Asset-Liabilities Committee (Evidence No. 22) to support operational and strategic decision-making.

According to the Letter No. BID 257 of 22 April 2026 and the list of staff contracts (Evidence No. 9), as of October 2025, the BID employed 134 staff members. Staff are allocated across the following critical functional areas:

- Back-office functions: Internal Audit; Legal; Internal Methodology and Secretariat; Cybersecurity; Financial and Accounting; Compliance; Risk Administration; Loan Approval; Non-performing Loans; Financial Operations; ITC.
- Front office functions: Commercial; Financial Products; EU Funds; Institutional and International Relations; Public Relations and Communication; Strategy and Sustainable Development.
- Supporting functions: Human Resources; Logistics and Procurement.

As evidenced by the Technical Assistance Agreement No. AA-011824 with the European Investment Bank (Evidence No. 12) and the technical assistance agreement No. P502277 with the International Bank for Reconstruction and Development (Evidence No. 13), the BID has received training services for its staff and for the Ministry of Finance's staff involved in assessing the performance of the bank.

The training sessions provided by the International Bank for Reconstruction and Development took place between September 2024 and November 2025 and were organised in a mixed format, with physical and online participation, covering topics such as: risk appetite, compliance and anti-money laundering / countering the financing of terrorism aspects, credit risk management, approval process for new products, and financial sanctions, liquidity risk policy. The authorities have provided copies of the participation certificates, along with the attendance lists (Evidence No. 14).

The training sessions provided the European Investment Bank took place between September 2024 – February 2025 and focused on the lifecycle of three financial instruments from the following categories: debt, guarantee and equity. The training sessions covered the structure/design of the products, draft agreements/contracts with beneficiaries, identifying target beneficiaries, distribution channels, procedure, policies, communication plan, guidelines for new products, DNSH, State aid. As evidence, the authorities have provided copies of the participation certificates, along with the attendance lists (Evidence No. 14).

The first three products have been launched, in line with the Investment and Lending Strategy of the BID (Evidence No. 11), as follow:

- SME Loan Portfolio Guarantee –based on the De minimis Aid Scheme No. 26 of 30 April 2025 (Evidence No. 10), in the form of guarantees for investment and working capital loans granted to SMEs, including liberal professions.
- Direct Landing – for investment projects aimed at the sustainable development of communities, such as infrastructure, public utilities, education, healthcare, and renewable energy.
- Individual Guarantee - for investment projects aimed at the sustainable development of local and regional communities, including infrastructure, public utilities, education, healthcare, and renewable energy. The Romanian authorities submitted hyperlinks to the BID's website where information about the offered financial products is published.

The Commission services accessed the links provided on 23 February 2026 to verify that the launch of the three financial products had been duly published and that multiple calls for applications have been launched. The verification was completed successfully, confirming that the three financial products are available to SMEs as well as to public authorities.

In light of the establishment of its governance structures and internal committees, the recruitment, training and allocation of staff across the aforementioned functions, as well as the launch of the first financial products in line with its Investment and Lending Strategy, the BID is functional and performing its mandate.

**In order to ensure that the measure complies with the “Do no significant harm” Technical Guidance (2021/C58/01), the investment and lending strategy of the National Development Bank shall:**

- **require the application of the Commission’s technical guidance on sustainability proofing for the InvestEU Fund; and**
- **exclude the following list of activities and assets from eligibility by way of an exclusion list:**
  - i. **activities and assets related to fossil fuels, including downstream use (*except projects in power and/or heat generation, as well as related transmission and distribution infrastructure, using natural gas, that are compliant with the conditions set out in Annex III of the “Do no significant harm” Technical Guidance (2021/C58/01);***
  - ii. **activities and assets under the EU Emission Trading System (ETS) achieving projected greenhouse gas emissions that are not lower than the relevant benchmarks. *Where the activity supported achieves projected greenhouse gas emissions that are not significantly lower than the relevant benchmarks an explanation of the reasons why this is not possible should be provided. Benchmarks established for free allocation for activities falling within the scope of the Emissions Trading System, as set out in the Commission Implementing Regulation (EU) 2021/447.***
  - iii. **activities and assets related to:**
    - a. **waste landfills,**
    - b. **incinerators - *this exclusion does not apply to actions in plants exclusively dedicated to treating non-recyclable hazardous waste, and to existing plants, where the actions are for the purpose of increasing energy efficiency, capturing exhaust gases for storage or use or recovering materials from incineration ashes, provided such actions do not result in an increase of the plants’ waste processing capacity or in an extension of the lifetime of the plants; for which evidence is provided at plant level and***
    - c. **mechanical biological treatment plants - this exclusion does not apply to actions in existing mechanical biological treatment plants, where the actions are for the purpose of increasing energy efficiency or retrofitting to recycling operations of separated waste to compost bio-waste and anaerobic digestion of bio-waste, provided such actions do not result in an increase of the plants’ waste processing capacity or in an extension of the lifetime of the plants; for which evidence is provided at plant level and**
  - iv. **activities and assets where the long-term disposal of waste may cause harm to the environment; and**
- **require the verification of legal compliance with the relevant EU and national environmental legislation by the National Development Bank for all transactions, including those exempted from sustainability proofing; and**

- **require beneficiaries of equity support and general-purpose corporate finance that derive more than 50% of their revenues during the preceding financial year from activities and/or assets in the exclusion list to adopt and publish green transition plans.**

The BID has fully integrated the “Do no significant harm” requirements in a dedicated chapter of its Investment and Lending Strategy. Specifically, Chapter 4 (pages 21–25) of the Strategy mirrors the above CID requirements *verbatim*:

- *Sustainability Proofing*: The Strategy explicitly mandates the application of the Commission’s technical guidance on sustainability proofing for the InvestEU Fund,
- *Exclusion List*: In accordance with the Council Implementing Decision, the Strategy includes an exclusion list, prohibiting financing for:
  - Fossil fuels: Activities related to fossil fuels and downstream use, with the strictly limited exceptions the activities compliant with Annex III of the DNSH Technical Guidance.
  - EU ETS activities: Assets under the EU Emission Trading System that are not lower than the relevant greenhouse gas emission benchmarks (Regulation EU 2021/447).
  - Waste Management: Specific exclusions are applied to landfills, incinerators (subject to limited efficiency-based exceptions for hazardous or existing plants), and mechanical biological treatment plants.
  - Long-term disposal: activities and assets where the long-term disposal of waste may cause harm to the environment.
- *Legal Compliance*: The BID’s framework requires a mandatory verification of legal compliance with both EU and national environmental legislation for all transactions, regardless of whether they are subject to full sustainability proofing.
- *Green Transition Plans*: For beneficiaries of equity or general-purpose corporate finance deriving more than 50% of their revenues from the aforementioned excluded activities, the Strategy imposes a binding requirement to adopt and publish green transition plans.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C8]-R[R6.0]-M[214] Legal act(s) on the pension system

**Related Measure:** RO-C[C8]-R[R6.0] Reform of the public pension system

**Qualitative Indicator:** Entry into force of legal act(s) on the pension system

**Time:** Q1 2023

### 1. Context:

The objective of the reform is to introduce a new calculation formula for new pensions and pensions in payment, based on input from technical assistance, to ensure fiscal sustainability of the pension system.

Milestone 214 concerns the entry into force of legal act(s) of the reform of the general pension system.

Milestone 214 is the fifth and last milestone of the reform. It follows the completion of milestone 211 (signature of the technical assistance provider), milestone 212 (establishment of a monitoring committee for the pension reform), milestone 213 (adoption of legal acts to ensure the sustainability of Pillar 2 pension) and milestone 215 (reform of special pensions).

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                 | Short description                                                                                                                                                                                                                                                                                                                     |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                           | Summary document justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.                                                                                                                                                                                                            |
| 2 | Copy of the Law No. 360/2023 on the public pension system (hereinafter referred to as " <i>Law No. 360/2023</i> "), published in the Official Journal No. 1089 of 4 December 2023.   | New legislative act on the public pension system. The law includes annexes that specify key parameters of the reform.<br><br>The Law entered into force on 1 September 2024, with the exception of Article 46 para. (2), Art. 84 para. (6), Art. 127, Art. 168 para. (2) and Article 169, which entered into force on 1 January 2024. |
| 3 | Copy of the Government Decision No. 181/2024 for the approval of the implementing rules for the provisions of Law No. 360/2023 on the public pension system (hereinafter referred to | Implementing rules of the law.<br><br>The Implementing rules came into force on the date of the publication, namely 1 March 2024.                                                                                                                                                                                                     |

|   |                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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|   | as “ <i>Government Decision No. 181/2024</i> ”), published in the Official Journal No. 171 of 1 March 2024.                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 4 | Copy of the World Bank Report on the ex-post analysis of the impact of the public pension reform.                                                                                               | The World Bank: Technical Note on pension expenditure projections for adopted and potential future policy decisions.                                                                                                                                                                                                                                                                                                                          |
| 5 | Copy of the World Bank impact assessment report the public pension reform.                                                                                                                      | The World Bank: Deliverable 4.2. Analysis, impact assessment, and recommendations for reforms to the public pension system and recommendations for improvement of data flows. <a href="https://mmuncii.gov.ro/wp-content/uploads/2025/11/Nota-tehnica-privind-proiectiile-pentru-sistemul-general-depensii.pdf">https://mmuncii.gov.ro/wp-content/uploads/2025/11/Nota-tehnica-privind-proiectiile-pentru-sistemul-general-depensii.pdf</a> . |
| 6 | Copy of Government Emergency Ordinance No. 23/2022 to supplement Article 43 of Law No. 411/2004 on privately managed pension funds, published in the Official Journal No. 259 of 16 March 2022. | This Ordinance includes the provision that, from 1 January 2024, the contribution rate to Pillar II pensions is increased to 4.75% from 3.75%.                                                                                                                                                                                                                                                                                                |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

#### Entry into force of legal act(s) on the pension system.

**Legal act(s) shall ensure the fiscal sustainability of the pension system, as well as equity, the respect of the contributory principle, adequacy of low / minimum / social pensions (including those relating to the fixed contribution period of 25 years).**

The respective legislative acts covering the public pension system, as well as its implementation norms, are in force.

Law No. 360/2023 on the public pension system (hereinafter referred to as “*Law No. 360/2023*”) (Evidence No. 2) was adopted on 29 November 2023 and was published in the Official Journal No. 1089 of 4 December 2023. According to its article 167, Law No. 360/2023 entered into force partially on 1 January 2024 and fully on 1 September 2024.

The Government Decision No. 181/2024 for the approval of the implementing rules for the provisions of Law No. 360/2023 on the public pension system (hereinafter referred to as “*Government Decision No. 181/2024*”) was published in the Official Journal No. 171 on 1 March 2024. This Government Decision entered into force on the same day in accordance with Article 108(4) of the Constitution.

The principles underpinning the public pension system are stated in Article 2 of Law No. 360/2023, including:

- the contributory principle, in Article 2(c);
- the equity principle, in Article 2(d).

As such, these principles are legally binding on the competent authorities and must guide both the implementation and application of the public pension system.

According to the World Bank Report (which provided technical assistance on the reform, including an impact evaluation) on the ex-post analysis of the impact of the public pension reform (Evidence No. 4), pages 5 to 10, the parameters of the new formula (introduced in Chapter II of Law No. 360/2023, Articles 83, 84 and 85), are adequate to ensure fiscal sustainability of pension expenditure developments, and of the pension system in general, in the medium to long term (until 2070). In particular, page 5 of the report notes that “the reform introduced a unified and transparent pension calculation model centered on strengthening the contributivity principle, meaning that pension benefits directly reflect the level and duration of contributions made over a person’s working life. Equity in the system was strengthened by introducing a single formula for all pensioners and by changing the approach to awarding bonus points for special working conditions (SWC). The pension reform addressed sustainability and demographic concerns by increasing the retirement age (setting the statutory age for women at 65, aligning it to that of men, and linking it for both genders to changes in life expectancy) and by providing strong incentives for workers to remain in the workforce for longer”. These elements are introduced in Article 2 of Law No. 360/2023.

Equity in the system and its long-term sustainability are restored by establishing a single formula for all pensioners, existing and new ones, increasing adequacy of the benefit for pensioners with long service, and reducing the use of the system of bonus points for special working conditions. The expected impact of the reform on the long-term sustainability of the pension system is large. According to the World Bank Report on the ex-post analysis of the impact of the public pension reform (Evidence No. 4, charts on page 10), at their peak, pension expenditures are expected to be about 9% of GDP, compared to nearly 12% of GDP under the previous regime.

According to the World Bank Report on the ex-post analysis of the impact of the public pension reform, the application of the law is expected to lead to an increase of the pension for the majority of current pensioners. Following a recalculation of the pensions based on the new system, in October 2024, about 80% of current pensioners received pension increases of 28.7% on average. This is a significant reduction in the inequities in the system and strengthened adequacy, since pensioners with lower pensions (in particular those below the poverty threshold) were those benefiting from the largest increases. The number of people receiving the social allowance decreased by 17% after the implementation of the reform, further evidence of the improvement in the adequacy of low pensions.

Moreover, the Report (page 9) highlights that, as a result of measures incentivizing longer careers and postponing retirement, the projected peak number of retirees is about 750 000 people below the baseline assessment. At the same time, the projected increase in the number of contributors reaches almost 500 000 people by the end of the projection period. These elements too will contribute to enhancing the long-term sustainability of the pension system.

**Any amendment to the law, which would result in a deviation from the reference projections established after adoption of the reform by the government, shall be accompanied by compensating measures to keep pension expenditure (as a share of GDP) in line with the reference path.**

There has been no amendment to Law No. 360/2023 that would have justified the activation of this part of the milestone, the purpose of which was to secure compensating measures in case an amendment were to occur that would have weakened the reform relative to the version adopted by the Government. The Parliamentary process and procedures for the adoption of the law are detailed on the website of the Chamber of Deputies. The Commission services accessed the link provided by the authorities on 30 November 2023 to verify the existence of amendments to the law between adoption by government and the vote in parliament. This check was completed successfully, confirming that no amendments were made to the law.

**Drawing on technical assistance (milestone 211), the reform shall contain at least the following elements:**

**1) Introduce a new calculation formula for new pensions and pensions in payment. The parameters of the formula shall be chosen to ensure fiscal sustainability of pension expenditure developments, and of the pension system in general, in the medium to long term (until 2070). Moreover, they shall not allow for ad hoc increases of pension levels. The detailed formula shall a priori eliminate the correction index, be based on the number of points achieved by each beneficiary in accordance with the contributory principle and apply a pension indexation mechanism that no longer allows for ad-hoc increases.**

The design and parameters of the reform were informed by the World Bank impact assessment report on the public pension system (Evidence No. 5) on the *Analysis, impact assessment, and recommendations for reforms to the public pension system and recommendations for improvement of data flows*. This report, part of measure C8.R6 (see milestone 211), provided a comprehensive analysis of the pension system, and formulated recommendations for the reform, including regarding systemic changes and parameters to ensure the reform is in line with the requirements of the milestone. In particular, the report formulated clear recommendations regarding the parameters of the formula to recalculate existing and future pensions, in a way that it ensures the fiscal sustainability of pension expenditure developments, and of the pension system in general, in the medium to long term (until 2070). Moreover, the report provided suggestions on how to eliminate the correction index, introduce a formula taking into account the number of points achieved by each beneficiary in accordance with the contributory principle. Finally, the report included concrete proposals for a pension indexation mechanism that no longer allows for ad-hoc increases.

Chapter II (Pension calculation) of Law No. 360/2023 introduces a new calculation formula, which applies to new pensions and to pensions in payment. The link between contributions and benefits was made fully transparent. The formula is based on the number of points achieved by each beneficiary in accordance with the contributory principle. According to Articles 83, 84 and 85, the detailed formula eliminates the correction index, which introduced distortions in the calculation of pensions and had made pensions dependent on the year and month of retirement, creating large differences in benefits for people with the same total number of pension points accumulated.

The formula applies a pension indexation mechanism that no longer allows for ad-hoc increases. Article 84 of Law No. 360/2023 specifies the pension indexation mechanism based on statistical indicators (average annual inflation rate and 50% of real wage growth), as provided for in Article 84(3) – Article 84(5).

The new benefit formula has a clear contribution-based logic. The pension benefit is determined by multiplying the total number of pension points a person has accumulated, including any bonus “stability points” earned for working beyond the standard length of service, by a single point value. The formula also includes a mechanism rewarding longer careers and encouraging later retirement with stability points, as well as by sharply curtailing so-called “assimilated” periods (such as higher

education or military service), with only contributory periods now counting toward the full contribution period required to obtain a full pension.

Bonuses granted for working in special and particular conditions were reviewed to favour workers receiving less than the average wage in the economy (Article 86), while the list of jobs and activities recognized as eligible was significantly reduced (Annexes 3 and 4).

**The detailed formula for the calculation of pensions shall:**

- **Determine, for existing and future pensioners, a number of points based on contributions paid to the system during the working life;**
- **Establish a statutory retirement age of 65 years, for both men and, as from 1 January 2035, women;**
- **Establish a minimum contribution period at 15 years, for both women and men;**
- **Establish a full contribution period at 35 years, for both women and men by 2030;**
- **Establish that the minimum contribution period, the full contribution period and the statutory retirement age will be amended in the light of developments in life expectancy in Romania;**
- **The initial reference point value, at the time of the entry into force of the reform, shall be set at a maximum of 81 lei.**
- **In a transition period, pensioners for whom the new formula would lead to a theoretically lower pension (relative to the time immediately prior to the entry into force of the reform) shall see their pension benefits frozen (in nominal terms) until the theoretical post-reform pension benefit reaches (through indexation rules) an amount equal to the frozen nominal pension.**

Law No. 360/2023, Title IV Social security benefits in the public pension system, Chapter II. Pension calculation sets the detailed formula for pension calculation, which applies both to existing and future pensions:

- Article 85 establishes the points based on contributions paid during the working life and how these points are calculated (both for existing and future pensioners).
- Article 47(1) sets the standard retirement age at 65 years, for both men and women, phasing-in the retirement age for women until 1 January 2035, as detailed in annex 5 of Law No. 360/2023.
- Article 47(2) sets the minimum contribution period at 15 years, for both women and men.
- Article 47(3) sets the full contribution period at 35 years, for both women and men by 2030, phasing-in the contribution period, as detailed in annex 5 of Law No. 360/2023.
- Article 47(5), Article 47(6) and Article 47(8) state that the minimum contribution period, the full contribution period and the standard retirement age provided for by Law No. 360/2023 will be increased in accordance with the evolution of life expectancy in Romania, at intervals of a maximum of 3 years. Article 47 also specifies how these changes in life expectancy will be reflected in the pension system parameters and how the implementation of these changes will be verified and enforced.
- Article 84(2) sets the initial reference point value at RON 81 at the time of the entry into force of Law No. 360/2023.

- Article 144(6) provides that if, as a result of the recalculation process a pension amount becomes lower than that in payment or due, the pension will be paid at the amount established and in payment prior to the recalculation, until the date on which a pension amount higher than that due as a result of the increase in the reference point is obtained. The transitory provisions for the application of the new formula to existing pensioners are detailed in the Implementation Rules (Government Decision No. 181/2024 - Evidence No. 3), Articles 112, 121 and 125.

**2) The Law shall revise pension indexation rules. In particular:**

- **The law shall include a pension indexation mechanism that does not allow for ad-hoc increases;**
- **The indexation rate shall be equal to inflation plus 50% of real wage growth in year t-1. It shall be subject to a cap and a floor;**
- **The indexation rate shall not be lower than inflation (floor);**
- **If the indexation rate produced by the rule is both above inflation and the growth rate of total pension system revenues, the indexation rate shall be capped at the latter (cap);**
- **Every year in June, the Fiscal Council shall draw up a report verifying whether indexation rules were fully applied. In case of any deviation from indexation rules, the report shall quantify the fiscal impact. This report shall be made public;**
- **Should the report identify deviations from legislated indexation rules, the government shall be obliged by law to adopt offsetting measures (parameter changes or increases in contributions) to neutralize the fiscal impact, in net present value terms, of any ad hoc increase in pensions. By default, social contributions will be increased to offset the fiscal impact, in net present value terms, of any ad hoc increase in pensions (i.e. any increase going beyond indexation rules).**

Article 84 of Law No. 360/2023 sets the value of the reference point, as well as the indexation mechanism:

- Paragraphs (3) - (5): pension indexation mechanism based on statistical indicators (average annual inflation rate plus 50% of real wage growth).
- Paragraphs (4) - (5): where one of the indicators has a negative value, the indicator with a positive value will be used to establish the value of the reference point. Where both indicators have negative values, the last value of the reference point will be retained. This is the floor in the indexation mechanism.
- Paragraph (7): from 2025 onwards, the percentage increase resulting from the application of the provisions of paragraphs (3)-(5) may not be higher than the percentage increase in the revenues from social security contributions to the budget or the average annual inflation rate of the last two years, which are definitive indicators, known for the last two previous years, communicated by the National Institute of Statistics, in which case the more advantageous percentage will be granted.
- Paragraph (8): in June of each year, the Fiscal Council will draw up a report on compliance with the rules for indexation of the reference point, as well as on possible deviations from

the increase rule and the financial impact caused by them. The report will be published on the Fiscal Council's website.

- Paragraph (9): if the Fiscal Council's report finds deviations, the competent authorities will take corrective measures, by amending the legal framework, in order to offset the financial impact, in net present value terms, generated by the ad hoc increases in the reference value.

**3) The law shall provide for a gradual convergence of the statutory retirement age of women to that of men (currently 65 years). This convergence shall start in 2024, proceed in a linear manner, and be completed by 2035.**

Article 47(1) of Law No. 360/2023 sets the standard retirement age at 65 years, for both men and women, phasing-in the retirement age for women (now at 60 years) starting in 2024 and until 1 January 2035, in a linear manner, and as detailed in Annex 5 of the law.

**4) The Law shall include incentives to work longer, until and beyond the statutory retirement age, and up to 70 years. In particular: additional points shall be awarded for each year when the contributory period exceeds 25 years: 0.50 points for each year over 25 years; 0.75 points for each year over 30 years; one point for each year over 35 years.**

Article 46(2) of Law No. 360/2023 provides that persons insured in the public pension scheme who fulfil the conditions for pension eligibility may choose between receiving an old-age pension and continuing to work, with the employer's annual agreement, until the age of 70.

Article 85(3) of Law No. 360/2023 establishes the stability points to be awarded for contributory service over 25 contributory years as follows:

- 0.50 points for each year completed over 25 years;
- 0.75 points for each year over 30 years;
- 1 point for each year over 35 years.

These provisions provide incentives for longer working lives, which contributes to the long-term sustainability of the system.

**5) The law shall review conditions for early retirement due to work in "special" or "particular" conditions:**

- The maximum reduction in the standard retirement age for activities carried out under special conditions shall be reduced to 10 years and the maximum reduction of the standard retirement age for activities under particular conditions shall be reduced to 7 years.
- The benefits bonuses granted in relation to years of work carried out in special working conditions shall be set at a fixed number of points, namely 0,25 and 0,50 point for each year completed under special working conditions.
- The list of units with activities allowing to benefit from "special conditions" status should be reduced by more than half.

Article 15(1) of Law No. 360/2023 defines the conditions for early retirement due to work in special or particular conditions, granting additional contribution periods:

- Four months for each year worked in jobs under special conditions;
- Six months for each year worked in employment under particular conditions.

Article 48(1) of Law No. 360/2023 sets the maximum reduction in the standard retirement age for work in special conditions to 10 years and in particular conditions to seven years.

Article 88(1) of Law No. 360/2023 provides the benefits bonuses, namely 0.25 and 0.50 point for each year completed under particular and special working conditions.

Article 28 of Law No. 360/2023 defines the types of jobs that qualifies for “special conditions” and Annex 3 includes the list of units with activities allowing to benefit from “special conditions”. The new provisions show a larger than 50% reduction in the number of units or activities allowing to benefit from “special conditions” extra points.

**6) Fiscal sustainability of the system shall also be supported by a “brake mechanism” embedded in the law. In particular:**

- **This mechanism shall provide for periodical reviews (every three years) of pension expenditure and system balance developments and projections, conducted by the Fiscal Council, based on projections of the Ageing Working Group. The Ministry of Labor and the Ministry of Finance shall transmit all the necessary data in a timely manner. This review shall be made public.**
- **Should the review identify deviations relative to the “reference path” established by the technical assistance provider at the time of the adoption of the reform by the government, the government shall be obliged to adopt measures (parameter changes) bringing pension expenditure (as a share of GDP) back on track with the reference path. By default, social contributions will be increased to offset the fiscal impact, in net present value terms, of any deviation from the reference path for pension expenditure.**
- **The first review shall take place in 2027.**

Article 84, paragraphs (10) and (11) of Law No. 360/2023 define the brake mechanism:

- Starting in the year 2027 and periodically every three years, the Fiscal Council is to prepare a report reviewing the evolution of public pension expenditures based on Ageing Working Group (AWG) projections, and on the data transmitted by the Ministry of Labor and the Ministry of Finance. The report is to be published on the Fiscal Council's website.
- If it is found that public pension expenditure is higher than the reference path calculated at the time of the adoption of the law (and published in the World Bank Report on the ex-post analysis of the impact of the public pension reform (Evidence No. 4)), the competent authorities are to take the necessary measures to return to the established reference path, expressed as a percentage of GDP (in NPV terms), including through an increase in social security contributions if necessary. In particular, this Article states that, should the review identify deviations relative to the “reference path” established by the technical assistance provider at the time of the adoption of the reform, the government shall be obliged to adopt measures (parameter changes) bringing pension expenditure (as a share of GDP) back on track with the reference path. If such measures are not implemented, then social contributions will be increased to offset the fiscal impact, in net present value terms, of any deviation from the reference path for pension expenditure.

**7) The reform shall introduce provisions ensuring that the key parameters of the system are adjusted periodically to reflect changes in life expectancy. In particular:**

- **The minimum contribution period, contribution period for a full pension, statutory retirement age, and all other parameters involving time, shall evolve by a fraction (50 pct) of any observed change in life expectancy (at retirement).**
- **When new projections of the AWG become available, every three years, the Fiscal Council shall write a report examining whether parameters of the pension system were adjusted in line with the law and changes in life expectancy at retirement. This report shall be made public.**
- **Should the report identify deviations from the rule, the government shall be obliged by law to adjust system parameters.**
- **The first review shall take place in 2027.**

Article 47 paragraphs (6)–(8) of Law No. 360/2023, introduce provisions to ensure the key parameters of the system are adjusted periodically to reflect changes in life expectancy:

- Starting in the year 2027 and periodically every three years, the Fiscal Council will prepare a report on the evolution of public pension expenditures based on Ageing Working Group (AWG) projections. The report will be published on the Fiscal Council's website.
- In the event of a positive trend in life expectancy, the competent authorities will take measures to increase the minimum contributory contribution period, the full contributory contribution period and the standard retirement age by half the size of the increase in life expectancy. Where there is a negative trend in life expectancy, the contribution periods and the standard retirement age may not be increased.
- With the publication of the AWG projections every three years, the Fiscal Council will prepare a report verifying whether the minimum contributory service, full contributory service and standard retirement age have been changed in line with changes in life expectancy. The report will be published on the Fiscal Council's website. Should the report identify deviations from the rule, the government shall be obliged by law to adjust system parameters.

**8) The law shall increase the adequacy of minimum and lower pensions, in particular for those below the poverty threshold;**

Equity in the system is restored by establishing a single formula for old and new pensioners, increasing adequacy of the benefit for pensioners with long service (Articles 47 and 85 of Law No. 360/2023). According to the World Bank Report on the ex-post analysis of the impact of the public pension reform (Evidence No. 4), the application of the law is expected to lead to an increase of the pension for the majority of current pensioners.

The Report shows that about 80% of current pensioners received pension increases of 28.7% on average on the first day of application of the law. This allows for a reduction in the inequities in the system, strengthens adequacy as a significant share of the increase accrues to pensioners with lower pensions, in particular those below or close to the poverty threshold. Indeed, according to the World Bank Report on the ex-post analysis of the impact of the public pension reform (Evidence No. 4) (page 9), most of the increases will happen for smaller pensions. This is also reflected in the projected reduction in the number of social allowance recipients (this allowance is specifically

designed to support individuals below or close to the poverty threshold) by 17% upon the entry into force of the reform.

**9) The law shall ensure financial viability of the Pillar II of the pension system by increasing contributions to this pension pillar.**

The Council Implementing Decision required that the law ensures financial viability of the Pillar II of the pension system by increasing contributions to this pension pillar. This objective was achieved under milestone 213. Government Emergency Ordinance No. 23/2022 to supplement Article 43 of Law No. 411/2004 on privately managed pension funds (hereinafter referred to as "*Government Emergency Ordinance No. 23/2022*") was published in the Official Journal No. 259 on 16 March 2022 (Evidence No. 6).<sup>5</sup> Government Emergency Ordinance No. 23/2022 entered into force on the same day in accordance with Article 12(3) of Law 24/2000 on the rules of legislative technique for the drafting of legislative acts. From 1 January 2024, the contribution rate to Pillar II was increased to 4.75% from 3.75%. Law No. 360/2023 did not modify any of these provisions. Whilst this constitutes a minimal formal deviation from the requirement of the Council Implementing Decision, the increase of the contribution rate to Pillar II through a Government Emergency Ordinance instead of a law is acceptable as the ordinance constitutes a legally binding document and achieves in full the scope of the measure, which is ensuring the financial viability of the Pillar II of the pension system. As of this, this minimal deviation does not change the nature of the measure and does not affect the progress towards achieving the reform that the milestone represents. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

**10) An ex-post analysis of the adopted legislation by the technical assistance provider, which shall establish, after the reform is adopted by the government, baseline / reference projections for total pension expenditure (as a share of GDP) and the fiscal sustainability of the system over the medium to long term (2024-2070) shall be made public.**

The ex-post analysis of the adopted legislation undertaken by the World Bank as the technical assistance provider builds on the results of the recalculation of public pensions in Romania. The World Bank ex-post analysis report (Evidence No. 4) presents the impact of the reform and includes a reference path for total pension expenditure (as a share of GDP) for the period 2024-2070. This report is public, available on the website of the Ministry of Labor.

**4. Commission Preliminary Assessment: Satisfactorily fulfilled.**

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<sup>5</sup> Law No. 238 of 20 July 2022 approving Government Emergency Ordinance No. 23/2022 to supplement Article 43 of Law No. 411/2004 on privately managed pension funds, was published in the Official Journal No. 735 of 21 July 2022.

**Number and name of the Target:** RO-C[C8]-I[I2.0]-T[219] Staff training on the risk management system

**Related Measure:** RO-C[C8]-I[I2.0]-Improving tax and tax administration processes, including through integrated risk management

**Quantitative Indicator:** Number

**Baseline:** 0

**Target:** 40

**Time:** Q2 2023

### 1.Context:

Target 219 is part of measure C8.I2, which seeks to increase tax compliance, reduce tax avoidance and evasion, and support the achievement of the planned budget revenues by increasing the efficiency of tax collection. This measure consists in the creation of digital platforms for integrated risk management, the electronic connection of cash registers, and training for relevant ministry staff.

Target 219 requires that 40 staff working in the risk management area of the Ministry of Finance of Romania are trained in the risk management system.

Target 219 is the third step of the implementation of investment C8.I2, and it follows the completion of targets 220 and 221, which required the connection of at least 150 000 cash registers and at least 600 000 cash registers, respectively, to the National Agency for Fiscal Administration (ANAF) servers and target 222 requiring that 30% of the total audits carried out by the ANAF are documentary audits (desk audits). Target 219 is accompanied in the same payment request by targets 223 and 224 related to a 60% share of the number of desk audits reported on the total audits carried out by ANAF and to increase the number of audits by 10%. Target 219 will be followed by milestones 225 and 226 related to functional electronic risk register and to the operationalisation of tax administration systems, including a functional Big Data/Analytics platform.

### 2. Evidence provided:

|   | Name of the evidence                                   | Short description                                                                                                               |
|---|--------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                             | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.      |
| 2 | Copy of individual certificates dated 3 February 2023. | 46 individual certificates issued by the International Monetary Fund (IMF) confirming the completion of the training programme. |
| 3 | Copy of attendance list.                               | List of participants in the course held between 30 January 2023 and 03 February 2023 with holographic signatures.               |

|   |                                                                                                                                                                  |                                                                                                                                                |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------|
| 4 | Copy of agenda of the course covering 30 January 2023 – 3 February 2023.                                                                                         | Agenda of the five-day course “Risk management system”.                                                                                        |
| 5 | Copy of course materials – Compliance Risk Management.                                                                                                           | Details regarding the course “Risk management system”.                                                                                         |
| 6 | Copy of ANAF President Order No. 680/2021 regarding the establishment of the Tax Non-Compliance Risk Management Committee, signed on 26 April by ANAF President. | The ANAF President Order provides details regarding the organization and structure of the Tax Non-Compliance Risk Management Committee.        |
| 7 | Copy of Government Decision No. 520/2013 on the organisation and functioning of ANAF, published in the Official Journal No. 473 of 30 July 2013.                 | Government Decision establishing that ANAF is a specialised body of the central public administration subordinated to the Ministry of Finance. |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the target.

#### **40 staff working in the risk management area of the Ministry of Finance shall be trained in the risk management system.**

Based on the evidence provided by the authorities, 46 experts from ANAF, a subordinated body to the Ministry of Finance, attended a five-day "Risk Management System" course conducted by experts from the IMF's Fiscal Affairs Department from 30 January to 3 February 2023. The authorities have provided an attendance list (Evidence No. 3) with holographic signatures, along with certificates of completion (Evidence No. 2) issued by the IMF for all 46 attendees.

According to the attendance list (Evidence No. 3), 32 staff members were working directly within the General Directorate of Risk Management. An additional nine participants originated from other organisational structures within ANAF that are directly involved in the risk management process as members of the Tax Non-Compliance Risk Management Committee. The composition and mandate of this Committee are established by ANAF President Order No. 680/2021 (Evidence No. 6). Article 1 defines its scope and responsibilities, while Article 5(1) lists the general directorates whose representatives form part of the Committee. All nine additional participants belong to the general directorates referred to in Article 5(1), namely: Anti-Tax Fraud, Tax Information, Coordination of Large Taxpayers, Control of Individual Income, and General Strategy and Process Monitoring. Therefore, all 41 participants either work directly within the General Directorate of Risk Management or are formally designated members of the Tax Non-Compliance Risk Management Committee and thus have explicit responsibilities in the field of tax non-compliance risk analysis and compliance risk management.

According to the Agenda (Evidence No. 4) and the Course Materials (Evidence No. 5), the course was organized into five modules, focusing on the Compliance Risk Management System. The content covered a review of key concepts, tools, and frameworks (such as the Risk Differentiation Framework). The learning format involved in-person sessions covering both theoretical concepts and the completion of practical exercises.

The Council Implementing Decision required that 40 staff working in the risk management area of the Ministry of Finance be trained in the risk management system. The evidence provided by the Romanian authorities demonstrates that the training was attended by 46 staff members from ANAF, rather than staff directly employed by the Ministry of Finance. Whilst this constitutes a minimal substantive deviation the requirement of the Council Implementing Decision, the deviation is acceptable as Article 1 of the Government Decision No. 520/2013 on the organisation and functioning of ANAF establishes that ANAF is a specialised body of the central public administration subordinated to the Ministry of Finance. The same Decision assigns ANAF responsibilities related to risk management, including the management of internal and external organisational risks (Article 7(A)(4)) and the analysis of fiscal information to identify risks of tax non-compliance (Article 7(B)(15)). Therefore, risk analysis and compliance risk management functions are carried out within ANAF structures and are not exercised directly by the Ministry of Finance itself. As of this, this minimal deviation does not affect the progress towards achieving the investment that the target represents. On this basis, it is considered that this constitutive element of the target is satisfactorily fulfilled.

**4.Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Target:** RO-C[C8]-I[I2.0]-T[223] Share of the number of desk audits reported on the total audits carried out by the tax administration — 60 %

**Related Measure:** RO-C[C8]-I[I2.0] Improving tax and tax administration processes, including through the implementation of integrated risk management

**Quantitative Indicator:** % (Percentage)

**Baseline:** 30

**Target:** 60

**Time:** Q4 2025

### 1. Context:

The objective of the investment is to enhance tax compliance, curb tax avoidance and evasion, and support the achievement of planned budget revenues by improving the efficiency of tax collection.

Target 223 requires that 60% of the total number of tax audits conducted by the National Agency for Fiscal Administration (ANAF) be documentary audits.

Target 223 represents the fourth step in the implementation of this investment and follows target 220, which requires at least 150 000 cash registers connected to ANAF's electronic system; target 221, which sets a minimum of 600 000 cash registers connected to ANAF's electronic system; and target 222, which requires a 30% share of documentary audits in the total number of tax audits conducted. Target 223 is accompanied in this payment request by target 224, which aims for a 10% increase in the total number of tax audits conducted, and target 219 which focuses on training on risk management systems for the Romanian Ministry of Finance staff. Target 223 will be followed by milestone 225, related to functional electronic risk register, and milestone 226, which requires the Big Data platform and other IT systems to be functional.

### 2. Evidence provided:

|   | Name of the evidence                                                                                       | Short description                                                                                                          |
|---|------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                 | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled. |
| 2 | Copy of centralised list of total audits conducted (comprehensive tax inspections and documentary audits). | List of 43345 tax audits carried out by ANAF during January – September 2025.                                              |
| 3 | Copies of 60 tax audits reports.                                                                           | In the context of the sampling analysis, copies of 60 tax audit reports were provided by the                               |

|   |                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                       |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   |                                                                                                                                                                                                                                    | authorities.                                                                                                                                                                                                                                                                                                          |
| 4 | Copy of ANAF Internal Report No. A_RFC3382 of 4 November 2025 regarding the satisfactory fulfilment of milestones and targets included in Component 8 – Tax and Pensions Reform, approved by the Deputy Secretary-General of ANAF. | The ANAF Internal Report provides details on the differences between comprehensive tax inspections and documentary tax audits, outlines the steps taken by the Tax Administration to support the shift from physically conducted inspections to digital audits, and provides data regarding the tax audits conducted. |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the target.

**The share of the documentary audits in total audits carried out shall increase to 60% by Q4 2025,** compared to the 30% baseline in 2020.

According to ANAF Internal Report No. A\_RFC3382 of 4 November 2025 (Evidence No. 4), ANAF does two types of tax audits, which are applied exclusively to taxpayers identified as presenting fiscal risks on the basis of a risk analysis:

- **comprehensive tax inspections** which involve examining all relevant factual situations and legal relationships related to taxation, as well as verifying compliance with obligations laid down in tax legislation. Upon completion, ANAF issues a tax inspection report setting out the findings and fiscal implications. Where irregularities are identified, the report forms the basis for the issuance of a tax decision (*decizie de impunere*).
- **documentary audits** is a narrower defined form of a tax audit, which may focus on one or several transactions carried out within a specific period. Documentary audits are conducted exclusively at ANAF's premises. Upon completion, ANAF issues a documentary audit report setting out the findings and fiscal implications. Where irregularities are identified, the report forms the basis for the issuance of a tax decision (*decizie de impunere*).

According to the centralized list of tax audits conducted during the first nine months of 2025 (Evidence No. 2), 43 345 audits were done in total, 16 150 were comprehensive tax inspections and 27 195 documentary audits, with documentary checks representing 64.12% of the total.

Based on the centralized list of 43 345 tax audits conducted (Evidence No. 2), each uniquely identified using information such as region, company identifier (partially anonymized), start and end dates of the audits, number of audit reports, type of tax audit, and, for documentary audits, the number and date of the tax decision or the related report, a random sample of 60 units was selected. Following the selection of a random sample of 60 units, Romania submitted: (i) a copy of the inspection report for the comprehensive tax inspection, along with the relevant tax decision for cases where irregularities were identified, and (ii) a copy of the documentary audit report for the documentary audit, together with the relevant tax decision for cases where irregularities were identified. The evidence provided for the sample of 60 units confirmed that the requirement of the target has been met. The copies of the 60 tax audit reports (Evidence No. 3) submitted by Romania

confirms that all 60 sample audits were effectively conducted and completed. As all sampled cases were validated, the analysis concluded that the share of 64.12% of the documentary audits carried out is also validated, and the target's requirement has been overachieved, exceeding the goal of 60% by 4.12 percentage points.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Target:** RO-C[C8]-I[I2.0]-T[224] Increase the number of audits by 10%

**Related Measure:** RO-C[C8]-I[I2.0] Improving tax and tax administration processes, including through the implementation of integrated risk management

**Quantitative Indicator:** Number

**Baseline:** 25 000

**Target:** 27 500

**Time:** Q4 2025

### 1. Context:

The objective of the investment is to enhance tax compliance, curb tax avoidance and evasion, and support the achievement of planned budget revenues by improving the efficiency of tax collection.

Target 224 requires an increase in the number of tax audits conducted by the National Agency for Fiscal Administration (ANAF).

Target 224 represents the fourth step in the implementation of this investment and follows target 220, which requires at least 150 000 cash registers connected to ANAF's electronic system; target 221, which sets a minimum of 600 000 cash registers connected to ANAF's electronic system; and target 222, which requires a 30% share of documentary audits in the total number of tax audits conducted. Target 224 is accompanied in this payment request by target 223, which sets a 60% share of documentary audits in total tax audits conducted, and target 219, which provides for training on risk management systems for the Romanian Ministry of Finance staff. Target 224 will be followed by milestone 225 regarding the functional electronic risk register, and milestone 226, which requires the Big Data platform and other IT systems to be functional.

### 2. Evidence provided:

|   | Name of the evidence                                                                                       | Short description                                                                                                          |
|---|------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                 | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled. |
| 2 | Copy of centralised list of total audits conducted (comprehensive tax inspections and documentary audits). | List of 43 345 tax audits carried out by ANAF during January – September 2025.                                             |
| 3 | Copies of 60 tax audits reports.                                                                           | In the context of the sampling analysis, copies of 60 tax audit reports were provided by the authorities.                  |

### **3. Analysis:**

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the target.

#### **Increase the number of audits by 10%, compared to the total number in 2020.**

According to the centralized list of tax audits conducted during the first nine months of 2025 (Evidence No. 2), a total of 43 345 audits were conducted, out of which 16 150 comprehensive tax inspections and 27 195 documentary audits, compared with a baseline of 20 000 audits in 2020.

Based on the centralized list of 43 345 tax audits carried out (Evidence No. 2), each uniquely identified using information such as region, company identifier (partially anonymized), start and end dates of the audits, number of audit reports, type of tax audit, and, for documentary audits, the number and date of the tax assessment decision or the related report, a random sample of 60 units was selected. Following the selection of a random sample of 60 units, Romania submitted: (i) a copy of the inspection report for the comprehensive tax inspection, together with the relevant tax decision for cases where irregularities were identified; and (ii) a copy of the documentary audit report for the documentary audit, together with the relevant tax decision for cases where irregularities were identified. The evidence provided for the sample of 60 units confirmed that the requirement of the target has been met. The copies of the 60 tax audit reports (Evidence No. 3) submitted by Romania confirm that all 60 sampled audits were effectively conducted and completed. As all sampled cases were validated, the analysis confirms that the requirement has been met and overachieved, exceeding the target of 2 500 additional tax audits (representing a 10% increase compared to 2020) by 15 845 audits.

#### **4. Commission Preliminary Assessment: Satisfactorily fulfilled.**

**Number and name of the Milestone:** RO-C[C8]-I[I3.0]-M[228] Increased Cyber security of the Ministry of Finance's and ANAF computer system

**Related Measure:** RO-C[C8]-I[I3.0] Ensuring the capacity to respond to current and future information challenges, including in the context of the pandemic, through the digital transformation of Ministry of Finance / National Agency for Fiscal Administration

**Qualitative Indicator:** Cybersecurity system functional

**Time:** Q2 2023

### 1. Context:

Milestone 228 is part of investment C8.I3, which has the objective to ensure the capacity to respond to current and future information challenges through the digital transformation of the Ministry of Finance / the National Agency for Fiscal Administration (ANAF).

Milestone 228 requires that the cybersecurity of the Romanian Ministry of Finance and ANAF computer system is increased.

Milestone 228 is the first milestone of the investment. Milestone 228 will be followed by milestone 227 and target 229, related to the modernisation of hardware and software infrastructure and of the support infrastructure for the provision of electronic services to taxpayers, and to 80% of IT hardware and software infrastructure being not more than 4 years old respectively.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                | Short description                                                                                                                                                                                                                                                                                                                                                                                   |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                          | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.                                                                                                                                                                                                                                                                          |
| 2 | Copy of Government Emergency Ordinance No. 77 of 26 October 2017 regarding the establishment of the National Centre for Financial Information (CNIF), published in the Official Journal No. 854 of 30 October 2017. | The Government Emergency Ordinance establishes the CNIF within the Ministry of Finance, tasked with managing, developing, and coordinating information technology and communications systems for the Ministry and its subordinated institutions, including ANAF. The legal act also regulates the transfer of IT personnel, resources, and responsibilities from other public institutions to CNIF. |
| 3 | Copy of Contract No. 676820 of 26 January 2023 signed between the Ministry of Finance and                                                                                                                           | Contract for the supply to the Ministry of Finance of a front-end security solution, including associated services, consisting, <i>inter alia</i> , of web application firewall components, an                                                                                                                                                                                                      |

|    |                                                                                                                                      |                                                                                                                                                                                                                                                  |
|----|--------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | Metaminds S.A and its Annex No. 1.                                                                                                   | application delivery controller, a security operations centre, and network detection and response. Annex No. 1 includes the tender specifications.                                                                                               |
| 4  | Copy of Final Quantitative Reception Certificate No. 402653 of 5 April 2023.                                                         | Final Quantitative Reception Certification regarding the security system outlined in Contract No. 676820 of 26 January 2023.                                                                                                                     |
| 5  | Copy of Qualitative Acceptance Certificate No. 403085 of 24 April 2023.                                                              | Qualitative Acceptance Certificate regarding the security system outlined in Contract No. 676820 of 26 January 2023.                                                                                                                             |
| 6  | Copy of Commissioning Certificate No. 403087 dated 24 April 2023.                                                                    | Commissioning Certificate regarding the security system outlined in Contract No. 676820 of 26 January 2023.                                                                                                                                      |
| 7  | Copy of Quantitative and Qualitative Acceptance Certificate of licenses No. 403068 of 24 April 2023.                                 | Quantitative and Qualitative Acceptance Certificate of licenses regarding the security system outlined in Contract No. 676820 of 26 January 2023.                                                                                                |
| 8  | Copy of Partial Quantitative Reception Certificate No. 402564 of 3 April 2023.                                                       | Partial Quantitative Reception Certificates for the network detection and response components outlined in Contract No. 676820 of 26 January 2023, components installed in Bucharest headquarters.                                                |
| 9  | Copy of Partial Quantitative Reception Certificate No. 402627 of 4 April 2023.                                                       | Partial Quantitative Reception Certificates for the network detection and response components outlined in Contract No. 676820 of 26 January 2023, components installed in Brasov regional office.                                                |
| 10 | Copy of Contract No. 688048 of 23 August 2022 signed between the Ministry of Finance and SC Datanet Systems SRL and its Annex No. 1. | Contract for the supply of a network security solution for the Ministry of Finance, including IPS services and related support services. Annex No. 1 includes the tender specifications.                                                         |
| 11 | Copy of Final Reception Certificate No. 409300 of 15 December 2022.                                                                  | Final Reception Certificate regarding the supply of a network security solution for the Ministry of Finance, including IPS services and related support services as outlined in Contract No. 688048 of 23 August 2022.                           |
| 12 | Copy of Commissioning Certificate No. 409525 of 23 December 2022.                                                                    | Commissioning Certificate regarding the supply of a network security solution, including IPS services and related support services as outlined in Contract No. 688048 of 23 August 2022.                                                         |
| 13 | Copy of Quantitative Reception Certificate No. 407417 of 11 October 2022.                                                            | Quantitative Reception Certificate regarding the supply of a network security solution, including IPS services and related support services as outlined in Contract No. 688048 of 23 August 2022 (equipment installed in Bucharest headquarter). |

|    |                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                  |
|----|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 14 | Copy of Quantitative Reception Certificate No. 407551 of 13 October 2022.                                                                                                        | Quantitative Reception Certificate regarding the supply of a network security solution, including IPS services and related support services as outlined in Contract No. 688048 of 23 August 2022 (equipment installed in Brasov office).                                                         |
| 15 | Copy of Qualitative Reception Certificate No. 409299 of 15 December 2022.                                                                                                        | Qualitative Reception Certificate regarding the supply of a network security solution, including IPS services and related support services as outlined in Contract No. 688048 of 23 August 2022 (cover both Bucharest headquarters and Brasov office).                                           |
| 16 | Contract No. 677690 of 14 February 2024 signed between Ministry of Finance and Sysdom Poiecte SRL and its Annex No. 1.                                                           | Contract covering the main hardware infrastructure. Annex No. 1 includes the tender specifications.                                                                                                                                                                                              |
| 17 | Copy of Contract No. 688427 of 1 September 2022 signed between the Ministry of Finance and ETA2U SRL and its Annex No. 1.                                                        | Contract for the provision of a hardware and software solution for upgrading the Active Directory and PKI infrastructure, including associated services. Annex No. 1 includes the tender specifications, including the detailed locations for installing the Active Directory and PKI equipment. |
| 18 | Copy of Final Reception Certificate No. 401257 of 10 February 2023.                                                                                                              | Final Reception Certificate regarding the components outlined in Contract No. 688427 of 1 September 2022.                                                                                                                                                                                        |
| 19 | Copy of Quantitative and Qualitative Acceptance Certificate of licenses No. 401256 of 31 January 2023.                                                                           | Quantitative and Qualitative Acceptance Certificate of licenses regarding the security system outlined in Contract No. 688427 of 1 September 2022.                                                                                                                                               |
| 20 | Copy of Commissioning Certificate No. 401258 of 10 February 2023.                                                                                                                | Commissioning Certificate regarding the components outlined in Contract No. 688427 of 1 September 2022.                                                                                                                                                                                          |
| 21 | Copy of Contract No. 689951 of 7 October 2022 signed between the Ministry of Finance and Asocierea S&T Romania (leader) - Power Net Consulting (associated) and its Annex No. 1. | The contract covers hardware and software solution for centralized management of workstation infrastructure. Annex No. 1 includes the tender specifications.                                                                                                                                     |
| 22 | Copy of Final Reception Certificate No. 401292 of 13 February 2023.                                                                                                              | Final Reception Certificate covering the hardware and software solution for centralized management of workstation infrastructure under Contract No. 689951 of 7 October 2022.                                                                                                                    |

|    |                                                                                                                 |                                                                                                                                                                                      |
|----|-----------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 23 | Copy of Commissioning Certificate No. 401293 of 13 February 2023.                                               | Commissioning Certificate covering the hardware and software solution for centralized management of workstation infrastructure under Contract No. 689951 of 7 October 2022.          |
| 24 | Copy of Qualitative Reception Certificate No. 400539 of 17 January 2023.                                        | Qualitative Reception Certificate covering the hardware and software solution for centralized management of workstation infrastructure under Contract No. 689951 of 7 October 2022.  |
| 25 | Copy of Quantitative Reception Certificate No. 409222 of 14 December 2022.                                      | Quantitative Reception Certificate covering the hardware and software solution for centralized management of workstation infrastructure under Contract No. 689951 of 7 October 2022. |
| 26 | Addendum No. 1 to Contract No. 688427 of 1 September 2022 signed between the Ministry of Finance and ETA2U SRL. | Addendum to the contract for the provision of a hardware and software solution for upgrading the Active Directory and PKI infrastructure, including associated services.             |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

**The Ministry of Finance/National Agency for Fiscal Administration information system shall be upgraded with the following cybersecurity and infrastructure components: web application firewall components, application delivery controller, security operation centre, network detection and response**

The Romanian Ministry of Finance manages a common information system through the National Centre for Financial Information (CNIF). According to Article 4 of Government Emergency Ordinance No. 77 of 26 October 2017 (Evidence No. 2), CNIF, a structure within the Ministry of Finance, administers and develops the IT systems of the Ministry and its subordinate institutions, including ANAF. This system has been upgraded with the following cybersecurity and infrastructure components:

Contract No. 676820 of 26 January 2023 (page 5, Evidence No. 3) includes the following components:

- **web application firewall components:** F5 Velos CX410 and F5 Velos BX110.
- **application delivery controller:** NGINIX Solution (includes functionalities like NGINIX Plus, App Protect, Ingress Controller), VMware HCI custom bundle solution (include NSX-T, vSAN, vSphere Enterprise Plus, vCentre Server Standard), VMware Tanzu custom bundle solution (include Tanzu Standard Runtime, Tanzu Application platform), Processing node DELL EMC PowerEdge R650.
- **security operation centre:** Graylog Security Solution and Palo Alto Cortex XSOAR Solution.
- **network detection and response:** NDR Vectra Cognito Detect Solution.

The Final Quantitative Reception Certificate No. 402653 of 5 April 2023 (Evidence No. 4), the Qualitative Acceptance Certificate No. 403085 of 24 April 2023 (Evidence No. 5), the Commissioning Certificate No. 403087 of 24 April 2023 (Evidence No. 6), and the Quantitative and Qualitative Acceptance Certificate for licenses No. 403068 of 24 April 2023 (Evidence No. 7) confirm that the

four components were delivered to the Ministry of Finance, accepted, and are fully operational. In addition, the authorities also provided two Partial Quantitative Reception Certificates, No. 402564 of 3 April 2023 (Evidence No. 8) and No. 402627 of 4 April 2023 (Evidence No. 9), for the network detection and response components installed in the headquarters in Bucharest and the regional office in Braşov.

**[...] firewall equipment - OSI LAYER 3 with IPS IDS services included [...]**

Contract No. 688048 of 23 August 2022 (page 5, Evidence No. 10) covers the Cisco firewall ecosystem, including Cisco Secure Firewall 3140 appliances and licenses, supporting hardware such as power supplies, fans, SSDs, and rail kits, the Firepower Threat Defence software, the Cisco Firepower Management Centre for 10 devices, and networking modules and cables (SFPs and power cords).

Contract No. 677690 of 14 February 2024 (Evidence No. 16) covers the main hardware infrastructure, with the OSI Layer 3 firewall functionality provided by the Fortinet FortiGate devices listed in the table on page 6: one Router Type 1 FortiGate-100F and two Router Type 2 FortiGate-200F units.

The Final Reception Certificate No. 409300 of 15 December 2022 (Evidence No. 11), the Commissioning Certificate No. 409525 of 23 December 2022 (Evidence No. 12), the Quantitative Reception Certificate No. 407417 of 11 October 2022 (Evidence No. 13), the Quantitative Reception Certificate No. 407551 of 13 October 2022 (Evidence No. 14), and the Qualitative Reception Certificate No. 409299 of 15 December 2022 (Evidence No. 15) confirm that these components were delivered to the Ministry of Finance, accepted and are functional.

**[...] upgrade of the existing Active Directory infrastructure for centralized management of users [...]**

Contract No. 688427 of 1 September 2022 (Evidence No. 17) covers the upgrade of the Active Directory and PKI hardware-software infrastructure components (page 1). It features 63 Dell EMC PowerEdge R650 servers (comprising 58 units for central and territorial Data Centres and 5 dedicated for PKI), supported by Windows Server Standard licenses and 25000 Windows Server User CALs which are fundamental for user authentication within the Active Directory environment. This deployment is integrated into a secure physical setup consisting of EXCEL Racks (42U and 29U) equipped with APC UPS 2200VA units and SMX120BP battery cabinets to ensure power redundancy and operational continuity for these critical services. In addition, page 2 of the Addendum to the contract (Evidence No. 26) contains the new brand of servers Racks.

The Final Reception Certificate No. 401257 of 10 February 2023 (Evidence No. 18), the Quantitative and Qualitative Acceptance Certificate of licenses No. 401256 of 31 January 2023 (Evidence No. 19) and the Commissioning Certificate No. 401258 of 10 February 2023 (Evidence No. 20) confirm that these components were delivered to the Ministry of Finance, accepted, and are functional.

**[...] hardware and software for automatic updates for security patches of the applications used.**

Contract No. 689951 of 7 October 2022 (page 5, Evidence No. 21) covers the hardware and software solution for centralized management of workstation infrastructure, enabling automatic updates and security patch deployment for the applications used. The solution includes: ManageEngine Desktop Central UEM Edition licenses for 27000 endpoints and single users, additional 5-user licenses, Failover Service licenses for computers above 5000; Lenovo ThinkSystem SR630 V servers for Desktop Central and its database; Lenovo Desktop TC Neo 50s SFF servers for distribution; and an HPE Aruba 6000 24G switch.

The Final Reception Certificate No. 401292 of 13 February 2023 (Evidence No. 22), the Commissioning Certificate No. 401293 of 13 February 2023 (Evidence No. 23), the Qualitative Reception Certificate No. 400539 of 17 January 2023 (Evidence No. 24), and the Quantitative Reception Certificate No. 409222 of 14 December 2022 (Evidence No. 25) confirm that these components were delivered to the Ministry of Finance, accepted, and are functional.

**The investment shall allow sharing data in real time in a secure manner and with accurate/up-to-date data.**

The tender specifications, which are annexed to the above-mentioned contracts, ensure that the investment allows sharing data in real time in a secure manner and with accurate/up-to-date data. A review has been carried out across all relevant contracts, their tender specifications, and corresponding certificates, in order to confirm that the requirement is fulfilled at the level of the overall investment.

For instance, Annex No. 1 to Contract No. 676820 (Evidence No. 3), which includes the tender specification titled “Front-End Security Solution”, when referring to the Network Detection and Response (NDR) functionalities, requires that the solution shall collect raw data with high real-time analytics performance and that it shall provide external connectivity with the cloud services of outside providers for downloading additional information (page 19 of the Annex), therefore allowing data sharing in real time. Real-time data sharing is also ensured as part of the support infrastructure of the investment, whereby the tender specification states that the mechanism shall ensure transparent and synchronous replication of memory and disk content without introducing latency (page 26 of the Annex).

Annex No. 1 to Contract No. 676820 also states that ensuring the functioning of the IT system in a secure manner is among the general objectives of the procurement (page 7 of the Annex).

Finally, Annex No. 1 to Contract No. 676820, when referring to NDR functionalities, requires that the solution must guarantee the integrity of the information collected (page 19 of the Annex). Annex No. 1 to Contract No. 676820 also requires that object data storage (ODS), part of dedicated support infrastructure, shall preserve the integrity of stored data in the event of the loss of a disc and/or node (page 31 of the Annex). Both elements ensure that data is accurate/up-to-date.

Qualitative Acceptance Certificate No. 403085 of 24 April 2023 (Evidence No. 5), Quantitative and Qualitative Acceptance Certificate of licenses No. 403068 of 24 April 2023 (Evidence No. 7), and Final Quantitative Reception Certificate No. 402653 of 5 April 2023 (Evidence No. 4) accept the deliverables and associated services which constitute the subject matter of Contract No. 676820 (Evidence No. 3).

In addition, Commissioning Certificate No. 403087 dated 24 April 2023 (Evidence No. 6) state that the installation of products under contract No. 676820 (Evidence No. 3) was carried out and no inconsistencies between the delivered products and the underlying contract and tender specifications were found.

**It shall also address data and information privacy, as well as security management.**

The tender specifications, which are annexed to the above-mentioned contracts, ensure that the investment addresses data and information privacy, as well as security management. A review has been carried out across all relevant contracts, their tender specifications, and corresponding certificates, in order to confirm that the requirement is fulfilled at the level of the overall investment.

For instance, Annex No. 1 to Contract No. 676820 states that the NDR functionalities shall include the possibility to encrypt the transmission of the data (page 19 of the Annex), therefore addressing data and information privacy. Annex No. 1 to Contract No. 676820 also states that the front-end security solution shall ensure the minimum hardware and software integration of several components, including security management (page 8 of the Annex).

Qualitative Acceptance Certificate No. 403085 of 24 April 2023 (Evidence No. 5), Quantitative and Qualitative Acceptance Certificate of licenses No. 403068 of 24 April 2023 (Evidence No. 7), and Final Quantitative Reception Certificate No. 402653 of 5 April 2023 (Evidence No. 4) accept the deliverables and associated services which constitute the subject matter of Contract No. 676820 (Evidence No. 3).

In addition, Commissioning Certificate No. 403087 of 24 April 2023 (Evidence No. 6) state that the installation of products under contract No. 676820 (Evidence No. 3) was carried out and no inconsistencies between the delivered products and the underlying contract and tender specifications were found.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C8]-I[I6.0]- M[235] Economic modelling tool updated

**Related Measure:** RO-C[C8]-I[I6.0] Economic modelling instrument (Pension Reform Options Simulation Toolkit) to expand institutional capacity to forecast pension expenditures

**Qualitative Indicator:** Economic modelling tool updated

**Time:** Q4 2023

### 1. Context:

Milestone 235 is part of investment C8.I6, which aims at updating the Economic modelling instrument (Pension Reform Options Simulation Toolkit) and in the training of staff to expand institutional capacity to forecast pension expenditures.

Milestone 235 requires that the Economic modelling tool is updated.

Milestone 235 is the only milestone of this investment.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                             | Short description                                                                                                                                                                                                                                |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                                                       | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.                                                                                                                       |
| 2 | Copy of Report titled "PROST Manual, including steps to update the PROST Input File", delivered by the World Bank, delivered by the World Bank in January 2024.                                                                                  | Report presenting the updates to the Economic modelling tool (Pension Reform Options Simulation Toolkit – PROST). The report is delivered as part of the Reimbursable Advisory Services Agreement (RAS) on Pensions Capacity Building (P177723). |
| 3 | Copy of Letter from the Ministry of Finance of Romania to the World Bank titled "Re: Reimbursable Advisory Services Agreement on Romanian Pensions Capacity Building (P177723) – Acceptance of Deliverables 2(a) and 2(b)", dated 14 March 2024. | Letter from the Ministry of Finance to the World Bank accepting deliverables 2(a) and 2(b) as part of the RAS P177723.                                                                                                                           |

|   |                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                         |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4 | Copy of PROST Licence Agreements signed by eight Ministry of Finance staff members on 16 May 2022.                                                                | PROST Licence Agreements, attesting the participation in PROST training and granting licence to use PROST, signed by eight staff members of the Ministry of Finance.                                                                                                                                    |
| 5 | Copy of 2024 Ageing Report Romania – Country fiche, approved on December 2023, and a link to the report <a href="#">a9702deb-0d2c-4540-a03c-65e2b4736c23_en</a> . | The 2024 Ageing Report presents long-term projections of Romania’s pension system, in line with EU requirements. It includes a description of the pension system, demographic and labour force projections, pension projection results, and an explanation of the projection model and underlying data. |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

**Economic modelling tool (Pension Reform Options Simulation Toolkit model) shall be updated to estimate the (ex-ante) impact of structural pension reforms in the medium to long term, refining the projections made and analysing the sustainability of the pension system.**

The report “PROST Manual, including steps to update the PROST Input File” (hereinafter referred to as “*the Manual*”) (Evidence No. 2), which constitutes deliverable 2(b) of the Reimbursable Advisory Services Agreement (RAS) on Pensions Capacity Building (P177723) signed between the World Bank and Romania, presents the update to the Pension Reform Options Simulation Toolkit (PROST) model implemented by the Ministry of Finance of Romania. The letter from the Ministry of Finance to the World Bank titled “Re: Reimbursable Advisory Services Agreement on Romanian Pensions Capacity Building (P177723) – Acceptance of Deliverables 2(a) and 2(b)” and dated 14 March 2024 (Evidence No. 3) constitutes the acceptance of the delivery of the PROST Manual.

Section 1 of the Manual (page 7) (Evidence No. 2) states that the manual aims to provide the necessary information for the modelling unit in the Ministry of Finance (MoF) of Romania on the updated model to prepare projections on the performance of the Romanian pension system and on how to adjust inputs to the model for the preparation of projections for proposed changes to the system. Section 2 of the Manual (pages 9 to 27) presents the updates made to tailor the PROST input file to the Romanian context. These include, among others, the indexation corridor (outlined in section 2.2.1, pages 13-14), which allows to align the PROST input file with the provisions on indexation included in the pension reform of 2023 (i.e., Law No. 360 of 29 November 2023, published in the Official Journal No. 1089 on 4 December 2023), and the points-based system (outlined in section 2.3 of the Manual), page 16). The updated model therefore allows to estimate the ex-ante impact of structural pension reforms.

Section 2.10 of the Manual (pages 23 to 27) (Evidence No. 2) presents the possible modifications to the input file for the simulation of sensitivity scenarios. These possible modifications include changes in parameters such as life expectancy, migration, fertility, inflation, employment rate, retirement age and benefit ratio. The updated model therefore allows refining the projections made.

Section 6 of the Manual (pages 42 to 51) (Evidence No. 2) presents general information on the PROST model. Section 6.1 (pages 42-43) states that the PROST model is a flexible, computer-based toolkit, adapted to a wide range of countries’ circumstances (related to e.g. demography, the

economy and the characteristics of the pension system) that can be for projections to analyse relevant policy questions, including the viability and sustainability of a pension system. The update to the PROST model, as presented in the PROST Manual, therefore allows to better analyse the sustainability of the Romanian pension system.

The Manual (Evidence No. 2) provides several examples of how the PROST model has been updated. According to page 9, the input file's data, assumptions, and pension system coding were updated from a base year of 2018 to a base year of 2022. As a result, the model now reflects the current points-based system more accurately and improves overall projection reliability. Then, the formulas in PROST's general tab were adapted to reflect the new indexation rule, which refers to t-2 inflation data (page 27). A second set of adjustments, included in the Summary file, fine-tuned the projections for old-age, survivors, and disability pensions to align with the latest statistical data. This harmonization used National Pension House open data from January to October 2023, with a linear extrapolation for November and December. One of the most significant adjustments was the application of a 104% factor to old-age expenditure. This adjustment was necessary to align PROST projections with the latest available statistics, as the updated data showed that the actual expenditures were higher than originally estimated (the 104% factor increases the projected expenditure by 4%, reflecting the real financial situation more accurately). However, most pension categories did not require any adjustment, as indicated by the 100% factor applied to other categories in the Summary file. These adjustment factors are applied consistently throughout the projection period from 2023 to 2070, ensuring the projections remain aligned with the most current data.

According to the 2024 Ageing Report – Romania country fiche (Evidence No. 5), the PROST model served as the core tool for projections, simulating pension contributions, entitlements, revenues, and expenditures over an extended horizon (page 57). The projections extend from 2022 to 2070, as shown in the country fiche tables, confirming that the model captures effects over the medium- to long-term. The pension projections presented in the 2024 Ageing Report – Romania country fiche incorporate the macroeconomic assumptions and methodologies agreed within the Ageing Working Group of the Economic Policy Committee, and they have been peer reviewed by the other Member States and the European Commission within the Ageing Working Group (page 3).

**The investment also covers the training of the eight responsible staff members using the new toolkit.**

Annex 1 of the PROST Manual (page 52) (Evidence No. 2) outlines that under the current RAS, the World Bank provided training and support in the use of the PROST model to staff of the modelling unit in the Ministry of Finance. The World Bank team prepared and delivered one workshop in Bucharest during the week of 9-13 May 2022. Eight staff members from the Ministry of Finance modelling unit completed the training and received a licence to use the PROST model, as evidenced by the PROST Licence Agreements (Evidence No. 4) signed by eight Ministry of Finance staff members.

**4.Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C8]-I[I8.0]-M[238] Purchase of software (licences) and hardware (laptops), IT services for staff, training for the staff of the National Development Bank (BID) and for the Ministry of Finance staff

**Related Measure:** RO-C[C8]-I[I8.0] Establishment of the National Development Bank

**Qualitative Indicator:** Purchase Contracts signed

**Time:** Q4 2024

### 1. Context:

The objective of this investment is to ensure that the National Development Bank (hereinafter referred to as "*BID*" or "*the bank*") is functional.

Milestone 238 concerns the purchase of software (licenses) and hardware (laptops), IT services for staff, training for the staff of the National Development Bank and for the Ministry of Finance staff.

This investment is complementary to C8.R5 regarding the legal establishment of the National Development Bank and C8.I11 in the loan component, related to an equity injection into the BID.

Milestone 238 is the only milestone of this investment.

### 2. Evidence provided:

|   | Name of the evidence                                               | Short description                                                                                                             |
|---|--------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover Note                                                         | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.    |
| 2 | Copy of Contract No. CBID_01 signed on 30 September 2024.          | Contract between Plaut Consulting Romania SRL and BID for the acquisition of S/4HANA software.                                |
| 3 | Copy of Contract No. CBID_02 signed on 30.09.2024.                 | Contract between Plaut Consulting Romania and BID for the acquisition of SAP software access and 3 years maintenance.         |
| 4 | Copy of Contract No. CBID_03 signed on 30 September 2024.          | Contract between Plaut Consulting Romania and BID for the acquisition of SAP Cloud licenses.                                  |
| 5 | Copy of Contract No. CBID_04 signed on 12 September 2025.          | Contract between Plaut Consulting Romania and BID for the acquisition of services related to the implementation of SAP CLOUD. |
| 6 | Copy of Ordering Document No. CPQ-3513138-1 from 7 November 2024.  | Order Document issued by Oracle Romania SRL showing the acquisition of Oracle licenses subscriptions.                         |
| 7 | Copy of Ordering Document No. CPQ-3630388-1 from 28 November 2024. | Order Document issued by Oracle Romania SRL showing the acquisition of Oracle software and related services.                  |

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| 8  | Copy of Ordering Document No. CPQ-3642534-1 from 27 November 2024.                                                                                                          | Order Document issued by Oracle Romania SRL showing the acquisition of Oracle Open-Source Service.                                  |
| 9  | Copy of Ordering Document No. CPQ-3694229-1 from 22 November 2024.                                                                                                          | Order Document issued by Oracle Romania SRL showing the acquisition of Cloud Services.                                              |
| 10 | Copy of Ordering Document No. RO-17648062 from 17 October 2024.                                                                                                             | Order Document issued by Oracle Romania SRL showing acquisition of Oracle services.                                                 |
| 11 | Copy of Ordering Document No. RO-17648074 from 17 October 2024.                                                                                                             | Order Document issued by Oracle Romania SRL showing acquisition of Oracle services.                                                 |
| 12 | Copy of Ordering Document No. RO- 17675987 from 18 October 2024.                                                                                                            | Order Document issued by Oracle Romania SRL showing acquisition of Oracle services.                                                 |
| 13 | Copy of Contract No. 5 from 01 October 2024.                                                                                                                                | Framework Contract between Conversion Marketing SRL and BID for the acquisition of website design and maintenance services.         |
| 14 | Copy of Contract No. DSE578 signed on 09 October 2024.                                                                                                                      | Contract between Datanet Systems SRL and BID for the acquisition of Networking equipment, and related services.                     |
| 15 | Copy of Additional Act No. 1 to Contract No. DSE578.                                                                                                                        | Extension of Contract No. DSE578 to include the acquisition of additional Firewall and Networking equipment and services.           |
| 16 | Copy of Contract No. 1030 from 12 December 2024.                                                                                                                            | Contract between DATACORE SYSTEMS SRL and BID for the acquisition of storage systems.                                               |
| 17 | Copy of Contract No. 8126BOM2023 from 27 December 2023.                                                                                                                     | Framework Contract between NET BRINEL SA and BID for the acquisition of laptops and Windows licenses.                               |
| 18 | Copy of Contract No. 1489 from 14 May 2024.                                                                                                                                 | ATLAS CORPORATION and BID for the acquisition of laptops, other IT equipment, and Windows licenses.                                 |
| 19 | Copy of Additional act No. 1 to Contract No. 1489.                                                                                                                          | Extension of Contract No. 1489 to include the acquisition of additional laptops, other IT equipment, and Windows licenses.          |
| 20 | Copy of Additional act No. 2 to Contract No. 1489.                                                                                                                          | Extension of Contract No. 1489 to include the acquisition of additional RAM capacity.                                               |
| 21 | Copies of Invoices No. 6255 from 22 July 2025, No. INVCZ8935715 from 6 February 2025, No. INVCZ10079685 from 29 September 2025, and No. 9948996C-0001 from 3 February 2025. | Invoices issued by Aikido Security BV, JetBrains sro, and Figma Inc to BID showing the acquisition of digital development software. |
| 22 | Copy of Invoice No. 3035894991 from 7 March 2025.                                                                                                                           | Invoice issued by Adobe Systems Software Ireland Ltd to BID showing the acquisition of Adobe software.                              |
| 23 | Copies of Invoices No. E0100RAO7X from 12 March 2024, No. E0100VS1S5 from 28 March                                                                                          | Invoices issued by Microsoft Ireland Operations Ltd to BID showing the acquisition of Microsoft software licenses.                  |

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|    | 2025, No. E0100XL2EB from 28 September 2025.                                                                                                                                                                                            |                                                                                                                                                                                                 |
| 24 | Copies of Invoices No. E37069D5-0001 from 7 March 2024, E37069D5-0002 from 7 March 2025, E37069D5-0003 from 25 June 2025, E37069D5-0004 from 27 June 2025, E37069D5-0005 from 07 November 2025, and E37069D5-0006 from 16 October 2025. | Invoices issued by Open AI LLC to BID for the acquisition of Open AI software licenses.                                                                                                         |
| 25 | Copy of Contract No. ICR00007 signed on 16 May 2025.                                                                                                                                                                                    | Contract between INTER COMPUTER ROMANIA SRL and BID for the acquisition of IBM software.                                                                                                        |
| 26 | Contract No. 5848 from 19 August 2025.                                                                                                                                                                                                  | Contract between Omega Trust SRL and BID for the acquisition of log management equipment and software.                                                                                          |
| 27 | Copy of Invoice No. R20250006647 from 22 June 2025.                                                                                                                                                                                     | Invoice issued by Paessler GmbH to BID showing the acquisition of network monitoring software.                                                                                                  |
| 28 | Copy of Contract No. 1366BM2024 from 20 August 2024.                                                                                                                                                                                    | Contract between NET BRINEL SA and BID for the acquisition of infrastructure equipment and services.                                                                                            |
| 29 | Copy of Additional act No. 1 to Contract No. 1366BM2024.                                                                                                                                                                                | Extension of Contract No. 1366BM2024 to include the acquisition of additional infrastructure equipment.                                                                                         |
| 30 | Copy of Additional act No. 2 to Contract No. 1366BM2024.                                                                                                                                                                                | Extension of Contract No. 1366BM2024 to include the acquisition of additional infrastructure equipment.                                                                                         |
| 31 | Copy of Additional act No. 3 to Contract No. 1366BM2024.                                                                                                                                                                                | Extension of Contract No. 1366BM2024 to include the acquisition of additional infrastructure equipment.                                                                                         |
| 32 | Copy of Additional act No. 4 to Contract No. 1366BM2024.                                                                                                                                                                                | Extension of Contract No. 1366BM2024 to include the acquisition of additional licenses subscriptions.                                                                                           |
| 33 | Copy of Additional act No. 5 to Contract No. 1366BM2024.                                                                                                                                                                                | Extension of Contract No. 1366BM2024 to include the acquisition of additional infrastructure equipment.                                                                                         |
| 34 | Copy of Additional act No. 6 to Contract No. 1366BM2024.                                                                                                                                                                                | Extension of Contract No. 1366BM2024 to include the acquisition of additional mass transfer software                                                                                            |
| 35 | Copy of Contract No. S-ARO-2024-0330 from 27 August 2024.                                                                                                                                                                               | Contract No. S-ARO-2024-0330 between ASEE Solutions and BID for the acquisition of Microsoft Cloud services.                                                                                    |
| 36 | Copy of Additional act No. 1 to Contract No. S-ARO-2024-0330.                                                                                                                                                                           | Extension of Contract No. S-ARO-2024-0330 to include the acquisition of additional data centre licenses.                                                                                        |
| 37 | Copy of Additional act No. 2 to Contract No. S-ARO-2024-0330.                                                                                                                                                                           | Extension of Contract No. S-ARO-2024-0330 to include the acquisition of additional data centre licenses.                                                                                        |
| 38 | Copy of Agreement for advisory services from the European Investment Bank No. 011824.                                                                                                                                                   | Letter from the European Investment Bank to the Minister of Finance highlighting the terms and conditions pursuant to which the former shall provide advisory services for BID's establishment. |
| 39 | Copy of Agreement for advisory services from the World Bank No. P502277.                                                                                                                                                                | Agreement for the provision of advisory services between the World Bank and the BID.                                                                                                            |
| 40 | List of staff contracts in force as of October 2025.                                                                                                                                                                                    | List of the bank's staff, providing details about each employee's department and position.                                                                                                      |

|    |                                                            |                                                                                                                  |
|----|------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|
| 41 | Copy of Letter No. BID 257 of 22 April 2026 and its Annex. | Letter issued by BID's human resources department highlighting the number of staff contracts as of October 2025. |
|----|------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|

### 3. Analysis:

The justification and substantiating evidence provided by the Romania authorities cover all constitutive elements of the milestone.

**The National Development Bank shall purchase the following: software, hardware, and other equipment, allowing the staff to perform their duties [...]. Purchase of software (licences) and hardware (laptops) (...). Purchase contracts signed.**

The BID has concluded several contracts to procure hardware, software, and IT equipment for its 134 staff members as of October 2025 (Evidence No. 40, 41) and digital systems, including laptops, workstations, software licenses, development tools, and communication equipment. In particular, framework Contract No. 8126BOM2023 (Evidence No. 17) on the purchase of hardware and licenses required by the BID staff. This contract shows the purchase of 20 laptops, alongside 265 Microsoft 365 Business Premium subscriptions and two Microsoft Planner and Project Plan 3 (pages 5-9).

Contract 1489 (Evidence No. 18 page 7), alongside Additional acts No. 1 and 2 (Evidence No. 19, page 2, and Evidence No. 20, page 2), are related to the purchase of a total of 155 laptops, 155 Windows 11 Pro licenses, 120 monitors, four pieces of videoconferencing equipment, and 20 RAM modules.

As evidenced by the Additional act No. 3 to Contract No. 1366BM2024 (Evidence No. 31), the BID purchased 11 workstations, as well as 85 headsets (page 2).

The Invoices No. 6255, INVCZ8935715, INVCZ10079685, and 9948996C-0001 (Evidence No. 21, pages 1-5) show the purchase of several software licenses supporting digital development activities, including Aikido PRO 10, IntelliJ IDEA Ultimate, Figma Design, Figma FigJam, and Figma Dev Mode, which are used for application development, collaborative design and planning, and ensuring the quality and security of software code. Additionally, Invoices No. 3035894991 issued by Adobe Systems Software Ireland Ltd (Evidence No. 22), E0100RAO7X, E0100VS1S5, E0100XL2EB issued by Microsoft Ireland Operations Ltd (Evidence No. 23), as well as E37069D5-0001, E37069D5-000, E37069D5-0003, E37069D5-0004, E37069D5-0005, E37069D5-0006 issued by Open AI LLC (Evidence No. 24) reflect the purchase of 5 Adobe Acrobat Pro, 12 Microsoft Visio Plan 2, and 28 ChatGPT Teams licenses (page 1; pages 1-6; pages 1-6 respectively).

The Council Implementing Decision requires that “The National Development Bank shall purchase software, hardware, and other equipment, allowing the staff to perform their duties”, and the qualitative indicator of the milestone is “Purchase contracts signed”. Evidence Nos. 17, 18, 19, 20, 31, and 48 demonstrates that several relevant purchases were made through the signature of purchase contracts. However, Evidence Nos. 21, 22, 23, and 24 indicated above demonstrates that other equipment and services for the BID staff were purchased through direct acquisition procedures and are evidenced by invoices rather than by signed purchase contract. Whilst this constitutes a minimal formal deviation from the requirement of the Council Implementing Decision, according to Romanian law, acquisitions below the applicable value threshold<sup>1</sup> are carried out through direct acquisition, without the need for a public tender procedure and, thus, without the signature of a dedicated purchase contract. Although no dedicated purchase contract was signed in those cases, the invoices demonstrate that the required equipment and services for allowing the BID staff to perform their duties were made. Therefore, the invoices serve as documentary evidence that the required purchases were completed. As of this, this minimal deviation does not change the

nature of the measure and does not affect the progress towards achieving the investment that the milestone represents. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

**[...] ITC infrastructure equipment and services for data centres [...]. Purchase contracts signed.**

The BID has procured ITC infrastructure equipment and services for data centres, including storage systems, servers, backup and recovery solutions, monitoring tools, database, and infrastructure management software.

In particular, according to Contract No. 1030 (Evidence No. 16) BID purchased two Pure Storage FlashArray X20R4 63TB systems (pages 16-17). These enterprise storage systems provide centralized storage for applications and data.

Contract No. 1366BM2024 (Evidence No. 28) shows the purchase of one PowerEdge R660, three PowerEdge R960, and two PowerEdge R760 servers, as well as maintenance and support services for a period of 60 months (pages 10-13). These servers provide computing capacity and infrastructure services. The Additional acts No. 1 (Evidence No. 29) and No. 5 (Evidence No. 33) extend Contract No. 1366BM2024 to include additional infrastructure equipment: nine PowerEdge R660 servers, three PowerEdge R960 servers, two PowerEdge R760 servers, two PowerProtect DD6400 systems (Evidence No. 29, page 10), and three Dell Intel i350-T4 network daughter cards (Evidence No. 33, page 2). The Additional act No. 4 (Evidence No. 32) extends Contract No. 1366BM2024 to include 15 Veeam Data Platform Foundation Universal Subscription licenses and 165 Veeam Backup for Microsoft 365 licenses. These solutions support the backup and recovery of systems and data (page 2).

Contract No. ICR00007 (Evidence No. 25) concerns the purchase of two IBM MQ Virtual Processor Core licenses used to enable communication between different applications and systems, benefiting from support services for 12 months (page 12). Contract No. 5848 (Evidence No. 26) provides evidence for the purchase of one Graylog Enterprise self-managed license (10GB) and two PowerEdge R760 servers, which includes a 60-month support services period (page 2). Invoice No. R20250006647 (Evidence No. 27) shows the purchase of one PRTG Network Monitor license which provides real-time monitoring of IT infrastructure (page 1).

Additional act No. 1 to Contract No. S-ARO-2024-0330 (Evidence No. 36) provides evidence that eight SQL Server Standard 2022, 96 x System Center 2025 Standard, and 108 System Center 2025 core license packs have been purchased (page 3). Additional act No. 2 to Contract No. 1366BM2024 (Evidence No. 30) concerns the acquisition of four PowerEdge R760 servers, providing computing capacity for hosting applications and processing data (pages 2-3).

**[...] cloud and Telecommunications infrastructure as well as connectivity, [...]. Purchase contracts signed.**

The BID has purchased cloud, telecommunications, and connectivity infrastructure. In particular, Contract No. DSE578 (Evidence No. 14) alongside Additional act No. 1 to Contract No. DSE578 (Evidence No. 15) concern the purchase and installation of telecommunications, connectivity and cybersecurity infrastructure for BID's data centres and headquarters. According to the aforementioned Contract and Additional act, the equipment and services purchased include two Catalyst 9300 switches supporting internal network connectivity, two C9300 DNA Advantage licenses, two power supplies, two Catalyst 9300 network modules, six Catalyst 9200 switches, six C9200 Cisco DNA Essentials licenses, six Catalyst 9200 network modules, six power supplies, four Catalyst 9500 switches, four C9500 DNA Advantage licenses, four power supplies, eight SFP modules, four Nexus 9300 switches, four Data Center Networking Essentials licenses, four Catalyst 9200L

switches, four C9200L Cisco DNA Essentials licenses, four power supplies, two Cisco Catalyst C8300 routers enabling interconnection and external network connectivity, two Cisco DNA Essentials licenses, two MDS 9148T Fibre Channel switches, installation services, as well as security infrastructure including two Cisco Secure Firewall 3105 appliances, 150 Cisco AnyConnect Apex licenses enabling remote connectivity, two FortiGate-121G with FortiCare Premium and FortiGuard Unified Threat Protection, four FortiGate-901G devices, four FortiGate-901G Advanced Threat Protection subscriptions, four FortiGate-121G devices, four FortiGate-121G Advanced Threat Protection subscriptions, two FortiManager VM license upgrades, four Palo Alto Networks PA-1410 firewalls, four PA-1410 DNS Security subscriptions, four PA-1410 Advanced URL Filtering subscriptions, four PA-1410 Advanced Threat subscriptions, one on-site spare Palo Alto Networks PA-1410 device, two Panorama central management software licenses, and installation services (Evidence No. 14, pages 14-23, Evidence No. 15, pages 1-5). Contract No. S-ARO-2024-0330 (Evidence No. 35) shows the purchase of cloud infrastructure services, representing pre-committed cloud capacity supporting the operation of the BIDs IT environment (page 7).

**[...] banking applications, [...]. Purchase contracts signed.**

The bank procured and implemented digital systems supporting its operational and financial activities, including the SAP S/4HANA enterprise resource planning system, the Oracle FLEXCUBE core banking platform, and related digital infrastructure and services. In detail, the Copies of Contracts CBID\_01, CBID\_02, CBID\_03 and CBID\_04 (Evidence No. 2–5) provide evidence that the BID purchased and implemented the SAP S/4HANA enterprise resource planning (ERP) system, together with the necessary software licenses, cloud services and implementation support. Evidence No. 2 demonstrates the procurement of implementation services for the SAP S/4HANA on-premises ERP system, covering core financial and operational modules such as SAP Financials, SAP Controlling, SAP Materials Management and SAP Expense Management (page 1; page 20). Evidence No. 3 shows the purchase of SAP S/4HANA on-premise software licenses, including SAP S/4HANA Enterprise Management user licenses, developer access licenses, SAP Document and Reporting Compliance, and the SAP HANA runtime database, together with annual maintenance services (pages 3-5). Evidence No. 4 shows the purchase of SAP cloud services and licenses, including solutions such as SAP SuccessFactors and SAP Analytics Cloud (pages 4-6). Finally, Contract CBID\_04 (Evidence No. 5) provides evidence of the purchase of implementation services for Additional SAP S/4HANA cloud modules, including SAP Success Factors Onboarding and Recruiting, SAP Analytics Business Intelligence, SAP Integration Suite, and SAP Single Sign-On (pages 4-10).

Ordering Documents No. CPQ-3513138-1, CPQ-3630388-1, CPQ-3642534-1, and CPQ-3694229-1, alongside RO-17648062, RO-17648074, and RO-17675987 (Evidence No. 6-12) reflect the purchase of software, infrastructure, and professional services required for the implementation and operation of the Oracle FLEXCUBE core banking platform. Specifically, Evidence No. 6 shows the purchase of the Oracle Banking application licenses supporting payments processing, corporate lending, treasury and deposit management (pages 1–2), while Evidence No. 7 covers the purchase of database and middleware infrastructure including Oracle Database Enterprise Edition, WebLogic Suite and associated support services (pages 1–3). Evidence No. 8 demonstrates the procurement of Oracle Linux Premier Support services (page 1), and Evidence No. 9 demonstrates the purchase of Oracle Cloud Infrastructure credits for PaaS/IaaS services (page 1). In addition, Evidence No. 10-12 demonstrates the acquisition of services for the implementation, configuration, integration and deployment of Oracle Banking Applications and related infrastructure (pages 2-3, page 3, pages 3-9 respectively).

Framework Contract No. 5 (Evidence No. 13) concerns the design, development, and maintenance of the bank's website. The services purchased through this Framework Contract include website design services, website development services, and website testing and implementation services, facilitating access to information for partners and stakeholders.

The Council Implementing Decision requires that “The National Development Bank shall purchase [...] banking applications”, and the qualitative indicator of the milestone is “Purchase contracts signed”. Evidence Nos. 2, 3, 4, and 5 demonstrates that several relevant purchases were made through the signature of purchase contracts. However, Evidence Nos. 6, 7, 8, 9, 10, 11, and 12 indicated above demonstrates that other banking applications were purchased through ordering documents signed by BID with Oracle, rather than through the signature of a purchase contract. Whilst this constitutes a minimal formal deviation from the requirement of the Council Implementing Decision, the ordering documents are governed by a publicly available standard contract used by Oracle in its contractual relationships and whose terms may, where necessary, be adjusted or further specified through ordering documents. Although no dedicated purchase contract was signed in those cases, taken together, the standard contract and the corresponding ordering documents establish the contractual basis for the individual purchases concerned and demonstrate that the required banking applications were made. Therefore, the ordering documents serve as documentary evidence that the required purchases were completed. As of this, this minimal deviation does not change the nature of the measure and does not affect the progress towards achieving the investment that the milestone represents. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

**[...] IT services for staff, [...]. Purchase contracts signed.**

The bank has procured solutions supporting IT services for staff. According to Additional Act No. 2 to Contract No. S-ARO-2024-0330 (Evidence No. 37), BID procured 40 Windows Server 2025 Remote Desktop Services User CAL licenses (page 30).

The Copy of Additional Act No. 6 to Contract No. 1366BM2024 (Evidence No. 34) shows that the bank procured one GoAnywhere MFT Starter Bundle with Gateway and Threat Protection for mass file transfers between the bank’s internal systems and external partners.

**[...] technical assistance and training service for the staff of the National Development Bank and for the Ministry of Finance staff involved in assessing the performance of the bank. Purchase contracts signed. Furthermore, in line with the description of the measure, this measure consists in the purchase of (...) technical assistance and training of the staff of the National Development Bank to carry out the operations and of the Ministry of Finance staff involved in the assessment of the activity and performance of the bank.**

According to the Agreement for advisory services from the European Investment Bank No. 011824 (Evidence No. 38) and the Agreement for advisory services from the World Bank No. P502277 (Evidence No. 39), the BID has received technical assistance and training services for its staff and for the Ministry of Finance’s staff involved in assessing the activity and performance of the bank.

In particular, the agreement with the European Investment Bank contains, on pages 5-7, the main advisory tasks of the agreement: delivery of feasibility study and design of financial instruments for the BID, provision of training support to build financial instrument capacity, and support on “Do No Significant Harm”. The agreement with the World Bank states that the World Bank is to provide advisory inputs for the BID’s Risk Management Framework, the development of BID’s ESG Framework, targeted technical assistance for operational priorities, and advisory inputs and capacity building on the shareholder function for the Ministry of Finance. The latter, specifically, focuses on informing the Ministry of Finance’s development of a monitoring and evaluation framework and also includes delivering two training sessions to selected Ministry of Finance staff members to enhance their skills for analysing, monitoring, and assessing BID’s performance (pages 4-6).

**4. Commission Preliminary Assessment: Satisfactorily fulfilled.**



**Number and name of the Target:** RO-C[C8]-I[I9.0]-M[239] All pension files recalculated

**Related Measure:** RO-C[C8]-I[I9.0] Supporting the process of assessing pension files

**Qualitative Indicator:** All pension files recalculated

**Time:** Q4 2023

### 1. Context:

The objective of this investment is to support the digitisation of pension files. The measure involves the recalculation of pension files in line with the new pension legislation and their digitisation. Milestone 239 is the sole milestone under this investment and covers the completion of the pension recalculation process.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Short description                                                                                                          |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled. |
| 2 | Copy of Law No. 360/29 November 2023 regarding the general pension system, published in the Official Journal No. 1089/4 December 2023.                                                                                                                                                                                                                                                                                                                                                                                      | New law on the general pension system.                                                                                     |
| 3 | Copy of Government Emergency Ordinance No. 89/28 June 2024 on certain measures for carrying out the integrated activities related to the issuance and transmission of pension recalculation decisions within the public pension system ( <i>Ordonanța de urgență Nr. 89/28 iunie 2024 privind unele măsuri pentru desfășurarea activităților integrate aferente emiterii și transmiterii deciziilor privind recalcularea pensiilor din sistemul public de pensii</i> ), published in Official Journal No. 611/29 June 2024. | Legislation adopted to regulate the process for issuing and submitting pension recalculation decisions.                    |
| 4 | Copy of Service Agreement No. 3022/JBO of 04 July 2024 for the transmission of                                                                                                                                                                                                                                                                                                                                                                                                                                              | Agreement between the Romanian National Postal                                                                             |

|    |                                                                                                                                                                                                                                                                          |                                                                                                                                                                       |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | pension recalculation decisions.                                                                                                                                                                                                                                         | Company and the Ministry of Labour, through the National Pension House, for the transmission of pension recalculation decisions.                                      |
| 5  | Copy of centralized list of recalculation letters submitted to pensioners.                                                                                                                                                                                               | The list of 4,701,716 pension recalculation decisions (one unique identifier per decision).                                                                           |
| 6  | Copies of 60 recalculation decisions.                                                                                                                                                                                                                                    | In the context of the sampling exercise, copies of 60 recalculation decisions were provided, concerning the 60 randomly selected units.                               |
| 7  | Copies of 60 receipts from the post office.                                                                                                                                                                                                                              | In the context of the sampling exercise, copies of 60 postal receipts were submitted as evidence that the government had sent the decisions to the citizens concerned |
| 8  | Copy of the World Bank's technical note: Recalculation of public pension following the pension system reform in Romania.                                                                                                                                                 | Independent report including justification that the technical specifications of the recalculation of pensions are aligned with the provisions of the new legislation. |
| 9  | Copy of Ministerial Order No. 108 of 28 January 2021.                                                                                                                                                                                                                    | Ministerial Order initiating the pensions recalculations process (digitisation of pension files into a database).                                                     |
| 10 | Copy of Letter No. A2089/IP26 of 2 February 2022 regarding the pension recalculation process                                                                                                                                                                             | Letter No. A2089/IP26 of 2 February 2022, which refers to the IT software used for the creation of the dataset (digitisation of pension files).                       |
| 11 | Copy of Operational Procedure No. 131/2021 approved by the President of the Pension House.                                                                                                                                                                               | Operational Procedure No. 131/2021, which sets out the operational steps for the recalculation of pensions.                                                           |
| 12 | Copy of Letter submitted by the National Pension House to the Ministry of Labour and Social Solidarity, providing clarifications regarding the fulfilment of Milestone 239 on the recalculation of pension files, signed by the President of the National Pension House. | Clarifications regarding the recalculation of pension files.                                                                                                          |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

**All approximately 5 million pension files recalculated on the basis of the new pension law. The government shall send to all citizens by post a decision regarding the result of the recalculation.**

According to Article 144 of Law No. 360 of 29 November 2023 on the general pension system, published in the Official Journal No. 1089 of 4 December 2023 (Evidence No. 2), and which entered into force on the date of its publication, pension benefits established under previous legislation are recalculated. The recalculation of pensions is part of the broader pension reform, which introduces a revised calculation formula and indexation framework aimed at ensuring fiscal sustainability, strengthening the contributory principle and preventing ad-hoc increases in pension benefits. In this context, the Romanian authorities provided a centralised list covering a total of 4,701,716 recalculated pension decisions (Evidence No. 5). Moreover, the same number of notification letters were sent by the local Pension Houses to pensioners to inform them of the recalculated benefits (Evidence No. 5).

In accordance with Article 1(2) of Government Emergency Ordinance No. 89/28 June 2024, published in the Official Journal No. 611/29 June 2024 (Evidence No. 3), and which entered into force on the date of its publication, the local Pension Houses issue pension recalculation decisions in line with the provisions of Law No. 360/29 November 2023 on the public pension system (Evidence No. 2). Under the same Government Emergency Ordinance, these decisions are transmitted to the designated sub-units of the National Postal Company based on a dispatch list. Pursuant to Article 1(3) of Government Emergency Ordinance No. 89/28 June 2024, the National Postal Company is exclusively entrusted with delivering these decisions to the beneficiaries. In accordance with Article 1(4) of Government Emergency Ordinance No. 89/28 June 2024, the provision of such services is carried out under a convention concluded between the Ministry of Labour and Social Solidarity, through the National House of Public Pensions, and the National Postal Company, namely Service Agreement No. 3022/JBO of 04 July 2024 for the transmission of pension recalculation decisions (Evidence No. 4). Furthermore, pursuant Article 2(6) of the same Government Emergency Ordinance, the National Postal Company ensures the dispatch of envelopes containing pension recalculation decisions via registered mail with acknowledgment of receipt, both nationwide and internationally.

The Council Implementing Decision required that the government sends to all citizens by post a decision regarding the result of the recalculation. According to the centralized list of recalculation decisions submitted to pensioners, out of the 4 701 716 decisions, 1 548 have been handed over to pensioners at the counter of the local Pension House offices. Whilst this constitutes a minimal formal deviation from the requirement of the Council Implementing Decision, the distribution of the recalculation decision letters did take place, albeit through an alternative channel for a very limited number of cases. The hand delivery of the letters ensured actual receipt, and that the pensioners were effectively informed of the decision concerning the results of the recalculation of their pensions, thereby fulfilling the purpose of the notification requirement. As of this, this minimal deviation does not affect the progress towards achieving the investment that the milestone represents. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

Based on the centralised list of 4,701,716 pension recalculation decisions (Evidence No. 5), each containing a unique identifier consisting of the county identifier and the pension dossier number, a random sample of 60 units was selected. Following the selection of a random sample of 60 units, Romania submitted, for each sampled unit, (i) a copy of the recalculation decision (Evidence No. 6), and (ii) a copy of receipts from the postal service (Evidence No. 7) demonstrating that the pension recalculation decision was sent to the beneficiary or proof of repeated delivery attempts by the postal officer.

The examination of the submitted extracts confirms that they correspond to the sample selected by the Commission. The evidence comprises 60 pension recalculation decisions (Evidence No. 6) together with the related postal receipts (Evidence No. 7). This documentation confirms that all 60 pension recalculation decisions were issued by the local Pension House offices. In addition, all 60 copies of the pension recalculation letters indicate in the header that the recalculation is based on Article 144 of Law No. 360 of 29 November 2023 on the public pension system. Of these, 57 sampled decisions were successfully transmitted to pensioners, while in three cases the authorities provided evidence of repeated delivery attempts. Therefore, as all sampled cases were validated, the analysis concluded that this constitutive element of the milestone has been achieved. The evidence provided for a sample of 60 units confirmed that the requirements of the milestone have been met.

**Furthermore, in line with the description of the measure, [...] this measure consists in the recalculation of pension files based on the new legislation and their digitisation.**

According to Article 1 of Ministerial Order No. 108 of 28 January 2021 (Evidence No. 9), the National Pension House initiated the procedure for the evaluation of pensions under the general public pension system, with a view to their recalculation. Furthermore, Article 2 specifies that the procedure aims at developing a comprehensive, reliable and efficient database, based on information collected from electronic and/or paper-based sources available at the level of the territorial pension houses.

For the evaluation of pensions, the National Pension House adopted Operational Procedure No. 131/2021 (Evidence No. 11). Section 2 of the procedure defines its scope of application, covering activities related to the verification, correction, collection and processing of data from existing electronic and/or paper-based sources at the level of the territorial pension houses, as well as their consolidation into a comprehensive, reliable and efficient database, for the purpose of pension recalculation. The procedure further defines the content and circulation of documents, as well as the material, human and financial resources involved. Section 6 of the procedure sets out the steps to be followed by the staff of the territorial pension houses in order to validate pensioners' data into the dedicated software application (such as type of pension, retirement date, average annual points accumulated, etc.). Letter No. A2089/IP26 of 2 February 2022 (Evidence No. 10) clarifies that the dedicated staff from the Territorial Pension Houses use the SII Orizont, EPBAS and SICA systems to store electronically the pensions-related data. SII Orizont serves as the centralised data repository, containing the main records and calculated pension rights, while EPBAS manages the execution of pension payments and SICA records the data on social insurance contributions. In addition, the Evaluation Grid (*Grid Evaluate*) and Calculation Application 1.09.2024 (*Aplicatia Calcul 1.09.2024*) systems were used in the digitisation and recalculation of pension files. Both applications are connected to SII Orizont. SII Orizont therefore integrates information from the other applications, ensuring that data on rights, payments, and accounting are linked and consistent. The authorities have provided step-by-step details regarding the recalculation process, including screenshots of the software used (Evidence No. 12).

The Commission services conducted an on-the-spot check on 4 March 2026 to verify the digitisation of pension files. This check was completed successfully, confirming that the recalculation of pension was based on the digitised files.

In accordance with the description of the measure and pursuant to Article 1(2) of Government Emergency Ordinance No. 89 of 28 June 2024 (Evidence No. 3), the local Pension House offices issue pension recalculation decisions in accordance with Law No. 360 of 29 November 2023 on the public pension system (Evidence No. 2). All 60 copies of the pension recalculation letters indicate in the header that the recalculation is based on Article 144 of Law No. 360 of 29 November 2023 on the public pension system.

In addition, according to page 5 of the World Bank's technical note (Evidence No. 8), the National House of Public Pensions carried out the recalculation process, supported by the hiring of 1,000 temporary staff for a period of 18 months, the procurement of IT and non-IT equipment, and the contracting of the National Postal Company for the delivery of the recalculation decisions.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Target:** RO-C[C9]-I[I2.a]-T[252] Finance or investment operations amounting to 100% of the total amount of resources allocated to the instrument approved by the InvestEU Investment Committee

**Related Measure:** RO-C[C9]-I[I2.a] Financial instruments for the private sector - Climate Action Portfolio Guarantee

**Quantitative Indicator:** percentage (%)

**Baseline:** 0

**Target:** 100

**Time:** Q2 2024

### 1. Context:

The objective of the investment is to contribute to the green and sustainable transformation of the Romanian economy by increasing access to finance for individuals and entities, including SMEs, through a financial instrument.

The target concerns the full allocation of the committed resources to financial instrument.

The target is the only step of this investment in the non-repayable support component. The investment is however complemented by (sub)investment 2.2 Climate Action Portfolio Guarantee in the loan component, in particular milestone 250 related to the signature of the contribution agreement between the European Commission and the Romanian Government, already assessed as part of the first payment request.

Following the completion of this target, in line with the description of the measure in the Council Implementing Decision, the specific goals and energy efficiency ambitions of the instrument, as well as structure and eligibility criteria will be fully aligned and correspond to the ones of the InvestEU EU-Compartment instrument. Furthermore, the guarantee agreement between the European Commission and the European Investment Fund (EIF) will in addition exclude certain activities and assets from eligibility. This is a further step of this measure that is not linked to the milestones and targets in the Council Implementing Decision.

### 2. Evidence provided:

|   | Name of the evidence                                                | Short description                                                                                                          |
|---|---------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover Note                                                          | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled. |
| 2 | Copy of the agreement between, among others, the European Union and | Agreement regulating the InvestEU guarantee(s) for all Member States.                                                      |

|   |                                                                                                                         |                                                                                                                            |
|---|-------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
|   | The European Investment Fund on the EU Guarantee under the InvestEU Regulation dated 7 March 2022.                      |                                                                                                                            |
| 3 | Copy of (first) Amendment Agreement in respect of EIF MS-C Schedule No. 1 – Romania dated 23 May 2023.                  | (first) agreement amending the InvestEU EU-Compartment guarantee by introducing the InvestEU guarantee(s) for Romania.     |
| 4 | Copy of (second) Amendment and Restatement Agreement in respect of EIF MS-C Schedule No. 1 – Romania dated 25 May 2024. | (second) agreement amending the InvestEU EU-Compartment guarantee by introducing the InvestEU guarantee(s) for Romania.    |
| 5 | Copy of the Annual Report EIF IN RESPECT OF THE InvestEU MEMBER STATE COMPARTMENT ROMANIA, dated June 2024.             | The report presents all operations approved by the InvestEU Investment Committee pertaining to the MS-Compartment Romania. |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

#### **Finance or investment operations amounting to 100% of the total amount of resources allocated to the instrument approved by the InvestEU Investment Committee**

Article 5 (a) of Annex 1 to the *Second Amendment and Restatement Agreement in respect of EIF MS-C Schedule No. 1 – Romania* signed by the European Commission and the EIF (hereinafter referred to as “*InvestEU Romania Guarantee Agreement*” – evidence No. 4) states that EUR 200 million are allocated to the Sustainability Guarantee product, corresponding to the product under this investment, i.e. 100% of the RRF budget allocated to the investment.

The *Annual Report EIF IN RESPECT OF THE InvestEU MEMBER STATE COMPARTMENT ROMANIA* dated June 2024 (hereinafter referred to as “*EIF Report*” – Evidence No. 5) written by the Commission with input from the EIF, explains on page 2 that a total guarantee amount of EUR 371.8 million or 185.90% of the allocated resources was approved by the InvestEU Investment Committee. The footnote at the bottom of the table on page 2 clarifies that Investment Committee approvals can be higher than the allocated EU Guarantee (i.e. above 100%), as the cap is applied to the subsequent signatures of contracts between the EIF and the financial intermediaries (banks).

Furthermore, in line with the description of the measure, **the specific goals and energy efficiency ambitions of the instrument, as well as structure and eligibility criteria shall be fully aligned and correspond to the ones of the InvestEU EU-Compartment instrument, currently under development.**

At the time of the entry into force of the Council Implementing Decision, the agreement between, among others, the European Union and The European Investment Fund *on the EU Guarantee under the InvestEU Regulation* (hereinafter referred to as “*the InvestEU EU-Compartment Guarantee Agreement*” was under development. On 7 March 2022, the InvestEU EU-Compartment Guarantee Agreement (Evidence No. 2) was signed. This agreement established the EU-Compartment Sustainability Guarantee Product, with instrument's' objective, eligibility criteria and structure set out in section Schedule 1.1 Sustainability Guarantee of Annex II-A.

On 23 May 2023, and subsequently on 25 May 2024, the InvestEU EU-Compartment Guarantee Agreement was amended by the first and second, respectively, *Amendment and Restatement Agreement in respect of EIF MS-C Schedule No. 1 – Romania* (hereinafter referred to as “*the InvestEU Romania Guarantee Agreement*” - Evidence Nos. 3 and 4, respectively). Article 1 of the latter introduces, in addition to the existing EU-Compartment Sustainability Guarantee Product, the new Romania Sustainability Guarantee product, further defined in Article 1 (a) of Annex 1 of the InvestEU Romania Guarantee Agreement (*Annex 1* is the term used for this section in the second InvestEU Romania Guarantee Agreement. In the first agreement, it was referred to as *Appendix*. The content of the first and second InvestEU Romania Guarantee Agreements is the same, except for Article 9, which was removed in the second agreement - see also the last paragraph of this fiche).

In addition, Article 1 (a) of Annex 1 to the InvestEU Romania Guarantee Agreement explains that the Romania Sustainability Guarantee Product corresponds to Climate Action Portfolio Guarantee set out in the Contribution Agreement between the EU and Romania dated 24 May 2022, assessed in the context of M250 in the first payment request. By incorporating this reference into the InvestEU Romania Guarantee Agreement, that correspondence is rendered legally binding on the parties.

Article 1(a) of Annex 1 to the InvestEU Romania Guarantee Agreement further states that the product is identical to the one described in the InvestEU EU-Compartment Guarantee Agreement, except where adapted by the InvestEU Romania Guarantee Agreement itself. By incorporating this reference into the InvestEU Romania Guarantee Agreement, that equivalence is legally binding on the parties. Consequently, the product objective - which is not amended by the InvestEU Romania Guarantee Agreement - remains the same as the one set out in Schedule 1.1 Sustainability Guarantee (Annex II-A) of the InvestEU EU-Compartment Guarantee Agreement. This objective is to support investments contributing to green and sustainable transformation of the European economy (in the case of the Romania Sustainability Guarantee Product, however, this objective only applies to Romania, as Article 2 of Annex 1 to the InvestEU Romania Guarantee Agreement specifies that the geographical coverage of the instrument is the territory of Romania).

Furthermore, the final paragraph of Article 1 of Annex 1 of the InvestEU Romania Guarantee Agreement provides that the product is to be implemented through an uncapped portfolio guarantee. This is consistent with Schedule 1.1 Sustainability Guarantee (Annex II-A) of the InvestEU EU-Compartment Guarantee Agreement, demonstrating that the structure of the two products is aligned. Concerning the eligibility criteria, Article 10(a) of Annex 1 of the InvestEU Romania Guarantee Agreement specifies that the conditions and eligibility criteria are to apply as laid down in Schedule 1.1 of Annex II-A to the InvestEU EU-Compartment guarantee agreement. These include energy efficiency eligibility criteria.

Therefore, the specific goals (corresponding to the above-mentioned product objective, namely what is supposed to be achieved) and energy efficiency ambitions, as well as structure and eligibility criteria of the Romania Sustainability Guarantee product included in the InvestEU Romania Guarantee Agreement are fully aligned and correspond to the ones of the InvestEU EU-Compartment Sustainability Guarantee.

**The guarantee agreement between the European Commission and the EIF shall in addition exclude the following list of activities and assets from eligibility: (i) activities and assets related to fossil fuels, including downstream use and (ii) activities and assets under the EU Emission Trading System (ETS) achieving projected greenhouse gas emissions that are not lower than the relevant benchmarks.**

The Council Implementing Decision required the guarantee agreement between the European Commission and the EIF to additionally exclude the following list of activities and assets from eligibility: (i) activities and assets related to fossil fuels, including downstream use and (ii) activities and assets under the EU Emission Trading System (ETS) achieving projected greenhouse gas emissions that are not lower than the relevant benchmarks. Article 9 of Annex 1 to the first InvestEU Romania Guarantee Agreement (Evidence No. 3) included a provision that indeed excluded i) activities and assets related to fossil fuels, including downstream use and (ii) activities and assets under the EU Emission Trading System (ETS) achieving projected greenhouse gas emissions that are not lower than the relevant benchmarks.

However, a new “Do no significant harm” Technical Guidance (C/2023/111) replaced the one in force at the time of the signature of the InvestEU Romania Guarantee Agreement (2021/C58/01). The new “Do no significant harm” Technical Guidance (C/2023/111) contains a specific provision for guarantee agreements, which states that the Commission considers the application of the Technical guidance on sustainability proofing for the InvestEU Fund (2021/C 280/01) in combination with the application of the relevant implementing partner’s policies (notably the EIB Group’s “Climate Bank Roadmap 2021-2025”) related to implementing the InvestEU Fund sufficient to prove the absence of significant harm as per Article 5(2) of the RRF Regulation. Consequently, the second InvestEU Romania Guarantee Agreement (Evidence No. 4) amended the first agreement by removing Article 9, namely the Article containing the exclusion list, given that such a list is not necessary in order to ensure compliance with the new “Do no significant harm” Technical Guidance (C/2023/111). Points 1 to 5 of the *Whereas* section of Evidence No. 4 present the abovementioned explanation concerning the new guidance. As of this, this minimal formal deviation does not change the nature of the measure and does not affect the progress towards achieving the investment. On this basis, it is considered that this constitutive element of the measure description is satisfactorily fulfilled.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Target:** RO-C[C9]-I[I3.a]-T[263] Number of financing contracts signed

**Related Measure:** RO-C[C9]-I[I3.a] Private sector aid schemes - Aid scheme for the digitalisation of SMEs

**Quantitative Indicator:** Number

**Baseline:** 0

**Target:** 4611

**Time:** Q4 2025

### 1. Context:

The objective of this sub-investment is to support the digitalisation of small and medium-sized enterprises (SMEs). It consists of two instruments: (i) a grant scheme supporting entrepreneurs in the development of advanced digital technologies; and (ii) a grant scheme of up to EUR 100,000 per enterprise to support SMEs in adopting digital technologies.

Target 263 represents the final step in the implementation of this investment and concerns the signature of financing contracts with enterprises. It follows milestone 262, which was positively assessed as part of the second payment request and concerned the selection of a scheme manager for the implementation of the de minimis schemes, responsible for launching the call, project assessment, contracting and project monitoring.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Short description                                                                                                          |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled. |
| 2 | Copy of de minimis scheme of 28 February 2023 regarding Digitalisation of SMEs – grant of up to EUR 100,000 per enterprise to support SMEs in adopting digital technologies, related to the National Recovery and Resilience Plan (NRRP) Pillar III. Smart, sustainable and inclusive growth, including economic cohesion, jobs, productivity, competitiveness, research, development and innovation, as well as a functional internal market, with strong Small and Medium-sized Enterprises (SMEs), Component C9. Support for the | Copy of de minimis scheme for SMEs digitalisation.                                                                         |

|   |                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | private sector, research, development and innovation, Investment I3. Aid schemes for the private sector, Measure 1. De minimis scheme and State aid scheme in the context of the digitalisation of SMEs; published in the Official Journal No. 191/7 March 2023. |                                                                                                                                                                                                                                                                                |
| 3 | Copy of State aid and the minimis scheme of 16 February 2024 regarding Grants for supporting entrepreneurs in developing advanced digital technologies, published in the Official Journal No. 155/26 February 2024.                                              | Copy of State aid and the minimis scheme for advanced technologies.                                                                                                                                                                                                            |
| 4 | List of signed contracts for the digitalisation of SMEs.                                                                                                                                                                                                         | List of 4,561 contracts signed under the de minimis scheme regarding the digitalisation of SMEs.                                                                                                                                                                               |
| 5 | Copies of 60 signed contracts for the digitalisation of SMEs.                                                                                                                                                                                                    | In the context of the sampling analysis, copies of 60 contracts signed under the de minimis scheme regarding the digitalisation of SMEs, along with the corresponding funding requests submitted by enterprises, were provided.                                                |
| 6 | List of signed contracts for advanced technologies.                                                                                                                                                                                                              | List of 52 contracts signed under the State aid and the minimis scheme to support entrepreneurs in developing advanced digital technologies.                                                                                                                                   |
| 7 | Copy of 18 signed contracts for advanced technologies.                                                                                                                                                                                                           | In the context of the sampling analysis, copies of 18 contracts signed under the State aid and the minimis scheme to support entrepreneurs in developing advanced digital technologies, along with the corresponding funding requests submitted by enterprises, were provided. |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the target.

In line with the description of the measure, **the sub-investment consists in two instruments:**

For the implementation of this investment, the Ministry of Investment and European Projects (MIPE), acting as the scheme manager, approved two de minimis /state aid schemes for enterprises. Each scheme was followed a call for projects, with its own specifics regarding the projects financed:

**A grant scheme of up to EUR 100 000 per enterprise to support SMEs adopting digital technologies:**

- **De minimis scheme of 28 February 2023 regarding *Digitalisation of SMEs – grant of up to EUR 100,000 per enterprise to support SMEs in adopting digital technologies***, published in the Official Journal No. 191 of 7 March 2023 (Evidence No. 2):
  - According to Chapter IV, Article 4 of the de minimis scheme, the objective of this scheme is to support SMEs carrying out investments in Romania by granting non-reimbursable financial support for their digitalisation. Furthermore, pursuant to Chapter V, Article 5(1), the scheme applies to enterprises that qualify as SMEs and have their registered office in Romania. Article 6(1) specifies that the value of the de minimis aid ranges between EUR 20 000 and EUR 100 000, depending on the size of the enterprise. Finally, Chapter X, Article 15(1) defines the eligible expenditure, which includes IT hardware; consultancy services for identifying optimal IT solutions; costs related to the establishment of LAN/Wi-Fi networks; IT software (such as Robotic Process Automation, Enterprise Resource Planning, Customer Relationship Management, Internet of Things, Artificial Intelligence, blockchain, e-commerce solutions, websites and cloud computing); staff training, etc.
  - According to Chapter X, Article 4(a), partial recovery of the de minimis aid received applies if expenditures do not comply with the eligibility rules under operations financed through the Recovery and Resilience Plan, in accordance with intervention fields 010 (digitising SMEs) and 012 (IT services and applications for digital skills and digital inclusion), as set out in Annex VII to Regulation (EU) 2021/241.

**A grant scheme to support entrepreneurs in development of advanced digital technologies:**

- **State aid and the de minimis scheme of 16 February 2024 regarding *Grants for supporting entrepreneurs in developing advanced digital technologies***, published in the Official Journal No. 155 of 26 February 2024 (Evidence No. 3):
  - According to Chapter 4 Article 4(a) of the State aid and the de minimis scheme, the main objective of the State aid and de minimis scheme is to promote regional development and job creation by supporting SMEs in the development and implementation of advanced digital technologies, such as artificial intelligence, data and cloud computing, blockchain technology, high-performance and quantum computing, the Internet of Things and cybersecurity.
  - Furthermore, according to Chapter 5, Article 5(1), this State aid and de minimis scheme applies to enterprises qualifying as SMEs that have their registered office or a working point in Romania, at least at the time of payment of the State aid, and that submit projects in partnership. Furthermore, Chapter 6, Article 6(2) provides that the amount of financial support ranges from EUR 500,000 to EUR 3 million, depending on the size of the enterprise acting as project leader.
  - According to Chapter XI, Article 22(4), partial recovery of the State aid received applies if expenditures do not comply with the eligibility rules under operations financed through the RRP, in accordance with intervention fields 021c (investment in advanced technologies) and 021d (development and deployment of cybersecurity technologies), as set out in Annex VII to Regulation (EU) 2021/241.

**Financing contracts signed with enterprises to support the uptake of digital technologies/solutions and the digital transformation of the business processes.**

Based on the centralised lists of the signed financing contracts submitted by Romania (Evidence No. 4 and Evidence No. 6), a total of 4 613 contracts have been signed under Investment 3.a, distributed as follows: (i) 4561 contracts under the SME digitalisation scheme (with grants of up to EUR 100000 per company, depending on company size), and (ii) 52 contracts under the advanced technologies scheme (with grants of up to EUR 3 million, depending on company size).

Following the selection of a random sample of 60 contracts from the full population of 4613 companies (which includes beneficiaries under the two schemes on SME digitalisation as well as support for advanced technologies), and an additional random selection of 18 companies from the population of 52 companies that received support for advanced technologies, the Romanian authorities provided the copies of the signed contracts as well as the copies of the funding requests submitted by the enterprises (Evidence No. 5 and Evidence No. 7). The analysis of the signed contracts, particularly the unique identifier of the signed contract, confirmed that the submitted evidence belongs to the units randomly selected by the Commission. Therefore, the evidence provided for the sample of 78 units confirmed that the contracts have been signed and the companies have received support for the uptake of digital technologies/solutions and the digital transformation of their business processes. Consequently, the analysis concluded that the target has been achieved, thus exceeding the goal of target 263 by 2.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C9]-R[R2.a] -M[273]: Entry into force of legal act(s) establishing a single body that encompasses the existing councils, ensures interministerial coordination and reaches out to the private sector

**Related Measure:** RO-C[C9]-R[R2.a] Streamline governance of research, development and innovation

**Qualitative Indicator:** Legal act(s) for the establishment of the single body

**Time:** Q2 2023

### 1. Context:

The objective of this reform is to streamline the governance of the research, development and innovation (RDI) system in Romania.

The milestone consists in the adoption of legal act(s) establishing a single decision-making body at governmental level responsible for the coordination of RDI, with the involvement of relevant ministries

Milestone 273 is the first step of the implementation of the reform and it will be followed by target 271, related to the implementation of the recommendations of the Policy Support Facility Romania Country Report and milestone 272, related to the establishment of a permanent system to ensure the harmonized design, implementation, monitoring and evaluation of research, development and innovation policy across ministries and agencies beyond the RRF timeline.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                                                                        | Short description                                                                                                                                                                                                                                                                                                                                                                    |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover Note                                                                                                                                                                                                                                                                                                                  | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.                                                                                                                                                                                                                                                           |
| 2 | Copy of Government Emergency Ordinance No. 43/2023, amending and supplementing Government Ordinance No. 57/2002 on scientific research and technological development, published in the Official Journal, No. 460 of 25 May 2023, Part I (hereinafter referred to as " <i>Government Emergency Ordinance No. 43/2023</i> "). | The Government Emergency Ordinance No. 43/2023 introduces Articles 401–404 into Government Ordinance No. 57/2002 and formally establishes the CNSTI as the only interministerial body with a decision-making role in the field of research, development and innovation. It defines CNSTI's mandate, composition, decision-making procedures and coordination role at national level. |
| 3 | Copy of Law No. 327/2023                                                                                                                                                                                                                                                                                                    | The Law No. 327/2023 approves and confirms the                                                                                                                                                                                                                                                                                                                                       |

|   |                                                                                                                                                                                                                                                                                                                                                                                                                                        |                                                                                                                                                                                                                                     |
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|   | approving Government Emergency Ordinance No. 43/2023, published in the Official Journal No. 1020 of 8 November 2023, Part I (hereinafter referred to as " <i>Law No. 327/2023</i> ").                                                                                                                                                                                                                                                  | provisions introduced by the Government Emergency Ordinance No. 43/2023.                                                                                                                                                            |
| 4 | Copy of Minutes of the meeting of the Committee for Science, Technology and Innovation held on 12 June 2023.                                                                                                                                                                                                                                                                                                                           | The minutes summarise the first CNSTI meeting, during which among others the Regulation of Organisation and Functioning was approved.                                                                                               |
| 5 | Copy of Regulation of Organisation and Functioning of the Committee for Science, Technology and Innovation adopted by Committee for Science, Technology and Innovation at its first meeting on 12 June 2023.                                                                                                                                                                                                                           | The document establishes the organisational and operational framework of CNSTI, presenting its internal procedures, roles and responsibilities, and stating its mandate as a national coordination and decision-making body in RDI. |
| 6 | Copy of Regulation on the Organisation and Functioning of the Secretariat of the Committee for Science, Technology and Innovation issued on 6 June 2024.                                                                                                                                                                                                                                                                               | The document sets out the organisation, staffing and operational procedures of the CNSTI Secretariat, including the organisational chart, its action plan and flow of activities in supporting the functioning of the CNSTI.        |
| 7 | Copy of Ministerial Order No. 20672, approving the selection procedure for private sector representatives with relevant experience in research, development and innovation within the National Committee for Science, Technology and Innovation, published in the Official Journal No. 556 of 21 June 2023, Part I; entered into force on the date of publication (hereinafter referred to as " <i>Ministerial Order No. 20672</i> "). | The Ministerial Order No. 20672 establishes the procedure for selecting representatives of the private sector to participate in CNSTI.                                                                                              |
| 8 | List of private sector representatives appointed to the National Committee for Science, Technology and Innovation.                                                                                                                                                                                                                                                                                                                     | Screenshot from the CNSTI site showing the results of the selection process for private sector representatives within the CNSTI, presented in anonymised form.                                                                      |
| 9 | Copy of Minutes of the                                                                                                                                                                                                                                                                                                                                                                                                                 | Minutes containing the adoption of an activity                                                                                                                                                                                      |

|    |                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                               |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | National Committee for Science, Technology and Innovation meeting held on 15 December 2025.                                                                                                                                                                                                                        | report and decisions on future meeting frequency and coordination of national RDI policies.                                                                                                                                                                                                                                                   |
| 10 | Copy of Government Decision No. 188/2025 concerning the organisation and functioning of the National Research Authority published in the Official Journal No. 185 of 3 March 2025, Part I; entered into force on the date of publication (hereinafter referred to as " <i>Government Decision No. 188/2025</i> "). | Government Decision No. 188/2025 reorganized the former Ministry of Research, Innovation and Digitalisation into the National Research Authority, which took over the former Ministry's competences in the fields of research and innovation.                                                                                                 |
| 11 | Copy of Ministerial Order No. 4038/2025 approving the organisation and functioning of the National Research Authority, published in the Official Journal No. 471 of 21 May 2025, Part I; entered into force on the date of publication (hereinafter referred to as " <i>Ministerial Order No. 4038/2025</i> ").    | The Ministerial Order No. 4038/2025 contains provisions on the organisational structure, general responsibilities, and duties of all departments of the National Research Authority, including coordinating body for research, internal audit, communications, research programme financing, international relations, NRRP coordination, etc. |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

#### **Legal act(s) modifications to create a new body with a decisional role focused on RDI and smart specialization policies, at the governmental level with the involvement of responsible ministries.**

Government Emergency Ordinance No. 43/2023, amending and supplementing Government Ordinance No. 57/2002 on scientific research and technological development (Evidence No. 2, hereinafter referred to as "*Government Emergency Ordinance No. 43/2023*"), published in the Official Journal No. 460 of 25 May 2023 and entered into force on the date of publication, in line with Article 12(3) of Law 24/2000 on the rules of legislative technique for drafting normative acts, establishes under Article 401(1) that the National Committee for Science, Technology and Innovation (CNSTI) is the single interministerial decision-making body in the field of research, development and innovation, under the coordination of the Prime Minister. Article 402(b) provides that CNSTI ensures the integrated coordination in the fields of research, development, innovation and smart specialisation, thus confirming its interministerial coordination role. Article 401(3) ensures that CNSTI is encompassing the existing consultative councils by integrating the leaders of the councils as observers, while Article 402(g) is empowering CNSTI to evaluate and propose changes to the activity and mandates of the existing councils.

Article 401(2) of the Government Emergency Ordinance No. 43/2023 stipulates that CNSTI includes ministers with relevant portfolios (Minister of Research, Innovation and Digitalisation; Minister of Education; Minister of Finance; Minister of Economy; Minister of Energy; Minister of Development, Public Works and Administration; Minister of Investments and European Projects; Minister of Agriculture and Rural Development; Minister of Environment, Waters and Forests; Minister of Health; Minister of Transport and Infrastructure; Minister of National Defence), the President of the Romanian Academy and representatives of the private sector.

Article 402(b) is explicitly mentioning smart specialisation within the scope of CNSTI's interministerial coordination mandate, alongside research, development and innovation.

Government Emergency Ordinance No. 43/2023 has subsequently been adopted by the Parliament through Law No. 327/2023 published in the Official Journal No. 1020 of 8 November 2023 and based on Article 12(3) of Law 24/2000 on legislative technique rules for drafting legal acts, the Law entered into force on the day of its publication in the Official Journal (Evidence No. 3).

**The new body shall cover the coordination of RDI activities (research driven innovation and entrepreneurship included) at the national level.**

The recitals of Government Emergency Ordinance No. 43/2023, which introduced Articles 401 and 402 into Government Ordinance No. 57/2002, are stating the CNSTI's aim to coordinate RDI activities, including research-driven innovation and innovative entrepreneurship, at national level. Articles 401 and 402 are setting the CNSTI's competence to set national priorities, ensure integrated coordination of RDI policies, cooperate with the private sector and oversee the implementation and monitoring of national strategies and plans in the RDI sector.

The Regulation of Organisation and Functioning of CNSTI, approved during the first meeting of the CNSTI on 12 June 2023, establishes CNSTI's role as coordinator of key national RDI instruments, including reforms and investments under the National Recovery and Resilience Plan, the Policy Support Facility recommendations, the National Plan for Research, Development and Innovation and the National Strategy for Research, Innovation and Smart Specialisation.

CNSTI coordinated and reviewed the implementation of RDI programmes and instruments used over 2024–2025, analysed and identified sector related obstacles, and agreed on coordinated follow-up actions involving several ministries, funding bodies and private sector representatives (Evidence No. 9).

**The secretariat of the new body shall be assured by National Research Authority.**

CNSTI's Secretariat has been established through secondary implementing acts, namely the Regulation on the Organisation and Functioning of the Secretariat of the CNSTI (Evidence No.6). At the time of adoption of this Regulation, the Secretariat function was ensured by the competent structures within the Ministry of Research, Innovation and Digitalisation. Following the institutional reorganisation through Government Decision No. 188/2025, which transformed the Ministry of Research, Innovation and Digitalisation into the National Research Authority (Evidence No.10), the Secretariat function is now carried out by that entity. The Ministerial Order No. 4038/2025 regulating the organisation and functioning of the National Research Authority (Evidence No.11) establishes at Article 82 that the National Research Authority ensures the Secretariat of the CNSTI.

**Furthermore, in line with the description of the milestone, the milestone consists in entry into force of legal act(s) establishing a single body that encompasses the existing councils, ensures interministerial coordination and reaches out to the private sector.**

Government Emergency Ordinance No. 43/2023 establishes CNSTI as the single interministerial decision-making body in the field of research, development and innovation (Evidence No. 2). Article 401(1) of the Government Emergency Ordinance No. 43/2023 establishes CNSTI as the only interministerial decision-making body under the coordination of the Prime Minister, and Article 401(2) provides that CNSTI is composed of ministers responsible for relevant portfolios. In addition, Article 402(b) assigns CNSTI the competence to ensure integrated coordination of national policies in the fields of research, development, innovation and smart specialisation.

Article 401(3) of the Government Emergency Ordinance No. 43/2023 establishes that CNSTI encompasses the existing councils by integrating the leaders of the consultative councils as observers within CNSTI, and Article 402(g) empowers CNSTI to evaluate their activity and propose modifications to their mandates.

Article 401(3) of the of the Government Emergency Ordinance No. 43/2023 also provides for the participation of private sector representatives within CNSTI, and Article 402(c), establishes cooperation and consultation with the private sector as part of the CNSTI's mandate thus ensuring that CNSTI is reaching out to the private sector. This is further ensured through Ministerial Order No. 20672 (Evidence No. 7), which establishes a transparent selection procedure for private sector representatives, and is further substantiated by the evidence demonstrating that the selection process for private sector representatives was completed and representatives were appointed (Evidence No. 8).

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C9]-R[R3.0]-M[274] Entry into force of legal act(s) on the researcher's career and status

**Related Measure:** RO-C[C9]-R[R3.0] Reform of research career

**Qualitative Indicator:** Legal act(s) on the researcher's career and status

**Time:** Q2 2024

### 1. Context:

This reform aims to enhance the attractiveness of research careers and improve the performance of the Romanian RDI sector. The measure entails the entry into force of legal act(s) to overhaul the research career in Romania, integrating merit-based recruitment and advancement, key performance indicators (KPIs), and strengthened ethics and integrity standards, while introducing incentives for research institutions to adopt the European Charter for Researchers and Code for the Recruitment of Researchers.

Milestone 274 represents the initial step in the implementation of this reform, and it is accompanied by target 275 in this payment request on requirements for institutions that adhered to the European Charter for Researchers and Code for the Recruitment of Researchers.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                                                            | Short description                                                                                                          |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                                                                                                                      | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled. |
| 2 | Copy of Law No. 183/10 June 2024 on the status of research, development and innovation personnel, published in Official Journal No. 546 of 12 June 2024.                                                                                                                                                        | Law No. 183/10 June 2024 on the status of RDI personnel.                                                                   |
| 3 | Copy of Government Decision 1568/4 December 2024 on the approval of the Methodological Rules on the organisation of competitions for filling vacant positions for research, development and innovation personnel within research organisations, published in the Official Journal No. 1264 of 16 December 2024. | Government Decision and its Annex approving the rules on the organisation of competitions for RDI personnel.               |
| 4 | Copy of Ministerial Order No. 6886/10 December 2025 and its Annex                                                                                                                                                                                                                                               | Annex to Ministerial Order No. 6886/10 December 2025 regarding                                                             |

|    |                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                             |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------|
|    | regarding the Code of Conduct and Professional Ethics for research, development and innovation personnel, published in the Official Journal No. 1187 of 23 December 2025.                                                                                                                                                                                                            | the Code of Conduct and Professional Ethics for RDI personnel.                              |
| 5  | Copy of Ministerial Order No. 21451/2022 on the approval of the State aid scheme “Competence Centre”, related to Romania’s National Recovery and Resilience Plan, Pillar III, Component C9 “Business support, development and innovation”, Investment 5 “Establishment and Operationalisation of Competence Centres”, published in the Official Journal No. 953 of 30 September 2022 | Ministerial Order approving the state aid scheme related to Investment 5 under Component 9. |
| 6  | Copy of Applicant’s Guide for Investment 5 under Component 9 ( <i>Establishment and Operationalisation of Competence Centres</i> ) approved by Ministerial Order No. 21480/30 September 2022.                                                                                                                                                                                        | Applicant’s Guide for Investment 5 under Component 9.                                       |
| 7  | Copy of Applicant’s Guide for Investment 8 under Component 9 ( <i>Programme to attract human resources from abroad in research, development and innovation activities</i> ) approved by Ministerial Order No. 21366/14 September 2022.                                                                                                                                               | Copy of Applicant’s Guide for Investment 8 under Component 9.                               |
| 8  | Copy of Applicant’s Guide for Investment 9 under Component 9 ( <i>Support for the holders of certificates of excellence received in the Marie Skłodowska Curie Individual Fellowship Award</i> ) approved by Ministerial Order No. 20968/26 July 2022.                                                                                                                               | Applicant’s Guide for Investment 9 under Component 9.                                       |
| 9  | Copy of Applicant’s Guide for Investment 10 ( <i>Establishment and financial support of a national network of eight regional career guidance centres</i> ) approved by Ministerial Order No. 21780/09 December 2022.                                                                                                                                                                 | Applicant’s Guide for Investment 10.                                                        |
| 10 | Copy of Law No. 199/4 July 2023 on higher education, published in Official Journal No. 614 of 5 July 2023.                                                                                                                                                                                                                                                                           | Law No. 199/4 July 2023 on higher education.                                                |
| 11 | Copy of Law No. 198/4 July 2023 on pre-university education, published in Official Journal No. 613 of 5 July 2023.                                                                                                                                                                                                                                                                   | Law No. 198/4 July 2023 on pre-university education.                                        |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

**Legal act(s) shall detail the Key Performance Indicators that shall be used to evaluate the performance of researchers and shall detail the standards for “good conduct in scientific research”, and therefore access to funding and scholarships.**

Law No. 183 of 10 June 2024 on the status of research, development and innovation personnel, was published in Official Journal No. 546/12 June 2024 (Evidence No. 2). According to the provisions in the Article 67(1), the law enters into force in 30 days after its publication in the Official Journal. Article 1 defines the scope of the law, regulating the status of RDI personnel, including their specific rights and obligations, recruitment and promotion procedures, and standards of conduct in scientific research. It also establishes the general framework for continuous training, professional development and motivation of human resources, with a view to ensuring competence, integrity and professional ethics in RDI activities. Pursuant to Article 27, the periodic evaluation of researchers' scientific performance is based on non-cumulative assessment criteria tailored to the specific nature of their activities, the mission of the research organisation, and their individual objectives. Priority is given to qualitative evaluation, supported by the use of quantitative indicators, such as: (a) research outputs and their impact, taking into account published scientific papers, books, and citations, (b) coordination of research activities, (c) collaboration with the business sector, (d) teaching and mentoring activities, (e) continuous professional development, (f) contributions to the advancement of science, for instance the receipt of prestigious awards from public authorities or institutions, and (g) services rendered to society, such as contributions to public policies, strategies, international research plans, and similar initiatives. In accordance with Article 1, read in conjunction with Article 27, the evaluation framework applies to all research organisations within the national RDI system and is mandatory for the assessment of researchers' performance. As such, the evaluation criteria set out in Article 27 constitute binding performance indicators which research organisations are required to apply when conducting performance evaluations.

Article 28 provides that, following the periodic evaluation of researchers' scientific performance, the following ratings may be awarded: (a) very good; (b) good, (c) satisfactory, (d) unsatisfactory. If an “unsatisfactory” rating is awarded, researchers will be re-evaluated after a period of 24 months, based on a decision of the head of the research organisation. When a researcher receives an “unsatisfactory” rating in two consecutive evaluations, the research organisation may decide to reduce the basic salary by up to 20% until the next scientific performance evaluation, reduce by 50% all salary supplements and allowances granted until the next evaluation, or terminate the individual employment contract.

In addition, Chapter IV of Law No. 183/10 June 2024 (Evidence No. 2) establishes a comprehensive framework on standards of good conduct applicable to research, development and innovation (RDI) personnel. More concretely, Article 50 defines the scope of good conduct rules, covering research activities, scientific communication and publication, project evaluation and monitoring, leadership roles in RDI, respect for human dignity and animal welfare, environmental protection, as well as the functioning of ethics committees. These rules are further complemented and detailed by the Code of Conduct and Professional Ethics applicable to RDI personnel, as set out in the Annex to Ministerial Order No. 6886/10 December 2025 (Evidence No. 4). Furthermore, Article 52 of Law No. 183/2024 specifies the categories of deviations from good conduct, distinguishing between misconduct related to research activities (including fabrication and falsification of data), scientific publication and dissemination (such as plagiarism, self-plagiarism and false authorship), evaluation processes

(including conflicts of interest, fraud and discrimination), and leadership responsibilities (including abuse of authority and obstruction of ethics oversight bodies). Article 52 further defines serious breaches of research integrity, notably plagiarism, fabrication of results and the submission of false information in grant or funding applications. Pursuant to Article 59, where breaches of good conduct in RDI activities committed by RDI personnel, as well as by other categories of staff in the public or private sector benefiting from public RDI funding, are established and proven, the competent authorities may impose sanctions, including the exclusion of the person(s) concerned from the project implementation team, the suspension of project funding, and the suspension of funding accompanied by an obligation to reimburse the funds received.

The Council Implementing Decision states that the milestone requires the entry into force of legal act(s) on the researcher's career and status providing, inter alia, for the evaluation of researchers for access to funding and scholarships. The Council Implementing Decision also states, in the description of Reform 3 on research careers, that the objective of the reform is to increase the attractiveness of the research career and the performance of researchers. Furthermore, Romania's Recovery and Resilience Plan – Component 9 (page 47) focuses on access to funding by making participation in public RDI competitions conditional upon the adoption of the European Charter for Researchers and Code for the Recruitment of Researchers by universities and research institutes/organisations. Under the Romanian national legal framework, researchers are employed under employment contracts and are therefore remunerated through wages (Article 24 of Law No. 183/2024, Evidence No. 2) and have access to competitive RDI funding through public calls but are not entitled to scholarships. Scholarship, by contrast, are regulated under the legal framework governing higher education's institutions and pre-university education institutions, and are intended for students, master students and doctoral students, as outlined by Art. 63(5) of the Law No. 199/2023 on higher education (Evidence No. 10), and Art. 61(11) of Law No. 198/2023 on pre-university education (Evidence No. 11). The reform is thus directed at researchers' access to funding, as scholarships are restricted solely to students and access to scholarships cannot be granted to researchers employed within research institutions. In light of the contextual interpretation of this requirement from the Council Implementing Decision, it is interpreted that the milestone requires the entry into force of legal acts covering the access to funding for researchers, and not scholarships. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

**The new legislation shall include the following requirements: (a) advance research career based on merit-based principles [...]**

Article 13 of Law No. 183/10 June 2024 on the status of RDI personnel (Evidence No. 2) sets out the requirements for the recruitment and promotion of researchers. According to Article 13(1), recruitment to positions and career promotion to professional grades of RDI personnel are carried out in accordance with the principle of professional merit, based on specific minimum standards. Minimum standards for the award of the professional grades of research assistant and scientific researcher grade III are established by each research organisation, while the minimum standards for obtaining the scientific researcher grade II and scientific researcher grade I are developed by the Advisory Board for RDI, a statutory advisory body.

**[...] (b) ensure recruitment through transparent, open and competitive procedures [...],**

Pursuant to Article 13(5) of Law No. 183/10 June 2024 (Evidence No. 2), recruitment of RDI personnel is carried out through open public competitions/exams, in accordance with the principles of transparency, competence and gender equality. In addition, Article 13(4) provides that the establishment of recruitment and promotion standards will take into account the general principles and conditions laid down in the European Charter for Researchers. Article 18 further specifies the procedural requirements applicable to recruitment and promotion. In particular, pursuant to Article 18(3), recruitment to and promotion within RDI positions are carried out through

competitions/exams, based on an assessment of professional performance, which ensures the competitive nature of the selection process through merit-based evaluation of candidates. According to Article 18(4), competitions are publicly announced, including through publication at the premises and on the website of the research organisation, as well as, where relevant, on national or international online platforms or those of professional associations.

Furthermore, Article 9 of the Annex to Government Decision No. 1568/4 December 2024 on the methodological rules governing competitions for filling vacant RDI positions (Evidence No. 3) requires that the competition regulations do not include discriminatory provisions based on sex, age, ethnic or social origin, political or religious beliefs, citizenship, disability, social or economic status, or any other grounds.

**[...] (c) Ensure good practices in ethics and integrity in scientific research.**

As described above, Chapter IV of Law No. 183/10 June 2024 (Evidence No. 2) sets out the ethics and integrity principles in scientific research applicable to RDI personnel. In addition to the elements already presented, Article 56 defines the role of the National Council for Ethics in Scientific Research, Technological Development and Innovation (NCESRTDI), which is responsible for coordinating and monitoring the application of moral and professional conduct rules in RDI activities. Article 57 lays down the tasks of the NCESRTDI, which include, inter alia: (a) drafting the Code of Ethics, to be approved by Ministerial Order; (b) developing sector-specific codes of ethics for research fields; (c) monitoring the application and compliance with the legal provisions on moral and professional conduct; (d) issuing opinions and recommendations on ethical issues arising from the evolution of science and knowledge; (e) examining cases concerning breaches of good conduct rules, following complaints, appeals or ex officio, and drawing up reports; (f) monitoring and verifying the activity of ethics committees within research organisations in the national RDI system. Furthermore, according to Article 58, the NCESRTDI examines cases related to breaches of good conduct rules in RDI activities, following complaints or ex officio, and issues decisions establishing the guilt or innocence of the person(s) concerned.

Pursuant to Article 59, where breaches of good conduct in RDI activities committed by RDI personnel, as well as by other categories of staff in the public or private sector benefiting from public RDI funding, are established and proven, the NCESRTDI may propose, depending on the gravity of the facts and the existence of previous similar breaches, the application of one or more of the following sanctions: (a) written warning, (b) permanent withdrawal and/or correction of all works published in breach of good conduct rules, (c) withdrawal of the professional RDI grade obtained as a result of breaching good conduct rules, (d) dismissal from a management position or removal from membership of the ethics committee within the research organisation, (e) disciplinary termination of the individual employment contract, (f) prohibition, for a determined period, of access to public funding for RDI activities, (g) suspension, for a determined period between one and five years, of the right to apply for a higher professional grade or to participate in competitions for higher-level or managerial positions, or to act as a member of examination or selection committees or of consultative bodies of the MCID, (h) exclusion of the person(s) concerned from the project implementation team, (i) suspension of project funding, (j) suspension of project funding, with the obligation to reimburse the funds received. Lastly, Articles 60 to 63 regulate the organisation and functioning of ethics committees within research organisations.

These rules are further complemented and detailed by the Code of Conduct and Professional Ethics applicable to RDI personnel, as set out in the Annex to Ministerial Order No. 6886/10 December 2025 (Evidence No. 4).

**Legal act(s) shall equally include a framework of financial and non-financial incentives to encourage the adoption of the European Charter for Researchers and Code for the Recruitment of Researchers by research institutions.**

- **Financial incentives**

To encourage research institutions to adopt the European Charter for Researchers and the Code for the Recruitment of Researchers, the Ministry of Education and Research provides financial incentives, with a view to achieving, upon completion of the required implementation process, the HR Excellence in Research (HRS4R) certification.

Ministerial Order No. 21451/2022 on the approval of the State aid scheme “Competence Centre”, related to Romania’s National Recovery and Resilience Plan, Pillar III, Component C9 “Business support, development and innovation”, Investment 5 “Establishment and Operationalisation of Competence Centres” (Evidence No. 5) was published in the Official Journal No. 953 of 30 September 2022. According to the provisions in the Article 12(3) of Law No. 24/2000 on legislative technique rules for drafting legal acts, the Ministerial Order entered into force on the date of its publication in the Official Journal. The Ministerial Order constitutes the implementing legal framework for the scheme, setting out the eligibility conditions, governance rules and implementation requirements applicable to the selection, contracting and execution of funded projects. Pursuant to Article 17 of Ministerial Order No. 21451/2022, as a funding eligibility criterion, beneficiaries (i.e. consortia or legal entities awarded funding and having signed the financing contracts under the scheme) must adhere, within the first 12 months from the signature of the funding contract, to the principles of the European Charter for Researchers and the Code for the Recruitment of Researchers. This introduces a conditionality mechanism linking funding eligibility to post-award institutional compliance with EU-level HR standards for researchers. These requirements are further operationalised in the Applicant’s Guide related to Investment 5 (Evidence No. 6), which translates the provisions of the Ministerial Order into implementation rules for beneficiaries. Chapter 2 of the Applicant’s Guide (page 27) further specifies that eligible expenses for the five competence centres explicitly include costs related to obtaining and renewing the HRS4R certification, which represents the final step in the implementation of the European Charter for Researchers and the Code for the Recruitment of Researchers. As such, the coverage of these costs under the scheme constitutes a direct financial incentive for research institutions to implement the Charter and the Code.

- **Non-financial incentives**

Law No. 183 of 10 June 2024 on the status of research, development and innovation personnel, was published in Official Journal No. 546/12 June 2024 (Evidence No. 2). According to the provisions in the Article 67(1), the law enters into force in 30 days after its publication in the Official Journal. Pursuant to Article 2(4), adherence by research organisations to the European Charter for Researchers and compliance with its principles constitutes an eligibility criterion for research project competitions funded from public resources. As a result, since organisations that comply with the European Charter for Researchers and the Code of Conduct for the Recruitment of Researchers gain access to public funding opportunities, this criterion functions as a non-financial incentive.

For example, under Component C9 “Business support, research, development and innovation”, the research related investments establish this non-financial incentive framework linking access to public support to the implementation of the European Charter for Researchers and the Code for the Recruitment of Researchers. In this context, the Applicant’s Guides constitute the operational documents governing each individual investment, detailing eligibility criteria, selection procedures, and implementation requirements applicable to applicants and beneficiaries.

In particular, the Applicant's Guide for Investment 8 (*Programme to attract human resources from abroad in RDI activities*) (Evidence No. 7), Investment 9 (*Support for holders of certificates of excellence under the Marie Skłodowska-Curie Individual Fellowship Award*) (Evidence No. 8), and Investment 10 (*Establishment and financial support of a national network of eight regional career guidance centres*) (Evidence No. 9) under Component 9 include as an eligibility criterion that the beneficiary must have adhered, or commit to adhere within 6/12 months from signing the funding contract or during the project implementation, to the European Charter for Researchers and the Code of Conduct for the Recruitment of Researchers. The beneficiary must also initiate or continue the implementation of the Charter and Code until obtaining the "HR Excellence in Research" logo awarded by the European Commission, for the duration of the project. In this context, the requirement to adhere to the European Charter for Researchers and the Code for the Recruitment of Researchers operates as a non-financial incentive, as it conditions access to public funding opportunities without providing dedicated financial support for the costs associated with their implementation.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C9]-R[R3.0]-T[T275] Institutions that adhered to the European Charter for Researchers and Code for the Recruitment of Researchers initiated the process of design, application and assessment of Action Plans

**Related Measure:** RO-C[C9]-R[R3.0] Reform of research career

**Quantitative Indicator:** Number

**Baseline:** 5

**Target:** 16

**Time:** Q4 2025

### 1. Context:

The objective of this reform is to increase the attractiveness of the research career and the performance of researchers.

Target 275 aims to increase the number of research organisations in Romania that adhere to the European Charter for Researchers and the Code for the Recruitment of Researchers.

Target 275 is the final step of the reform, and it follows the completion of milestone 274, related to the entry into force of legal act(s) on the researcher's career and status.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                                                                                                                                                           | Short description                                                                                                                                             |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover Note                                                                                                                                                                                                                                                                                                                                                                                                     | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.                                    |
| 2 | List published by the European Commission with all the institutions that adhered to the European Charter for Researchers and Code for the Recruitment of Researchers and initiated the process of design, implementation and assessment of Action Plans – available online at: <a href="https://euraxess.ec.europa.eu/hrexcellenceaward/awarded">https://euraxess.ec.europa.eu/hrexcellenceaward/awarded</a> . | List of all institutions, including the Romanian ones, that adhered to the European Charter for Researchers, including institution names and adherence dates. |
| 3 | Action Plan Transilvania University of Braşov.                                                                                                                                                                                                                                                                                                                                                                 | Action Plan submitted by the Transilvania University of Braşov under the European Commission's Human Resources Strategy for Researchers.                      |

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|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4  | Action Plan Technical University of Cluj-Napoca.                                                                                                                                                                                      | Action Plan submitted by the Technical University of Cluj-Napoca under the European Commission's Human Resources Strategy for Researchers.                                   |
| 5  | Action Plan Dunarea de Jos University of Galati.                                                                                                                                                                                      | Action Plan submitted by the Dunarea de Jos University of Galati under the European Commission's Human Resources Strategy for Researchers.                                   |
| 6  | Action Plan University of Medicine and Pharmacy "Carol Davila" of Bucharest.                                                                                                                                                          | Action Plan submitted by the University of Medicine and Pharmacy "Carol Davila" of Bucharest under the European Commission's Human Resources Strategy for Researchers.       |
| 7  | Action Plan University of Bucharest.                                                                                                                                                                                                  | Action Plan submitted by the University of Bucharest under the European Commission's Human Resources Strategy for Researchers.                                               |
| 8  | Action Plan Institute of Cellular Biology and Pathology "Nicolae Simionescu".                                                                                                                                                         | Action Plan submitted by the Institute of Cellular Biology and Pathology "Nicolae Simionescu" under the European Commission's Human Resources Strategy for Researchers.      |
| 9  | Action Plan Victor Babes National Institute of Pathology Bucharest.                                                                                                                                                                   | Action Plan submitted by the Victor Babes National Institute of Pathology Bucharest under the European Commission's Human Resources Strategy for Researchers.                |
| 10 | Action Plan Institute of Macromolecular Chemistry "Petru Poni".                                                                                                                                                                       | Action Plan submitted by the Institute of Macromolecular Chemistry "Petru Poni" under the European Commission's Human Resources Strategy for Researchers.                    |
| 11 | Action Plan National Research and Development Institute for Industrial Ecology.                                                                                                                                                       | Action Plan submitted by the National Research and Development Institute for Industrial Ecology under the European Commission's Human Resources Strategy for Researchers.    |
| 12 | Action Plan National Institute of Research and Development for Technical Physics.                                                                                                                                                     | Action Plan submitted by the National Institute of Research and Development for Technical Physics under the European Commission's Human Resources Strategy for Researchers.  |
| 13 | Decision of the Senate of "Ștefan cel Mare" University of Suceava No. 109 of 24 July 2024 regarding the approval of the Human Resources Strategy for Researchers of "Ștefan cel Mare" University of Suceava for the period 2024–2026. | Document issued by the "Ștefan cel Mare" University of Suceava including the Action Plan submitted under the European Commission's Human Resources Strategy for Researchers. |
| 14 | Action Plan University of Medicine and Pharmacy of Craiova.                                                                                                                                                                           | Action Plan submitted by the University of Medicine and Pharmacy of Craiova under the European Commission's Human Resources Strategy for Researchers.                        |
| 15 | Action Plan University of Medicine and Pharmacy Iuliu Hatieganu.                                                                                                                                                                      | Action Plan submitted by the University of Medicine and Pharmacy Iuliu Hatieganu under                                                                                       |

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|    |                                                                                            | the European Commission's Human Resources Strategy for Researchers.                                                                                                                                                                                                                                                                                                                                                            |
| 16 | Action Plan West University of Timișoara.                                                  | Action Plan submitted by the West University of Timișoara under the European Commission's Human Resources Strategy for Researchers.                                                                                                                                                                                                                                                                                            |
| 17 | Action Plan National Institute of Research and Development for Biological Sciences.        | Action Plan submitted by the National Institute of Research and Development for Biological Sciences under the European Commission's Human Resources Strategy for Researchers.                                                                                                                                                                                                                                                  |
| 18 | Action Plan New Europe College.                                                            | Action Plan submitted by the New Europe College under the European Commission's Human Resources Strategy for Researchers.                                                                                                                                                                                                                                                                                                      |
| 19 | Institutional webpage of Transilvania University of Brașov.                                | Dedicated institutional webpage presenting publicly available documents related to the process of design, application and assessment of Action Plans based on the European Commission's "Human Resources Strategy for Researchers" (HRS4R) tool: <a href="https://unitbv.ro/cercetare/hrs4r-human-resources-strategy-for-researchers.html">https://unitbv.ro/cercetare/hrs4r-human-resources-strategy-for-researchers.html</a> |
| 20 | Institutional webpage of Technical University of Cluj-Napoca.                              | Dedicated institutional webpage presenting publicly available documents related to the process of design, application and assessment of Action Plans based on the European Commission's HRS4R tool: <a href="https://research.utcluj.ro/index.php/hrs4r.html">https://research.utcluj.ro/index.php/hrs4r.html</a>                                                                                                              |
| 21 | Institutional webpage of Dunarea de Jos University of Galati.                              | Dedicated institutional webpage presenting publicly available documents related to the process of design, application and assessment of Action Plans based on the European Commission's HRS4R tool: <a href="https://cercetare.ugal.ro/cercetare/management/hrs4r/">https://cercetare.ugal.ro/cercetare/management/hrs4r/</a>                                                                                                  |
| 22 | Institutional webpage of University of Medicine and Pharmacy "Carol Davila" of Bucharest.  | Dedicated institutional webpage presenting publicly available documents related to the process of design, application and assessment of Action Plans based on the European Commission's HRS4R tool: <a href="https://umfcd.ro/en/research-and-development/human-resources-strategy-for-researchers-hrs4r/">https://umfcd.ro/en/research-and-development/human-resources-strategy-for-researchers-hrs4r/</a>                    |
| 23 | Institutional webpage of University of Bucharest.                                          | <a href="https://unibuc.ro/cercetare/hrs4r/">https://unibuc.ro/cercetare/hrs4r/</a>                                                                                                                                                                                                                                                                                                                                            |
| 24 | Institutional webpage of Institute of Cellular Biology and Pathology "Nicolae Simionescu". | Dedicated institutional webpage presenting publicly available documents related to the process of design, application and assessment of Action Plans based on the European Commission's HRS4R tool:                                                                                                                                                                                                                            |

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|    |                                                                                                | <a href="https://www.icbp.ro/static/en/en-careers/otmr_strategy_hrs4r.html">https://www.icbp.ro/static/en/en-careers/otmr_strategy_hrs4r.html</a>                                                                                                                                                                                                                                                                 |
| 25 | Institutional webpage of Victor Babes National Institute of Pathology Bucharest.               | Dedicated institutional webpage presenting publicly available documents related to the process of design, application and assessment of Action Plans based on the European Commission's HRS4R tool: <a href="https://www.ivb.ro/hrs4r-strategia-de-resurse-umane">https://www.ivb.ro/hrs4r-strategia-de-resurse-umane</a>                                                                                         |
| 26 | Institutional webpage of Institute of Macromolecular Chemistry "Petru Poni".                   | Dedicated institutional webpage presenting publicly available documents related to the process of design, application and assessment of Action Plans based on the European Commission's HRS4R tool: <a href="https://icmpp.ro/hrs4r_otmr-strategy.php">https://icmpp.ro/hrs4r_otmr-strategy.php</a>                                                                                                               |
| 27 | Institutional webpage of National Research and Development Institute for Industrial Ecology.   | Dedicated institutional webpage presenting publicly available documents related to the process of design, application and assessment of Action Plans based on the European Commission's HRS4R tool: <a href="https://www.incdecoind.ro/hrs4r-ro/">https://www.incdecoind.ro/hrs4r-ro/</a>                                                                                                                         |
| 28 | Institutional webpage of National Institute of Research and Development for Technical Physics. | Dedicated institutional webpage presenting publicly available documents related to the process of design, application and assessment of Action Plans based on the European Commission's HRS4R tool: <a href="https://www.phys-iasi.ro/en/hrs4r">https://www.phys-iasi.ro/en/hrs4r</a>                                                                                                                             |
| 29 | Institutional webpage of "Ștefan cel Mare" University of Suceava.                              | Dedicated institutional webpage presenting publicly available documents related to the process of design, application and assessment of Action Plans based on the European Commission's HRS4R tool: <a href="https://usv.ro/cercetare/hrs4r/">https://usv.ro/cercetare/hrs4r/</a>                                                                                                                                 |
| 30 | Institutional webpage of University of Medicine and Pharmacy of Craiova.                       | Dedicated institutional webpage presenting publicly available documents related to the process of design, application and assessment of Action Plans based on the European Commission's HRS4R tool: <a href="https://www.umfcv.ro/ro/cercetare/human-resources-strategy-for-researchers-hrs4r">https://www.umfcv.ro/ro/cercetare/human-resources-strategy-for-researchers-hrs4r</a>                               |
| 31 | Institutional webpage of University of Medicine and Pharmacy Iuliu Hatieganu.                  | Dedicated institutional webpage presenting publicly available documents related to the process of design, application and assessment of Action Plans based on the European Commission's HRS4R tool: <a href="https://cdn.umfcluj.ro/uploads/2024/10/UMPhI_H_template-1-Process-Description-EURAXESS-2024.pdf">https://cdn.umfcluj.ro/uploads/2024/10/UMPhI_H_template-1-Process-Description-EURAXESS-2024.pdf</a> |

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| 32 | Institutional webpage of West University of Timișoara.                                           | Dedicated institutional webpage presenting publicly available documents related to the process of design, application and assessment of Action Plans based on the European Commission's HRS4R tool: <a href="https://hrs4r.uvt.ro/">https://hrs4r.uvt.ro/</a>                                                                                                                             |
| 33 | Institutional webpage of National Institute of Research and Development for Biological Sciences. | Dedicated institutional webpage presenting publicly available documents related to the process of design, application and assessment of Action Plans based on the European Commission's HRS4R tool: <a href="https://www.incdsb.ro/hrs4r/">https://www.incdsb.ro/hrs4r/</a>                                                                                                               |
| 34 | Institutional webpage of New Europe College.                                                     | Dedicated institutional webpage presenting publicly available documents related to the process of design, application and assessment of Action Plans based on the European Commission's HRS4R tool: <a href="https://nec.ro/about-us/regulations/human-resources-strategy-for-researchers-hrs4r/">https://nec.ro/about-us/regulations/human-resources-strategy-for-researchers-hrs4r/</a> |
| 35 | European Charter for Researchers /EURAXESS.                                                      | The European Charter for Researchers is a European Commission framework of principles defining the rights and responsibilities of researchers as well as of their employers , aiming at improving working conditions, recruitment practices and career development in research <a href="#">European Charter for Researchers   EURAXESS</a>                                                |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the target.

#### 11 additional institutions adhered to the European Charter for Researchers and Code for the Recruitment of Researchers

Romania submitted a list of the 16 new institutions that adhered to the European Charter for Researchers and Code for the Recruitment of Researchers (Evidence No. 2), as well as a link to the list published by the European Commission with all the institutions that adhered to the European Charter for Researchers and Code for the Recruitment of Researchers, including the Romanian ones, and initiated the process of design, implementation and assessment of Action Plans, thus exceeding the goal of 11 institutions by five institutions.

The Commission services accessed the link provided by the authorities on 15 January 2025 (Evidence No. 2) to verify that the 16 institutions have adhered to the European Charter for Researchers and the Code for the Recruitment of Researchers. This check was completed successfully, confirming that the additional 16 institutions indicated by Romania adhered to the European Charter for Researchers and Code for the Recruitment of Researchers after 1 February 2020.

**The additional institutions initiated the process of design, application and assessment of Action Plans based on the European Commission's "Human Resources Strategy for Researchers" (HRS4R) tool.**

The Romanian authorities provided the dedicated webpage for each institution (Evidence No. 19-34) containing the documentation related to the process of initiating the design, application and assessment of Action Plans based on the European Commission's HRS4R tool (this tool is a European Commission framework for implementing the European Charter for Researchers and Code for the Recruitment of Researchers - Evidence No. 35).

The Commission has accessed on 15 January 2025 the dedicated institutional webpages (Evidence No. 19-34) to verify that they include publicly available documentation related to the process of initiating the design, application and assessment of Action Plans based on the European Commission's HRS4R tool, as follows:

i) design phase: webpages include gap analyses assessing alignment with the Charter principles; questionnaires and surveys with synthesis of results; stakeholder consultation reports; gender equality strategies and indicator analyses; Open, Transparent and Merit-based Recruitment checklists and policies; and process descriptions defining governance structures.

ii) application phase: webpages contain formal endorsement letters (issued by the legal representatives of the applicant institutions) of the European Charter for Researchers and the Code for the Recruitment of Researchers; aligned human resources and recruitment policies, codes of ethics and professional conduct, and documentation evidencing formal submission and progression within the HRS4R framework.

iii) assessment phase: webpages publish interim and periodic assessment reports; implementation and performance indicator reports.

This check was completed successfully, confirming that the additional institutions initiated the process of design, application and assessment of Action Plans based on the European Commission's "Human Resources Strategy for Researchers" (HRS4R) tool.

Furthermore, the Romanian authorities provided Action Plans prepared using the European Commission's HRS4R tool (Evidence No. 3–18), which include a completed gap analysis, a structured set of actions with responsibilities and timelines, and arrangements for monitoring and review.

The completion and formal adoption of these Action Plans (Evidence No. 3-18), in several cases accompanied by their submission to the European Commission via EURAXESS, constitute the initiation of the Human Resources Strategy for Researchers process, as they trigger the implementation and assessment stages under the HR Excellence in Research framework. The participation in the framework demonstrates that the respective institution has applied the HRS4R process in line with the European Commission's requirements.

The additional institutions that are performing research activities and that initiated the process of design, application and assessment of Action Plans based on the European Commission's HRS4R tool are as follows:

**i. Public universities:**

1. Transilvania University of Braşov (Evidence No. 3)
2. Technical University of Cluj-Napoca (Evidence No. 4)
3. "Dunărea de Jos" University of Galaţi (Evidence No. 5)
4. University of Medicine and Pharmacy "Carol Davila" Bucharest (Evidence No. 6)
5. University of Bucharest (Evidence No. 7)
6. "Ştefan cel Mare" University of Suceava (Evidence No. 13)
7. University of Medicine and Pharmacy of Craiova (Evidence No. 14)
8. University of Medicine and Pharmacy Iuliu Hatieganu (Evidence No. 15)

- 9. West University of Timișoara (Evidence No. 16)
- 10. New Europe College (Evidence No. 18)

**ii. Public research institutes**

- 11. Institute of Cellular Biology and Pathology “Nicolae Simionescu” (Evidence No. 8)
- 12. “Victor Babeș” National Institute of Pathology, Bucharest (Evidence No. 9)
- 13. Institute of Macromolecular Chemistry “Petru Poni” (Evidence No. 10)
- 14. National Research and Development Institute for Industrial Ecology (Evidence No. 11)
- 15. National Institute for Research and Development for Technical Physics (Evidence No. 12)
- 16. National Institute for Research and Development in Biological Sciences (Evidence No. 17)

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Target:** RO-C[C9]-I[I8]-T[284] Projects led by international researchers

**Related Measure:** RO-C[C9]-I[I8] Programme to attract human resources from abroad in research, development and innovation activities

**Quantitative Indicator:** Number

**Baseline:** 0

**Target:** 100

**Time:** Q4 2023

### 1. Context:

The objective of this investment is to increase Romania's research capacity. The investment consists in granting funding to research projects led by top international researchers hosted by research, development and innovation organisation based in Romania.

The target concerns the selection of 100 projects led by international researchers.

Target 284 is the only step of this investment.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                              | Short description                                                                                                                                                                                                                                                                                                                                                                                                         |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                                                                        | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.                                                                                                                                                                                                                                                                                                |
| 2 | Copy of financing contracts signed between Ministry of Research, Innovation, and Digitalisation (MCID) and Research, Development, and Innovation (R&D&I) institutions, between 23 May and December 2023.                                                          | Financing contracts granting funding to R&D&I organisations.                                                                                                                                                                                                                                                                                                                                                              |
| 3 | Copies of project implementation reports dated between July 2025 and February 2026.                                                                                                                                                                               | Reports describing the implementation status of the research projects.                                                                                                                                                                                                                                                                                                                                                    |
| 4 | Clarification document submitted by the Romanian authorities on 4 February 2026, including hyperlinks to documents showing that the beneficiary organisations perform R&D&I activities, and a hyperlink to the published job vacancy for project 760274 director. | <a href="https://www.edu.ro/universitati_stat_civile">https://www.edu.ro/universitati_stat_civile</a><br><a href="https://www.research.gov.ro/sistemul-de-cercetare/institute-nationale-de-cercetare-dezvoltare/">https://www.research.gov.ro/sistemul-de-cercetare/institute-nationale-de-cercetare-dezvoltare/</a><br><a href="https://acad.ro/institutia/cercetare.html">https://acad.ro/institutia/cercetare.html</a> |

|   |                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | The links were accessed on 27 February 2026.                                                                                                                                                                                                                                                                                                                                                                                                   | <a href="https://icfundeni.ro/wp-content/uploads/2022/03/r-o-f-i-c-f.pdf">https://icfundeni.ro/wp-content/uploads/2022/03/r-o-f-i-c-f.pdf</a><br><br><a href="http://jobs.research.gov.ro/docs/Project_director_for_the_project_JobKG_A_Knowled_8986.pdf">http://jobs.research.gov.ro/docs/Project_director_for_the_project_JobKG_A_Knowled_8986.pdf</a><br><br><a href="https://jobs.research.gov.ro">https://jobs.research.gov.ro</a> |
| 5 | Copy of Ministerial order, including its Annexes, No. 21366/2022, regarding the approval of the Applicant's Guide for I8: Development of a programme to attract highly specialised human resources from abroad to activities in research, development and innovation, under the National Recovery and Resilience Plan – Component C9: Support for the Private Sector, Research, Development and Innovation, and the launch of the competition. | Ministerial order dated 14 September 2022 launching the call for project under the investment.                                                                                                                                                                                                                                                                                                                                          |
| 6 | Copy of Ministerial order, including its Annexes, No. 20736/2023 relaunching the competition for I8. Development of a programme to attract highly specialised human resources from abroad to activities in research, development and innovation, under the National Recovery and Resilience Plan – Component C9: Support for the Private Sector, Research, Development and Innovation.                                                         | Ministerial order dated 22 June 2023 re-launching the call for project, as an insufficient number of projects had been selected during the first call.                                                                                                                                                                                                                                                                                  |
| 7 | Copies of researcher Final Evaluation Reports compiled by international researchers acting as independent experts dated between May 2023 and December 2023.                                                                                                                                                                                                                                                                                    | The evaluation reports assessing the quality of the researchers.                                                                                                                                                                                                                                                                                                                                                                        |
| 8 | Copies of project director replacements' documents dated between November 2023 and December 2025.                                                                                                                                                                                                                                                                                                                                              | In certain cases, the project director left the project and was replaced.                                                                                                                                                                                                                                                                                                                                                               |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the target.

**100 selected projects led by international researchers hosted by research, development and innovation organisations in Romania.**

Furthermore, in line with the description of the measure, **the investment consists in granting funding to projects led by top international researchers.**

The Romanian authorities selected 116 projects following a call for applications. Following the selection of a random sample of 60 units, Romania submitted, for each unit, the signed financing contracts (Evidence No. 2) demonstrating that the projects had been selected and were granted funding, as indicated in Article 1(1) of each contract.

Article 1(2) of each contract provides that the contract needs to be carried out in accordance with the financing application contained in Annex 1 to the contract. Annex 1, section B2, contains the CV of the project director (hereinafter, project director and researcher are used interchangeably) and their career path, confirming that each project director has an international career, and therefore that the project is to be led by an international researcher.

Section A - General information specifies the name of the host research, development and innovation organisation, and its location in Romania. The host institution is also a signatory to the financing contract, as shown in Section 1. Parties of the contract (the other contracting party is the Ministry of Research, Innovation, and Digitalisation, hereinafter referred to as “MCID”).

The Romanian authorities also submitted the implementation reports (Evidence No. 3) which include information on relevant implementation aspects, including procurement of equipment, activities undertaken, scientific outputs, or conferences organised, demonstrating that the projects are ongoing.

Furthermore, the Romanian authorities submitted a clarification document (Evidence No. 4) containing links to all sampled Research, Development, and Innovation (R&D&I) host organisations. These organisations fall into the following categories:

- i. Public universities,
- ii. National Research and Development Institutes,
- iii. Research institutes under the Romanian Academy.

Moreover, the link to the Rules of Organisation and Functioning of the Fundeni Clinical Institute, an entity not falling within the three abovementioned categories, was provided (Evidence No. 4). Article 3 of the Rules of Organisation and Functioning provides that the Institute carries out education and research activities, in addition to providing medical services as set out in Article 2 of the same document.

The Commission services accessed all links provided by the authorities on 27 February 2026 to verify the activity of each organisation. This check was completed successfully, confirming that the host organisations are active in R&D&I.

The Romanian authorities shared the Final Evaluation Report (Evidence No. 7) for each researcher, on the basis of which the projects were selected. Each report assigns a score to each researcher against criteria 1.1 (*Quality of the project director research output*), 1.2 (*Visibility and impact of the PI's research output*), and 1.3 (*ability to tackle the proposed topic*) As indicated in Annex 2 - Evaluation Sheet, Section 1 of Ministerial Order No. 21366/2022, approving the applicant guide for I8. Development of a programme for attracting highly specialised human resources from abroad to activities in research, development and innovation (Evidence No. 5, as well as Evidence No. 6 as the call was relaunched due to insufficient applicants), those criteria are weighted at 40%, 30%, and 30%, respectively. Section 5.2 of Annex 1 to Evidence No. 5 and No. 6 further indicates that independent experts with a high level of professional experience and high international visibility perform the evaluation. The resulting final score therefore reflects an overall expert assessment of the quality of each researcher. The scoring grid (section 3 of Annex 2 of Evidence No. 5 and No. 6) uses a scale from 0 to 5, where 3 corresponds to “good”, 4 to “very good”, and 5 to “excellent”. A score at or close to 4 therefore demonstrates that the researcher was assessed as being at least very good, or very close to that level, under the relevant expert-assessed criteria. The final score of the

researchers was at least 4 in 56 cases, 3.975 in two cases and 3.85 in one case. Only one researcher (project 760034) obtained an average score of 3.2 which the Commission considers it does not qualify as a top-level researcher under the requirements of the measure. Except for this specific case, for all the other cases the assessment demonstrates - together with the abovementioned checks of researchers' CVs - that the project directors are top international researcher.

Finally, for seven projects in the sample, the project director left the project after his/her selection, for example due to death, resignation, or termination by mutual agreement. In response, the Romanian authorities filled the vacant position with another top-level researcher and provided the respective documents for six out of the seven projects. Specifically, for projects 760064, 760083, 760081, 760274, 760103, 760275, the Romanian authorities provided evidence showing, for each new project director, the career path (including a CV), demonstrating the international profile of the researcher. They also provided evidence of the top-level quality of the project director, either in the form of a complete table factually comparing the qualifications of the former and the new director, such as the number of citations or the publications in top journals, or in the form of a decision by an evaluation committee composed of international researchers assessing the new candidate (Evidence No. 8). In the case of project 760274, a proposed project director was rejected by MCID in May 2025 on the ground that the candidate did not meet the qualifications for the post. The Romanian authorities communicated that they re-published the vacancy notice on 10 September 2025, but no candidate applied. At the time of the assessment, the recruiting process was ongoing.

In view of the aforementioned researcher (project 760034) who obtained an average score of 3.2 and of project 760274, for which the candidate did not meet the qualifications for the post, a conservative approach was adopted, and those two units were considered as a fail. A statistical analysis was carried out taking into account the overachievement of the target of 116 units for a required target of 100. Based on this, there is statistical assurance that the target has been met, and all its constitutive elements have been satisfactorily fulfilled.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Target:** RO-C[C9]-I[I9.0]-T[285] Marie Skłodowska Curie recipients of Seal of Excellence

**Related Measure:** RO-C[C9]-I[I9.0] Support for the holders of certificates of excellence received in the Marie Skłodowska Curie Individual Fellowship Award

**Quantitative Indicator:** Number

**Baseline:** 0

**Target:** 10

**Time:** Q4 2023

### 1. Context:

The objective of this investment is to increase the attractiveness of research careers and support confirmed researchers in carrying out their research projects. The investment consists in providing grants to recipients of the Marie Skłodowska-Curie Individual Fellowship Seal of Excellence, where the certificates were awarded by 31 December 2023, to implement Horizon 2020 and Horizon Europe research projects.

Target 285 is the only target of this investment and specifically refers to grants awarded to the selected recipients.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                   | Short description                                                                                                                        |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                                                             | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.               |
| 2 | Copy of the Marie Skłodowska Curie Individual Fellowship Seal of Excellence certificates.                                                                                                                                                              | Certificates granted by the European Commission following the submission of research proposal for Horizon 2020 and Horizon Europe calls. |
| 3 | Copy of the contracts signed by the Ministry of Research, Innovation and Digitalisation (currently the National Authority for Research under the Ministry of Education and Research) with the beneficiaries (host universities or research institutes) | Twelve contracts signed with final beneficiaries – holders of Marie Skłodowska - Curie Excellence Certificates.                          |
| 4 | Copy of the research proposals submitted to Horizon 2020 / Horizon                                                                                                                                                                                     | Copy of the 12 research proposals.                                                                                                       |

|   |                                                                                                                                                                                                                                                                                                                                     |                                                                                                                          |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------|
|   | Europe calls.                                                                                                                                                                                                                                                                                                                       |                                                                                                                          |
| 5 | Copy of approval notes of the funding requests.                                                                                                                                                                                                                                                                                     | Copy of the 12 approval notes of the funding request, signed by the Ministry of Research, Innovation and Digitalisation. |
| 6 | Copy of Ministerial Order No. 20466/28 April 2022 on the approval of the State Aid Scheme “Grant Provision for Holders of Marie Skłodowska-Curie Excellence Certificates”, part of the Romania’s National Recovery and Resilience Plan, Pillar III, Component C9, 2021–2026, published in the Official Journal No. 494/18 May 2022. | Copy of Ministerial Order approving the State Aid Scheme, published in the Official Journal.                             |
| 7 | Copy of payment orders and a summary table issued by the National Authority for Research on 17 March 2026.                                                                                                                                                                                                                          | Copy of payment orders to beneficiaries related to their grants.                                                         |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the target.

**At least 10 Marie Skłodowska Curie recipients of Seal of Excellence for excellent individual fellowships shall receive a grant to carry out Horizon 2020 and Horizon Europe research projects.**

The authorities have provided copies of 12 approval notes concerning the funding requests (Evidence No. 5) together with the corresponding grant contracts (Evidence No. 3) signed to carry out Horizon 2020 and Horizon Europe research projects with Marie Skłodowska Curie Seal of Excellence recipients (contract numbers: 760013/27 January 2023; 760015/27 January 2023; 760026/30 March 2023; 760014/27 January 2023; 760016/27 January 2023; 760017/27 January 2023; 760018/27 January 2023; 760130/15 September 2023; 760122/31 July 2023; 730132/18 September 2023; 760146/31 October 2023; 760265/06 March 2024). According to Article 12(1) of Ministerial Order No. 20466/28 April 2022, approving the State Aid Scheme and published in the Official Journal No. 494/18 May 2022 (Evidence No. 6), the Seal of Excellence certificate, previously awarded by the European Commission, served as an eligibility criterion for the selection of research projects. The authorities have also provided copies of the Seal of Excellence certificates (Evidence No. 2), together with the corresponding research proposals submitted under the Horizon 2020 and Horizon Europe calls (Evidence No. 4), which led to the awarding of the Seal of Excellence certificate. According to the evidence provided, Romania signed 12 grant contracts, thus exceeding the goal of target 285 by two contracts.

Under Article 3.3 of the contracts signed by Ministry of Research Innovation and Digitalisation (currently the National Authority for Research under the Ministry of Education and Research) with the beneficiaries (host universities or research institutes) (Evidence No. 3), the payment mechanism allows for advance payments of up to 90% of the allocated amount for each implementation step/calendar year, subject to justified request. Beneficiaries are required to incur the relevant expenditure and submit quarterly financial reports. Subsequent advance payments are conditional

upon the full justification or recovery of previous granted advances. Any overpayments must be reimbursed within 10 days of notification.

The Romanian authorities have provided payment orders and a summary table, issued by the National Authority for Research (Evidence No. 7) confirming that all 12 beneficiaries (host universities or research institutes) have received at least partial grant payments.

**The investment consists in providing researchers who are awarded with the Marie Skłodowska Curie Individual Fellowship Seal of Excellence by 31 December 2023 with a grant to carry out Horizon 2020 and Horizon Europe research projects.**

In line with the description of the measure, for all 12 research projects, the Marie Skłodowska Curie Individual Fellowship Seal of Excellence certificates were issued before 31 December 2023 (Evidence No. 2). Verification of the issuance dates indicated on the certificates confirmed the following: four certificates issued on 5 May 2022, three certificates issued on 26 March 2021, three certificates issued on 4 April 2023, one certificate issued on 25 March 2020, and one certificate issued on 5 April 2023.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Target:** RO-C[C9]-I[I10]-T[287] Established regional centres for research career orientation

**Related Measure:** RO-C[C9]-I[I10] Establishment and financial support of a national network of eight regional career guidance centres

**Quantitative Indicator:** Number

**Baseline:** 0

**Target:** 8

**Time:** Q2 2026

### 1. Context:

The objective this Investment is to provide research career orientation and attract people to the research profession. The investment consists in the establishment and financial support of a network of research career orientation centres.

Milestone 287 requires that eight regional centres for research career orientation are established and hosted by 8 public universities.

Milestone 287 is the only milestone of this investment.

Following the completion of this milestone, in line with the description of the measure in the Council Implementing Decision, Romania will provide financial support to the centres. This is a further step of this measure that is not linked to the milestones and targets in the Council Implementing Decision.

### 2. Evidence provided

|   | Name of the evidence                                                                                             | Short description                                                                                                                                  |
|---|------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                       | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.                         |
| 2 | Copy of financing contracts signed between Ministry of Research and each university, between 23 and 25 May 2023. | The contracts establish the eight regional centres for research career orientation.                                                                |
| 3 | Ministry of Education website listing all public universities.                                                   | The link was accessed on 27 February 2026<br><a href="https://www.edu.ro/universitati_stat_civile">https://www.edu.ro/universitati_stat_civile</a> |
| 4 | Copy of implementation report, issued by each                                                                    | Implementation reports describing projects' progress.                                                                                              |

|   |                                                                                                                                                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                    |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | host university and dated between April 2025 and January 2026.                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                    |
| 5 | Clarification documents submitted by the Romanian authorities on 16 January 2026, and follow-up clarifications for the Central region submitted on 16 February 2026. The documents include the hyperlink to the EURAXESS Website, accessed on 27 February 2026. | The documents describe the context of the services provided to students and researchers.<br><br>EURAXESS website:<br><a href="https://www.euraxess.gov.ro/ro/romania/reteaua-euraxess-romania">https://www.euraxess.gov.ro/ro/romania/reteaua-euraxess-romania</a>                                                                                                                 |
| 6 | Central region career orientation service – hyperlinks to school visits, accessed on 27 February 2026.                                                                                                                                                          | Hyperlinks: <a href="https://grants.ulbsibiu.ro/cocerc/o-incursiune-fascinanta-in-lumea-cunoasterii/">https://grants.ulbsibiu.ro/cocerc/o-incursiune-fascinanta-in-lumea-cunoasterii/</a><br><br><a href="https://grants.ulbsibiu.ro/cocerc/setul-de-ateliere-cercetarea-pe-limba-copiilor/">https://grants.ulbsibiu.ro/cocerc/setul-de-ateliere-cercetarea-pe-limba-copiilor/</a> |
| 7 | Summary document produced by MCID presenting examples of joint events happening between August 2024 and November 2025.                                                                                                                                          | The document shows the events jointly organised by the centres.                                                                                                                                                                                                                                                                                                                    |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

### 8 regional centres for research career orientation shall be hosted by 8 public universities.

The Romanian authorities provided copies of the financing contracts signed between Ministry of Research, Innovation, and Digitalisation (hereinafter referred to as “MCID”) and each university, for the establishment of the regional career orientation centres (hereinafter referred to as “*the centres*”), as set out in *section 1. Parties of the contract*. The contracts were signed between 23 and 25 May 2023. The universities concerned are: the University of Craiova (for the South-West Oltenia region), Ovidius University of Constanța (South-East region), Babeș – Bolyai University of Cluj-Napoca (North-West region), University of Bucharest (Bucharest-Ilfov region), Valahia University of Târgoviște (South-Muntenia region) West University of Timișoara (West region), Lucian Blaga University of Sibiu (Central region), and Ștefan cel Mare University of Suceava (North-East region) (Evidence No. 2).

Article 1(2) of each contract sets out that the beneficiary, meaning the university, is responsible for carrying out the project described in Annex 1 to the contract.

The services that the host universities are supposed to provide under the contract are detailed in Section A.1 of Annex 1 of each of the contracts (Evidence No. 2), namely the financing application. It outlines that the main activities of the project will include research career guidance for students, doctoral candidates and post-doctoral students from the respective region.

The facilities the universities will use for hosting the centres are indicated in Section B.4 of Annex 1 of the contracts (Evidence No. 2).

The public status of each university is demonstrated through the publicly available document of the Ministry of Education listing all public universities (Evidence No. 3). The Commission services accessed the link on 27 February 2026 to verify whether the host universities are contained in the document. This check was completed successfully, confirming that the eight universities have public status.

**The roles of the centres shall be: - providing career orientation to researchers [...]**

According to the implementation reports (Evidence No. 4), each centre offers different research career orientation services. Depending on the centre, the number of people - including researchers, PhD candidates, and post-doctoral candidates - benefitting from these services for each centre ranges from around 200 to more than 1000 since the start of the projects. According to the clarification documents (Evidence No. 5), each research centre provides a range of services, including, among others, sessions on:

- South-West Oltenia Region: publication of scientific research articles in journals; presenting platforms to promote researcher profile and research employment opportunities; preparation of the doctoral thesis. Moreover, the sessions vary according to the academic field.
- South-East Region: the ethical and responsible use of artificial intelligence tools; management of bibliographic references; methods of statistical analysis and interpretation of data. Moreover, the sessions vary according to the academic field.
- Bucharest-Ilfov Region: *Chemistry Day - a session of scientific communications, coaching and best practices in research; ERC Grants – How to Build a Successful Application; Science Day – Early career researchers: between scientific publications for a sustainable research career and the use of AI in HR management; Restoration of Our Oceans and Waters – between research and implementation.*
- South-Muntenia Region: sessions on writing and publication of scientific articles; Ethics and academic integrity in research; valorisation of research results and knowledge transfer. Moreover, the sessions vary according to the academic field.
- West Region: tailor-made training sessions are carried out on each field of doctoral university studies, specific to each doctoral school, and the needs of the beneficiaries.
- Central Region: personalised sessions following identification of training needs through a survey to researchers. The sessions then include, among others: Networking Strategies and Open Access Publishing in Exact Sciences; Innovation and Intellectual Property in Engineering; Emerging Technologies in Research; Funding and public visibility of medical research
- North-West Region: advanced methods and specialised research techniques; development and management of research projects, including planning, budgeting and administrative matters; strategies for publishing in specialized journals and management of the peer review process. Moreover, the sessions vary according to the academic field
- North-East Region: the sessions vary according to the academic field. In particular:
  - Technical and engineering fields: sessions on experimental research, use of digital tools and validation of results;

- Economic fields: sessions on quantitative methodologies, statistical analysis and publication of research results;
- Social sciences and humanities: sessions on qualitative methodologies, construction of theoretical framework and integration of doctoral research into relevant academic networks

**The roles of the centres shall be: [...] attracting people to a research career [...]**

Each research career centres organises visits to schools with the objective of promoting science and attracting young people to a research career. The clarifications documents (Evidence No. 5) include the hyperlinks to the school visit events for each centre. The Commission services accessed the link provided by the authorities on 27 February 2026 to verify that school visits were documented. This check was completed successfully, confirming that the school visits took place. For the Central region, the hyperlink was not provided. However, the Commission services identified two relevant hyperlinks, confirming that school visits were carried out by that centre (Evidence No. 6).

Moreover, according to the implementation reports, each centre offers research career orientation services to master's students aimed at encouraging them to a research career. In addition, each centre provided clarifications (still Evidence No. 5) on what these services specifically consist of. They include, among others, sessions on:

- South-West Oltenia Region: elaboration of the dissertation paper; participation in scientific competitions; presentation and publication of scientific articles in journals or conferences.
- South-East Region: use of scientific databases; ethical and responsible use of Artificial Intelligence tools; Management of bibliographic references. Moreover, the sessions vary according to the academic field.
- Bucharest-Ilvov Region: *training session on good research practices "Solutions for biological and biochemical research"; How do we structure a research paper?; Scientific conferences – networking, opportunities, challenges; Physics day: Trends in high-energy physics.*
- South-Muntenia Region: elaboration of the dissertation paper; good practices in academic writing and citation of sources; presenting career opportunities in research and academic pathways. Moreover, the sessions vary according to the academic field
- West Region: tailor-made training sessions are carried out on each field of master's studies, and based on the specific needs of the researchers.
- Central Region: sessions on good practices in scientific research delivered by career counsellors, and personalised research career sessions based on the master's field delivered by experienced researchers.
- North-West Region: assessment of research interests and needs; introduction to the fundamental principles of scientific research, methods and formulation of hypotheses; developing scientific communication and academic writing skills. Moreover, the sessions vary according to the academic field.
- North-East Region: the sessions vary according to the academic field. In particular:
  - Economic fields: sessions on quantitative research methodologies, use of databases and structuring of dissertation works;
  - Technical and engineering fields: sessions on applied research, experimental study design and validation of results;
  - Social sciences and humanities: sessions on qualitative methodologies, critical analysis and integration of research results in academic and interdisciplinary approaches.

These services inform students about research careers to attract them to pursue such a career path.

### **The roles of the centres shall be: [...] working as a network**

The Romanian authorities explained that all centres are presented in the Romania section of EURAXESS - a platform for researchers, entrepreneurs, universities and businesses to interact with each other. The clarifications documents include hyperlinks to the EURAXESS Romania webpage (Evidence No. 5). The webpage provides a single, centralised entry point through which students and researchers can access information about the different regional career centres and identify the centre corresponding to the region in which they study or work. This centralised presentation of all centres on the same platform allows coordination and work as a network.

Moreover, each centre's website includes a dedicated section with links to all other centres, further confirming the work as a network. The clarifications documents (Evidence No. 5) include hyperlinks to the relevant sections of the centres' websites. The Commission services accessed the links provided by the authorities on 27 February 2026 to verify the location and activity of each of them. This check was completed successfully, confirming that all centres are listed on the EURAXESS Romania platform and that each centre's website includes hyperlinks to the other centres.

Finally, the Romanian authorities provided a summary document (Evidence No. 7) containing photos, flyers, and screenshot of participants in online meetings for events jointly organised by multiple centres. This is also reflected in the implementation reports (evidence No. 4), which indicate that each centre has participated in between one and six joint events with other research centres, depending on the centre, since the start of the projects. This further confirms that the centres work as a network.

Furthermore, in line with the description of the measure, **the investment consists in the establishment and financial support of a network of research career orientation centres.**

Article 3 (3) of each centre's financing contract provides the rules on submitting payment requests to MCID, including deadlines, mechanisms, and as the centre's bank details. In particular, within 10 days of the payment request MCID must authorise it, and must pay the authorised amounts within five days.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C11]-R[R3.a]-M[345] Entry into force of the legal acts on the legal framework applicable to cultural workers

**Related Measure:** RO-C[C11]-R[R3.a] Reforming the funding system for the cultural sector

**Qualitative Indicator:** Provision in the legal acts indicating the entry into force of the legal framework for the statute of the cultural workers

**Time:** Q1 2025

### 1. Context:

The objective of the reform is to establish a legal and administrative framework for cultural workers.

Milestone 345 concerns the entry into force of legal acts establishing the legal framework applicable to cultural workers, covering elements necessary for a predictable and sustainable reform of the cultural system.

Milestone 345 is the only milestone under Reform 3.a., which is complemented by Reform 3 and milestone 344 in the loan component on reforming the funding system for the cultural sector.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                         | Short description                                                                                                                                                                                                                                                                                                                                           |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                   | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.                                                                                                                                                                                                                             |
| 2 | Copy of Government Emergency Ordinance No. 21 of 5 April 2023 regarding the Statute of a professional cultural worker. Entry into force on 7 April 2023 (Official Journal No. 297 of 7 April 2023, Part I).  | Government Emergency Ordinance No. 21 of 5 April 2023 establishes the legal framework applicable to professional cultural workers. It defines their legal status, regulates the forms of collective agreements, provides for the creation of the Register of Professional Cultural Workers as well as the National Mobility Programme for cultural workers. |
| 3 | Copy of Law No. 346 from 10 November 2023 approving the Government Emergency Ordinance No. 21/2023 on the status of professional cultural worker. Entry into force on 13 November 2023 (Official Journal No. | The Parliament of Romania approved Government Emergency Ordinance No. 21/2023 (see Evidence No. 2) on the status of professional cultural worker, thereby becoming Law No. 346 of 10 November 2023.                                                                                                                                                         |

|   |                                                                                                                                                                                                                               |                                                                                                                                         |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------|
|   | 1030 of 13 November 2023, Part I).                                                                                                                                                                                            |                                                                                                                                         |
| 4 | Screenshot of Cultural workers registry.                                                                                                                                                                                      | This screenshot shows the Register of Professional Cultural Workers.                                                                    |
|   | Link to the Register of Professional Cultural Workers interface.                                                                                                                                                              | The Register is accessible at the following link: <a href="https://fonduri-cultura.ro/#/login">https://fonduri-cultura.ro/#/login</a> . |
| 6 | Copy of Ministerial Order No. 2618 for the approval of the Methodological Rules on the Register of Professional Cultural Workers, of 13 February 2025, published in the Official Journal No. 172 of 26 February 2025, Part I. | The Ministerial Order specifies the methodological norms regarding the Register of Professional Cultural Workers.                       |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of milestone 345.

#### **Legal acts shall enter into force on the legal framework applicable to cultural workers [...]**

The Government Emergency Ordinance No. 21/2023 on the Statute of a professional cultural worker (hereinafter referred to as “GEO No. 21/2023”) (Evidence No. 2) was published in the Official Journal No. 297 on 7 April 2023. The GEO No. 21/2023 entered into force on the date of its publication, in accordance with Article 12(2) of Law No. 24/2000 on legislative technique rules for drafting legal acts.

GEO No. 21/2023 regulates:

- The legal and tax regime applicable to professional cultural workers (Articles 1-7);
- The organisation and performance of cultural activity, including the types of contracts that may be concluded by professional cultural workers and their legal effects (Articles 8-10);
- Fiscal obligations and social contributions applicable to professional cultural workers and to beneficiaries of their activities (Articles 8-11);
- Rights of professional cultural workers, including rights related to collective participation, representation, social and health insurance, and unemployment benefits (Articles 12-14);
- Measures to support professional training, qualification, and mobility, including the establishment of the National Mobility Programme and local mobility programmes (Articles 15-26);
- The establishment, organisation, and functioning of professional associations of professional cultural workers (Articles 27-37).

Subsequently, Law No. 346/2023 approving GEO No. 21/2023 was adopted by the Romanian Parliament on 10 November 2023 and published in the Official Journal No. 1030 of 13 November 2023 (Evidence No. 3). The Law confirmed the validity of the legal framework applicable to cultural workers in accordance with Article 115 of the Romanian Constitution.

**[...] which shall: define employment in “artistic work” and “cultural work”**

Article 2(1)(a) of GEO No. 21/2023 (Evidence No. 2) defines artistic and cultural work by reference to the concept of work **in the context of cultural activity**. As such, the concept of “cultural activity” encompasses the terms of artistic and cultural work, and is defined as *“the creation of a literary or artistic work or of a protected subject matter and/or the interpretation or performance, unfixed or fixed, as defined in Law No. 8/1996 on copyright and related rights<sup>6</sup>, republished, as subsequently amended and supplemented, protected or liable to be protected by copyright or related rights, as well as the support or ancillary cultural activities listed in the Annex of the present emergency ordinance”*.

**[...] Set out standards for employment, taxation, and social security, ensuring commensurate remuneration and access to benefits (for example, unemployment and health protection)**

GEO No. 21/2023 (Evidence No. 2) establishes binding standards governing the employment, taxation, and social protection of professional cultural workers. Articles 8-10 set out the contractual framework under which cultural work is performed, including contracts for the performance of cultural activity and for the transfer of copyright or related rights, and recognise these contracts for fiscal and social insurance purposes. Income derived from such contracts is classified as taxable income and subject to compulsory social contributions. This ensures legal recognition of remuneration and eligibility for benefits (Articles 8-11).

Professional cultural workers should receive commensurate remuneration, meaning pay that is proportionate to the nature, scope, and value of the work performed. Pursuant to Article 51 of GEO No. 21/2023, minimum remuneration levels for different categories of cultural activities, as well as minimum conditions for carrying out those activities, must be established through collective bargaining between the parties entitled to negotiate collective agreements in the relevant cultural and creative sectors. In addition, Article 40 of GEO No. 21/2023 provides that professional associations must initiate and/or participate in collective bargaining with beneficiaries of cultural activities to determine minimum remuneration for the different categories of professional cultural workers. Together, these provisions ensure that commensurate remuneration is set through collective negotiation and reflects the specific characteristics and requirements of professional cultural activities, rather than being determined arbitrarily.

Access to social protection systems, including health insurance, sickness, maternity, and unemployment benefits, is set out in Articles 13 and 14 of GEO No. 21/2023. As such, professional cultural workers are integrated into the public social insurance system under conditions comparable to other contributors.

**[...] Set out provisions for identifying freelancer cultural artists and their access to social protection systems**

GEO No. 21/2023 (Evidence No. 2) establishes a formal registration system for professional cultural workers, including freelancers. Pursuant to Articles 3-5, those whose cultural activities generate at least 50% of their taxable income may apply for registration based on verifiable tax documentation issued by the National Agency for Fiscal Administration. Approved applicants are entered into the Register of Professional Cultural Workers, a public database administered by the Ministry of Culture. They are assigned a unique registration number and proof of registration (Article 4). Registration is granted for a renewable period of three consecutive tax years. Evidence No. 4 provides a screenshot, and Evidence No. 5 provides a link to the Register’s interface. The Commission services accessed the link provided by the authorities on 16 February 2026 to verify that the Registry interface was

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<sup>6</sup> Law No. 8 of 14 March 1996 on Copyright and Neighbouring Rights (as amended up to Law No. 329/2006).

available online and functioning. This check was completed successfully, confirming that the platform allowing for the identification of freelancer cultural artists is functioning.

The Methodological Rules on the Register of Professional Cultural Workers, approved by Ministerial Order on 13 February 2025 and published in the Official Journal on 26 February 2025 (Evidence No. 5), further regulate the registration procedure, the content and management of the Register, and the communication of registration.

Pursuant to Article 8(8) of the GEO No. 21/2023 (Evidence No. 2), registration confers official recognition of professional status and constitutes the legal basis for the application of the employment, taxation and social security provisions. This enables registered freelance cultural workers to be identified by public authorities and to access social protection systems.

**Furthermore, in line with the description of the measure, this measure consists in the adoption of legal acts on the funding system for cultural projects and the support to workers in cultural sectors.**

Milestone 345 forms part of a broader measure aimed at strengthening both the stability of cultural project funding and the structural support available to cultural workers. By introducing the Statute of the professional cultural worker through GEO No. 21/2023 (Evidence No. 2), it establishes a clear legal, fiscal and professional framework for individuals working in cultural sectors. Article 9 of GEO No. 21/2023, as amended by Law No. 346 from 10 November 2023 approving the Government Emergency Ordinance No. 21/2023 on the status of professional cultural worker (Evidence No. 3), enables cultural workers to be assimilated to existing legal regimes applicable to funding of cultural projects, such as public procurement frameworks or framework service agreements for cultural activities. As such, the Milestone facilitates the integration of workers in cultural sectors into existing funding programmes by providing a recognised status and a structured contractual framework.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C11]-I[I6.0]-M[348] Digital system for cultural funding processes

**Related Measure** RO-C[C11]-I[I6.0] Establishment of digital system for cultural funding processes

**Qualitative Indicator:** Digital system for cultural funding processes accessible online

**Time:** Q3 2025

### 1. Context:

The objective of this investment is to develop a digital system for the award of public funding in cultural sectors. The measure consists in the roll out of the digital system facilitating access to finance for national cultural operators.

Milestone 348 concerns the digital system for cultural funding processes that should be accessible online such to streamline application and project assessment, ensuring registration of public cultural grants, also with the objective of preventing double funding.

Milestone 348 is the only milestone of this investment.

### 2. Evidence provided:

|   | Name of the evidence                                          | Short description                                                                                                                                                                |
|---|---------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                    | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.                                                  |
| 2 | Webpage of the Digital System for Cultural Funding Processes. | A link to the Digital System for Cultural Funding Processes <a href="https://fonduri-cultura.ro/#/login">https://fonduri-cultura.ro/#/login</a> , accessible after registration. |

### 3. Analysis:

The justification and substantiating evidence provided by the Romania authorities cover all constitutive elements of the milestone.

**The digital system for cultural funding processes is accessible online. It shall streamline application and project assessment and allow the registration of public cultural grants to prevent double funding. It shall allow data collection for cultural spending analysis and provide public access to non-confidential project information.**

The Commission services accessed the link provided by the authorities (Evidence No. 2) on 19 February 2026 to verify that the system for cultural funding processes was active and accessible online, and that the digital system covered the options for application and project assessment in cultural funding. The landing page includes user manuals and video tutorials to enable easy access to the online tool. Registration is open to fiscal residents in Romania. The system streamlines

application and project assessments in digital form; the projects being assigned through the system to technical evaluators who assess online.

This check was completed successfully, confirming that the Digital System for Cultural Funding Processes is accessible online following registration.

The developed digital system has a modular structure, comprising of technical modules that allow for the entire process related to project cycle management (project submission, assessment, contracting, monitoring, evaluation and control, funding disbursement, ex post assessment) to be carried out online.

The digital tool enables registration of public cultural grants through the *National Cultural Grants Registry Module*, which displays relevant information on cultural programmes in a dynamic table format. The tool thereby provides sufficient data for users to be able to perform checks for double funding, in line with the description of the milestone.

The tool enables the registration of public cultural grants, allowing data collection for cultural spending analysis and public access to non-confidential information on cultural projects through the *National Cultural Grants Registry Module*, without the need to create a user account on the platform.

This check was completed successfully, confirming that the Digital System for Cultural Funding Processes streamlines applications and project assessments, allowing the registration of public cultural grants to prevent double funding.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Target:** RO-C[C11]-I[I7.0]-T[350] Film producers and distributors participating in trainings for digital skills capacity

**Related Measure:** RO-C[C11]-I[I7.0] Accelerating the digitalisation of film production and distribution

**Quantitative Indicator:** Number

**Baseline:** 0

**Target:** 40

**Time:** Q3 2025

### 1. Context:

The objective of the investment is to enhance the digital skill capacity of micro, small and medium-sized enterprises involved in film and media production, supporting the digital transition of the industry in Romania.

This measure consists in financing film and media producers for acquiring digital skills in production and distribution.

Target 350 consists of training to film and media undertakings, to develop digital competencies in production and distribution.

Target 350 is the only target of the investment.

### 2. Evidence provided:

|   | Name of the evidence                                 | Short description                                                                                                                                                                                               |
|---|------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                           | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.                                                                                 |
| 2 | Certificates of training in digital skills.          | These are the 46 certificates confirming the completing of digital skills training by employees working in the media or film sector, in 44 individual undertakings. All certificates are duly dated and signed. |
| 3 | List of 44 projects of film and media undertakings.  | List of projects undertaken by 44 unique film and media undertakings for creating digital content.                                                                                                              |
| 4 | List of employees in 44 film and media undertakings. | List of employees, identified by individual certificates for digital competences, who have been trained, and the unique film and media undertaking project associated.                                          |

### 3. Analysis:

The justification and substantiating evidence provided by the Romania authorities cover all constitutive elements of the measure and target.

#### **Certificates for trainings in digital skills capacity of film producers and distributors from 40 undertakings active in the film and media sector.**

Romania provided 46 training certificates (Evidence No. 2) to individuals who successfully completed training in digital skills for the film and media industry. Each certificate confirms participation in the dedicated training for a specified duration, successful completion of a final examination. It also confirms that all individuals who participated in the training work in the film and media sector, as demonstrated by the relevant Classification of Occupations in Romania (COR) code in line with the nomenclature system in force under national legislation. The Commission verified that all 46 certificates were properly awarded (duly dated and signed) to people working in the context of projects for digitalisation of the film and media industry, employed by 44 undertaking active in that sector.

The Commission verified the supplements to the training certificates, which confirm the list of skills gained and verified by the exam the individuals took, thereby ensuring the skills trained fall under the category of digital skills for film production and distribution.

The beneficiaries of these digital training programmes (44 legal entities, including 43 enterprises and 1 NGO) are all active and legally authorised organisations operating in the film production and distribution sector (Evidence No. 3). Their eligibility is demonstrated through registration under the relevant NACE codes: 5911 Motion picture, video and television programme production activities, or 5913 Motion picture, video and television programme distribution activities, which were verified using public information. In the case of the NGO, eligibility is demonstrated through its statutory objectives in the same field, also verified using publicly available information. This confirms that only active and legally authorised entities in the film production and distribution sector were contracted. In addition, Evidence No. 4 links the individual undertakings to individual employees who received training in film digitalisation under the projects awarded. The employees are identified by the unique identifiers shown on their individual and unique training certificates (Evidence No. 2), which in turn confirm that they are employed by one of the 44 film and media undertakings.

According to the evidence provided, Romania completed 46 certificates of training from 44 undertakings. The certificates were awarded to people working in the film and media industry in the context of training for digital skills, thus exceeding the goal of Target 350 by 4 undertakings receiving certificates for training.

The requirements contained in the measures description of Investment 7 are not materially different from the requirements of Target 350 and therefore have already been assessed in the context of the above analysis.

#### **4. Commission Preliminary Assessment: Satisfactorily fulfilled.**

**Number and name of the Milestone:** RO-C[C12]-R[R1]-M[352] Entry into force of the legal act for a new model framework contract for the health insurance system

**Related Measure:** RO-C[C12]-R[R1] Increased capacity for the management of public health funds

**Qualitative Indicator:** Provision in the legal act indicating its entry into force

**Time:** Q2 2023

### 1. Context:

The objective of reform C12.R1 is to increase the efficiency of public health spending by adopting legislative changes and by piloting a grants scheme for rewarding the most performing healthcare providers.

The reform consists in financial mechanisms that reward the performance of healthcare providers through the “Health Service Quality Fund”, and the drafting of a new model framework contract governing the conditions for the provision of healthcare.

Milestone 352 requires a new model framework contract for the health insurance system.

Milestone 352 is the second and last milestone of the reform, and it follows the completion of milestone 351, related to the performance and quality indicators to be used for the selection of the medical units benefiting from the Health Quality Fund.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                                                                                                                                | Short description                                                                                                                                                       |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover Note                                                                                                                                                                                                                                                                                                                                                                          | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.                                              |
| 2 | Copy of Government Decision No. 521 of 26 May 2023 for the approval of the Service Packages and the Framework Contract governing the conditions for granting healthcare, medicines and medical devices under the social health insurance system, published in the Official Journal No. 466 on 26 May 2023 (hereinafter referred to as “ <i>Government Decision No. 521/2023</i> ”). | Government Decision No. 521/2023 approves the Service Packages and the Framework Contract.                                                                              |
| 3 | Copy of Annex 1 (Service packages) (to Government Decision No. 521/2023, published in the Official Journal No. 466bis on 26 May 2023; hereinafter referred to as “ <i>Service packages</i> ”).                                                                                                                                                                                      | Annex 1 contains the service package.                                                                                                                                   |
| 4 | Copy of Annex 2 (Framework Contract) (to Government Decision No. 521/2023, published in the Official Journal No. 466bis on 26 May 2023; hereinafter referred to as “ <i>Framework Contract</i> ”).                                                                                                                                                                                  | Annex 2 includes Framework Contract governing the conditions for granting medical assistance, medicinal products and medical devices under the health insurance system. |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

#### **Entry into force of the legal act for a new model framework contract for the health insurance system. Provision in the legal act indicating its entry into force.**

The Government Decision No. 521/2023 for the approval of the Service Packages and the Framework Contract governing the conditions for granting healthcare, medicines and medical devices under the social health insurance system (Evidence No. 2; hereinafter referred to as “*Government Decision No. 521/2023*”) was published in the Official Journal on 26 May 2023. According to its Article 4, Government Decision No. 521/2023 entered into force on 1 July 2023.

Government Decision No. 521/2023 includes as Annex 1 the minimum service package and basic service package (Evidence No. 3; hereinafter referred to as “*Service packages*”) published in the Official Journal No. 466bis on 26 May 2023.

Government Decision No. 521/2023 includes as Annex 2 the framework contract governing the conditions for the provision of health care, medicinal products and medical devices under the health insurance system (Evidence No. 4; hereinafter referred to as “*Framework Contract*”), published in the Official Journal No. 466bis on 26 May 2023.

#### **The new model framework contract for the health insurance system shall:**

**- Contain efficiency indicators for National Health Insurance Fund expenditure, to be reported on a regular basis;**

The new model framework contract establishes efficiency indicators for National Health Insurance Fund expenditure through the payment mechanisms and monitoring frameworks set out in Articles 15, 18, and 92 of the Framework Contract (Evidence No. 4). The provisions in Article 15 establishes the annual calculation by the National Health Insurance Fund of standardised payment values which serve as efficiency indicators for fund allocation across the healthcare system. Article 15(2) establishes standardised payment values as points per capita and Article 15(4) as points per service. These standardised values enable efficiency monitoring by creating comparable metrics for service volume, provider productivity, and resource allocation across the healthcare system. Furthermore, Article 15(5) defines performance targets in the implementing norms. Article 15(3)(d) allocates 1% of the primary care fund for performance-based payment, creating a financial incentive mechanism linking provider remuneration to measured efficiency outcomes. Article 15(6) establishes an annual reporting cycle for performance-based payments tied to efficiency indicators, whereby family doctors under contract with health insurance funds report their achievement of performance targets set by the implementing norms. Payment by performance is made annually in the first quarter of the year following that for which the achievement of the performance indicators is measured. Article 18 (1) establishes monthly reimbursement cycles for the “value of the medical services provided in accordance with the contracts concluded between the providers of primary health care services and the health insurance funds, at the standardised value for one point per capita, respectively at the standardised value for one point per service.” The monitoring of the reporting requirement is further defined in Article 92 (e), which provides that “The Ministry of Health shall review the implementation of the revenue and expenditure budget of public healthcare units with beds on a quarterly basis, [...]”.

**- Increase the scope of outpatient services;**

Article 24(7) of the Framework Contract introduces diagnostic medical services, which are provided in specialty outpatient clinics as a new service category. Thereby, the scope of outpatient services is expanded to treatments so far done with inpatient admission.

**- Mandate preventive care protocols and early detection programs at primary care level;**

The Framework Contract extends preventive consultations from asymptomatic adults without chronic diseases to four new early detection provisions within the primary care basic services package (Chapter II.A of the Service packages) (Evidence No. 3). These new provisions target: (i) adults aged 40-60 already registered with chronic diseases for detection of additional comorbidities (point 1.2.6); (ii) adults over 60 already registered with chronic diseases for detection of additional comorbidities (point 1.2.7); (iii) opportunistic diabetes mellitus screening for at-risk individuals aged 18 or older who are overweight/obese and/or show risk factors (point 1.2.8); and (iv) chronic kidney disease screening for persons showing risk factors (point 1.2.9). Of these, points 1.2.6 and 1.2.7 “are given at the family doctor's surgery, actively to adults registered on the family doctor's list” establishing a proactive screening obligation.

Article 1 of the Framework Contract (Evidence No. 4) underlines that these services have to be delivered at primary care level by family doctors. Article 7(a) of the Framework Contract establishes that services in the basic package are mandatory contractual obligations. Article 7(c)(ii) requires family doctors to display information on the basic service package to inform patients of available services. Article 19(2) of the Framework Contract establishes financial penalties for failing to provide contracted services: If the health insurance fund inspection and monitoring activities discover breaches and a written warning had been issued, a 3-5% reduction in guaranteed payment value is applied.

**- Enable telemedicine and remote consultation capabilities for some medical services;**

Chapter II.A of the Service packages (Evidence No. 3) provides that family doctors may conduct remote consultations for (i) infectious diseases requiring isolation, and (ii) ongoing management of chronic conditions. Respectively, Chapter II.B of the Service packages introduces remote consultations for infectious diseases and chronic condition management by specialist doctors in outpatient care. Chapter II.B of the Service packages furthermore expands remote diagnostic and therapeutic procedures from psychiatric-only authorization to psychiatric therapies and genetic advice. Chapter II.C of the Service packages allows to remotely provide clinical psychology, counselling, psychotherapy, and logopaedic services.

**- Include provisions on financial incentives and support mechanisms for healthcare providers serving underserved rural populations;**

Article 9 and Article 28 of the Framework Contract (Evidence No. 4) maintain the obligation for health insurance funds to grant healthcare providers in primary care, and outpatient specialist care, amounts that take into account conditions for operating in remote areas under heavy and very heavy conditions. Article 14 of the Framework Contract facilitates contracting for rural areas, by allowing new family doctors in rural areas to receive contracts for their patient list established within 6 months, without the requirement on a minimum number of insured persons on the list that apply in urban areas. Article 17 of the Framework Contract introduces differentiated financial support for new family doctors establishing practices in rural areas: new doctors in rural administrative-territorial units receive a monthly income increased by 50% for a maximum of 6 months, while new doctors in completely underserved rural areas receive monthly income increased by 100% for the same period.

**- Expand the defined scope of covered services across primary, specialized, and community care.**

Chapter II.A of the Service packages (Evidence No. 3) expands the scope of services in primary care through new early detection protocols (see the milestone's criterion 3 above on the preventive care protocols and early detection programs at primary care level) and the option of remote consultations for infectious diseases and chronic conditions (see the milestone's criterion 4 above on telemedicine and remote consultation capabilities for some medical services).

Chapter II.B of the Service packages expands the scope of services in outpatient specialist care by introducing day hospitalization in outpatient settings for diagnostic medical services (see the milestone's criterion 2 above on an increase of the scope of outpatient services), remote consultations for infectious diseases and chronic conditions (see the milestone's criterion 4 above), and genetic advice added to remote provision (see the milestone's criterion 4 above).

The Council Implementing Decision states the new model framework contract for the health insurance system shall expand the defined scope of covered services across [...] community care. The Recovery and Resilience Plan provides (Component 12, page 2) that *"Improvements in community care are much needed but delayed. The roll-out of community care centres delivering integrated care has suffered further delays. Improving community care could reduce the current high level of avoidable hospitalisations for "ambulatory diseases" such as diabetes and hypertension"*. In light of the purposive interpretation of this requirement from the Council Implementing Decision, it is interpreted that the expansion of the defined scope of covered services across community care includes healthcare services delivered outside inpatient hospital settings, accessible within patients' communities (including their homes), designed to prevent hospitalization or enable earlier hospital discharge.

The Framework Contract (Evidence No. 4) expands community care scope across four interconnected dimensions: (i) Primary care (see the first paragraph of this criterion); (ii) Outpatient specialist care (see the second paragraph of this criterion); (iii) Remote service provision (see the milestone's criterion 4 above); and (iv) Home care services (Chapter II.H.1 of the Service Packages) which deliver medical and nursing care directly in patients' homes. The addition of four new services - individual logopaedic therapy, lymphedema massage, manual assessment and management of fecal impaction, and collection of biological specimens for diagnostic testing - expands the range of medical interventions that can be provided in home settings, supporting patients who would otherwise require facility-based care. The extended scope in these four dimensions leads to an overall extension of scope of community care in general, thus is in line with the purposive interpretation. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

**4. Commission Preliminary Assessment: Satisfactorily fulfilled.**

**Number and name of the Milestone:** RO-C[C12]-R[R3]-M[365] – Operationalisation of the transparenta.ms.ro portal on the use of public resources

**Related Measure:** RO-C[C12]-R[R3]– Increased capacity for health management and human resources in health

**Qualitative Indicator:** Publication of data on transparenta.ms.ro portal regarding the use of public resources in health

**Time:** Q4 2024

### 1. Context:

The objective of reform C12.R3 is to support the development of knowledge, skills and competences of the staff working in the Romanian health system, and furthermore to prevent corruption. Milestone 365 concerns ensuring transparency on the use of resources in the public health system through the transparenta.ms.ro portal.

Milestone 365 is the fourth milestone of the reform, and it follows the completion of milestones 356, 357 and 358, related to the entry into force of a legislative framework for the increased capacity for health management and human resources in health and the legislation for the strategic framework for the development of human resources in health, and the development of human resources in health. It will be followed by target 360 and milestone 361, related to the construction and equipment of two skill development centres for training public healthcare staff, and the delivery of training for healthcare staff.

### 2. Evidence provided:

|   | Name of the evidence                    | Short description                                                                                                          |
|---|-----------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover Note                              | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled. |
| 2 | Link to the website transparenta.ms.ro. | Link to the website transparenta.ms.ro:<br><a href="https://transparenta.ms.ro/">https://transparenta.ms.ro/</a>           |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

**The use of public resources shall be made more transparent through the centralized aggregation of data on the portal transparenta.ms.ro.**

The Commission services accessed the link provided by the authorities on 27 January 2026 to verify that the website from the milestone description <https://transparenta.ms.ro/> is online. This check was completed successfully, confirming that it was accessible. The website consists of three pages of graphs which are adjustable through filtering in and out data on public procurement in the healthcare system. The website's data cover the years 2024 and 2025. Moreover, the website

includes a cross-reference to the website [data.gov.ro](http://data.gov.ro), where the Ministry of Health provides complementary datasets for direct downloads. The aggregation of the public procurement data of the healthcare system at one place which is assessable for stakeholders and the broad public increased the transparency of the use of public resources in this sector. These checks were completed successfully, confirming that the website provides centralised aggregated data.

**The data included shall cover resources used by central and local institutions, incl. hospitals, and list of firms having been awarded public contracts and the contracting authorities.**

The Commission services conducted an on-the-spot check on 27 January 2026 to verify that the data covers resources used by central and local institutions, incl. hospitals, and list of firms having been awarded public contracts and the contracting authorities. The checks concluded that the website includes aggregated data from central and local institutions, supplying firms, and contracting authorities, for the years 2024 and 2025, and with the possibility to view monthly data. The user of the website can select a region, supplier, institution, or type of institution and acquire on this way the information related to this subset. The contracting authorities are listed for the aggregate or per region, differentiated by the type of contract (direct acquisition, framework contract or public procurement). Respectively, the selection of a supplier shows their geographic activity, and their customers within the institutions. These checks were completed successfully, confirming that the included data covers resources used by central and local institutions, incl. hospitals, and list of firms having been awarded public contracts and the contracting authorities.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Target:** RO-C[C12]-I[I1]-T[367] Practices of family doctors or associations of primary care practices equipped or renovated, prioritising practices located in marginalised regions and municipalities

**Related Measure:** RO-C[C12]-I[I1] Pre-hospital medical infrastructure

**Quantitative Indicator:** Number

**Baseline:** 0

**Target:** 2 000

**Time:** Q2 2025

### 1. Context:

The objective of the investment is to support the accessibility to basic health care. The investment consists in investments in practices of family doctors or associations of primary care practices, outpatient care units, integrated community centres, and family planning offices.

Target 367 requires that family doctors or primary care practices are constructed, renovated or equipped.

Target 367 is the second step of the implementation of the investment, and it follows the completion of milestone 366 related to the adoption of criteria for prioritising investments in integrated community centres. It is accompanied in the fourth payment request by target 369 related to the construction/renovation and equipment of outpatient care units. It will be followed by target 370, related to the construction/renovation and equipment of integrated community centres, and target 372, related to the equipment of family planning cabinets.

### 2. Evidence provided:

|   | Name of the evidence                                                                                       | Short description                                                                                                                                          |
|---|------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover Note                                                                                                 | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.                                 |
| 2 | Overview table with 2 569 units.                                                                           | The table lists all units which were equipped or renovated under this target.                                                                              |
| 3 | Copy of reception certificates for the 60 units selected through the sampling procedure.                   | Reception certificates for equipment for the selected practices of family doctors or associations proving that equipment has been delivered and installed. |
| 4 | Copy of certificates for the completion of works for the 60 units selected through the sampling procedure. | Certificates for the completion of works for the selected practices of family doctors or associations.                                                     |

|   |                                                                                                                                                                                                                                                                                                                                                                                                                     |                                                                                                                                                                                                                                                                    |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 5 | The Atlas of Rural Marginalized Areas and of Local Human Development in Romania (2016), by E. Teşliuc, V. Grigoraş, M.S. Stănculescu, ISBN: 978-973-0-21723-0, accessible online: <a href="https://documents1.worldbank.org/curated/en/847151467202306122/pdf/106653-WP-P159257-PUBLIC.pdf">https://documents1.worldbank.org/curated/en/847151467202306122/pdf/106653-WP-P159257-PUBLIC.pdf</a>                     | The Atlas of Rural Marginalized Areas in Romania is a study/tool designed to identify and list less developed rural areas that include disadvantaged and marginalised population.                                                                                  |
| 6 | The Atlas of Urban Marginalized Areas in Romania (2014), by R. Swinkels, M. Stanculescu, S. Anton, B. Koo, T. Man, and C. Moldovan, 10.13140/2.1.2986.2082., accessible online: <a href="https://documents1.worldbank.org/curated/en/857001468293738087/pdf/882420WP0P1430085232B00OU00900Atlas.pdf">https://documents1.worldbank.org/curated/en/857001468293738087/pdf/882420WP0P1430085232B00OU00900Atlas.pdf</a> | The Atlas of Urban Marginalized Areas in Romania is a study/tool designed to identify and list less developed urban areas that include disadvantaged and marginalised population.                                                                                  |
| 7 | Background study for the national strategy on social inclusion and poverty reduction (2015), by E.D. Tesliuc, V.A. Grigoras, M.S. Stanculescu, accessible online: <a href="http://documents.worldbank.org/curated/en/465051467995789896">http://documents.worldbank.org/curated/en/465051467995789896</a>                                                                                                           | The Background study for the national strategy on social inclusion and poverty reduction summarised the diagnostics and analyses carried out by the World Bank team, and provided a base for the related strategy, adopted by the Romanian Government in May 2015. |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

**At least 2 000 associations of practices or practices of family doctors shall be equipped or renovated.** Furthermore, in line with the description of the measure, the investment consists in **investments in practices of family doctors or associations of primary care practices**. The population of beneficiaries included family doctors as well as associations of practices (different doctors sharing their practice). Generally, primary care refers to the first point of contact within the formal healthcare system, therefore general practitioners such as family doctors.

Romania provided an overview table with 2 569 associations of practices and practices of family doctors which were equipped or renovated for the purpose of satisfactorily fulfilling this target. This list contained their tax identification number, the name of the applicant and the project name (Evidence No. 2). Following the selection of a random sample of 60 units, Romania submitted, for 57 of the units in the sample, at least a copy of a reception certificate of equipment (Evidence No. 3) or a certificate for the completion of works (Evidence No. 4). One unit was not uniquely identifiable based on the data provided in the list, as multiple units had been listed under the same tax identification number.

Therefore, in total, the sample falls short of four units. A statistical analysis was carried out taking into account the overachievement of the target of 2 569 for a required 2 000. Based on this, there is statistical assurance that the target has been met, and all its constitutive elements have been satisfactorily fulfilled.

**[...] prioritising practices located in marginalised regions and municipalities. At least 75% of all associations of practices or family doctors shall be located in marginalized regions or**

**municipalities. The marginalized regions/municipalities are those without or with a limited access to primary health care. The criteria of marginalization and the degree of marginalization are established at regional level according to the methodologies for calculating the local human development index and the development index presented in the Atlas of marginalized rural areas and local human development in Romania, in the Atlas of marginalized urban areas in Romania and in the Substantiation Study for the National Strategy on Social Inclusion and Poverty Reduction.**

The overview table with the population of 2 569 associations of practices or practices of family doctors also contains their location and indicates if the respective practice is located in a marginalized region or municipality. According to this overview, 2 256 practices are located in marginalised regions and municipalities (Evidence No. 2).

The Romanian authorities used criteria for marginalisation and the degree of marginalisation from Annex 2 (“Rates of Marginalization by Commune (Rural Territorial-Administrative Unit)”) of the Atlas of Rural Marginalized Areas and of Local Human Development in Romania (Evidence No. 5) and with Annex 8 (“Urban population by type of areas at city level”) of The Atlas of Urban Marginalized Areas in Romania (Evidence No. 6) to identify associations of practices or family doctors located in marginalized regions or municipalities. The Commission services verified that at least 1 500 out of the 2 000 practices are located in marginalised regions or municipalities by comparing the locations with the annexes of the abovementioned atlases. This check was completed successfully, confirming that the corresponding evidence has been linked with the Atlas of marginalized rural areas and local human development in Romania and the Atlas of marginalized urban areas in Romania. Thereby the constitutive element of the target according to which at least 75% of practices supported should be located in regions or municipalities with marginalised population has been satisfactorily fulfilled. This substantial proportion demonstrates that the implementation of the investment prioritised practices located in marginalised regions and municipalities.

The Atlas of Urban Marginalized Areas in Romania and the Atlas of Urban Marginalized Areas in Romania were developed alongside with the background study for the national strategy on social inclusion and poverty reduction (Evidence No. 7), summarising the diagnostics and analyses carried out by the World Bank team, providing the base for the National Strategy on Social Inclusion and Poverty Reduction 2015-2020, adopted by the Romanian Government in May 2015. The Local Human Development Index (LHDI) was used as a composite indicator measuring development at the level of localities based on dimensions such as education, employment and housing conditions. It provides an objective basis for identifying structurally disadvantaged areas and for classifying localities according to their degree of marginalisation.

**4.Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Target:** RO-C[C12]-I[I1]-T[369] Outpatient care units that are newly built or renovated, and equipped

**Related Measure:** RO-C[C12]-I[I1] Pre-hospital medical infrastructure

**Quantitative Indicator:** Number

**Baseline:** 0

**Target:** 30

**Time:** Q4 2024

### 1. Context:

The objective of this investment is to support the accessibility to basic health care. The investment consists in investments in practices of family doctors or associations of primary care practices, outpatient care units, integrated community centres, and family planning offices.

Target 369 requires that 30 outpatient care units should be built or renovated and equipped, of which 20 should be in less developed areas.

Target 369 is the third step of the implementation of the investment, and it follows the completion of milestone 366 related to the adoption of criteria for prioritising investments in integrated community centres. It is accompanied in the fourth payment request by target 367 related to the equipment and renovation for practices of family doctors or associations of primary care practices. It will be followed by target 370 related to the construction/renovation and equipment of integrated community centres, and target 372, related to the equipment of family planning cabinets.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                                                                                                           | Short description                                                                                                                    |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover Note                                                                                                                                                                                                                                                                                                                                                     | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.           |
| 2 | Copy of Ministerial Order No. 256 of 2 February 2023 approving the investment objectives approved for financing under the National Recovery and Resilience Plan, Pillar V: Health and institutional resilience Component C12 – Health, Investment 1. Development of medical infrastructure pre-hospital, Specific Investment I1.3. Outpatient care facilities. | The ministerial order approves the list of outpatient care units (including their location) selected following a public tender.      |
| 3 | Copy of reception certificates.                                                                                                                                                                                                                                                                                                                                | The reception certificates for medical equipment for 30 outpatient care units prove that equipment has been delivered and installed. |

|   |                                                                                                                                                                                                                                                                                                                                                                                                                               |                                                                                                                                                                                   |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4 | Copy of certificates for the completion of works.                                                                                                                                                                                                                                                                                                                                                                             | Certificates for the completion of works for 30 outpatient care units prove renovation or construction works.                                                                     |
| 5 | The Atlas of Urban Marginalized Areas in Romania (2014), by R. Swinkels, M. Stanculescu, S. Anton, B. Koo, T. Man, and C. Moldovan, 10.13140/2.1.2986.2082, accessible online:<br><a href="https://documents1.worldbank.org/curated/en/857001468293738087/pdf/882420WP0P1430085232B000UO0900A%20Atlas.pdf">https://documents1.worldbank.org/curated/en/857001468293738087/pdf/882420WP0P1430085232B000UO0900A%20Atlas.pdf</a> | The Atlas of Urban Marginalized Areas in Romania is a study/tool designed to identify and list urban less developed areas that include disadvantaged and marginalised population. |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

#### **At least 30 outpatient care units shall be newly built or renovated and equipped.**

Romania shortlisted, by means of Ministerial Order No. 256 of 2 February 2023, 69 outpatient care units with different locations in the country to benefit from financing under this RRF investment (Evidence No. 2). Out of these 69 units, Romania selected 30 outpatient care units which received medical equipment and have been newly constructed or renovated.

For all 30 units, Romania provided reception certificates for medical equipment (Evidence No. 3). The purchased, received and installed equipment includes, amongst others, CT scanners, mammographs, echographs and laboratory equipment.

Moreover, Romania provided certificates for the completion of works for renovation or construction works (Evidence No. 4). These confirm that 28 outpatient care units were newly built or renovated. Two units were set-up in container-based facilities to provide patients with medical services, including tomography and mammography.

The Council Implementing Decision required that the *“outpatient care units shall be newly built or renovated and equipped”*. However, for the outpatient care units in Sibiu and in Gura Humorului, Romania did not construct or renovate conventional units, but purchased container-based facilities in which medical services are provided and installed medical equipment in those facilities. Whilst this constitutes a minimal substantive deviation from the requirement of the Council Implementing Decision, the purchase of the two container-based facilities and the installation therein of medical equipment resulted in the creation of new treatment spaces, equipped for the provision of outpatient medical treatment, and therefore achieved the same practical and functional result as the construction or renovation and equipping of conventional outpatient care units. These actions are consistent with and contribute to achieving the objective of the measure, namely *“to support the accessibility to basic health care”*, as well as with the Recovery and Resilience Plan (page 42 of the extended version of the Healthcare component), which provides that the investments carried out under this measure can include *“Rehabilitation/upgrading/extension/equipping of existing outpatient infrastructure; Improving the accessibility of space for health services and access routes; Providing/upgrading general and specific utilities (including connection to utilities at the location of the investment objective)”*. The container-based facilities provide additional space for healthcare services and were equipped for the intended outpatient function. As of this, this minimal deviation does not change the nature of the measure and does not affect the progress towards achieving the

investment that this target represents. On this basis, it is considered that this constitutive element of the target is satisfactorily fulfilled.

**Out of the 30 outpatient care units, at least 20 outpatient care units shall be located in less developed regions or municipalities, considering the Atlas of marginalized urban areas, part of milestone 367.**

Romania provided evidence that at least 20 out of the 30 outpatient care units are located in municipalities with marginalised population. In particular, Romania provided the reception certificates (Evidence No. 4) and the Atlas of Urban Marginalized Areas in Romania (Evidence No. 5). The Commission services successfully verified, based on the reception certificates, that the locations of the identified outpatient care units correspond to those classified as less developed regions or municipalities in Annex 8 of the Atlas of Urban Marginalized Areas in Romania.

The Commission considers that there is a clerical error in the text of the Council Implementing Decision as regards the description of target 369 and has undertaken the assessment on a revised basis. The description refers to the Atlas of marginalized urban areas as *“part of milestone 367”*. However, the Atlas is not a deliverable or distinct outcome of milestone 367. Rather, it is a reference document, published in 2015, which identifies and list urban less developed areas with disadvantaged and marginalised populations, and which is used for the purposes of assessing target 369. Accordingly, the satisfactory fulfilment of target 369 is not subject to an assessment *“considering the Atlas of marginalized urban areas, part of milestone 376”*, as the Atlas did not constitute a deliverable of that milestone. Against this background, the justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the target.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Target:** RO-C[C12]-I[I2]-T[375] Public hospitals receive equipment and materials to reduce the risk of infections

**Related Measure:** RO-C[C12]-I[I2] Public hospital infrastructure

**Quantitative Indicator:** Number

**Baseline:** 0

**Target:** 25

**Time:** Q4 2024

### 1. Context:

The objective of investment C12.I2 is to strengthen the healthcare system through constructing and equipping public hospitals.

The investment includes among other targets the purchase of equipment and materials helping to reduce the risk of hospital-acquired infections.

Target 375 requires that at least 25 public hospitals receive equipment and materials aiming to reduce the risk of infections within the hospital environment.

Target 375 is the first step of the implementation of the investment and it will be followed by targets 376 and 377, related to the equipment of new-born intensive care units and the construction of and/or equipping new public health units/hospitals.

### 2. Evidence provided:

|   | Name of the evidence            | Short description                                                                                                          |
|---|---------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover Note                      | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled. |
| 2 | Copy of purchasing contracts.   | Contracts for purchasing of equipment and materials for 25 hospitals.                                                      |
| 3 | Copy of reception certificates. | Reception certificates for equipment and materials for 25 hospitals.                                                       |
| 4 | List of equipment and location. | Table summarizing which equipment has been received for each hospital.                                                     |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

**At least 25 public hospitals shall receive equipment and materials helping to reduce the risk of hospital-acquired infections, which may include, but is not limited to, equipment for the microbiological air control in the operating blocks and Intensive Care Units through specific air-conditioning facilities as well as facilities for the disinfection of medical personnel (for example, environmental decontamination equipment, sterilization, waste receptacles).**

Romania provided evidence that 25 public hospitals received equipment and materials helping to reduce the risk of hospital-acquired infections. For all equipped units, purchasing contracts (Evidence No. 2) and reception certificates were submitted (Evidence No. 3). A detailed list shows the new equipment for each recipient (Evidence No. 4).

The purchased and received equipment includes, amongst others, microbiological air control systems for operating theatres and intensive care units; disinfection and decontamination systems; sterilisation systems; equipment for environmental monitoring; equipment for personnel protection and hygiene control. The purchased and delivered materials include, amongst others, personnel protection materials and hygiene control materials. In line with the description of the measure, *“the investment consists in [...] equipment and materials to reduce the risk of nosocomial infections”*. Nosocomial infections are those infections which are hospital-acquired. The received equipment and materials reduce hospital-acquired/nosocomial infections by maintaining sterile air environments through specialized filtration and air circulation systems that remove airborne pathogens, while providing proper sterilization and decontamination facilities that eliminate bacteria, viruses, and other microorganisms from surfaces, medical instruments, and healthcare workers before they can spread to patients. Thus, all requirements of the target are met.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Target:** RO-C[C13]-R[R3.0]-T[386] Activation measures received

**Related Measure:** RO-C[C13]-R[R3.0] Provision of the Minimum Inclusion Income (VMI)

**Quantitative Indicator:** Percentage

**Baseline:** 0

**Target:** 60%

**Time:** Q2 2025

### 1. Context:

The reform aims to increase social assistance and reduce poverty, while reducing the administrative burden for the public administration, and the beneficiaries. It consists in the adoption of legal acts on the methodological rules for implementing the VMI.

Target 386 concerns the provision of activation measures to able-to-work recipients of the minimum inclusion income.

Target 386 is the second and final milestone or target of this reform. It follows milestone 384 related to the entry into force of the legislation approving the implementing rules for the application of VMI.

### 2. Evidence provided:

|   | Name of the evidence                                                                                     | Short description                                                                                                                                                                                                                                                                                                                                                                                               |
|---|----------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                               | Summary document duly justifying how the target (including all the constitutive elements) has been satisfactorily fulfilled.                                                                                                                                                                                                                                                                                    |
| 2 | Copy of the list with minimum income recipients, including the ones benefiting from activation measures. | Ministry of Labour provided the list of able to work persons receiving the VMI which are registered in the database of the National Agency for Payments and Social Inspection (ANPIS), identifying the beneficiaries receiving at least one activation measure, which are registered in the database of the National Agency for Employment (ANOFM) for the period between 1 January 2023 and 30 September 2025. |
| 3 | Copy of the Decisions from the Mayor's Office for the random sample of 60 beneficiaries.                 | Ministry of Labour provided the Decisions from the Mayor's Office indicating the right of the persons/households to receive the VMI, for all the 60 beneficiaries drawn in the sampling.                                                                                                                                                                                                                        |
| 4 | Copy of the fiches from the Public Employment Service for the random sample of 60 beneficiaries.         | Ministry of Labour provided the fiches from the Public Employment Service demonstrating the types of activation measures received, for all the 60 beneficiaries drawn in the sampling.                                                                                                                                                                                                                          |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

#### Activation measures received

**At least 60% of able-to-work recipients of the minimum inclusion income since 2023 shall have received at least one of the following activation measures: training or retraining services, information and career counselling, job mediation and job proposals, advice and assistance in starting a self-employed or business activity, boosting labour mobility, as well as enrolment in 'second chance' education programmes**

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the target.

The legal framework for the implementation of the minimum inclusion income scheme and the activation measures is represented by two pieces of legislation positively assessed under milestone 384<sup>7</sup>:

(a) Law No. 196/2016 on the minimum inclusion income. Article 97(1) of Law No. 196/2016, as amended by the Government Emergency Ordinance No. 114 of 26 August 2022 (hereinafter, "GEO No. 114/2022"), provides for the establishment of the minimum inclusion income (VMI), the payment of the subsidy, as well as the complementary measures associated with it including the activation measures. Article III of GEO No. 114/2022 provides that these measures start to apply as of 1 January 2024.

(b) Government Decision No. 1154/2022 for the approval of the methodological norms on the application of the provisions of Law No. 196/2016, which enabled the practical implementation of the VMI scheme. The relevant provisions entered into force on 1 January 2024, making the new scheme applicable from that date.

The Council Implementing Decision states at least 60% of able-to-work recipients of the minimum inclusion income *since 2023* shall have received at least one activation measure. This target of the reform follows milestone 384, which established the legislative basis approving the implementing rules for the application of the minimum income inclusion. That milestone had an indicative timeline for completion of Q3 2022, where target 386 – which is based on those people that benefit from the minimum income inclusion – measures the implementation of that legislation. Though, as the minimum inclusion income only began to apply as of 1 January 2024, it is interpreted that this requirement from the Council Implementing Decision requires at least 60% of able-to-work recipients of the minimum inclusion income, as of the creation of such minimum inclusion income, shall have received at least one activation measure. This contextual interpretation of the Council Implementing Decision based on the sequencing of the milestone on legislation and the target measuring the implementation of that legislation is supported by the purposive interpretation stemming from the Recovery and Resilience Plan, which referred to a timeline of approving the legislative amendments and subsequently measuring the operationalisation of the institutional and

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<sup>7</sup> The legal framework has been positively assessed in the third payment request under M384 - Entry into force of the legislation approving the implementing rules for the application of the Minimum Inclusion Income (VMI).

technical system for minimum inclusion income implementation (with no references to 2023 or any specific period).

Romania extracted the list of able-to-work minimum income recipients from the database of the National Agency for Payments and Social Inspection (ANPIS). For checking this information, an on-the-spot check was performed by the Commission. The establishment and management of the national database on social assistance benefits is among the responsibilities of ANPIS, as provided by Article 6(1) of Government Emergency Ordinance No. 113/2011 on the organization and functioning of ANPIS. The data is collected by territorial agencies from the county level and transmitted at central level. The list also indicated the VMI recipients benefiting from activation measures from 1 January 2024 to 30 September 2025 (Evidence No. 2), based on the information reported by the Public Employment Service (PES). The information on able-to-work VMI beneficiaries receiving activation measures from 1 January 2024 to 30 September 2025 formed the basis for the sampling performed by the Commission.

Following the selection of a random sample of 60 VMI beneficiaries from the persons receiving activation measures, Romania submitted for each beneficiary, the Decision from the Mayor's Office confirming the right to receive the minimum inclusion income and the fiche from the Public Employment Service (PES) stating the activation measures received (Evidence No. 3 and Evidence No. 4). Article 13(1) a) of Law No. 196/2016 provides that in order to receive the VMI, able-to-work persons in the family, who are not in employment, should be registered with the PES as job seekers and should not refuse a job or the activation measures offered by the PES. Therefore, only able-to-work persons can be registered with the PES and receive activation measures, which is proved by the fiche issued by the PES for the VMI beneficiaries in the sample. For all the 60 beneficiaries which were checked, the fiche from the PES lists one or more of the activation measures provided to each beneficiary, such as: information and career counselling, training/retraining, job mediation, job proposals, or enrolment in "second chance" education programmes. The evidence provided for a sample of 60 beneficiaries confirmed that the requirements of the target have been met.

However, the Council Implementing Decision required that at least 60% of able-to-work recipients of the minimum inclusion income have received at least one activation measure. 166 168 persons received activation measures out of 282 126 eligible persons, which corresponds to 58.9%. Whilst this constitutes a minimal numerical deviation of 1.84% from the requirement of the Council Implementing Decision, the overall objective of this target is considered met notwithstanding this minor deviation. On this basis, it is considered that this constitutive element of the target is satisfactorily fulfilled.

#### **4. Commission Preliminary Assessment: Satisfactorily fulfilled.**

**Number and name of the Milestone:** RO-C[C13]-R[R5.0]-M[392] Entry into force of the legal acts governing the new system for minimum wage setting

**Related Measure:** RO-C[C13]-R[R5.0] Ensure a minimum wage setting

**Qualitative Indicator:** Provision in the legal acts indicating their entry into force

**Time:** Q1 2024

### 1. Context:

The reform aims at establishing a minimum wage setting mechanism based on objective criteria and consistent with the job creation and competitiveness objectives of the country.

Milestone 392 concerns the adoption of legal acts that provide for the creation of a new mechanism and a formula to objectively set the minimum wage level.

Milestone 392 is the only milestone of this reform.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                     | Short description                                                                                                               |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                                                               | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled. |
| 2 | Copy of the Government Decision No. 35/2025 on the approval of the implementation procedure of the mechanism for setting and updating the guaranteed country-wide base gross minimum wage, published in the Official Journal No. 111 on 6 February 2025. | The legal act covers the criteria, indicators and formula for establishing and updating the minimum gross wage.                 |
| 3 | Copy of the Law No. 283/2024 on the amendment and supplementation of normative acts, for setting adequate minimum wages, published in the Official Journal No. 1139 on 14 November 2024.                                                                 | The legal act aims at transposing the provisions of the EU Directive 2041/2022 on adequate minimum wages in the EU.             |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

#### **Entry into force of the legal acts governing the new system for minimum wage setting**

##### **Provision in the legal acts indicating their entry into force**

Law No. 283/2024 on the amendment and supplementation of normative acts, for setting adequate minimum wages (hereinafter referred to as "*Law No. 283/2024*") (Evidence No. 3) was published in the Official Journal No. 1139 on 14 November 2024 and entered into force three days after its publication, in accordance with Article 12(1) of Law No. 24/2000 on legislative technique rules for drafting legal acts. Law No. 283/2024 has the objective to transpose into national law Directive 2022/2041 of the European Parliament and of the Council on adequate minimum wages in the European Union. It also establishes the legal basis for the implementation of the mechanism to set the minimum wage level in a systematic manner, through a Government Decision.

Government Decision No. 35/2025 on the approval of the implementation procedure of the mechanism for setting and updating the guaranteed country-wide base gross minimum wage (hereinafter referred to as "*Government Decision No. 35/2025*") (Evidence No. 2) was published in the Official Journal No. 111 on 6 February 2025 and entered into force on the date of its publication, according to Article 12(3) of Law No. 24/2000 on legislative technique rules for drafting legal acts. This Government Decision regulates the mechanism that is foreseen by Law No. 283/2024.

##### **The legal acts shall establish a new mechanism and a formula to objectively set the minimum wage level in a systematic manner**

In line with Article I point 4 of Law No. 283/2024, the new mechanism for setting and updating the minimum wage provides that the minimum wage will be set annually through Government Decision, implemented as of the 1 January of the following year and updated once a year after the consultation of trade union and employers confederations representative at national level. It also provides that the adequacy of the minimum wage will be assessed relative to its share in the gross average wage. The gross minimum wage should represent a share of 47% to 52% of the gross average wage. In addition, when setting the gross minimum wage, the following criteria should be met: the purchasing power of the minimum wage taking into account the cost of living; the general level and distribution of wages; the wage growth rate; and the long-term national productivity levels and trends.

Article 5(1) of Government Decision No. 35/2025 provides the formula used to set the gross minimum wage and update it annually. The minimum wage for the next year is derived by multiplying the current minimum wage with one plus the sum of change in the forecasted annual average inflation rate and the forecasted real annual labour productivity growth rate. The calculation formula is the following:

$$\text{Minimum gross basic wage}_{t+1} = \text{Minimum gross basic wage}_t \left( 1 + \frac{\text{Inflation rate}_{t+1/t}}{100} + \frac{\text{Real labour productivity growth rate}_{t+1/t}}{100} \right)$$

The gross basic minimum wage in  $t + 1$  represents the updated gross minimum wage for the next year.

The minimum gross basic wage in  $t$  represents the gross minimum wage in force in the current year. The annual average inflation rate is calculated by subtracting 100 from the average annual consumer price index (CPI).

The inflation rate in  $t + 1/t$  represents the annual average inflation rate forecasted by the National Commission for Strategy and Forecast (CNSP) for the following year compared with the current year.

Forecasted labour productivity is calculated as the ratio between forecasted GDP and forecasted employed population (indicators provided by CNSP).

Real annual labour productivity growth rate in  $t + 1/t$  is calculated based on forecasted labour productivity for the next year compared with forecasted labour productivity for the current year, using GDP values expressed in real terms.

If, after applying this formula, the level of the gross minimum wage is below 52% of the gross average wage, the minimum wage is negotiated in the National Tripartite Council for Social Dialogue, within the range of 47% to 52% of the average wage, which is the reference indicator for assessing its adequacy as provided by Law No. 283/2024.

With this mechanism and formula, which are based on a set of well-defined, measurable and relevant indicators, the minimum wage level is determined in a systematic way, avoiding discretionary interventions and ad hoc increases.

#### **in consultation with social partners**

Article I point 4 of Law No. 283/2024 provides that the minimum wage will be set annually and updated once a year after the consultation of trade union and employers' confederations representative at national level. Moreover, the procedure for the implementation of the mechanism for setting and updating the minimum wage, which is regulated by Government Decision No. 35/2025, has been approved based on a proposal from the Ministry of Labour, following the consultation of the National Tripartite Council for Social Dialogue (NTCSD), as required by the same article. The NTCSD is the consultative body between the Government and the social partners, which promotes the tripartite social dialogue at national level, as provided by Article I point 6 of Law No. 283/2024.

#### **and taking into account the actions of the Union**

Law No. 283/2024 is aimed at transposing the Directive (EU) 2022/2041 of the European Parliament and of the Council of 19 October 2022 on adequate minimum wages in the European Union. Government Decision No. 35/2025 represents the secondary legislative framework which details the mechanism for setting the minimum wages.

Government Decision No. 35/2025 takes into account the actions of the Union by including the most relevant elements of the EU Directive, which ensure that the minimum wage level is objectively set. Article 3c) of the Government Decision makes reference to the adequacy assessment of the minimum wage, which should be set between 47% and 52% of the average wage. This corresponds to the provisions of Article 5(4) of the Directive, which requires that Member States shall use indicative reference values to guide their assessment of adequacy of statutory minimum wages, such as 50% of the gross average wage. Also, Article 4(1) of the Government Decision refers to the criteria for setting and updating the minimum wage, which are identical to those in Article 5(2) of the EU Directive.

#### **4. Commission Preliminary Assessment: Satisfactorily fulfilled.**

**Number and name of the Target:** RO-C[C13]-I[I2.0]-T[395] Modernised community services for persons with disabilities

**Related Measure:** RO-C[C13]-I[I2.0] Rehabilitation, renovation and extension of social infrastructure for persons with disabilities

**Quantitative Indicator:** Number

**Baseline:** 0

**Target:** 50

**Time:** Q4 2024

### 1. Context:

The investment aims to modernize and increase the number of social services provided to persons with disabilities to support their de-institutionalisation. It consists in the licensing of new community services and the modernisation of other community centres for persons with disabilities.

Target 395 concerns the modernisation of community services for persons with disabilities through rehabilitation, renovation, or equipment.

Target 395 is the first step of the implementation of the investment. It will be followed by target 396 related to the licensing of new community services.

### 2. Evidence provided:

|   | Name of the evidence                                              | Short description                                                                                                                                                                                                                                                                                                                     |
|---|-------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                        | Summary document duly justifying how the target (including all the constitutive elements) has been satisfactorily fulfilled.                                                                                                                                                                                                          |
| 2 | Copies of the operating licenses for the community services.      | The licenses for the 53 social services issued by the National Authority for the Protection of Rights of Persons with Disabilities (ANPDPD) indicate that the services were licensed at the time of selection for modernisation, and that they are currently licensed to provide services in line with the minimum quality standards. |
| 3 | Copies of the certificates of completion for works and equipment. | 53 certificates of completion for works and equipment issued by the General Directorates for Social Assistance and Child Protection at county level demonstrate the modernisation of 53 community services for persons with                                                                                                           |

|   |                                                                                                                                                                                                             |                                                                                                            |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
|   |                                                                                                                                                                                                             | disabilities.                                                                                              |
| 4 | Copy of Ministerial Order No. 82/2019 approving the minimum compulsory quality standards of social services for adults with disabilities, published in the Official Journal No. 100 bis on 8 February 2019. | The legal act provides that the community services have a minimum capacity of eight beneficiaries per day. |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

#### **50 modernised community services (25-day centres and 25 neuro-motor recovery centres for persons with disabilities) through rehabilitation, renovation, or equipment.**

According to the evidence provided by the authorities, Romania modernised 53 community services for persons with disabilities through works of rehabilitation or renovation, and/or through provision of equipment (Evidence No. 3). The certificates of completion for works and equipment provide details on the construction works performed for the rehabilitation/renovation of the buildings of the centres, as well as on the medical equipment, IT equipment and furniture purchased and installed for the improved functioning of the services. Thus, exceeding the goal of Target 395 by three modernised centres.

The Council Implementing Decision requires that 50 community services shall be modernised (25-day centres and 25 neuro-motor recovery centres for persons with disabilities). The evidence provided by the Romanian authorities demonstrates that 29-day centres and 24 neuro-motor recovery centres for persons with disabilities have been modernised (Evidence No. 2 and No. 3). The certificates of completion for works and equipment contain specific references to works like consolidation of the buildings, internal and external renovations, changing the sanitary, thermic and electrical installations, and to the delivery of medical equipment like electrotherapy, magnetotherapy, ultrasound or laser therapy devices. Whilst this constitutes a minimal numerical deviation of 4% from the requirement of the Council Implementing Decision on the number of neuro-motor recovery centres, the overall objective of this target is considered met notwithstanding this minor deviation. On this basis, it is considered that this constitutive element of the target is satisfactorily fulfilled.

#### **The modernised community centres shall be selected from the existing social services (licensed at the time of selection) and shall provide services to at least eight beneficiaries per day, according to their license**

For all of the 53 community services, Romania provided the functioning licenses proving that the centres were licensed at the time of selection for modernisation, but also that they are currently licensed for functioning (Evidence No. 2).

The functioning licenses of the centres are only issued if the minimum quality standards for the services are met. These standards are regulated by Ministerial Order No. 82/2019 approving the minimum compulsory quality standards of social services for adults with disabilities (Evidence No. 4).

Annex 6 of the Ministerial Order provides that the centres shall have a minimum capacity of eight beneficiaries per day. The functioning licenses contain references to the types of services provided, such as 8899 CZ-D-I or 8899 CZ-D-II, as they are defined in Article 1 f) of Ministerial Order No. 82/2019. The licenses also state that the social services are accredited according to the provisions of Law No. 197/2012 on ensuring quality of social services, which represents the general legal framework in this field. Ministerial Order No. 82/2019 states in its preamble that it is based on the provisions of Article 9(1) of Law No. 197/2012 which provides that the criteria and minimum standards for the accreditation of social services and their providers are approved by order of the minister of labour.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C13]-I[I3.0]-M[397] Digital platform for the use of labour vouchers by domestic providers and service beneficiaries

**Related Measure:** RO-C[C13]-I[I3.0] The establishment of the labour voucher system for domestic providers and service beneficiaries

**Qualitative Indicator:** Digital platform accessible online

**Time:** Q4 2023

### 1. Context:

The investment aims at making the labour voucher system available to domestic providers and service beneficiaries.

Milestone 397 concerns the delivery of a digital platform that is made available for the use of labour vouchers by domestic providers and service beneficiaries.

Milestone 397 is the only milestone of this investment.

### 2. Evidence provided:

|   | Name of the evidence                                                        | Short description                                                                                                                                                                                                                                                    |
|---|-----------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                  | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.                                                                                                                                      |
| 2 | Copy of the services contract.                                              | Services contract No. 1370 dated 15 September 2023 for setting the digital platform on labour vouchers for domestic work                                                                                                                                             |
| 3 | Copy of the Certificate of completion.                                      | The Final Acceptance Certificate for the development and implementation services of the electronic platform for recording domestic work No. 13587 dated 14 June 2024 – issuer – Ministry of Labour and Social Solidarity, recipient – Flame Data Technologies S.R.L. |
| 4 | Copy of the User Manual for the electronic platform on domestic activities. | User Manual of the electronic platform for recording domestic work, explaining the processes for registration of providers and beneficiaries, voucher-related transactions and details of domestic workers' activity – issuer - Flame Data Technologies S.R.L.       |
| 5 | Copy of the Interoperability Annex.                                         | Document providing a summary of the electronic platform interoperability with other relevant                                                                                                                                                                         |

|   |                                             |                                                                   |
|---|---------------------------------------------|-------------------------------------------------------------------|
|   |                                             | Databases.                                                        |
| 6 | Electronic platform on domestic activities. | <a href="https://tichete.anofm.ro/">https://tichete.anofm.ro/</a> |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

#### **The digital platform shall be accessible online**

The digital platform was developed under the services contract No. 1370 on 15 September 2023 for the purchase of the Integrated System Implementation (IT solution development and implementation services, including the provision of equipment, basic software and training) (Evidence No. 2), concluded between the Ministry of Labour and a group of economic operators. The contract was finalized on 14 June 2024 when the Final Acceptance Certificate for the development and implementation services of the digital platform for recording domestic work (No. 13587 on 14 June 2024, *hereafter referred to as "the Certificate"*) (Evidence No. 3) was signed between the Ministry of Labour and the developers. The final acceptance certifies that the digital platform has been developed, tested, launched in the production environment, and it is operational.

The Commission services accessed the link provided by the authorities on 15 January 2025 (Evidence No. 6) to verify the online accessibility of the digital platform. This check was completed successfully, confirming that the digital platform is accessible online.

**[...] and shall allow for the registration of domestic providers, previously recorded as unemployed or inactive, as service providers and the registration of services beneficiaries as users of domestic services.**

The Final Acceptance Certificate (Evidence No. 3) includes a system design report (page 5) which provides that the digital platform is composed of a back-office component and a front-office component. It certifies that the front-office component allows for the registration of users, both service providers and service beneficiaries. On page 15 of the Final Acceptance Certificate, it is explained that the external portal module (the front-office component) contains a platform registration sub-module which includes the domestic beneficiaries' registration stream and the domestic service providers registration stream.

In addition, the User Manual for the digital platform, delivered as part of the personnel training services, mentioned on page 17 of the Certificate, provides details on the registration of providers (pages 24 – 26) and on the registration of beneficiaries (pages 27 – 30).

Also, the Certificate specifies that the digital platform is accessible from a computer and through a mobile application.

The status of domestic services providers, of being previously recorded as unemployed or inactive, is checked in the digital platform through the interoperability function with other national databases (in the back-office component), as certified on page 5 of the Certificate and in the Interoperability Annex (Evidence No. 5).

By interrogating the ANOFM (National Employment Agency) database, the unemployment status of domestic providers is checked. In addition, through the connection with the database of the Labour

Inspectorate, by interrogating the national Revisal database of employment contracts, the “active/inactive status” of a provider is determined.

**The platform shall allow:**

**- To carry out voucher-related transactions (for example, buying vouchers, encoding working hours) digitally**

Pages 15 - 16 of the Final Acceptance Certificate (Evidence No. 3) indicate that the voucher-related transactions can be carried out digitally in the platform. The document explains that the external portal module (the front-office component) contains an online purchasing sub-module which includes the purchasing stream for domestic services vouchers and a marketplace sub-module which includes the contracting stream for domestic services (including the number of hours of work).

Therefore, these functions allow for buying of vouchers, encoding working hours digitally, but also other operations like returning unused vouchers, exchanging vouchers for their monetary value or providing vouchers by employers as a bonus to their employees.

In addition, the User Manual for the digital platform (Evidence No. 4), delivered as part of the personnel training services, mentioned on page 17 of the Certificate, provides details on purchasing vouchers, exchanging vouchers for money, payment for returning of unused vouchers, acquiring bonus vouchers (pages 46 – 52).

**- Encoding domestic workers activity details (for example, number of hours, type of domestic activity carried out)**

Domestic workers activity details can be encoded digitally in the platform as also certified on pages 15 - 16 of the Final Acceptance Certificate (Evidence no.3). The document explains that the external portal module (the front-office component) contains a marketplace sub-module which includes the contracting stream for domestic services (including the number of hours worked and the types of activities performed). These functions allow for digital encoding of domestic workers activity details.

In addition, the User Manual for the digital platform (Evidence no. 4), delivered as part of the personnel training services, mentioned on page 17 of the Certificate, provides details on the types of domestic activities carried out (page 5).

**- Digital interoperability with other national databases**

The Final Acceptance Certificate (Evidence No. 3) certifies on page 5 that the digital platform is connected to the following national databases through the interoperability function:

- DGEP (Directorate General for Persons Registration), which checks and imports personal data on users registered in the platform from the national personal identity database;
- IM (Labour Inspectorate), which interrogates the national Revisal database of employment contracts, in order to determine the “active/inactive status” of a provider;
- ANAF (National Tax Agency), which checks the tax status of employers purchasing vouchers to use as a bonus for their employees;
- ANPIS (National Agency for Payments and Social Inspection), which checks potential family relations between beneficiaries and providers according to the social assistance definitions, to ensure legal compliance with restrictions regarding family members;
- ANOFM (National Employment Agency), which checks the unemployment status of domestic providers;

- CNPP (National Pensions House), which checks the employment/activity restrictions for pensioners receiving a public pension under special conditions, in order to prevent fraudulent activity;
- ONRC (National Trade Registry), which checks the legal status of employers purchasing vouchers to use as a bonus for their employees.

In addition, the User Manual for the digital platform (Evidence No. 4), delivered as part of the personnel training services, mentioned on page 17 of the Certificate, provides details on the interoperability of the digital platform with other national databases (pages 11, 25, 30, 33 and 65).

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C14]-R[R1.0]-M[402] A new strategic management and planning system used in all ministries

**Related Measure:** RO-C[C14]-R[R1.0] Enhancing the quality of government decision-making

**Qualitative Indicator:** A new strategic management and planning system is available for use in all line ministries

**Time:** Q2 2023

### 1. Context:

Milestone 402 is part of reform C14.R1, aiming at improving the quality and transparency of public policy making through the adoption of new methodologies, systems and legal tools to support strategic planning, regulatory impact analysis, public consultation, transparency, and the use of programme budgeting.

Milestone 402 consists in establishing a new strategic management and planning system, which is used by all ministries.

Milestone 402 is the sixth milestone of the reform, and it follows the completion of milestone 401 related to establishing new methodologies and procedures for improved public policy planning, milestone 404 related to the operationalisation of a new structure ensuring the implementation of an effective regulatory quality control mechanism, milestone 410 related to the introduction of guidelines for transparency of interactions between public authorities and interest representatives, milestone 411 related to the entry into force of a new methodology governing the use of Emergency Ordinances, and milestone 412 related to the systematic publication of consolidated versions of laws after amendments. It will be followed by target 403, related to the use of programme budgeting in three ministries, milestone 406 related to the training of civil society organisations' staff to increase their administrative capacity, and milestone 407 related to the adoption of the Plan for Better Regulation 2026–2030 ensuring an improved public policy planning, impact assessment and stakeholder consultation process.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                              | Short description                                                                                                                                                                                                                                                                                                                                                                                                                            |
|---|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover Note                                                                                                                                                        | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.                                                                                                                                                                                                                                                                                                                   |
| 2 | Deliverable 1 – Report with proposals for updating the instructions for the preparation of strategies reflecting the Strategic Management Methodology – May 2024. | The report, prepared by the World Bank, in May 2024, under a technical assistance agreement between the General Secretariat of the Government and the World Bank, analyses the existing Guide for Strategy Development and proposes updates to align it with the newly adopted strategic management methodologies, including instructions and responsibilities for the preparation of Institutional Strategic Plans (ISP) by all ministries. |

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| 3 | Deliverable 2 – Report on the specialised training provided to the General Secretariat of the Government and line ministries on strategic planning and budget programming – June 2023, Part I.                                                                                                                                                               | The report, prepared by the World Bank, under a technical assistance agreement between the General Secretariat of the Government and the World Bank, describes the training programme delivered to all line ministries and the General Secretariat of the Government to strengthen capacity for operating the new strategic management and planning system, including the revision and updating of ISPs, and the use of monitoring and evaluation data, involving 176 participants during 7 sessions held in March and April 2023. |
| 4 | Deliverable 3 – Report with recommendations and inputs for updating the functionalities and improving the Institutional Strategic Plans monitoring IT system to support the process of aligning strategies with ISPs – June 2023.                                                                                                                            | The report, prepared by the World Bank, under a technical assistance agreement between the General Secretariat of the Government and the World Bank, presents the ISP IT platform, its extension with a strategic management component, and its use for ISP preparation, updating and monitoring by all ministries.                                                                                                                                                                                                                |
| 5 | Deliverable 4 – Report on the practical training provided for the operationalisation of the new strategic management and planning system, the integration and alignment of strategies and Institutional Strategic Plan (ISP) content during the revision of strategic documents in the updated ISP monitoring platform, for all line ministries – July 2023. | The report, prepared by the World Bank, under a technical assistance agreement between the General Secretariat of the Government and the World Bank, provides evidence of on-the-job support to ministries for the operationalisation of the strategic management system, including preparation and revision of ISPs.                                                                                                                                                                                                              |
| 6 | Deliverable 6 – Report on provision of training courses on the implementation of the new strategic management system – May 2024.                                                                                                                                                                                                                             | The report, prepared by the World Bank, under a technical assistance agreement between the General Secretariat of the Government and the World Bank, presents the specialised training programme delivered in the year 2024 to technical staff from line ministries and the General Secretariat of the Government on leadership, strategic management and change management.                                                                                                                                                       |
| 7 | Deliverable 7 – Report on the specialised training provided to the General Secretariat of the Government and line ministries on strategic planning and budget programming – February 2024.                                                                                                                                                                   | The report, prepared by the World Bank, in February 2024, under a technical assistance agreement between the General Secretariat of the Government and the World Bank, describes the training programme delivered to all line ministries and the General Secretariat of the Government to strengthen capacity for operating the new strategic management and planning system, including the                                                                                                                                        |

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|    |                                                                                                                                                                                                                                                                         | revision and updating of Institutional Strategic Plans, programme budgeting for the 2024 State Budget, and the use of monitoring and evaluation data, involving 220 participants during 10 sessions held in November and December 2023.                                                                                                                                                                                                                                                                                                                                          |
| 8  | Deliverable 9 – Report on the on-the-job training for updating the content of the new strategic management and planning system, the platform and the dashboard for monitoring Institutional Strategic Plans during the revision of strategic documents, September 2024. | The report, prepared by the World Bank, under a technical assistance agreement between the General Secretariat of the Government and the World Bank, describes the technical assistance provided by the World Bank between July 2023 and September 2024 to support the implementation of the new strategic management system, including guidance on ISP revision, alignment of strategies and Sustainable Development Goals, strengthening of monitoring and evaluation tools, and consolidation of the central dashboard operated by the General Secretariat of the Government. |
| 9  | Deliverable 10 – Report on the specialised training provided to the General Secretariat of the Government and line ministries on strategic planning and budget programming – August 2024, Part I.                                                                       | The report, prepared by the World Bank, under a technical assistance agreement between the General Secretariat of the Government and the World Bank, describes the training programme delivered to all line ministries and the General Secretariat of the Government to strengthen capacity for operating the new strategic management and planning system, and the use of monitoring and evaluation data, involving 297 participants during 14 sessions held between April and June 2024.                                                                                       |
| 10 | Deliverable 12 – Report on the specialised training provided to the General Secretariat of the Government and line ministries on strategic planning and budget programming – July 2025, Part II.                                                                        | The report, prepared by the World Bank, in July 2025, under a technical assistance agreement between the General Secretariat of the Government and the World Bank, describes the training programme delivered to all line ministries and the General Secretariat of the Government to strengthen capacity for operating the new strategic management and planning system, and the use of monitoring and evaluation data, involving 488 participants during 18 sessions held between October 2024 and May 2025.                                                                   |
| 11 | Deliverable 13 - Report on the on-the-job training for updating the content of the new strategic management and planning system, the platform and the dashboard for monitoring Institutional Strategic Plans during the revision of strategic documents – October 2025. | The report, prepared by the World Bank, under a technical assistance agreement between the General Secretariat of the Government and the World Bank,, describes the technical assistance provided by the World Bank between October 2024 and September 2025 to further consolidate the implementation and sustainability of the new strategic management and planning system, including support for State Budget preparation, revision and harmonisation of ISPs and the real-time monitoring and evaluation through the                                                         |

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|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | ISP IT platform, marking the third consecutive year of World Bank support for the implementation of the new strategic management system.                                                                                                                                                               |
| 12 | Compliance of the deliverable “Report with recommendations and contributions for updating the functionalities and improving the Institutional Strategic Plans (ISP) monitoring IT system in order to support the process of aligning strategies with ISPs”, provided by the World Bank under the technical assistance project for the implementation of milestone 402 / target 403 of the National Recovery and Resilience Plan, issued by the General Secretariat of the Government on 30 June 2023. | The document confirms the formal acceptance, validation and operational readiness of the upgraded ISP IT platform at central government level. It also confirms that the IT platform for monitoring the ISPs is operational and the process of uploading data in the system is ongoing.                |
| 13 | List of institutions configured in the ISP IT platform in 2024.                                                                                                                                                                                                                                                                                                                                                                                                                                       | Screen shot showing that all ministries are configured as selectable and active entities in the ISP platform.                                                                                                                                                                                          |
| 14 | Ministerial Orders establishing strategic management groups.                                                                                                                                                                                                                                                                                                                                                                                                                                          | List containing the Ministerial Orders through which all ministries have formally established strategic management groups responsible for ISP preparation, validation and coordination.                                                                                                                |
| 15 | ISPs 2024 and 2025.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Screen shots from the ISP platform showing that in 2024 and 2025 all ministries have done ISP updating and monitoring in the platform, including uploading of targets, budgets and execution data.                                                                                                     |
| 16 | PDF/CSV extract from the ISP IT platform.                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Document containing an extract generated from the ISP platform for all ministries, containing objectives, programmes, measures, targets, budgets and execution data.                                                                                                                                   |
| 17 | Monitoring reports on the implementation of the Institutional Strategic Plans of the ministries and the General Secretariat of the Government.                                                                                                                                                                                                                                                                                                                                                        | The document includes reports generated from the ISP platform presenting updated information on the implementation of the ISPs by all ministries and the General Secretariat of the Government.                                                                                                        |
| 18 | Guide for Strategy Development.                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Screenshots showing that the Guide for Strategy Development, developed by the World Bank under Deliverable 1 – Report with proposals for updating the instructions for the preparation of strategies reflecting the Strategic Management Methodology – May 2024, has been uploaded on the ISP platform |

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|  |  | and made available for all ministries and the General Secretariat of the Government. |
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### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

#### **All ministries use the strategic management and planning system to prepare their plans.**

The legislative framework regulating the use of a new strategic management and planning system by ministries was set up through two government decisions<sup>1</sup>:

- i) Government Decision No. 379/2022, published in the Official Journal No. 285 on 24 March 2022, entered into force on the date of its publication in the Official Journal, in line with Article 12(3) of Law 24/2000 on the rules of legislative technique for drafting normative acts (hereinafter referred to as "*Government Decision No. 379/2022*"), lays down procedures for the development, implementation, monitoring, evaluation and updating of government strategies, and contains in its Annex a methodology with further details on the procedures for elaboration, implementation, monitorization, evaluation and updating of government strategies;
- ii) Government Decision No. 427/2022, published in the Official Journal No. 301 on 29 March 2022, entered into force on the date of its publication in the Official Journal, in line with Article 12(3) of Law 24/2000 on the rules of legislative technique for drafting normative acts (hereinafter referred to as "*Government Decision No. 427/2022*"), lays down the procedures for the development, implementation, monitoring, evaluation and updating of Institutional Strategic Plans (ISP).

Following the setting up of the above-mentioned legislative framework, all ministries have issued ministerial orders establishing strategic management groups (Evidence No. 14), through which they have formally established internal structures (groups) responsible for the preparation of strategic plans based on the new ISP system, while using the strategic management and planning system to prepare their plans.

The General Secretariat of the Government (hereinafter referred to as "*SGG*") implemented supportive measures enabling all ministries to use the strategic management and planning system to prepare their Institutional Strategic Plans (hereinafter referred to as "*ISP*") based on methodological proposals formulated by "Deliverable 1 Report with proposals for updating the instructions for the preparation of strategies reflecting the Strategic Management Methodology" (Evidence No. 2, hereinafter referred to as "*Deliverable 1*"). Deliverable 1 was prepared by the World Bank, in May 2024, under a technical assistance agreement between the General Secretariat of the Government and the World Bank, analyses the existing Guide for Strategy Development and proposes updates to align it with the newly adopted strategic management methodologies, including instructions and responsibilities for the preparation of Institutional Strategic Plans (ISP) by all ministries. Deliverable 1 provided recommendations for the preparation of strategic plans according to the provisions of Government Decision No. 379/2022 and Government Decision No. 427/2022. The methodological proposals provided under Deliverable 1 were the basis for the design of the training programme supporting the implementation of the new strategic management methodologies. The training programme was delivered to selected staff from all ministries and the SGG in 2023 and 2024 (see Evidence Nos. 3, 4 and 7 for 2023 and Evidence Nos. 6, 8, 9, 10 and 11 for 2024) This training covered practical ISP drafting, ISP alignment with national and sectoral strategies and budgeting, as well as instructions on ISP monitoring requirements. The training deliverables and the participation of the respective staff allowed all ministries building the capacity to use the new strategic

management and planning system to prepare their ISPs and also offered them the possibility to receive clarifications on issues such as measurability of indicators, linkage of budget and monitoring through the ISP platform. The revisions resulting from the discussions held during the training sessions were incorporated into the revised Guide for the Elaboration of Strategies (Evidence no. 6, page 20) which contains updated instructions for the elaboration of the ISPs. Subsequently the revised Guide for the Elaboration of Strategies has been published on the ISP platform for the use of all ministries and the SGG (Evidence No. 18). The Commission services conducted an on-the-spot check on 25 March 2026 to verify that the revised Guide for the Elaboration of Strategies has been published on the ISP platform. This check was completed successfully, confirming that the revised Guide for the Elaboration of Strategies is available for all ministries, all of them using the strategic management and planning system to prepare their plans.

Based on the revised Guide for the Elaboration of Strategies, a new strategic management and planning system is used in all ministries. The screenshots of ISPs for 2024 and 2025 (Evidence No. 15) show that in these years all ministries updated the ISP and monitored in the platform, whereas the PDF/CSV extracts generated from the ISP IT platform (Evidence No. 16) show that all ministries uploaded in the system strategic objectives, programmes, measures, targets, budgets and execution data.

### **All plans are updated and monitored through the Institutional Strategic Plans (ISP) platform.**

Government Decision No. 427/2022 regulates for all ministries the obligation to monitor the implementation of their ISPs on an ongoing basis and to produce annual monitoring reports, using performance indicators defined in the plans. Monitoring data must be regularly introduced and updated by the responsible ministries in the centralized ISP platform. The resulting annual monitoring reports are to be generated through the ISP platform.

The new functionalities of the ISP platform were introduced based on the recommendations formulated through the “Deliverable 3 Report with recommendations and inputs for updating the functionalities and improving the Institutional Strategic Plans monitoring IT system to support the process of aligning strategies with ISPs” (Evidence No. 4, hereinafter referred to as “*Deliverable 3*”). Deliverable 3 presents recommendations and technical inputs for upgrading the ISP platform and extending it with a strategic management component to support ISP preparation, updating and monitoring by all ministries and the SGG. The first part of the deliverable explains the role of the platform in supporting the new strategic management system, while the second part presents the developed application, including its concept, functionalities, logical and physical architecture, as well as aspects related to administration, user authorisation and maintenance. The third section of the report consists of annexes containing user and administrator manuals for the application. Deliverable 3 further specifies (Evidence No. 4, Table 1, page 11) that the World Bank experts were responsible for including the new functionalities on the revised ISP platform. The updated platform was formally accepted and taken over from the World Bank by SGG for management and administration (Evidence No. 12) after having been tested by representatives of all ministries and the SGG during the training sessions delivered under Deliverable 4 - Report on the practical training provided for the operationalisation of the new strategic management and planning system, the integration and alignment of strategies and Institutional Strategic Plan (ISP) content during the revision of strategic documents in the updated ISP monitoring platform, for all line ministries (Evidence No. 5).

The monitoring reports for the first semester of 2025 on the implementation of the ISPs of the ministries and the SGG provided as evidence (Evidence No. 17), show that the ISPs are updated and monitored through the ISP platform. The monitoring reports present, in a standardised format, information on the progress of the implementation of the ISPs by displaying for each ministry and the SGG programme-level tables (showing planned, approved and available budgetary allocations,

semester execution amounts and execution rates, as well as an aggregated status of programme performance); measure-level tables (showing financial execution and progress in implementation of strategic measures), and indicator-level tables for performance objectives (showing comparisons between approved and revised annual targets, with execution data for the current and previous years, including semester-by-semester progress, degree of achievement and explanatory notes).

Screenshots of ISPs from the years 2024 and 2025 (Evidence no. 15) and the extract from the ISP IT platform (Evidence No. 16), further show the updating and monitoring of ISPs through the platform by all ministries and the SGG. These screenshots (Evidence No. 15) show active fields for planned and approved budgets, execution data, indicator values, and semester and annual reporting functions, while the platform export extracts generated directly from the ISP platform for all ministries (Evidence No. 16) show how the updating and monitoring of all plans is covering objectives, programmes, measures, baseline values, planned and revised targets, approved budgets under the State Budget Law, and execution data. The Commission services conducted an on-the-spot check on 25 March 2026 to verify how all plans are updated and monitored through the ISP platform. This check was completed successfully, confirming that:

- i. Monitoring reports are generated on a semester and yearly basis for all Ministries and the SGG from the ISP platform.
- ii. Through the ISP platform updates made by all ministries (including uploading of targets, budgets and execution data and implementation at the level of programs and measures) are monitored in real time.
- iii. The ISP platform extracts are generated for all ministries, containing objectives, programs, measures, targets, budgets and execution data. The platform supports the identification of deviations between planned and actual budget execution; as well as between target and achieved indicator values. In cases of deviation, ministries are required to provide explanations and, where necessary, propose corrective actions.

#### **The Institutional Strategic Plans (ISP) platform is extended to all ministries.**

In June 2023 SGG assessed the functionality of the ISP platform and following successful tests has issued an acceptance note (Evidence No. 12), confirming both the formal acceptance and validation of the new ISP platform and its functionalities, and the fact that the platform was operational and ready for use by all ministries. Furthermore, the list of institutions configured in the ISP platform (Evidence No. 13) shows that all ministries are configured as selectable and active entities on the ISP platform, proving that access and functionality of the ISP platform is extended to all ministries. The Commission services conducted an on-the-spot check on 25 March 2026 to verify how the ISP platform is extended to all ministries. This check was completed successfully, confirming that all ministries are configured as selectable and active entities on the ISP platform where all ministries are uploading updated data.

This extension is further supported by the execution of trainings in 2023 and 2024 for all ministries (Evidence Nos. 3, 4, 6, 7, 8, 9, 10 and 11) enabling them to use the ISP platform.

#### **Furthermore, in line with the description of the milestone, the milestone consists in a new strategic management and planning system used in all ministries.**

Government Decision No. 379/2022 and Government Decision No. 427/2022 established new strategic management and planning system, setting uniform procedures for the preparation, implementation and monitoring of strategies and ISPs. The new system is used across all ministries with the support of dedicated structures within each ministry (Evidence No. 14) and through coordinated methodological guidance (Evidence No. 2) and training (Evidence Nos. 3, 4, 6, 7, 8, 9, 10 and 11). The new system is used in all ministries, as all ministries prepare, update and monitor their

ISPs within a centralised platform that enables structured data entry, performance tracking and reporting (Evidence No. 17).

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Target:** RO-C[C14]-R[R1.0]-T[403] Three ministries planned and used budgets per programme

**Related Measure:** RO-C[C14]-R[R1.0] Enhancing the quality of government decision-making

**Quantitative Indicator:** Number

**Baseline:** 0

**Target:** 3

**Time:** Q2 2025

### 1. Context:

Target 403 is part of reform C14.R1, aiming at improving the quality and transparency of public policy making through the adoption of new methodologies, systems and legal tools.

Target 403 aims to the implementation of a specific methodology for planning and setting up budgets per programme by three ministries.

Target 403 is the seventh step of the reform and it follows the completion of milestone 401 related to the entry into force of the methodologies and procedures to improve public policy rationale and planning and administrative simplification, milestone 410 related to the introduction of guidelines for transparency of interactions between public authorities and interest representatives, milestone 411 related to the entry into force of a new methodology governing the use of Emergency Ordinances, and milestone 412 related to the systematic publication of consolidated versions of laws after amendments. Milestone 403 is accompanied in the same payment request by milestone 402 related to the new strategic management and planning system applied across all ministries, milestone 404 and related to the entry into force of a legislative act operationalising a structure aiming to ensure the implementation of an effective regulatory quality control mechanism and milestone 406 related to the completion of training sessions for civil society staff. It will be followed by milestone 407 related to the adoption of the Plan for Better Regulation 2026–2030 ensuring an improved public policy planning, impact assessment and stakeholder consultation process.

### 2. Evidence provided:

|   | Name of the evidence                                                                            | Short description                                                                                                                                                                                                                                                                               |
|---|-------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover Note                                                                                      | Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled.                                                                                                                                                                         |
| 2 | Copy of the hyperlink to the 2024 budget annex of the Ministry of Education and Research (MER). | The Romanian authorities provided in the Cover Note the hyperlink to the MER 2024 budget annex available at:<br><a href="https://mfinante.gov.ro/static/10/Mfp/buget2024/A nexa3/Ministerul_Educatiei.pdf">https://mfinante.gov.ro/static/10/Mfp/buget2024/A nexa3/Ministerul_Educatiei.pdf</a> |

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|   |                                                                                                                                                                                                                                                                                                                                        | The 2024 budget annex includes all budgetary programmes of the Ministry.                                                                                                                                                                                                                                                                                                                                                  |
| 3 | Copy of the hyperlink to the 2024 budget annex of the Ministry of Health (MoH).                                                                                                                                                                                                                                                        | <p>The Romanian authorities provided in the Cover Note the hyperlink to the MoH 2024 budget annex available at:<br/> <a href="https://mfinante.gov.ro/static/10/Mfp/buget2024/A nexa3/Ministerul Sanatatii.pdf">https://mfinante.gov.ro/static/10/Mfp/buget2024/A nexa3/Ministerul Sanatatii.pdf</a></p> <p>The 2024 budget annex includes all budgetary programmes of the Ministry.</p>                                  |
| 4 | Copy of the hyperlink to the 2024 budget annex of the Ministry of Environment, Water and Forest (MEWF).                                                                                                                                                                                                                                | <p>The Romanian authorities provided in the Cover Note the hyperlink to the MEWF 2024 budget annex available at:<br/> <a href="https://mfinante.gov.ro/static/10/Mfp/buget2024/A nexa3/Ministerul Mediului Apelor Padurilor.pdf">https://mfinante.gov.ro/static/10/Mfp/buget2024/A nexa3/Ministerul Mediului Apelor Padurilor.pdf</a></p> <p>The 2024 budget annex includes all budgetary programmes of the Ministry.</p> |
| 5 | Copy of Memorandum No. 20/46702/M.A. of 8 February 2024 between the General Secretariat of the Government (GSG), the Ministry of Finance (MoF), the Ministry of Education and Research (MER), the Ministry of Environment, Water and Forests (MEWF), and the Ministry of Health (MoH) and the National Health Insurances House (NHIH). | The Memorandum set out the process ensuring that the involved ministries apply the budget programming methodology.                                                                                                                                                                                                                                                                                                        |
| 6 | Copy of GSG Report No. 76 MCD of 28 June 2025 containing description of the overall implementation of the Target 403 – Summary document, approved by the Secretary of state in charge of RRP coordination within GSG Mihnea Drumea.                                                                                                    | Report containing a description of the overall implementation of the target. The document also describes how the spending reviews elaborated by the Ministry of Finance for three sectors (Education, Health and Environment) were included in the Institutional Strategic Plans (ISPs) of the three institutions.                                                                                                        |
| 7 | Copy of 2024 Performance report for the Ministry of Education and Research (MER) No. 281/UPPRE of 22 May 2025, approved by the Secretary of state Gigel Paraschiv.                                                                                                                                                                     | Annual report regarding achievement of indicators and budget execution at program level for the MER in the fiscal year 2024.                                                                                                                                                                                                                                                                                              |
| 8 | Copy of 2024 Performance report for the Ministry of Health (MoH) and the National Health Insurances House (NHIH) No. 442/DCPP of 10 June 2025, approved by the Minister of Health, Alexandru Rafila.                                                                                                                                   | Annual report regarding achievement of indicators and budget execution at program level for the MoH and NHIH in the fiscal year 2024.                                                                                                                                                                                                                                                                                     |
| 9 | Copy of 2024 Performance report for the Ministry of Environment, Water and Forests (MEWF), sent to GSG by address No. 20251 of 5 June 2025,                                                                                                                                                                                            | Annual report regarding achievement of indicators and budget execution at program level for the MEWF in the fiscal year 2024.                                                                                                                                                                                                                                                                                             |

|    |                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                               |
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|    | approved by the Deputy Secretary General of MEWF Istvan Barczy.                                                                                                                                                    |                                                                                                                                                                                                                                                               |
| 10 | Copy of Government Decision No. 467/2022 approving the Methodology for the development and execution of budget programmes, published in the Official Journal No. 368/2022 and entered into force on 14 April 2022. | This legal act establishes the methodological framework for the development and execution of budgetary programmes. It sets out a standardized approach for programme-based budgeting and strengthen the link between policy objectives and budget allocation. |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the target.

#### **Three ministries shall have planned and used budgets per programme by applying Institutional Strategic Planning (ISP) methodology.**

The ISP methodology, which focuses on the strategic planning and budgeting process, is established through Government Decision No. 427/2022<sup>8</sup>, which entered into force for the satisfactory fulfilment of milestone 401 and provides the procedure for the development, monitoring, reporting and revision of the Institutional Strategic Plans (ISPs).

The Government Decision No. 427/2022 defines an ISP as a document including the strategic objectives and the corresponding budget (Article I.1. of the Annex). For a selected policy area, according to Article 7 of Government Decision No. 427/2022, the methodology requires the ISP to define a long-term vision and to divide it into strategic objectives. The pursuit of these objectives is detailed in the budgetary component, which lists a medium-term (2-4 years) program with related measures and actions, according to Article I.1. and Article I.2 of the Annex to Government Decision No.427/2022. The methodology links the policy priorities (strategic component) and the budget formulation according to Article III of the Annex (budgetary component). According to Article I.1 of the Annex to Government Decision No. 427/2022, each ministry specifies for each programme and measure the performance indicators (for monitoring and evaluating the public policy effects over time), the timeline for implementation and the programme financing (an annual budget with estimates for the following three years).

The ISP methodology is further supported at operational level by the Government Decision No. 467/2022, which sets out the procedure for the development and execution of budget programmes.

The Annex to Government Decision No. 467/2022 ensures the form of presentation of the budgetary programmes, their content and the method for developing result and/or efficiency indicators, and the way in which the implementation of budgetary programmes is to be monitored. For each budget programme, according to Article IV of the Annex to Government Decision No. 467/2022 a fiche must be prepared, containing the following mandatory information: identification data of the public institution and the budget programme, description of the budget programme and the public policy area (including the objectives and duration of the implementation), specific performance indicators of the budget programme (including output indicators, outcome indicators and measures to achieve the objectives) and the programme's budget. Finally, Article VI, point 2 of the Annex to Government

<sup>8</sup> The legislative framework was assessed in detail in the positive preliminary assessment of milestone 401, part of the second payment request.

Decision No. 467/2022 requires each ministry to draft an annual performance report describing, for each programme, the reporting of objectives, planned and achieved results, performance indicators and related costs.

Government Decision No. 427/2022 and Government Decision No. 467/2022 do not reflect two different methodologies, but rather they are the legal framework for the two integrated components of the ISP system – strategic planning and budgetary planning and execution. The budgetary programme is a structural element, both in the ISP and budget, that links strategic objectives to financial resources. Development and revision of the ISP, together with programme-based budget based on the ISP, form interdependent stages, part of the same strategic planning process, as set out in Annex No.2 to Government Decision No. 427/2022.

In view of the above, the Institutional Strategic Plan is operationalised annually through the budget and its annexes, where strategic priorities and objectives included in the Institutional Strategic Plan are translated into budgetary programmes, linking them to budget allocation and indicators. A budget program supports the implementation of the corresponding strategic objective and its results.

In line with Article IV of the Annex of Government Decision No. 467/2022 requiring that planning of the budgetary programmes and of the main KPIs considers the provisions of Government Decision No. 427/2022, the budget and its annexes are consistent with the Institutional Strategic Plan (ISP) and show that each institution planned its budget per programme on the basis of ISP derived information, as explained below.

i) The first document presented by the Romanian authorities is the Memorandum No. 20/46702/MA of 28 February 2024 endorsed by the General Secretariat of the Government, the Ministry of Finance, the Ministry of Education and Research, the Ministry of Environment, Water and Forests, and the Ministry of Health and National Health Insurances House, (Evidence No. 5) that tasks the Ministry of Education and Research (MER), the Ministry of Health (MoH) and the Ministry of Environment, Water and Forests (MEWF) to implement in 2024 the planning and execution of their respective budgets by applying ISP methodology, respectively based on programmes and indicators included in the Institutional Strategic Plans (ISP) (page 3).

Thus, the memorandum operationalises the ISP methodology by mandating the selected ministries (three, as provided by the target) to plan and use the budgets based on their ISPs. This requirement reflects the practical application of the ISP methodology, as it ensures a direct link between strategic planning (ISP priorities) and budgetary execution (programmes-based budgeting).

The Romanian authorities also provided a set of documents for each of the three ministries tasked to plan and use budgets per programme by applying the ISP methodology: the 2024 budget annexes (Evidence Nos. 2, 3 and 4) as well as the respective performance reports (Evidence Nos. 7, 8, and 9) showing that each of the selected ministry applied the ISP methodology as follows:

ii) The Romanian authorities included a hyperlink to the website where the Ministry of Education and Research budget annex for 2024 was published (Evidence No. 2). The Commission services accessed the link provided by the authorities on 16 January 2026 to verify that the Ministry of Education and Research planned and used its budget per programme by applying the ISP methodology. This check was completed successfully, confirming that the Ministry of Education and Research planned and executed its budget per programme based on the same strategic priorities, programmes and indicators derived from its ISP. The alignment between ISP and the structure of Annex 3, with budgetary fiches reflecting the strategic objectives, their timeline and how these priorities are financed, demonstrates that the ministry's budget was planned in line with ISP methodology.

Accordingly, the target requirements to apply the ISP methodology is evidenced through the integration and operational use of strategic derived content in programme budgeting, as provided by Article IV “Content of the budgetary programmes” of the Annex of Government Decision No. 467/2022.

In particular, the Ministry of Education and Research 2024 budget Annex 3, pages 45-100 (Evidence No. 2), contains all templated elements required by Government Decision No. 467/2022, Article IV. The institutional budget is structured by programmes with clear identifiable objectives and performance indicators. Each budgetary programme has a programme fiche describing objectives aligned with ISP, multiannual targets (actuals/preliminary execution/planned/estimates for 2025–2027), measures and performance indicators, linked to programme objectives. The fiches include outcome-type indicators (performance indicators), such as the school dropout rate (primary and lower secondary), alongside access and coverage indicators (e.g., early childhood education coverage) and output results. The Annex also contains investment programming sections detailing budget allocation by funding source, with commitments and payments appropriations specified. Budget data are presented, and planning for 2024 and 2025-2027 and preliminary execution for 2023 is reported at programme level.

Annex 3 demonstrates that the Ministry planned its budget including the same programmes defined in the ISP with their measures, the indicators and budget allocation, as required by the ISP methodology.

Then, the 2024 Performance report for the Ministry of Education and Research (Evidence No. 7), part of the monitoring phase, prepared in the following year in accordance to Article IV of the Annex to Government Decision No. 467/2022 and Article VI of the Annex to Government Decision No. 427/2022, presents the execution of the budget and the evolution of performance indicators based on the budget execution for the fiscal year 2024. While Annex 3 contains budgetary information and demonstrate planning of the budget per programme, the Performance report confirms budget execution as it assesses financial implementation, programme performance and evolution of indicators.

The report is structured into four main sections covering:

- an overview of Institutional Strategic Plan (including the architecture of the ministry’s strategic objectives and programmes, progress towards strategic objectives, budget);
- an overall assessment of the reporting period (including ministry performance, key developments and influencing factors, progress towards sectoral results and contributions to the impact of the priority at the national level, state of play of major reforms and projects, key changes in service delivery);
- performance at programme level (including financial performance, achievements and efficiency, performance deviations, progress of performance indicators in relation to financial progress/execution, implementation of efficiency measures arising from spending reviews, as well as identified challenges, risks, conclusions and lessons learned);
- detailed information on indicators and budgetary sources.

The 2024 Performance report also includes a detailed presentation of the three programmes included in the 2024 Budget, providing information on the related strategic objectives, budget allocation, measures, budget execution, spending and performance indicators:

- Programme “University and postgraduate studies” (pages 29-33);
- Programme “Pre-university studies” (pages 33-40);
- Programme “Management and administration” (pages 40-43).

The 2024 Performance report (Evidence No.7) provides structured information (through the overall assessment of the reporting period and performance at programme level, as presented above) of the budget execution and performance monitoring at programme level. Budget execution was carried out in accordance with the ISP methodology, as the ministry's Performance report assess budget execution through the same programmes, objectives and performance indicators established in the ISP (thus ending the ISP process – planning, budgeting, monitoring and evaluation).

It shows results and performance for each programme and measure included in the ISP and budget based on their respective indicators. By reporting output and outcome indicators, the Performance report confirms that the budget (financial resources) was executed to implement the strategic objectives and that the execution phase was conducted on a result-based approach, which is the core of the ISP methodology.

Through the performance indicators presented and their evolution in correlation with budget execution, the report demonstrates that the ministry applied programme-based budgeting throughout the full financial cycle, from planning to execution and evaluation, in line with the ISP methodology.

iii) The Romanian authorities submitted copy of the hyperlink where the Ministry of Health budget annex for 2024 was published (Evidence No.3). The Commission services accessed the links provided by the authorities on 16 January 2026 to verify that the Ministry of Health planned and used its budget per programme by applying the ISP methodology. This check was completed successfully, confirming that the Ministry of Health planned and executed its budget per programme, based on the same strategic priorities, programmes and indicators derived from its ISP. The alignment between ISP and the structure of Annex 3, with budgetary fiches reflecting the strategic objectives, their timeline and how these priorities are financed, demonstrates that the ministry's budget was planned in line with ISP methodology.

Accordingly, the target requirements to apply the ISP methodology is evidenced through the integration and operational use of strategic derived content in programme budgeting, as provided by Article IV "Content of the budgetary programmes" of the Annex of the Government Decision No.467/2022.

Specifically, the Ministry of Health 2024 budget annex, pages 35-60 (Evidence No. 3), includes all templated elements required by Government Decision No. 467/2022, Article IV. The institutional budget is structured by programmes with clear identifiable objectives and performance indicators. There are programme fiches for each budgetary programme, describing objectives aligned with ISP, multiannual targets (actuals/preliminary execution/planned/estimates for 2025–2027), measures and performance indicators, linked to programme objective. The Annex also contains investment programming sections detailing budget allocation by funding source, with commitments and payments appropriations specified. Budget data are presented, and planning for 2024 and 2025-2027 and preliminary execution for 2023 is reported at programme level.

The performance framework provides indicators reflecting core health outcomes (e.g., vaccination coverage thresholds, treatment success rates, disease control metrics), expressed in operational and measurable form (% , rate, number of cases/treated patients).

Annex 3 demonstrate that the Ministry planned its budget including the same programmes defined in the ISP with their measures, the indicators and budget allocation, as required by the ISP methodology.

Then, the 2024 Performance report for the Ministry of Health (Evidence No. 8), part of the monitoring phase, prepared in the following year in accordance to Article IV of the Annex to

Government Decision No. 467/2022 and Article VI of the Annex to Government Decision No. 427/2022, presents the execution of the budget and the evolution of performance indicators based on the budget execution for the fiscal year 2024. While Annex 3 contains budgetary information and demonstrate planning of the budget per programme, the Performance report confirms budget execution as it assesses financial implementation, programme performance and evolution of indicators.

The report also includes a detailed presentation of the seven programmes included in the 2024 Budget, providing information on the related strategic objectives, budget allocation, measures, budget execution, spending and performance indicators:

- Programme “Prevention and control of diseases with a major impact on the population's health” (pages 23-27);
- Programme “Ensuring the quality of medical services” (pages 27-31);
- Programme “National program for providing medical care, medications, and medical devices” (pages 34-36);
- Programme “Program regarding medicines subject to cost-volume/cost-volume-result contracts” (pages 36-37);
- Programme “Programme regarding leaves and insurance allowances” (pages 37-38);
- Programme “Management and administration” (pages 38-39);
- Programme “Transfers between public administration units” (pages 40-41).

This Performance report (Evidence No. 8) provides structured information (through the overall assessment of the reporting period and performance at programme level, as presented above) of the budget execution and performance monitoring at programme level. Budget execution was carried out in accordance with the ISP methodology, as the ministry’s Performance report assess budget execution through the same programmes, objectives and performance indicators established in the ISP.

It shows results and performance for each programme and measure included in the ISP and budget based on their respective indicators. By reporting output and outcome indicators, the Performance report confirms that the budget was executed to implement the strategic objectives and that execution phase was conducted on a result-based approach, core of the ISP methodology. Funds were directed towards the strategic outcomes and not to simple item consumption.

Through the performance indicators presented and their evolution in correlation with budget execution, the report demonstrates that the ministry applied programme-based budgeting throughout the full financial cycle, from planning to execution and evaluation, in line with the ISP methodology.

iv) The Romanian authorities provided the hyperlink where the Ministry of Environment, Water and Forests budget annex for 2024 was published (Evidence No. 4). The Commission services accessed the links provided by the authorities on 16 January 2026 to verify that the Ministry of Environment, Water and Forests planned and used its budget per programme by applying the ISP methodology. This check was completed, confirming that the Environment, Water and Forests planned and executed its budget per programme, based on the same strategic priorities, programmes and indicators derived from its ISP.

The alignment between ISP and the structure of Annex 3, with budgetary fiches reflecting the strategic objectives, their timeline and how these priorities are financed, demonstrates that the ministry’s budget was planned in line with ISP methodology.

Accordingly, the target requirements to apply the ISP methodology is evidenced through the integration and operational use of strategic derived content in programme budgeting, as provided by Article IV “Content of the budgetary programmes” of the Annex of Government Decision No. 467/2022.

In particular, the Ministry of Environment, Water and Forests 2024 budget Annex 3 (Evidence No. 4, pages 42-87) contains all required templated elements by Article IV of the Annex to the Government Decision No. 467/2022. The institutional budget is structured by clear identifiable programmes. Each budgetary programme has a programme fiche describing objectives aligned with ISP, multiannual targets (actuals/preliminary execution/planned/estimates for 2025–2027), measures and performance indicators, linked to programme objective. The Annex also contains investment programming sections detailing budget allocation by funding source, with commitments and payments appropriations specified, which is consistent with standard project and investment budgeting practices. Budget data are presented, and planning for 2024 and 2025-2027 and preliminary execution for 2023 is reported at programme level.

Annex 3 demonstrates that the Ministry planned its budget including the same programmes defined in the ISP with their measures, the indicators and budget allocation, as required by the ISP methodology.

The 2024 Performance report for Ministry of Environment, Water and Forests (Evidence No. 9) part of the monitoring phase, prepared in the following year in accordance to Article IV of the Annex to Government Decision No. 467/2022 and Article VI of the Annex to Government Decision No. 427/2022, presents the execution of the budget and the evolution of performance indicators based on the budget execution for the fiscal year 2024. While Annex 3 contains budgetary information and demonstrates planning of the budget per programme, the Performance report confirms budget execution as it assesses financial implementation, programme performance and evolution of indicators.

The report also includes a detailed presentation of the five programmes included in the 2024 Budget, providing information on the related strategic objectives, budget allocation, measures, budget execution, spending and performance indicators:

- Programme “Water ressources management” (pages 40-45);
- Programme “Forest ressources conservation” (pages 46-53) ;
- Programme “Meteorological activity management” (pages 46-58);
- Programme “Environnement protection” (pages 59-72) ;
- Programme “Capacity building of MEWF” (pages 73-79).

The Performance report (Evidence No. 9) provides structured information (through the overall assessment of the reporting period and performance at programme level, as presented above) of the budget execution and performance monitoring at programme level. Budget execution was carried out in accordance with the ISP methodology, as the ministry’s Performance report assess budget execution through the same programmes, objectives and performance indicators established in the ISP.

It shows results and performance for each programme and measure included in the ISP and budget based on their respective indicators. By reporting output and outcome indicators, the Performance report confirms that the budget was executed to implement the strategic objectives and that execution phase was conducted on a result-based approach, core of the ISP methodology. Funds were directed towards the strategic outcomes and not to simple item consumption.

Through the performance indicators presented and their evolution in correlation with budget execution, the report demonstrates that the ministry applied programme-based budgeting throughout the full financial cycle, from planning to execution and evaluation, in line with the ISP methodology.

All three budgets were planned and set out in accordance with the ISP methodology, based on the priorities, same budgetary programmes and indicators, as the ones included in the ISPs published on the ISP platform, establishing a correspondence between ISPs and the related budgets per programme.

v) The application of the ISP methodology by the three ministries was also assessed by the General Secretariat of the Government. It provided a summary document No.76 MCD/SDS of 28 June 2025 – Report - describing how the target was satisfactorily fulfilled (Evidence No. 6).

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C14]-R[R1.0]-M[406] Staff of civil society organisations trained to increase the administrative capacity

**Related Measure:** RO-C[C14]-R[R1.0] Enhancing the quality of government decision-making

**Qualitative Indicator:** Civil society staff completed training sessions

**Time:** Q4 2025

### 1. Context:

Milestone 406 is part of reform C14.R1, which aims at improving the quality and transparency of public policy making through the adoption of new methodologies, systems and legal tools to support strategic planning, regulatory impact analysis, public consultation, transparency, and the use of programme budgeting.

Milestone 406 concerns the training of staff of civil society organisations in order to increase their administrative capacity.

Milestone 406 is the eighth milestone of the reform, and it follows the completion of milestone 401 related to establishing new methodologies and procedures for improved public policy planning, milestone 402 related to the use of a new strategic management and planning system at the level of all ministries, target 403 related to the use of programme budgeting in three ministries, milestone 404 related to the operationalisation of a new structure ensuring the implementation of an effective regulatory quality control mechanism, milestone 410 related to the introduction of guidelines for transparency of interactions between public authorities and interest representatives, milestone 411 related to the entry into force of a new methodology governing the use of Emergency Ordinances, and milestone 412 related to the systematic publication of consolidated versions of laws after amendments. It will be followed by milestone 407 related to the adoption of the Plan for Better Regulation 2026–2030 ensuring an improved public policy planning, impact assessment and stakeholder consultation process.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                          | Short description                                                                                                                                                                                                                                                                                                                            |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover Note                                                                                                                                                                                    | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.                                                                                                                                                                                                                   |
| 2 | Public Service Procurement Contract No. 66 of 19 May 2023 for the acquisition of services for the organisation of events and professional training under the National Recovery and Resilience | Document containing the contractual framework signed by the Secretariat General of the Government with Avangarde Business Group SRL for the organisation and delivery of training sessions for staff of civil society organisations, including the scope, thematic content, duration, target groups and obligations of the service provider. |

|   |                                                                                                                                                                                                                                                                                                                                                         |                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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|   | Plan, Component “406 – Development of the administrative capacity of civil society organisations and of their level of digitalisation”, whereby 800 representatives of civil society organisations have participated in training courses aimed at increasing administrative capacity and the level of digitalisation of their organisational structure. |                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 3 | List of participants.                                                                                                                                                                                                                                                                                                                                   | Document containing list of 800 participants at the training sessions, including anonymised participant identifiers for participants, type of organisation (non-governmental organisation, trade union or employer organisation), name of the organisation represented, training group and period attended, and the series and number of the participation certificate issued upon completion of participation at the training sessions. |
| 4 | Final evaluation tests for course “Development of the Administrative Capacity and Digitalisation Level” delivered in 2023.                                                                                                                                                                                                                              | Document containing completed and corrected final evaluation tests demonstrating assessment of participants knowledge at the end of the training sessions delivered in 2023.                                                                                                                                                                                                                                                             |
| 5 | Final evaluation tests for course “Development of the Administrative Capacity and Digitalisation Level” delivered in 2024.                                                                                                                                                                                                                              | Document containing completed and corrected final evaluation tests demonstrating assessment of participants knowledge at the end of the training sessions delivered in 2024.                                                                                                                                                                                                                                                             |
| 6 | Final evaluation tests for course “Development of the Administrative Capacity and Digitalisation Level” delivered in 2025.                                                                                                                                                                                                                              | Document containing completed and corrected final evaluation tests demonstrating assessment of participants knowledge at the end of the training sessions delivered in 2025.                                                                                                                                                                                                                                                             |
| 7 | Feedback questionnaires for training sessions delivered in 2023.                                                                                                                                                                                                                                                                                        | Anonymised feedback questionnaires completed by participants at the 2023 training sessions, assessing the relevance, clarity and applicability of the training’s content to their organisational activities.                                                                                                                                                                                                                             |
| 8 | Feedback questionnaires for training sessions delivered in 2024.                                                                                                                                                                                                                                                                                        | Anonymised feedback questionnaires completed by participants at the 2024 training sessions, assessing the relevance, clarity and applicability of the training’s content to their organisational                                                                                                                                                                                                                                         |

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|   |                                                                  | activities.                                                                                                                                                                                                  |
| 9 | Feedback questionnaires for training sessions delivered in 2025. | Anonymised feedback questionnaires completed by participants at the 2025 training sessions, assessing the relevance, clarity and applicability of the training's content to their organisational activities. |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

#### **Increased administrative capacity of civil society organizations' staff realized through their participation at training sessions.**

Training sessions targeting staff of civil society organisations were organised and delivered between 2023 until the last quarter of 2025. The contractual framework governing the delivery of the training sessions was established through Service Contract No. 66 of 19 May 2023, which defines the scope, thematic focus and delivery obligations of the service provider (Evidence No. 2). The training sessions included modules such as development of administrative capacity, consultation mechanisms and transparency tools aiming to contribute to increasing the administrative capacity of civil society organisations' staff.

800 staff of civil society organisations participated in the training. The lists of participants (Evidence No. 3) include for each individual trained:

- i. an anonymised participant identifier;
- ii. the type of civil society organisation represented (non-governmental organisation, trade union or employer organisation);
- iii. the name of the organisation represented;
- iv. the training session or group and the period attended; and
- v. the series and number of the participation certificate issued upon completion of the training session.

Evidence that participation to the training sessions organised in the period 2023-2025 contributed to an increase in administrative capacity is provided by the anonymised, completed and corrected final evaluation tests, demonstrating the assessment of participants' knowledge at the end of the training sessions (Evidence No. 4-6). All participants achieved a score above 5 on a 1 to 10 grading scale (with 10 as the highest grade) indicating that each participant attained at least a satisfactory level of performance. The evaluation covers topics linked to administrative capacity, such as public consultation mechanisms, regulatory processes, organisational management and digital tools.

#### **4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C14]-R[R2.0]-M[415] Sustainable development expert role established and training programme prepared

**Related Measure:** RO-C[C14]-R[R2.0]- Increasing strategic governance for climate and sustainable development and environmental policies

**Qualitative Indicator:** Provision in the legal act indicating entry into force of the role of sustainable development experts and confirming accreditation of training programme for sustainable development experts

**Time:** Q1 2026

### 1. Context:

The objective of this reform is to improve climate action and sustainable development and environmental policies across all levels of public administration. The reform consists in the creation of an inter-institutional mechanism for monitoring and prioritising climate initiatives, providing access to digital tools, and building capacity in sustainable development policymaking.

Milestone 415 concerns the establishment of the function of sustainable development expert in the public administration and the delivery of an accredited training programme for sustainable development experts.

Milestone 415 is the last milestone of the reform. It is preceded by milestone 413, related to the operationalisation of an Inter-Institutional Climate Committee.

Following the completion of this milestone, in line with the description of the measure in the Council Implementing Decision, Romania will provide access to digital tools. This is a further step of this measure that is not linked to the milestones and targets in the Council Implementing Decision.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                                                                                                                                                             | Short description                                                                                                               |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                                                                                                                                                                                                                       | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled. |
| 2 | Copy of Law No. 156/2022 approving the Government Emergency Ordinance No. 138/2021 amending and supplementing the Government Emergency Ordinance No. 57/2019 on the Administrative Code and amending the Law No. 208/2015 on the election of the Senate and the Chamber of Deputies, as well as for the organization and functioning of the Permanent Electoral Authority, published in the Official Journal No. | Legal act establishing the public function of sustainable development expert.                                                   |

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|    | 515 of 25 May 2022.                                                                                                                                                                                |                                                                                                                                                                                                                                                           |
| 3  | Copy of Decision No. 49/25.02.2021 of the National Authority for Qualifications on the approval of the occupational standard of sustainable development expert.                                    | The document establishes the occupational standard of sustainable development expert in Romania and describes in its two annexes the specific related activities, competences and qualifications, as well as the requirements for education and training. |
| 4  | Copy of public procurement contract for the provision of services (No. 261 of 23 December 2024) awarded to Smart Integration, Goldbach Consulting and University of Bucharest – Lot I.             | The contract refers to the provision of training and continuous professional development services for the training and qualification of 266 sustainable development experts carried out in the North-West region.                                         |
| 5  | Copy of public procurement contract for the provision of services (No. 262 of 23 December 2024) awarded to Smart Integration, Goldbach Consulting and University of Bucharest – Lot II.            | The contract refers to the provision of training and continuous professional development services for the training and qualification of 238 sustainable development experts carried out in the Centre region.                                             |
| 6  | Copy of public procurement contract for the provision of services (No. 264 of 30 December 2024) awarded to Smart Integration, Goldbach Consulting and University of Bucharest – Lot III.           | The contract refers to the provision of training and continuous professional development services for the training and qualification of 340 sustainable development experts carried out in the North-East region.                                         |
| 7  | Copy of public procurement contract for the provision of services (No. 265 of 30 December 2024) awarded to The Academy of Economic Studies and the University “Dunarea de Jos” of Galati – Lot IV. | The contract refers to the provision of training and continuous professional development services for the training and qualification of 246 sustainable development experts carried out in the South-East region.                                         |
| 8  | Copy of public procurement contract for the provision of services (No. 266 of 30 December 2024) awarded to Ascendis Consulting and University of Bucharest – Lot V.                                | The contract refers to the provision of training and continuous professional development services for the training and qualification of 296 sustainable development experts carried out in the South-Muntenia region.                                     |
| 9  | Copy of public procurement contract for the provision of services (No. 267 of 30 December 2024) awarded to Ascendis Consulting and University of Bucharest – Lot VI.                               | The contract refers to the provision of training and continuous professional development services for the training and qualification of 245 sustainable development experts carried out in the Bucharest-Ilfov region.                                    |
| 10 | Copy of public procurement contract for the provision of services (No. 268 of 30 December 2024) awarded to Smart Integration, Goldbach Consulting and University of Bucharest – Lot VII.           | The contract refers to the provision of training and continuous professional development services for the training and qualification of 194 sustainable development experts carried out in the South-West Oltenia region.                                 |

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| 11 | Copy of public procurement contract for the provision of services (No. 269 of 30 December 2024) awarded to Smart Integration, Goldbach Consulting and University of Bucharest – Lot VIII. | The contract refers to the provision of training and continuous professional development services for the training and qualification of 175 sustainable development experts carried out in the West region.                                                                            |
| 12 | Copy of public procurement contract for the provision of services (No. 79 of 15 April 2025) awarded to Nosce Group – Lot I.                                                               | The contract refers to the provision of event organisation services required for the training and professional development sessions for the qualification of 266 sustainable development experts and for the certificate award ceremony, carried out in the North-West region.         |
| 13 | Copy of public procurement contract for the provision of services (No. 80 of 15 April 2025) awarded to Incubcenter and Virtual Reality Zone – Lot II.                                     | The contract refers to the provision of event organisation services required for the training and professional development sessions for the qualification of 238 sustainable development experts and for the certificate award ceremony, carried out in the Centre region.             |
| 14 | Copy of public procurement contract for the provision of services (No. 81 of 15 April 2025) awarded to Goldbach Consulting, Smart Integration and Publi Media Business – Lot III.         | The contract refers to the provision of event organisation services required for the training and professional development sessions for the qualification of 340 sustainable development experts and for the certificate award ceremony, carried out in the North-East region.         |
| 15 | Copy of public procurement contract for the provision of services (No. 82 of 15 April 2025) awarded to Global Services Group – Lot IV.                                                    | The contract refers to the provision of event organisation services required for the training and professional development sessions for the qualification of 246 sustainable development experts and for the certificate award ceremony, carried out in the South-East region.         |
| 16 | Copy of public procurement contract for the provision of services (No. 83 of 15 April 2025) awarded to Nosce Group – Lot V.                                                               | The contract refers to the provision of event organisation services required for the training and professional development sessions for the qualification of 296 sustainable development experts and for the certificate award ceremony, carried out in the South-Muntenia region.     |
| 17 | Copy of public procurement contract for the provision of services (No. 84 of 15 April 2025) awarded to Global Services Group – Lot VI.                                                    | The contract refers to the provision of event organisation services required for the training and professional development sessions for the qualification of 245 sustainable development experts and for the certificate award ceremony, carried out in the Bucharest-Ilfov region.    |
| 18 | Copy of public procurement contract for the provision of services (No. 85 of 15 April 2025) awarded to Avangarde Business Group – Lot VII.                                                | The contract refers to the provision of event organisation services required for the training and professional development sessions for the qualification of 194 sustainable development experts and for the certificate award ceremony, carried out in the South-West Oltenia region. |

|    |                                                                                                                                                                                                                                                       |                                                                                                                                                                                                                                                                          |
|----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 19 | Copy of public procurement contract for the provision of services (No. 86 of 15 April 2025) awarded to Nosce Group – Lot VIII.                                                                                                                        | The contract refers to the provision of event organisation services required for the training and professional development sessions for the qualification of 175 sustainable development experts and for the certificate award ceremony, carried out in the West region. |
| 20 | Copy of list of graduates of the postgraduate programme “Sustainable Development Expert” in the North-West region – Lot I.                                                                                                                            | The list contains the names of 275 graduates, their personal identification number, the average grade and the reference numbers of their postgraduate certificate.                                                                                                       |
| 21 | Copy of list of graduates of the postgraduate programme “Sustainable Development Expert” in the Centre region – Lot II.                                                                                                                               | The list contains the names of 253 graduates, their personal identification number, the average grade and the reference numbers of their postgraduate certificate.                                                                                                       |
| 22 | Copy of list of graduates of the postgraduate programme “Sustainable Development Expert” in the North-East region – Lot III.                                                                                                                          | The list contains the names of 352 graduates, their personal identification number, the average grade and the reference numbers of their postgraduate certificate.                                                                                                       |
| 23 | Copy of list of graduates of the postgraduate programme “Public Administration for Sustainable Development” in the South-East region – Lot IV.                                                                                                        | The list contains the names of 256 graduates and the reference numbers of their postgraduate certificate.                                                                                                                                                                |
| 24 | Copy of list of graduates of the postgraduate programme “Sustainable Development Expert” in the South-Muntenia region – Lot V.                                                                                                                        | The list contains the names of 298 graduates, their personal identification number, the average grade and the reference numbers of their postgraduate certificate.                                                                                                       |
| 25 | Copy of list of graduates of the postgraduate programme “Sustainable Development Expert” in the Bucharest-Ilfov region – Lot VI.                                                                                                                      | The list contains the names of 280 graduates, their personal identification number, the average grade and the reference numbers of their postgraduate certificate.                                                                                                       |
| 26 | Copy of list of graduates of the postgraduate programme “Sustainable Development Expert” in the South-West Oltenia region – Lot VII.                                                                                                                  | The list contains the names of 203 graduates, their personal identification number, the average grade and the reference numbers of their postgraduate certificate.                                                                                                       |
| 27 | Copy of list of graduates of the postgraduate programme “Sustainable Development Expert” in the West region – Lot VIII.                                                                                                                               | The list contains the names of 177 graduates, their personal identification number, the average grade and the reference numbers of their postgraduate certificate.                                                                                                       |
| 28 | Copies of certificates of attestation by the National Authority for Qualifications of the postgraduate programmes for training and continuous professional development “Sustainable Development Expert” from the University of Bucharest (No. 6552 of | The certificates confirm the accreditation of the postgraduate programmes for sustainable development experts.                                                                                                                                                           |

|  |                                                                                                                                           |  |
|--|-------------------------------------------------------------------------------------------------------------------------------------------|--|
|  | 28 June 2024) and “Public Administration for Sustainable Development” from the Academy of Economic Studies (No. 5754/10 of 12 July 2021). |  |
|--|-------------------------------------------------------------------------------------------------------------------------------------------|--|

### 3. Analysis:

The justification and substantiating evidence provided by the Romania authorities cover all constitutive elements of the milestone.

#### **Sustainable development expert role established and training programme prepared**

##### **Provision in the legal act indicating entry into force of the role of sustainable development experts and confirming accreditation of training programme for sustainable development experts.**

Law No. 156/2022 approving the Government Emergency Ordinance No. 138/2021 amending and supplementing the Government Emergency Ordinance No. 57/2019 on the Administrative Code (hereinafter referred to as “*the Law*”) was published in the Official Journal No. 515 of 25 May 2022 (Evidence No. 2). According to the provisions in Article 12(1) of Law No. 24/2000 on legislative technique rules for drafting legal acts, the Law entered into force three days after its publication in the Official Journal.

Article I(2) of the Law supplements the Government Emergency Ordinance No. 57/2019 on the Administrative Code with Article 610<sup>1</sup> that establishes the specific public function of sustainable development expert. Article 610<sup>1</sup>(1) enables central and local public authorities to establish public functions of sustainable development expert either by transforming existing positions with more than 50% of the duties related to sustainable development or by creating new dedicated positions. The article also introduces the requirement to graduate from postgraduate training courses/programmes organized in accordance with the national occupational standard of sustainable development expert.

The occupational standard of sustainable development expert describes the specific activities of the position, such as coordinating public policies in the field of sustainable development and managing the implementation of government policy on achieving sustainable development goals, and the content of the relevant training programme, focused on management and public administration and the economic, social and environmental dimensions of sustainable development (Evidence No. 3).

##### **Sustainable development experts have completed an accredited training programme.**

The General Secretariat of the Government (GSG) concluded in January 2025 eight contracts for the provision of training and continuous professional development services for 2000 sustainable development experts (Evidence Nos. 4 to 11). Each contract covers one of the eight development regions of Romania. In April 2025 GSG also concluded eight additional contracts for each of the above-mentioned regions and the respective number of sustainable development experts for the provision of in-person training sessions and final award ceremonies (Evidence Nos. 12 to 19).

The training programmes for sustainable development experts were accredited by the National Authority for Qualifications (Evidence No. 28).

According to the lists of graduates of the training programmes, 2 094 public officials have successfully completed the qualification and received certification as sustainable development experts (Evidence Nos. 20 to 27).

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C14]-R[R5.0]-M[423] Entry into force of the “Justice laws” (laws on the status of magistrates, judicial organisation, Superior Council of Magistracy)

**Related Measure:** RO-C[C14]-R[R5.0] Ensuring the independence of the judiciary, enhancing its quality and efficiency

**Quantitative Indicator:** Provision in each law indicating its entry into force

**Time:** Q2 2023

### 1. Context:

The objective of the reform is to make the functioning of judicial institutions more efficient. The milestone consists in the adoption of legal acts covering the independence of the judiciary.

Milestone 423 is the last step of the reform. It follows the completion of milestone 421 related to the entry into force of the government decision approving the strategy for the development of the judiciary 2022-2025, milestone 422 related to the entry into force of the law amending the powers of the National Agency for the Management of Seized Assets, and milestone 424, related to the amendment of the Criminal Code and Criminal Procedure Code.

The effectiveness and independence of the justice system, including any issues emerging in the implementation of the Justice laws, are being monitored under the Rule of Law Report.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                       | Short description                                                                                                                                           |
|---|--------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                 | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.                                  |
| 2 | Copy of Law No. 303/2022 on the Statute of judges and prosecutors, published in the Official Journal No. 1102 of 16 November 2022 (Law 1). | Regulates the career of magistrates, such as their appointment, promotion, evaluation, training, and independence and accountability mechanisms.            |
| 3 | Copy of Law No. 304/2022 on Judicial organization, published in the Official Journal No. 1104 of 16 November 2022 (Law 2).                 | Establishes the organization of the judiciary, clarifies independence of prosecutors, hierarchy, and appointments in special structures.                    |
| 4 | Copy of Law No. 305/2022 on the Superior Council of Magistracy, published in the Official Journal No. 1105 of 16 November 2022 (Law 3).    | The legal framework that provides for the functioning and competences of the Superior Council of Magistracy, election procedures, and disciplinary actions. |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the target.

#### Provision in each law indicating its entry into force

#### The new justice laws shall provide for increased independence of judges and prosecutors, [...]

The Law No. 303/2022 on the Statute of judges and prosecutors ("*Law 1*"), Law No. 304/2022 on Judicial organization ("*Law 2*"), and Law No. 305/2022 on the Superior Council of Magistracy ("*Law 3*"), hereinafter referred to as "*the Justice Laws*", were revised, adopted, promulgated, and published in the Official Journal on 16 November 2022. According to provisions in each law (Article 294(1) in Law 1, Article 168(1) in Law 2, and Article 96(1) in Law 3), the Justice Laws entered into force on 16 December 2022.

The Justice Laws introduce several changes to strengthen the independence of the judiciary, including the following:

- The principle of separating the careers of judges and prosecutors is increased by the adopted laws, with the career management of each profession governed through differentiated rules, according to Article 1(2) of Law 1 (Evidence No. 2).
- Chapter IV in Law 1 covers the professional training of magistrates, which is established as a professional duty and a right, contributing to strengthening judicial independence, while also observing the principle of specialization. Law 1 regulates the framework of training and career-long professional development of magistrates (Articles 81–86, Evidence No. 2).
- Articles 68(3)–(4) of Law 2 (Evidence No. 3) provide that measures and/or solutions adopted by a prosecutor may be overruled by the superior prosecutor, only in writing and with reasons, and only when illegal or unfounded; for the National Anticorruption Directorate (DNA) and Directorate for Investigating Organized Crime and Terrorism (DIICOT), overruling is further restricted to specified superior levels, thus establishing limits for the hierarchical control and reducing scope for informal or arbitrary interventions.
- Article 68(6) of Law 2 (Evidence No. 3) provides that a prosecutor may notify the Section for Prosecutors of the Superior Council of the Magistracy (SCM) against measures that may amount to undue influence, thus strengthening checks and balances within the prosecutorial hierarchy.
- Article 172(8) of Law 1 (Evidence No.2) provides that the Presidential decree revoking a prosecutor upon proposal of the Minister of Justice from a high management post may be challenged by contestation before the High Court of Cassation and Justice (Administrative and Fiscal Litigation Section), without a prior administrative procedure; the court may assess the legality and merits of the Minister of Justice's revocation proposal. This provision establishes a direct, high-level judicial remedy against removal from senior prosecutorial leadership, thus ensuring an independence safeguard against arbitrary dismissal.
- Article 66(4) of Law 3 (Evidence No.4) provides that the inspection activities are approved (upon proposal of the Chief Inspector of the Judicial Inspection) by regulation adopted via decision of the SCM Plenary, published in the Official Journal. This provision reduces the risk of self-regulation by the Judicial Inspection and strengthens institutional oversight by the

constitutional guarantor of judicial independence (SCM), reinforcing checks and balances in the area of disciplinary procedures.

**[...] admission to the profession of magistrate and career advancement on meritocratic grounds, [...]**

The Justice Laws introduce several changes aimed at fostering admission to the profession and career advancement on meritocratic grounds, including the following:

- Article 5 of Law 1 (Evidence No. 2) confirms the admission through the National Institute of Magistracy as the primary entry point to the profession/access to the magistracy. In addition, Law 1 provides in Article 63 for the possibility to be admitted to the magistracy for candidates with at least five years of professional experience in a legal specialty as an eligibility criterion.
- In order to strengthen the professionalisation and transparency of access to the judiciary, the Justice Laws have eliminated alternative entry routes that bypass competitive examinations (such as recruitment based solely on interviews). The only exception concerns retired magistrates, who may be reappointed without competition, but exclusively to courts or prosecutor's offices that are unable to function properly due to a high number of vacancies. (Law 1, Article 216(2), Evidence No. 2).
- Article 64(4) Law 1 (Evidence No. 2) provides for all information concerning the competition for admission to the magistracy to be published online at least 60 days before the competition date, increasing the predictability, equal access and transparency of the admission process.
- Article 127(2) of Law 1 (Evidence No. 2) provides for the promotion of judges and prosecutors to superior levels to be made only through competitions organized at national level, thus reducing scope for discretionary advancement in the career of magistrates.
- Article 87 and Article 94(2) of Law 2 (Evidence No. 3) provides for a merit-based access to specialised prosecution structures (DNA and DIICOT) through regulating that only candidates that have obtained a minimum score of 70 points (out of the total of 100) and are ranked within the limits of the available posts can be admitted. Furthermore, Article 86(17) provides that challenges to interview results are resolved through re-evaluation on the basis of the audio-video recording of the interview, thus regulating procedural fairness and aiming to mitigate the risk of subjectivity of the interviews' assessments.
- Judicial inspectors are appointed following a competition organized, with the support of the National Institute of Magistracy, by the relevant section of the Superior Council of Magistracy, depending on the inspection directorate for which the competition is organized. The competition for the appointment as a judicial inspector is organized according to the provisions of the law and the approved regulations, at the proposal of the chief inspector, by decisions of the sections of the Superior Council of the Magistracy, which are published in the Official Journal (Law 3, Articles 79 – 81) (Evidence No. 4).

**[...] the accountability of magistrates, as well as their protection against any interference and abuse.**

The Justice Laws strengthen the protection of magistrates against abuse, through the following provisions:

- The disciplinary infringement concerning: "non-compliance with the decisions of the Constitutional Court or the decisions issued by the High Court of Cassation and Justice in the resolution of appeals in the interest of the law" was eliminated (Law 1, Article 271, Evidence No. 2). As a result, judges cannot be subject to disciplinary procedures on that basis.
- The disciplinary infringement concerning "manifestations that affect honour or professional probity or the prestige of justice, committed in the exercise of or outside the exercise of official duties", was eliminated due to its lack of clarity and predictability, which was considered as creating uncertainty for magistrates concerning the expected conduct, possibly giving rise to difficulties in application and non-uniform practice in disciplinary matters (Law 1, Article 271, Evidence No. 2).
- In order to ensure the independence of the magistrates, the possibility of exclusion from the magistracy as a result of the lack of good reputation was removed from the law, considering the subjectivity of its assessment and the procedure for ascertaining the lack of good reputation, a mechanism that could have given rise to abusive interpretations in practice, with the risk of affecting the independence of magistrates.
- Articles 268-269 of Law 1 (Evidence No. 2) regulate the procedures of the right to intervene in state recourse actions and are transferring the main decision role from the Ministry of Finance to the SCM, including the main decision-making role in recourse actions linked to magistrates' patrimonial liability. With this vested central authority in the SCM, responsibility has shifted from the executive to the judiciary and increasing internal judicial accountability and independence.

This assessment for the purposes of payments from the Recovery and Resilience Facility does not prejudice the evaluation by the Commission of the Justice laws in any other legal proceedings, in particular in the proceedings launched on the basis of Article 258 TFEU.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C14]-R[R6.0]-T[427] An increase of the value of seized assets managed by the National Agency for the Management of Seized Assets

**Related Measure:** RO-C[C14]-R[R6.0] Stepping up the fight against corruption

**Quantitative Indicator:** percentage (%)

**Baseline:** 0

**Target:** 50

**Time:** Q4 2025

### 1. Context:

The objective of the reform is to step-up the fight against corruption, through its prevention and repression. The target consists in the increase of the value of seized assets managed by the National Agency for the Management of Seized Assets (ANABI).

Target 427 is the final step of the reform. It follows the completion of milestone 426 related to the entry into force of the new National Anti-Corruption Strategy, milestone 430 related to the entry into force of the law on whistle-blowers' protection, and target 429, related to the occupation rate of 85% of National Anti-Corruption Directorate prosecutor positions attained (also included in the fourth payment request).

### 2. Evidence provided:

|   | Name of the evidence                                                                                                | Short description                                                                                                                                                             |
|---|---------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                          | Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled.                                                       |
| 2 | ANABI Asset Management Reports 2021–2025.                                                                           | ANABI's annual reports since 2021 onwards, detailing the yearly activity of the agency.                                                                                       |
| 3 | The list of independent experts contracted by ANABI to evaluate seized assets and copies of the relevant contracts. | Contracts concluded between ANABI and authorised evaluators in the framework of Law No. 98/2016 regarding public procurement for the purpose of evaluating the seized assets. |
| 4 | The lists of seized assets in 2021 and in 2025, with their respective values.                                       | Documents and bank statements including the assets seized in 2021 and 2025, and their value.                                                                                  |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the target.

**An increase in the value of seized assets managed by the National Agency for the Management of Seized Assets shall be attained. The baseline for this target shall be the value of the seized assets, managed by the Agency, in June 2021 (approximately 45 million Euro).**

According to data published by ANABI and submitted as evidence, the value of seized assets increased over 2021-2025 by around 176%, from approximately EUR 45 million in June 2021 to EUR124.6 million in September 2025, thus exceeding the target of 50% by 126 percentage points.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C14]-R[R6.0]-T[429] Occupation rate of 85% of National Anti-Corruption Directorate prosecutor positions attained

**Related Measure:** RO-C[C14]-R[R6.0] Stepping up the fight against corruption

**Quantitative Indicator:** percentage (%)

**Baseline:** 0

**Target:** 85

**Time:** Q2 2023

### 1. Context:

The objective of the reform is to step-up the fight against corruption, through its prevention and repression, by strengthening the capacity of the National Anti-Corruption Directorate.

The target consists in attaining an occupation rate of 85% of National Anti-Corruption Directorate prosecutor positions.

Target 429 is the third step of the reform. It follows the completion of milestone 426 related to the entry into force of the new National Anti-Corruption Strategy, milestone 430 related to the entry into force of the law on whistle-blowers' protection, and target 427, related to the increase of the value of seized assets managed by the National Agency for the Management of Seized Assets (also included in the fourth payment request).

### 2. Evidence provided:

|   | Name of the evidence                                                                          | Short description                                                                                                                                                                                                   |
|---|-----------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                    | Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled.                                                                                             |
| 2 | The organigram (or organisational chart) of the National Anti-corruption Directorate in 2021. | The organisational chart outlines the institutional structure of the Directorate, including its leadership, central and territorial departments, and the allocation of prosecutorial and support functions in 2021. |
| 3 | The organigram (or organisational chart) of the National Anti-corruption Directorate in 2023. | The organisational chart outlines the institutional structure of the Directorate, including its leadership, central and territorial departments, and the allocation of prosecutorial and support functions in 2023. |
| 4 | The organigram (or organisational chart) of the National Anti-                                | The organisational chart outlines the institutional structure of the Directorate,                                                                                                                                   |

|   |                                                                                                    |                                                                                                                                          |
|---|----------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------|
|   | corruption Directorate in 2025.                                                                    | including its leadership, central and territorial departments, and the allocation of prosecutorial and support functions in 2025.        |
| 5 | Nominal list containing National Anti-corruption Directorate prosecutors' mandates, November 2025. | This document includes a list of all prosecutors within the National Anti-Corruption Directorate and the duration of their appointments. |
| 6 | Positions occupied in the National Anti-corruption Directorate, November 2023-2025.                | Annex that includes the number of prosecutor positions occupied in 2023, 2024, and 2025.                                                 |
| 7 | Positions occupied in the National Anti-corruption Directorate, 1 November 2025.                   | Annex that includes the number of prosecutor positions occupied on 1 November 2025.                                                      |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the target.

#### **Occupation rate of 85% of National Anti-Corruption Directorate prosecutor positions attained.**

The institutional structure of the National Anti-Corruption Directorate has remained stable between 2021 – 2025. The institution has a total number of 195 prosecutor positions as shown in the respective organisational charts for 2021, 2023, and 2025 (Evidence No. 2, 3 and 4).

According to the evidence provided by the Romanian authorities (Evidence No. 2), in 2021 the National Anti-Corruption Directorate had 148 prosecutor positions occupied, resulting in a 75.8% occupancy rate. Evidence No. 6 shows that this rate increased to 84.96% in 2023, 85.90% in 2024, and further to 86.15% in 2025, when 168 positions were filled (Evidence No. 6). Progress toward the target was gradual over time and by 2025 this occupancy rate exceeded the required target of 85% by 1.15 percentage points.

#### **4. Commission Preliminary Assessment: Satisfactorily fulfilled.**

**Number and name of the Milestone:** RO-C[C14]-R[R7.0]-M[432] Approved revised ethics and conduct legal acts for the Government

**Related Measure:** RO-C[C14]-R[R7.0] Updating the integrity legal framework for the civil service

**Qualitative Indicator:** Provision in each revised ethics and conduct legal acts for the Government indicating its entry into force

**Time:** Q1 2026

### 1. Context:

The objective of this reform is to increase the integrity in the civil service.

Milestone 432 concerns the entry into force of the revised code of ethics and conduct for members of Government.

Milestone 432 is the last milestone of the reform. It is preceded by milestone 431, related to the entry into force of the consolidated law on integrity, which is included in the next instalment.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                                                                                                                     | Short description                                                                                                               |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                                                                                                                                                                               | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled. |
| 2 | Copy of Law No. 49/2025 amending and supplementing the Government Emergency Ordinance No. 57/2019 on the Administrative Code and amending Article 1(1) of Law No. 251/2004 on certain measures related to goods received free of charge at protocol events during the exercise of a mandate or public office published in the Official Journal No. 336 of 15 April 2025. |                                                                                                                                 |

### 3. Analysis:

The justification and substantiating evidence provided by the Romania authorities cover all constitutive elements of the milestone.

**Approved revised ethics and conduct legal acts for the Government.**

**Provision in each revised ethics and conduct legal acts for the Government indicating its entry into force.**

Law No. 49/2025 amending and supplementing the Government Emergency Ordinance No. 57/2019 on the Administrative Code and amending Article 1(1) of Law No. 251/2004 on certain measures related to goods received free of charge at protocol events during the exercise of a mandate or public office (hereinafter referred to as “*Law No. 49/2025*”) (Evidence No. 2) was published in the Official Journal No. 336 of 15 April 2025. According to the provisions in the Article 12(1) of Law No. 24/2000 on legislative technique rules for drafting legal acts, Law No. 49/2025 entered into force three days after its publication in the Official Journal.

Law No. 49/2025 amends and supplements the Government Emergency Ordinance No. 57/2019 on the Administrative Code with a new chapter IV<sup>1</sup> on rules of ethics and conduct for members of Government and for other persons holding public office at central government level.

Article 47<sup>2</sup>(1) sub-paragraph a of Law No. 49/2025 indicates that the provisions of the law apply to members of Government.

**The revised code of ethics and conduct shall:**

- **clarify the implications for members of Government of the current provisions on conflicts of interest;**

The current provisions on conflicts of interest for members of Government are stated in Article 72(1) of Law No. 161/2003 on some measures to ensure transparency in holding of public office, public functions and in the business environment, the prevention and sanctioning of corruption. According to these provisions, members of Government are obliged not to issue an administrative act, to conclude a legal act, to take a decision or participate in decision-making in the exercise of their function, any of which produces a material benefit for themselves, their spouse or their first-degree relatives.

Article 47<sup>8</sup> of Law No. 49/2025 introduces rules to clarify the implications of the abovementioned provisions. As a result, according to paragraphs 1 and 2 of Article 47<sup>8</sup>, members of Government are required to notify in writing and describe their personal interest and to refrain from issuing or participating in the issuance or adoption of administrative acts, from concluding or participating in the conclusion of legal acts that could produce a material benefit for themselves or other specified cases going beyond their spouse and first-degree relatives. Moreover, according to Article 47<sup>8</sup>(3) the notification of personal interest shall be registered within two days of the date of identification and, according to Article 47<sup>8</sup>(4), the list of notifications shall be published on the website of the institution or central public administration authority, respectively on the Government website.

- **extend the definition of conflict of interest beyond the personal financial interests;**

Article 47<sup>8</sup>(1) of Law No. 49/2025 stipulates the specific cases for which the persons concerned by the conflict of interest could obtain a material benefit beyond their personal financial interests, such as for any private-law entity in which they pursued their professional activity in the year preceding their appointment or for the association or foundation to which they belong.

Moreover, Article 47<sup>3</sup>(1) of Law No. 49/2025 extends the definition of a gift as any good, benefit or service offered free of charge to members of Government and that can include, beyond gifts of a financial nature, any other non-patrimonial service or benefit.

- **introduce a requirement of ad hoc disclosure when a conflict of interest occurs;**

Article 47<sup>8</sup>(1) of Law No. 49/2025 requires members of Government to notify their personal interest to the Prime Minister, the minister or hierarchical superior and to refrain from issuing or participating in the issuance or adoption of administrative acts, from concluding or participating in the conclusion of legal acts that could produce a material benefit for themselves or for other persons or entities related to them. Paragraph 2 provides that the notification shall be made in writing, shall include a description of the personal interest that the person has in the matter and the designated alternate. Paragraph 3 establishes that the notification shall be registered within two days from the date of identification of the personal interest.

- **establish a set of restrictions concerning gifts, hospitality, favours and other benefits for Government members;**

Section one of Law No. 49/2025 regulates the rules of ethics and conduct regarding gifts. Article 47<sup>3</sup>(1) defines gifts as any goods, benefits or services given free of charge to the members of Government and that include hospitality, favours and other benefits. Article 47<sup>4</sup> establishes the prohibition for members of Government from requesting or accepting gifts from individuals, legal entities and organizations which have contractual agreements with the institutions they represent, which require authorizations, permits, licenses from those respective institutions, which have interests in promoting individual administrative acts regulated by those institutions or which are potential beneficiaries of public procurement procedures, contracts or financing agreements provided by those institutions. The same article regulates a series of exceptions when members of Government can accept and keep low value gifts. Articles 47<sup>5</sup> and 47<sup>6</sup> regulate the return of gifts and the conditions for keeping gifts received during official activities.

- **introduce rules on how members of Government engage with lobbyists and other third parties.**

Article 47<sup>11</sup> of Law No. 49/2025 establishes rules on how members of Government engage with third parties. The definition of third parties in paragraph 2 includes lobbyists. Paragraphs 3 and 4 establish the requirements for members of Government to register themselves on the online public platform RUTI (*Registrul Unic al Transparenței Intereselor* - Single Registry of Transparency of Interests) and publish official meetings with third parties on this platform two days prior to the meeting, including information on the names of participating persons and/or entities, date, place and scope of the meeting. Paragraph 5 provides that five working days after the meeting, the information on the meeting that took place shall be complemented with the main topics of discussion and their conclusions, as appropriate. Paragraph 6 states that members of Government may request the registration of third parties in the online platform. Paragraph 7 lists the exceptions to the publication of official meetings, which concern fundamental rights of natural persons, legal rights of parties involved in administrative or judicial trials, foreign policy issues, communications of trade unions on labour relations, and information regulated by the legislation on free access to public information. Paragraph 8 states the requirement to publish meetings with third parties that occurred without prior planning within two days of their occurrence.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Target:** RO-C[C14]-R[R8.0]-T[435] Centralised procurement bodies (CPBs) are used by local authorities

**Related Measure:** RO-C[C14]-R[R8.0] Modernising and streamlining the national public procurement system

**Quantitative Indicator:** Number of centralised procurement bodies (CPBs) for local authorities

**Baseline:** 3

**Target:** 7

**Time:** Q4 2025

### 1. Context:

The objective of this reform is to increase the efficiency, transparency and functionality of the public procurement system and support the application of strategic procurement policies. This measure consists in updating the legislative framework, increasing institutional capacity, adding new features to digital tools and increasing the interoperability for public procurement processes.

Target 435 concerns the establishment of four additional centralised procurement bodies (CPBs) for local authorities, provided with resources and know-how.

Target 435 is the second step of the reform, it follows the completion of milestone 433, related to the entry into force of amendments to the national legislation on remedies (Law No. 101/2016), and it is accompanied in this payment request by milestone 437, related to the interconnection and interoperability of the Public Procurement Electronic System (SEAP) with other databases.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                     | Short description                                                                                                               |
|---|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                               | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled. |
| 2 | Copy of Decision No. 116 of 26 April 2023 of Bihor County Council approving the organigramme, the establishment plan and the rules of organisation and functioning of the specialised apparatus of Bihor County Council. | Decision of Bihor County Council establishing the CPB within the county council.                                                |
| 3 | Copy of Decision No. 195 of 30 May 2023 of Brasov County Council approving the establishment of a CPB for Brasov County through the                                                                                      | Decision of Brasov County Council establishing the CPB within the county council.                                               |

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|    | Brasov County Council.                                                                                                                                                                                  |                                                                                                                                                                                                                          |
| 4  | Copy of Decision No. 581 of 12 July 2023 of Cluj-Napoca Local Council regarding organisational and operating measures for the Cluj-Napoca City Hall.                                                    | Decision of Cluj-Napoca Local Council setting up the CPB within the local authority.                                                                                                                                     |
| 5  | Copy of Decision No. 186 of 7 September 2023 of Bucharest Sector 6 City Hall Local Council granting Bucharest Sector 6 City Hall the role of CPB and approving the specific operating rules of the CPB. | Decision of Bucharest Sector 6 City Hall Local Council granting Bucharest Sector 6 City Hall the status of CPB and approving the specific operating rules of the CPB.                                                    |
| 6  | Copy of Decision No. 201 of 27 July 2023 of Bihor County Council approving the specific operating rules of the CPB.                                                                                     | Decision setting up the specific operating rules of the Bihor County CPB.                                                                                                                                                |
| 7  | Copy of Decision No. 262 of 27 July 2023 of Brasov County Council approving the specific operating rules of the CPB within the Brasov County Council.                                                   | Decision setting up the specific operating rules of the Brasov County CPB.                                                                                                                                               |
| 8  | Copy of Decision No. 705 of 7 September 2023 of Cluj-Napoca City Hall approving the specific operating rules of the CPB.                                                                                | Decision setting up the specific operating rules of the Cluj-Napoca CPB.                                                                                                                                                 |
| 9  | Copy of the establishment plan for posts in the Bucharest Sector 6 City Hall.                                                                                                                           | Establishment plan allocating 3 posts to the Bucharest Sector 6 CPB. The document is dated 4 July 2024.                                                                                                                  |
| 10 | Copy of Inventory sheets for CPB Bihor.                                                                                                                                                                 | Inventory sheets of CPB Bihor listing one office, one desktop and one laptop allocated to the CPB personnel. The document is dated November 2025.                                                                        |
| 11 | Copy of Inventory sheets for CPB Brasov.                                                                                                                                                                | Inventory sheets of CPB Brasov listing two laptops allocated to the CPB personnel. The document is dated 7 August 2024.                                                                                                  |
| 12 | Copy of Inventory sheets for CPB Cluj-Napoca.                                                                                                                                                           | Inventory sheets of CPB Cluj-Napoca listing two laptops allocated to the CPB personnel. The document is dated 3 December 2025.                                                                                           |
| 13 | Copy of Inventory sheets for CPB Bucharest Sector 6.                                                                                                                                                    | Inventory sheets of CPB Bucharest Sector 6 listing one laptop, one desktop and office furniture (such as four offices, four chairs, two cabinets) allocated to the CPB personnel. The document is dated 20 January 2026. |
| 14 | Progress report No. 5 and final report on the Agreement for Support Services between the National Agency for Public                                                                                     | Final Report, including progress report no.5, issued under the technical assistance provided by EIB to ANAP. The report details the activities carried out by EIB and ANAP between 28 September 2024 and                 |

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|  | Procurement (ANAP) and the European Investment Bank (EIB). | 21 January 2025 and summarises the activities, the deliverables (Annex 1) and transfer of know-how (Annex 3) carried out from October 2022 until December 2024. |
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### 3. Analysis:

The justification and substantiating evidence provided by the Romania authorities cover all constitutive elements of the target.

#### **Four additional CPBs for local authorities shall be configured.**

Compared to the baseline of three CPBs, four additional CPBs have been established in 2023 based on decisions adopted by County or Local Councils:

- One CPB has been established as a service within the Economic Department of Bihor County Council (Article 1 of Evidence No. 2) with one corresponding post allocated in the establishment plan (Annex 2 of Evidence No. 2);
- One CPB has been established as a service within the Purchasing and Contracting Department of Brasov County Council (Article 1 of Evidence No. 3) with three corresponding posts allocated in the establishment plan (Annex 1 of Evidence No. 3);
- One CPB has been established as a service within the Technical Department of Cluj-Napoca City Hall (Article 1 of Evidence No. 4) with three corresponding posts allocated in the establishment plan (annex 2 of Evidence No. 4);
- One CPB has been established as a service within the Public Procurement Service of Bucharest Sector 6 City Hall (Article 1 of Evidence No. 5) with three corresponding posts allocated in the establishment plan (Evidence No. 9).

Specific operating rules were adopted for the CPB of Bihor County (Article 1 of Evidence No. 6), Brasov County (Article 1 of Evidence No. 7), Cluj-Napoca City Hall (Article 1 of Evidence No. 8) and Bucharest Sector 6 City Hall (Article 2 of Evidence No. 5). The specific operating rules of the four CPBs include provisions on the objectives of the CPB, their roles and attributions, the categories of centralised procurements to be carried out, the list of principal and secondary users of the CPB and the rights, obligations and relations between the CPB and the users during the public procurement procedure.

#### **Four additional CPBs for local authorities shall be provided with resources (such as office supplies, IT equipment and communication services).**

The four additional CPBs have been provided with resources such as office furniture, IT and communication equipment: office furniture and IT equipment for CPB Bihor (Evidence No. 10), IT equipment for CPB Brasov (Evidence No. 11), IT equipment for CPB Cluj-Napoca (Evidence No. 12) and office furniture and IT equipment for CPB Bucharest Sector 6 (Evidence No. 13).

#### **Four additional CPBs for local authorities shall be provided with know-how.**

The four additional CPBs have been provided with know-how through activities such as:

- One training session of five days on centralized public procurement for the staff of the four additional CPBs (Evidence No. 14, pages 65 and 68);

- Four seminars of one day each organised for the seven local CPBs facilitating the exchange of good practices and opinions on the main challenges encountered in centralized public procurement activity (Evidence No. 14, pages 65 and 69 to 72);
- A set of documents defining and supporting the functioning of each of the four CPBs: the detailed plans for the establishment and operationalization, the general annual plan of activities, the manual of organizational performance indicators, the guide for monitoring and evaluating the activity and performance, the detailed description of workflows both internally and with regard to users and economic operators, the description of the mechanism of financial operations, training needs analysis and training plan (Evidence No. 14, pages 68 and 69);
- A study visit of five days to Vienna for the staff of the four additional CPBs to exchange with the Austrian authorities on centralised public procurement institutional framework and approaches (Evidence No. 14, pages 14 and 15).

ANAP has published on its website a set of standardised documentation for CPBs covering centralised procurement for products and services such as fuel, office supplies and stationery, cleaning products, vehicle maintenance service, indoor cleaning services, hardware, electricity supply, courier services, food products, and green space maintenance services. The standardised documentation includes, among others, templates for tender specifications, for instructions for the tenderers and for framework contracts. The Commission services accessed the link provided by the authorities on 12 January 2026 to verify that the documents published corresponded to those transmitted as evidence. This check was completed successfully, confirming that the corresponding evidence has been made public.

#### **CPBs are used by local authorities**

The specific operating rules of the four additional CPBs list the local authorities identified as principal users of CPB Bihor (Article 7.1 of Evidence No. 6), CPB Brasov (Article 7.1 of Evidence No. 7), CPB Cluj-Napoca (Article 7.1 of Evidence No. 8) and CPB Bucharest Sector 6 (Article 7.1 of Evidence No. 5). Moreover, the same rules introduce the obligation of the principal users identified for each of the four CPBs to buy all the categories of centralised purchases through the CPB (Article 7.3 of Evidence Nos 5, 6, 7, 8), including centralised purchases of cleaning products, office supplies and stationery, or fuel (Article 6 of Evidence Nos. 5, 6, 7, 8).

The four CPBs launched and managed each two centralized procurement procedures for framework contracts (Evidence No. 14, pages 8 and 9):

- CPB Bihor launched one procurement procedure for cleaning products, following which two framework contracts were signed, and one procurement procedure for office supplies and stationery, following which one framework contract was signed;
- CPB Brasov launched one procurement procedure for cleaning products, following which two framework contracts were signed, and one procurement procedure for office supplies and stationery, following which one framework contract was signed;
- CPB Cluj-Napoca launched one procurement procedure for cleaning products, following which two framework contracts were signed, and one procurement procedure for fuel, following which one framework contract was signed;
- CPB Bucharest Sector 6 launched one procurement procedure for fuel, which was cancelled due to non-compliance of the economic operator with the award documentation, and one procurement procedure for vehicle maintenance service, which was cancelled due to lack of offers.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C14]-R[R8.0]-M[437] The Public Procurement Electronic System (SEAP) system is interconnected and interoperable with other databases

**Related Measure:** RO-C[C14]-R[R8.0] Modernising and streamlining the national public procurement system

**Qualitative Indicator:** SEAP system interconnected and interoperable

**Time:** Q2 2026

### 1. Context:

The objective of this reform is to increase the efficiency, transparency and functionality of the public procurement system and support the application of strategic procurement policies. The measure consists in updating the legislative framework, increasing institutional capacity, adding new features to digital tools and increasing interoperability of the public procurement process.

Milestone 437 concerns the interconnection and interoperability of the Public Procurement Electronic System (SEAP) with other national databases and the deployment of advanced digital functionalities.

Milestone 437 is the third and last milestone or target of the reform, and it follows the completion of milestone 433 and target 435, related to the entry into force of amendments to the national legislation on remedies (Law No. 101/2016) and the use and strengthening of centralised procurement bodies (CPBs) at local level.

### 2. Evidence provided:

|   | Name of the evidence                                      | Short description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| 1 | Cover Note (including Appendix No. 1 and Appendix No. 2). | <p>Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.</p> <p>Appendix No. 1 contains technical evidence of the interconnections and interoperability of SEAP with other external systems, namely production-level log extracts for the interconnections and interoperability, and screenshots showing real transactions between SEAP and external institutional systems, with the stated purpose of evidencing actual system-to-system exchanges.</p> <p>Appendix No. 2 contains screenshots of SEAP public pages, notices, user manuals and guides showing that the following functionalities were implemented and made available in SEAP on 26 September 2025:</p> |

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|   |                                                                                                                                                                | electronic forms in the bid evaluation process, extension of the dynamic purchasing system, and electronic contract, electronic invoice and electronic payment. It also points to the relevant public SEAP news items and user manual sections for contracting authorities and suppliers that document these functionalities.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| 2 | SEAP Interconnection – Software Requirements Specifications.                                                                                                   | The document issued by S.C. ALTIMATE S.A. contains the technical requirements formulated by the S.C. ALTIMATE S.A. company, contracted on 21 February 2023 by the Authority for the Digitalisation of Romania for making the Public Procurement Electronic System (SEAP) interoperable with other national public databases that are operating public procurement processes.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 3 | Copy of the Reception Certificate No. SEAP-PNRR-540/2024 for the development of services for the Public Procurement Electronic System financed under the NRRP. | The document, issued by the reception committee for goods and services of the Application Support Department established by the President of the Authority for the Digitalisation of Romania, formally records the verification, reception and acceptance by the Authority for the Digitalisation of Romania of the development services delivered by the S.C. ALTIMATE S.A. company for the Public Procurement Electronic System (SEAP), confirming its interconnection and interoperability functionalities with the information systems operated by the National Agency for Public Procurement (ANAP), the National Integrity Agency, the National Board for Complaints, the Romanian Criminal Records Information System operated by the Ministry of Justice, the Virtual Private Space operated by the National Agency for Fiscal Administration, and the MySMIS information system used for the management of structural and cohesion. |
| 4 | Copy of the Acceptance Certificate No. SEAP-PNRR-5372024.                                                                                                      | The document issued by the project implementation team of the Romanian Authority for the Digitalisation of Romania (formally appointed by the President of the Authority for the Digitalisation of Romania), acting as beneficiary, formally records the acceptance by the Authority for the Digitalisation of Romania of the interconnection and interoperability services delivered by the S.C. ALTIMATE S.A. company for the interconnection and interoperability of SEAP with the National Agency for Public Procurement (ANAP), the National Integrity Agency, the National Board for Complaints, the Romanian Criminal Records Information System operated by the Ministry of Justice, the Virtual                                                                                                                                                                                                                                     |

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|    |                                                                                                                | Private Space operated by the National Agency for Fiscal Administration, and the MySMIS information system used for the management of structural and cohesion funds.                                                                                                       |
| 5  | Interconnection and Interoperability Report (between SEAP and the National Trade Register Office).             | Document issued in September 2024 by the Authority for the Digitalisation of Romania and the National Trade Register Office, formally confirming that SEAP is interconnected and interoperable with the IT system of the National Trade Register Office (ONRC).            |
| 6  | Interconnection and Interoperability Report (between SEAP and the National Integrity Agency).                  | Document issued in September 2024 and October 2024 respectively by the Authority for the Digitalisation of Romania and National Integrity Agency (ANI), formally confirming that SEAP is interconnected and interoperable with ANI's system.                               |
| 7  | Interconnection SEAP – ANI.                                                                                    | The document contains screenshots taken from the operational online environment demonstrating the operational interconnection between SEAP and ANI's IT system.                                                                                                            |
| 8  | Interconnection and Interoperability Report (between SEAP and the National Agency for Fiscal Administration).  | Document issued in September 2024 and December 2024 respectively by the Authority for the Digitalisation of Romania and the National Agency for Fiscal Administration (ANAF), formally confirming that SEAP is interconnected and interoperable with the ANAF's IT system. |
| 9  | Interconnection and Interoperability Report (between SEAP and the National Agency for Public Procurement).     | Document issued in September 2024 and October 2024 respectively by the Authority for the Digitalisation of Romania and the National Agency for Public Procurement (ANAP), formally confirming that SEAP is interconnected and interoperable with the ANAP's IT system.     |
| 10 | Interconnection and Interoperability Report (between SEAP and the National Council for Complaints Settlement). | Document issued in September 2024 by the Authority for the Digitalisation of Romania and the National Council for Complaints Settlement (CNSC), formally confirming that SEAP is interconnected and interoperable with the CNSC's system.                                  |
| 11 | Interconnection and Interoperability Report (between SEAP and the Ministry of Internal Affairs).               | Document issued in October 2024 by the Authority for the Digitalisation of Romania and the Ministry of Internal Affairs (MAI), formally confirming that SEAP is interconnected and interoperable with the MAI's system.                                                    |
| 12 | Interconnection SEAP - MAI.                                                                                    | The document contains screenshots taken from the operational online environment demonstrating the operational interconnection between SEAP and MAI's systems.                                                                                                              |
| 13 | Copy of the Final Progress Report No. SEAP-PNRR 722 /2025 regarding SEAP Functional                            | The document issued by the project coordinator of the SEAP functionalities' extension, presents the completion, testing and online deployment (as of 26                                                                                                                    |

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|    | Developments Financed through NRRP – Q3 2025.                                                                                                                   | September 2025) of the new functionalities in SEAP, including electronic evaluation forms, extended functionalities for the dynamic purchasing system, electronic contracts, electronic invoicing, and electronic payments.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 14 | Copy of Certificate of Acceptance No. SEAP-PNRR-723/.2025 for the development of services for the Public Procurement Electronic System financed under the NRRP. | The document issued by the project implementation team of the Romanian Authority for the Digitalisation of Romania (formally appointed by the President of the Authority for the Digitalisation of Romania), acting as beneficiary, formally records the acceptance by the Authority for the Digitalisation of Romania, following technical verification and testing, of the development services delivered for SEAP, adding to SEAP three new functionalities (1. Development and implementation of electronic forms in the process of evaluating bids within public procurement procedures; 2. Extension of the functionalities of the dynamic public procurement system; and 3. Electronic contract, electronic invoice, electronic payment) that are confirmed as implemented after being tested and validated as compliant with the contractual requirements. |
| 15 | Copy of the Reception Certificate No. SEAP-PNRR-724/.2025 for the development of services for the Public Procurement Electronic System financed under the NRRP. | The document issued by the reception committee for goods and services of the Application Support Department established by the President of the Authority for the Digitalisation of Romania, records the formal reception and administrative acceptance by the Authority for the Digitalisation of Romania of the services delivered for adding to SEAP three new functionalities (1. Development and implementation of electronic forms in the process of evaluating bids within public procurement procedures; 2. Extension of the functionalities of the dynamic public procurement system; and 3. Electronic contract, electronic invoice, electronic payment) that are confirmed as being effectively deployed in the production environment according to the technical requirements set in the contractual agreement.                                        |
| 16 | Service Provision Contract for the Development of SEAP Functionalities Financed through the NRRP No.21/2023.                                                    | Service contract between the Authority for the Digitalisation of Romania and S.C. ALTIMATE S.A. for the development of new functionalities for the Public Procurement Electronic System (SEAP), including interoperability functionalities with other databases.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 17 | Implementation of electronic forms, extension of SEAP functionalities - Software Requirements Specification. Final                                              | Document issued by S.C. ALTIMATE S.A. company (acting as contractor under the service contract concluded with the Romanian Agency for the Digitalization of Romania (ADR)) in April 2025, and                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |

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|    | iteration 2025.                                                                                                             | formally approved by ADR as contracting authority, defining the scope, objectives, and detailed functional and non-functional requirements for the development and enhancement of the Romanian Public Procurement Electronic System (SEAP). The document sets out the functionalities to be implemented under the project financed through the National Recovery and Resilience Plan, namely: the development and integration of standardised electronic forms for the evaluation of tenders; the extension of the Dynamic Purchasing System through electronic catalogues and structured data handling; and the implementation and extension of end-to-end digital procurement components, including electronic contracts, integration with the national e-invoicing system (e-Factura) via system-to-system interfaces, and online payments. |
| 18 | User Guide for SEAP for the Evaluation of Public Procurement Procedures Using Standard Forms under ANAP Order No.1170/2021. | The document is a user guide for the SEAP platform detailing the implementation and practical use of standardised electronic forms (e-forms) made available through the official SEAP platform (at the <a href="https://www.e-licitatie.ro/pub/archive/manual-and-video/100001043/0">https://www.e-licitatie.ro/pub/archive/manual-and-video/100001043/0</a> link), under the responsibility of the Romanian Authority for the Digitalization of Romania (ADR), which administers and operates the system.                                                                                                                                                                                                                                                                                                                                     |
| 19 | Electronic contracts.                                                                                                       | The document is a user guide issued by ADR detailing how SEAP supports the creation, management and execution of electronic contracts through structured templates, automated data population and integrated workflows. It explains end-to-end functionalities, including validation, version control, electronic signature and full traceability, across all types of procurement procedures.                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 20 | Electronic invoice and online payment.                                                                                      | The document is a user guide issued by ADR describing how SEAP enables electronic invoicing (e-invoicing) and online payment (e-payment) functionalities, including the generation, import, management and visualization of e-invoices, as well as their association with procurement procedures and e-contracts. It also explains the integrated workflow for processing and paying invoices through system-to-system interaction with the national e-invoice system and a payment processor, ensuring traceability and full lifecycle management of financial transactions within SEAP                                                                                                                                                                                                                                                       |
| 21 | Dynamic Purchasing System –                                                                                                 | The document is a user guide issued for bidders by                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

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|    | Bidder.                                                           | ADR, explaining how economic operators search and view dynamic purchasing systems, submit participation requests, complete the European Single Procurement Document, respond to invitations, submit offers, and use structured electronic catalogues for pricing and encrypted bid submission.                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 22 | Dynamic Purchasing System – Contracting Authority.                | The document is a user guide issued for contracting authorities by ADR, explaining how the authority sets up and publishes the dynamic purchasing system, prepares the procurement documentation, configures electronic catalogues and lots, manages candidates and additional buyers, launches individual purchases within the system, evaluates offers and awards contracts.                                                                                                                                                                                                                                                                                                                                          |
| 23 | Procedures – Contracting Authority.                               | The document is a user guide issued for contracting authorities by ADR explaining how contracting authorities manage public procurement procedures within SEAP, covering the full lifecycle from procedure initiation to contract award, including configuration of procedures and lots, management of evaluation committees, handling of procedural states (suspension, cancellation, extension), and the complete evaluation process through structured electronic forms (including the European Single Procurement Document, as well as technical and financial assessment), together with deliberation, communication, clarification requests and the generation of official documents such as reports and minutes. |
| 24 | Procedures – Bidder.                                              | The document is a user guide issued for bidders by ADR, explaining how economic operators interact with SEAP throughout the public procurement procedures, including accessing and enrolling in procedures and lots, submitting participation requests and bids through structured electronic forms, providing qualification, technical and financial documentation (including the European Single Procurement Document), responding to clarification requests, and participating in evaluation-related interactions.                                                                                                                                                                                                   |
| 25 | Integrity forms queried from the National Integrity Agency (ANI). | The document is an extract in Excel format of the dataset containing structured records of integrity forms queried in the year 2025 within the SEAP system in relation to the National Integrity Agency (ANI).                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 26 | Integrity warnings sent by the National Integrity Agency (ANI).   | The document is an extract in Excel format dataset containing records of integrity warnings issued in the                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

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|    |                      | year 2025 by the National Integrity Agency (ANI) in relation to public procurement procedures processed through SEAP.                                                                                                                                                                                                                                                                              |
| 27 | 2024-02-27_ANAF.txt. | The document is a system log file issued on 27 February 2024 recording the startup and runtime activity of an ANAF-related service integrated with SEAP. It includes entries generated by Microsoft hosting components, showing application initialization, hosting environment configuration and HTTP requests. The log shows interconnection and interoperability between SEAP and ANAF systems. |
| 28 | 2024-03-26_MIPE.txt. | The document is a system log file capturing runtime interactions on 26 March 2024 between SEAP and the system of the Ministry of Investments and European Projects (MIPE). It shows Application Programming Interface (API) calls to endpoints related to procurement procedures, including request routing and controller execution.                                                              |
| 29 | 2024-04-22_MIPE.txt. | The document contains MIPE system logs from 22 April 2024, showing API request handling and backend processing within the SEAP platform. It includes details on hosting environment setup, request routing, and execution of procurement-related queries, showing the interconnection and interoperability between the SEAP and MIPE systems.                                                      |
| 30 | 2025-01-08_MAI.txt.  | The document is a log file records interactions between SEAP and the Ministry of Internal Affairs (MAI) system from 8 January 2025. It shows API calls related to document submission, including request processing and controller execution. The document shows automated exchange of documents and validation processes between SEAP and MAI systems.                                            |
| 31 | 2025-04-02_MAI.txt.  | The document contains system logs of MAI from 2 April 2025, reflecting continued operation of document submission services via API endpoints. It includes request traces, middleware processing, and controller actions.                                                                                                                                                                           |
| 32 | 2025-06-30_MAI.txt.  | The document contains system logs of MAI from 30 June 2025, showing repeated API calls for document submission and processing                                                                                                                                                                                                                                                                      |
| 33 | 2025-12-01_ANAP.txt. | The document contains a system log from 1 December 2025 showing interconnection and interoperability between SEAP and the National Agency for Public Procurement (ANAP). It includes API calls related to publication status of procurement notices (eForms-related processes).                                                                                                                    |

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| 34 | 2025-12-01_CNCS.txt.    | The document is a log file from 1 December 2025 recording interactions with the National Council for Solving Complaints (CNSC). It shows API requests for submitting decisions, along with routing and execution details.                                                                                                                                                                                                                                       |
| 35 | 2025-12-02_ANAP.txt.    | The document is a log file from 2 December 2025 related to the ANAP system, showing API communication for procurement notice publication status.                                                                                                                                                                                                                                                                                                                |
| 36 | Log_API_CALL_ANAF.xlsx. | The document is an extract of API call logs from 27 February 2024 between SEAP and the National Agency for Fiscal Administration (ANAF). It contains fields such as API call ID, system and operation identifiers, document IDs, timestamps, and request/response payloads.                                                                                                                                                                                     |
| 37 | Log_API_CALL_ANAP.xlsx. | The document contains records of API interactions between SEAP and ANAP from 2 December 2025. It includes multiple entries capturing request and response messages, with fields such as sender ("ANAP" / "SEAP"), publication request data, and status-related information. The document shows automated exchange of procurement notice data, supporting the handling and validation of standardised electronic forms (eForms) and their publication workflows. |
| 38 | Log_API_CALL_CNCS.xlsx. | This document contains API logs reflecting data exchange between SEAP and CNSC from the period 20–24 November 2025. It includes records of submitted decisions and appeals, along with timestamps and request/response structures.                                                                                                                                                                                                                              |
| 39 | Log_API_CALL_MAI.xlsx.  | The document contains API call logs between SEAP and MAI from September 2024 to June 2025. It shows repeated document submission operations, including timestamps, identifiers, and request/response payloads involving document uploads.                                                                                                                                                                                                                       |
| 40 | Log_API_CALL_MIPE.xlsx. | The document contains API call logs between SEAP and MIPE from the period March-April 2024. The logs include procurement-related requests including notice numbers, timestamps, and response messages.                                                                                                                                                                                                                                                          |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

**The Public Procurement Electronic System (SEAP) system shall be interconnected and interoperable with other databases, for example: National Trade Register Office, National Integrity Agency, National Agency for Fiscal Administration, National Agency for Public Procurement, National Board for Complaints, Ministry of Interior, Ministry of Justice.**

The Romanian Agency for the Digitalization of Romania has concluded a service contract (Evidence No. 16) with a company that has provided the Software Requirements Specification (Evidence No. 2) describing the scope, objectives and technical requirements for interconnecting SEAP with external systems operated by, for example, the National Integrity Agency, the National Agency for Fiscal Administration, the National Agency for Public Procurement, the National Board for Complaints, the Ministry of Interior and the Ministry of Justice. This document establishes the functional and technical framework for interoperability, including the types of data exchanged and the integration logic supporting procurement procedures and controls.

The operational implementation of the interconnection and interoperability of SEAP, managed by the National Agency for Public Acquisitions (ANAP) with other external databases is proved by the Reception Certificate, issued by the Romanian Agency for the Digitalization of Romania (the governmental institution responsible at national level for the development, administration and technical management of all digital public infrastructure), which formally records the verification, reception and acceptance of the interconnection and interoperability functionalities for all interconnections (Evidence No. 3) and the Certificate of Acceptance for all interconnections (Evidence No. 4), which attest that the interconnection and interoperability services foreseen for the institutions mentioned as examples under the milestone description were delivered, tested and accepted in accordance with the contractual requirements (Evidence No. 2). The interconnection and interoperability is further proved through a set of bilateral interconnection and interoperability completion reports signed between the Authority for the Digitalisation of Romania and the relevant institutions, namely: the National Trade Register Office (Evidence No. 5), the National Integrity Agency (Evidence No.6), the National Agency for Fiscal Administration (Evidence No. 8), the National Agency for Public Procurement (Evidence No. 9), the National Board for Complaints (Evidence No.10) and the Ministry of Interior (Evidence No. 11). These reports confirm that SEAP is interconnected and interoperable with other external databases through a system-to-system data exchange and functional integration of procurement procedures such as retrieval and validation of data. This is further proved through screenshots from the online environment for the National Integrity Agency (Evidence No. 7) and the Ministry of Interior (Evidence No. 12), which show the results of system-to-system data exchanges being used within procurement workflows.

The interconnection and interoperability of SEAP is further substantiated by the technical documentation contained in Appendix No. 1 (Evidence No. 1), which provides examples of system-generated logs and screenshots showing the operational online environment of the interconnections and interoperability in real conditions. Annex No. 1 includes production-level logs for the interconnection and interoperability of SEAP with with the system operated by ANAF – PATRIMVEN application (pages 15-18); with the system operated by the Ministry of Interior (pages 18-19); and screenshots of the interconnections and interoperability with the system of the National Council for Complaints Settlement (CNSC) (pages 21-22). The logs included as examples contain timestamps, transaction identifiers, file references and system responses showing that the interconnections and the interoperability of SEAP with other external systems is used for automated data exchange and processing within procurement procedures.

The interconnection and interoperability of SEAP with external systems is further substantiated by system logs (Evidence Nos. 27 – 35) and structured API call records (Evidence No. 36-40), which show automated data exchange in the online production environment. In addition, interconnection and interoperability with the National Integrity Agency (ANI) with SEAP is evidenced through datasets on integrity forms queried (Evidence No. 25) and integrity warnings transmitted within

SEAP (Evidence No. 26), which show structured retrieval and processing of integrity-related data in procurement procedures.

### **SEAP shall include functionalities for the use of standard EU e-forms**

The “Implementation of electronic forms, extension of SEAP functionalities – Software Requirements Specification – Final iteration 2025” document (Evidence No. 17) shows the way in which SEAP includes functionalities enabling the use of standard EU e-forms. The functional specifications include details on the development of structured, standardised electronic forms for the evaluation of tenders as well as provisions ensuring that procurement data is captured, validated and processed in a standardised format corresponding to EU e-forms requirements (pages 8-12). The technical specification shows the integration of the standard EU e-forms into end-to-end procurement workflows, including submission, evaluation and processing stages (pages 25–32), demonstrating their operational use within SEAP.

The “User Guide for SEAP for the Evaluation of Public Procurement Procedures Using Standard Forms” document (Evidence No. 18) details how SEAP has been updated to support a fully structured and digital evaluation process, guiding both contracting authorities and economic operators in completing, submitting and assessing procurement data through standard EU e-forms. The guide describes the functionalities enabling structured data entry, automated validation, and step-by-step evaluation workflows, including the assessment of the European Single Procurement Document (a particular standard EU-form).

The screenshot included in the Appendix 2 (Evidence No. 1, page 30) displays the Online Evaluation Forms module embedded in the SEAP workflow, where standard EU e-forms are directly accessible and organised by evaluation stages, including the European Single Procurement Document (DUAE – self-declaration regarding exclusion grounds and selection criteria) which is a particular standard EU e-form. The SEAP online platform screenshot’s left-side navigation bar shows how procurement evaluators interact with the standard EU e-forms and the explanatory panel indicates that these forms are automatically populated with data already available in the system (including data submitted by bidders and information from procurement notices).

Furthermore, the Procedures for the Contracting Authority (Evidence No. 23) and the Procedures for Bidder (Evidence No. 24) show that both contracting authorities and economic operators interact with SEAP through standard EU e-forms for the submission and evaluation of procurement data, including the completion and assessment of the European Single Procurement Document.

### **SEAP shall include functionalities for the electronic tender evaluation**

The Final Progress Report (Evidence No. 13) provided evidence for the implementation of the electronic tender evaluation functionalities within SEAP by presenting the new functionalities in SEAP, including electronic evaluation forms, extended functionalities for the dynamic purchasing system, electronic contracts, electronic invoicing, and electronic payments. These functionalities are operational, as formally confirmed through the Certificate of Acceptance (Evidence No.14) and the Reception Minute (Evidence No.15), which attest that the electronic evaluation functionalities were completed, tested and functional in the online environment.

The Procedures for the Contracting Authority (Evidence No. 23) and the Procedures for Bidder (Evidence No. 24) explain the practical implementation of electronic tender evaluation functionalities within SEAP. These documents show how the electronic tender evaluation process is fully integrated into the SEAP system through structured electronic workflows, covering all stages from submission of candidatures and offers to qualification, technical and financial evaluation, and final deliberation. Evidence No. 23 and Evidence No. 24 explain the use of standard EU e-forms for

the assessment of the European Single Procurement Document (DUAE – self-declaration regarding exclusion grounds and selection criteria), as well as the scoring and verification of technical and financial offers, all performed directly within SEAP. They also show the system functionalities for managing evaluation committees, assigning roles, handling clarification requests, recording evaluation decisions, and generating official evaluation outputs (such as reports and minutes), while ensuring traceability and control of procedural stages and statuses. Through these functionalities SEAP provides a complete, end-to-end electronic tender evaluation system, where all assessment activities are conducted, processed and documented digitally within the system.

**SEAP shall include functionalities for the dynamic purchasing procedures with automated qualification assessment**

The Final Progress Report (Evidence No. 13), the Certificate of Acceptance (Evidence No. 14) and the Reception Minute (Evidence No. 15) proved the inclusion of the extension of the dynamic purchasing system through automated qualification assessment that includes functionalities, such as structured electronic catalogues, predefined participation requirements, document handling at dynamic purchasing system level and reuse of structured data. These automated qualification assessment functionalities enable the automated handling and verification of participant requirements within dynamic purchasing procedures.

The functionalities related to dynamic purchasing procedures with automated qualification assessment are further substantiated by the user guides “Dynamic Purchasing System – Contracting Authority” (Evidence No. 22) and “Dynamic Purchasing System – Bidder” (Evidence No. 21), which explain how these processes are operationalised within SEAP. Evidence No. 21 shows that economic operators submit participation requests through structured e-forms, including the completion of the European Single Procurement Document (DUAE), with the system performing validation checks before submission (pages 5–7). The same document further demonstrates how the system manages candidatures through structured statuses (e.g. submitted, admitted, rejected) and dashboards, enabling automated processing and filtering of applicants (pages 4–5). Evidence No. 22 shows that the contracting authorities define participation requirements and manage candidate evaluation within structured system workflows, including document handling and assessment at the level of the dynamic purchasing system (pages 6–12), as well as the reuse of candidate data across multiple procurements within the system (pages 13–18). In addition, both documents confirm the use of structured electronic catalogues and standardised data inputs for participation and offer submission, supporting automated processing and verification.

**SEAP shall include functionalities for e-contracts, e-invoicing, e-payments and contract management.**

The Final Progress Report (Evidence No. 13) describes the implementation and online deployment of electronic contracts applicable to all procurement procedures, the integration with the national electronic invoicing system, and the availability of electronic payment functionalities, including the association of invoices and payments with contracts. These elements are formally confirmed by the Certificate of Acceptance (Evidence No. 14) and the Reception Minute (Evidence No. 15), which confirm that the corresponding deliverables were completed and confirmed as operational online.

The guide for the use of the electronic contracts (Evidence No. 19) explains the SEAP functionalities by providing a description of how electronic contracts are implemented, used and managed within SEAP. The document shows how SEAP enables the generation of electronic contracts based on predefined structured templates and sections configured within the system (pages 3–6), the automatic pre-population of contract data from award notices (pages 8–9), and the management of contracts through a complete workflow including creation, editing, transmission for validation, and version control between contracting authorities and economic operators (pages 10–13). It also

confirms the availability of functionalities for electronic signature and timestamping of contracts, ensuring their legal validity (page 12), as well as the storage of contract versions and traceability of all actions performed. Moreover, the document shows that these functionalities are applicable across all procurement procedures, including dynamic purchasing systems and direct awards (page 14), and that contracts can be fully managed electronically, including validation, modification and finalisation through system-supported processes (pages 14–16).

The guide for the use of e-invoices and e-payments (Evidence No. 20) explains the SEAP functionalities through which the e-invoices are generated automatically by the SEAP system based on procurement-related data, being processed, signed and time-stamped in digital format in compliance with applicable legislation (page 3). It further shows how the SEAP system enables the import of invoices issued by economic operators for contracts concluded through SEAP, based on secure authentication and system-to-system data exchange (pages 12–13, 16–17). The document also shows functionalities for the association of imported invoices with specific procurement procedures and contracts, ensuring traceability and linkage between financial and contractual data (pages 20–21). In addition, it describes the availability of e-payment functionalities through integration with a payment processor, allowing contracting authorities to execute payments directly within SEAP, with automatic confirmation, recording and visibility of payment status for both parties (pages 7–8, 23–24).

Furthermore, in line with the description of the measure, the measure consists in an **increased interoperability for public procurement processes**.

Through the extension of the SEAP interconnection and interoperability with other external systems - such as the the National Agency for Public Procurement (ANAP), the National Integrity Agency, the National Board for Complaints, the Romanian Criminal Records Information System operated by the Ministry of Justice, the Virtual Private Space operated by the National Agency for Fiscal Administration, and the MySMIS information system used for the management of structural and cohesion funds – a more unified digital environment was created, contributing to an increased interoperability for public procurements processes. The additional functionalities made available in SEAP are facilitating automated interoperability between SEAP and other external systems thus increasing the consistent application of procurement rules and processes.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C14]-R[R9.0]-M[441] Publication of the Monitoring Dashboard listing the financial and non-financial key performance indicators (KPIs) for all state-owned enterprises (SOEs)

**Related Measure:** RO-C[C14]-R[R9.0] Improve the procedural framework for the implementation of corporate governance principles in state-owned enterprises

**Quantitative Indicator:** Monitoring Dashboard published

**Time:** Q2 2023

### 1. Context:

The objective of this reform is to improve the corporate governance of state-owned enterprises (SOEs) in Romania by enforcing OECD standards.

Milestone 441 concerns the publication of the Monitoring Dashboard listing the financial and non-financial key performance indicators (KPIs) for all state-owned enterprises (SOEs).

Milestone 441 is the third step of the reform, and it follows milestones 439 and 440. It is accompanied by milestone 441a related to the preparation and publication by the Agency for Monitoring and Evaluation of State-Owned Enterprises Performance (AMEPIP) of an evaluation of all SOEs, based on which AMEPIP has also to put forward recommendations for the sale or listing of SOEs. Milestones 441 and 441a will be followed by targets 442 and 443, related to, respectively, the reduction in the number of interim appointments to SOEs boards, and the listing/restructuring of SOEs.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                          | Short description                                                                                                           |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                                                                    | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled.  |
| 2 | Copy of Government Decision No. 639/2023, published in the Official Journal No. 697 of 28 July 2023.                                                                                                                                                          | Secondary legislation providing legal framework for the key performance indicators.                                         |
| 3 | Copy of the Order of the President of AMEPIP No. 651/2024 on establishing the minimum KPI thresholds for SOEs active in Romania, and its Annex.<br>The Order entered into force on 4 March 2025, the date of its publication in the Official Journal No. 187. | The Order establishes the legal framework according to which AMEPIP can set the minimum KPI thresholds for each active SOE. |

|   |                                                                                    |                                                                                                                                                              |
|---|------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4 | Copy of the list of public entities engaged in economic activities in Romania.     | The list was issued by the Ministry of Finance on 27 October 2025 and includes all public entities carrying out economic activities in Romania on that date. |
| 5 | Copy of the technical documentation for the programming of the dashboard.          | Document provided by the technical supplier of the dashboard to detail technical specifications of the platform.                                             |
| 6 | Copy of the certificate of completion for the dashboard, signed on 24 October 2023 | Certificate for completion of works signed by the provider and the beneficiary, concluded after at the finalization of the dashboard.                        |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the target.

**The task force shall: - identify standard financial and non-financial key performance indicators (KPIs) for monitoring performance of all state-owned enterprises (SOEs) [...]**

Through Government Emergency Ordinance (GEO) No. 109/2011] Romania established a permanent taskforce for corporate governance policy coordination and monitoring of state-owned enterprises, i.e., the Agency for Monitoring and Evaluation of State-Owned Enterprises Performance (*Agencia pentru Monitorizarea și Evaluarea Performanțelor Întreprinderilor Publice*, "AMEPIP").

Article 4<sup>6</sup> of Government Emergency Ordinance No. 109/2011, provides that the methodology to identify KPIs is approved by the Government, at the proposal of AMEPIP. Building on this framework, Government Decision No. 639/2023 (Evidence No. 2) regarding the methodological norms for the application of GEO No. 109/2011 lays out in Article 2 and Annex 2 the definition and, respectively, listing of a comprehensive set of financial and non-financial performance indicators for all state-owned enterprises at central and local level. Furthermore, Annex 2 provides calculation methodologies to support implementation and ensure consistency/standardization across all categories of indicators.

The standard financial and non-financial categories of key performance indicators for monitoring performance of all state-owned enterprises, as listed in Annex 2, are:

- Financial: performance, profitability, financing, and level of investment.
- Non-financial: impact on environment, employees, clients, corporate governance, innovation, and market share.
- Non-commercial: gender-equality and employment opportunities.

According to Article 25 of Government Decision No. 639/2023 (Evidence No. 2) and in line with GEO No. 109/2011 on corporate governance of public enterprises, AMEPIP identifies and establishes the reporting obligations for state-owned enterprises, following consultations with the public tutelary authorities, through an Order of the President (Evidence No. 3).

**[...] - endorse the financial and non - financial KPIs for all SOEs [...]**

According to the Order of the AMEPIP President No. 651/2024 (Evidence No. 3), AMEPIP approved the financial and non-financial performance indicators for all SOEs by means of the Order of the AMEPIP President No. 651/2024 (Evidence No. 3, Article 2), depending on their field of activity and

particularities, in line with the legal framework on corporate governance of state-owned enterprises. These indicators are listed in Articles 8(2), 8(3), and Annexes 2a and 2b of Government Decision No. 639/2023 (Evidence No. 2).

**[...] publish a Monitoring Dashboard for reporting and monitoring yearly progress in achieving KPIs for all SOEs. Publication of the Monitoring Dashboard listing the financial and non - financial key performance indicators (KPIs) for all state - owned enterprises (SOEs)**

The Commission services accessed the link provided by the authorities on 24 April to verify compliance with the milestone requirements, namely that the dashboard for reporting and monitoring yearly progress was published. This check was completed successfully, confirming that the corresponding information has been made public. In particular, the Dashboard publicly displays financial and non-financial performance indicators to support reporting and monitor annual progress towards key performance indicators achievement across all SOEs. Its main functions include:

- Listing financial indicators, including those related to operational performance, profitability, financing, and investment.
- Listing non-financial indicators including those related to environment, employees, clients, corporate governance, innovation, and market share.
- Presenting non-commercial indicators, included in categories such as gender equality, and employment opportunities.
- Providing company rankings based on performance indicators and by tutelary authorities.
- Enabling comparisons across indicators.

The Romanian authorities provided the descriptive technical documentation of the dashboard (Evidence No. 5), issued by the service provider. This document presents details on the platform architecture, the data base model, the information/update process, and calculation protocols for the approved indicators.

According to this document, information on achieved financial indicators is collected from the Ministry of Finance and automatically uploaded in the dashboard. For non-financial indicators, AMEPIP has implemented an electronic reporting system through which SOEs submit relevant data, facilitating structured data collection, improving comparability, and strengthening the overall monitoring and evaluation process.

Furthermore, according to the Certificate of Reception of Works (Evidence No. 6) concluded between the provider of the dashboard and the beneficiary, the dashboard was programmed/finalized, configured, and deployed in line with the requirements of milestone 441 from both a technical and functional perspective being compliant with the requirements set out in the project's financing documentation.

Romania provided the list of public entities carrying out economic activities, as issued by the Ministry of Finance in October 2025 (Evidence No. 4), published in accordance with Order No. 2873/2016 of the Minister of Finance, which regulates the reporting of performance indicators by public entities and their monitoring at central level. The list includes 1 415 public entities active in October 2025 across all sectors of Romania's economy and reporting to the Ministry of Finance. By contrast, the dashboard reflects the real-time status of the SOEs, including changes to their legal and operational status.

The Council Implementing Decision required the publication of a Monitoring Dashboard for reporting and monitoring yearly progress in achieving KPIs for all SOEs. According to the information provided on the dashboard, at the time of the assessment, a total of 1 390 entities was reported. This difference results from the different reference dates and functions of the dashboard and the list

of public entities carrying out economic activities, as issued by the Ministry of Finance in October 2025. The Ministry of Finance list provides a fixed overview of the SOEs active and reporting in October 2025, whereas the dashboard reflects the updated status of the relevant SOEs at the time of consultation. In the period between October 2025 and the Commission's assessment, certain entities were newly established, while others entered legal statuses such as liquidation, dissolution or bankruptcy). The latter fall outside the scope of GEO No. 109/2011 and are accordingly not reported on the dashboard. Whilst this constitutes a minimal numerical deviation of 1.77% from the requirement of the Council Implementing Decision, the overall objective of this milestone is considered met notwithstanding this minor deviation. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C14]-R[R9.0]-M[441a] Publication of an evaluation of all SOEs based on progress in achieving financial and non-financial KPIs reported on the dashboard

**Related Measure:** RO-C[C14]-R[R9.0] Improve the procedural framework for the implementation of corporate governance principles in state-owned enterprises

**Qualitative Indicator:** Evaluation of all SOEs published

**Time:** Q2 2023

### 1. Context:

The objective of this reform is to improve the corporate governance of state-owned enterprises (SOEs) in Romania by enforcing OECD standards.

Milestone 441a concerns the preparation and publication by the Agency for Monitoring and Evaluation of State-Owned Enterprises Performance of an evaluation of all SOEs. Based on this evaluation, AMEPIP is also required to put forward recommendations for the sale or listing of SOEs.

Milestone 441a is the fourth milestone of the reform, and it follows milestones 439 and 440. It is accompanied by milestone 441 related to the publication of AMEPIP's monitoring dashboard listing the key performance indicators (KPIs) for SOEs, and will be followed by targets 442 and 443, related to, respectively, the reduction in the number of interim appointments to SOEs boards and the listing/restructuring of SOEs.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Short description                                                                                                                                                                                                                                 |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.                                                                                                                   |
| 2 | Copy of the list of public entities engaged in economic activities in Romania.                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | The list provided was issued by the Ministry of Finance on 27 October 2025 and includes all public entities carrying out economic activities in Romania at that date.                                                                             |
| 3 | Copy of AMEPIP's report on the evaluation of SOEs, and links to the report and its annexes.<br>Report <a href="https://amepip.gov.ro/wp-content/uploads/2025/12/Raport-evaluare-Intreprinderi-Publice-2024-2.pdf">https://amepip.gov.ro/wp-content/uploads/2025/12/Raport-evaluare-Intreprinderi-Publice-2024-2.pdf</a><br>Addendum to the report <a href="https://amepip.gov.ro/wp-content/uploads/2025/12/Adanagirea-Intreprinderi-Publice-2024-2.pdf">https://amepip.gov.ro/wp-content/uploads/2025/12/Adanagirea-Intreprinderi-Publice-2024-2.pdf</a> | The evaluation report published by AMEPIP includes a consolidated overview of the size and performance of the SOE portfolio, as well as individual assessment fiches for all SOEs falling under the scope of AMEPIP's monitoring in October 2025. |

|   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |                                                                             |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|
|   | <a href="#">content/uploads/2026/04/Addendum-la-Raport-evaluare-KPI.pdf</a><br>Annex 1 <a href="https://amepip.gov.ro/wp-content/uploads/2026/05/anexa-1.pdf">https://amepip.gov.ro/wp-content/uploads/2026/05/anexa-1.pdf</a><br>Annex 2 <a href="https://amepip.gov.ro/wp-content/uploads/2026/05/Anexa-2.pdf">https://amepip.gov.ro/wp-content/uploads/2026/05/Anexa-2.pdf</a><br>Annex 3 <a href="https://amepip.gov.ro/wp-content/uploads/2026/05/anexa-3.pdf">https://amepip.gov.ro/wp-content/uploads/2026/05/anexa-3.pdf</a><br>Annex 4 <a href="https://amepip.gov.ro/wp-content/uploads/2025/12/Anexa-nr.4.-Lista-intreprinderilor-publice-care-indeplinesc-criteriile-minime-pentru-admiterea-pe-o-piata-reglementata.pdf">https://amepip.gov.ro/wp-content/uploads/2025/12/Anexa-nr.4.-Lista-intreprinderilor-publice-care-indeplinesc-criteriile-minime-pentru-admiterea-pe-o-piata-reglementata.pdf</a><br>Annex 5 <a href="https://amepip.gov.ro/wp-content/uploads/2026/04/Anexa-nr.5-Lista-intreprinderilor-publice-care-indeplinesc-criterii-financiare-suplimentare-privind-listarea.pdf">https://amepip.gov.ro/wp-content/uploads/2026/04/Anexa-nr.5-Lista-intreprinderilor-publice-care-indeplinesc-criterii-financiare-suplimentare-privind-listarea.pdf</a><br>Annex 6 <a href="https://amepip.gov.ro/wp-content/uploads/2026/04/Anexa-nr.6-Tabel-sintetic-al-recomandarilor-tehnice-privind-listarea-intreprinderilor-publice-adresate-autoritatilor-publice-tutolare.pdf">https://amepip.gov.ro/wp-content/uploads/2026/04/Anexa-nr.6-Tabel-sintetic-al-recomandarilor-tehnice-privind-listarea-intreprinderilor-publice-adresate-autoritatilor-publice-tutolare.pdf</a> |                                                                             |
| 4 | Copy of the methodology for evaluating the financial and non-financial performance of SOEs.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | The methodology was prepared by AMEPIP in May 2025 with the OECD's support. |
| 5 | Copy of the Annex to Order of the President of AMEPIP No. 651/2024 on establishing the minimum KPI thresholds for SOEs active in Romania. The Order entered into force on 4 March 2025, the date of its publication in the Official Journal.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | The Annex establishes the minimum KPI thresholds for each active SOE.       |

### 3. Analysis:

The justification and substantiating evidence provided by the Romania authorities cover all constitutive elements of the milestone.

**The task force shall conduct and publish an evaluation of all SOEs, based on the KPIs reported on the dashboard.**

Pursuant to Government Emergency Ordinance (GEO) No. 109/2011<sup>9</sup>, as amended, Romania established a permanent task force for corporate governance policy coordination and monitoring of state-owned enterprises, i.e., the Agency for Monitoring and Evaluation of State-Owned Enterprises Performance (*Agencia pentru Monitorizarea și Evaluarea Performanțelor Întreprinderilor Publice*, “AMEPIP”).

AMEPIP conducted an evaluation of all SOEs active in Romania in October 2025 (Evidence No. 3). The evaluation report and its annexes were published on AMEPIP’s website. The Commission services accessed the link provided by the authorities on 5 May 2026 to verify that the evaluation conducted was published and corresponded to that transmitted as evidence. This check was completed successfully, confirming that the evaluation was published.

The evaluation includes a report on the performance of the SOE portfolio in Romania in 2024, covering their activities, geographical distribution and financial performance by sector, as well as an individual assessment fiche for each active SOE falling under the scope of AMEPIP’s monitoring in October 2025. These fiches are generated by the dashboard for each SOE monitored by AMEPIP at a given point in time and provide an assessment of the KPIs reported on AMEPIP’s dashboard.

Romania provided the list of public entities carrying out economic activities, as issued by the Ministry of Finance in October 2025 (Evidence No. 2). The list is published in accordance with Order No. 2873/2016 of the Minister of Finance, which regulates the reporting of performance indicators by public entities and their monitoring at central level. The list is a standardised tool with a unified structure and contains information such as identification data of public entities, their public supervisory authority, legal status and classification, reporting obligations. It is publicly available on the Ministry’s website (through the ANAF platform) and is regularly updated to reflect changes in the structure and status of public entities. Public entities included in this list that meet the requirements in Article 2(2) of Government Emergency Ordinance No. 109/2011 to qualify as SOEs, fall under the scope of AMEPIP’s monitoring and, therefore, have their KPIs reported and monitored on AMEPIP’s dashboard.

The list shows that in October 2025, 1 415 public entities were active across all sectors of Romania’s economy and reported to the Ministry of Finance in accordance with the process described above. Of these 1 415 public entities, 50 fall outside the scope of application of GEO No. 109/2011, and are not subject to AMEPIP’s monitoring.<sup>10</sup> The remaining 1 365 public entities qualify as SOEs under GEO. 109/2011 and, according to the list, were active in October 2025, when AMEPIP’s evaluation was conducted.<sup>11</sup> Therefore, these entities were to be monitored by AMEPIP, and an individual assessment fiche was to be generated through the dashboard and included in AMEPIP’s evaluation report for each of them.

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<sup>9</sup> Government Emergency Ordinance No. 109/2011 on corporate governance of public undertakings, published in Official Journal No. 883 of 14 December 2011.

<sup>10</sup> Two public entities, namely the National Banknote Printing House and the State Mint, are expressly exempt from the application of GEO No. 109/2011, as subsequently amended. In addition, 48 public entities are national research and development institutes, established under Law No. 324/2003. The national and development institutes have a defined management structure and specific research objectives that do not align with corporate governance rules and therefore do not meet the requirements for being qualified as SOEs under GEO No. 109/2011.

<sup>11</sup> At the time the list was published, 308 additional public entities were exempt from the application of GEO No. 109/2011, in accordance with Article 1(7) thereof.

A total of 1 325 individual assessment fiches for active SOEs were included in the evaluation, based on the KPIs reported on the dashboard for 2024.<sup>12</sup> The Council Implementing Decision required that an evaluation of all SOEs is published by AMEPIP. However, 40 of the 1 365 active SOEs in October 2025 have not been evaluated by AMEPIP based on their performance in 2024. This is due to the fact that, at the moment the report was produced, AMEPIP's dashboard had not been duly updated to reflect the most recent changes in the SOE portfolio. Whilst this constitutes a minimal numerical deviation of 2.93% from the requirement of the Council Implementing Decision, the overall objective of this milestone is considered met notwithstanding this minor deviation. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.

**The evaluation shall consist of:**

- an evaluation based on financial KPIs for all SOEs; and**
- an evaluation based on both financial and non-financial KPIs for SOEs under the remit of public authorities at central level.**

**The evaluation shall be based on a methodology for assessing progress in achieving financial and non-financial KPIs prepared by the task force.**

Individual assessment fiches were provided for the SOEs evaluated, as follows:

- i. for the assessment of financial KPIs and non-financial KPIs reported for 2024 by SOEs operating under the remit of central authorities monitored through AMEPIP's dashboard (Annexes 1 and 2 to the evaluation report, Evidence No. 3), and
- ii. for the assessment of financial KPIs reported for 2024 by SOEs operating under the remit of local authorities monitored through AMEPIP's dashboard (Annex 3 to the evaluation report, Evidence No. 3).

Romania has also provided the methodology prepared and used by AMEPIP to assess progress in achieving the financial and non-financial KPIs by the SOEs (Evidence No. 4). This methodology was developed in close collaboration with the Organisation for Economic Cooperation and Development (OECD) through the technical support instrument.

In line with this methodology, financial data (such as revenue, expenditure, operating result, debt) are imported directly from the annual reports submitted by public entities to the Ministry of Finance. This data is automatically processed and uploaded to AMEPIP's dashboard and used to calculate the financial KPIs underpinning the assessment of the performance of SOEs. For SOEs that did not submit their 2024 financial statements to the Ministry of Finance, and for which the financial results could not be extracted and KPIs could therefore not be recorded on the dashboard, the assessment fiches extracted from the dashboard included only an assessment of non-financial KPIs.

For the reporting of non-financial KPIs (such as corporate governance, transparency, quality of service), AMEPIP developed and made available on the dashboard a smart PDF form. This electronic document is designed to be completed directly by SOEs, with pre-defined fields and automated consistency checks. Once completed, the form is signed electronically by the legal representatives of the SOEs and submitted to AMEPIP through the dashboard, which ensures the legal validity and integrity of the data.

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<sup>12</sup> The report also includes assessment fiches for 57 SOEs that had become inactive at the time the report was produced but had not been removed from the scope of AMEPIP's monitoring and therefore continued to appear on AMEPIP's dashboard. Therefore, Romania provided a total number of 1 382 assessment fiches, 1 325 for active SOEs and 57 for inactive SOEs.

In line with the methodology provided, an evaluation of all non-financial KPIs reported on the dashboard by SOEs operating under the remit of central authorities has been carried out. The assessment fiches extracted from the dashboard included only an assessment of KPIs reported by the SOEs. Where non-financial KPIs have not been duly reported by the SOEs, AMEPIP has initiated control proceedings as pursuant to Government Emergency Ordinance No. 109/2011, which are currently ongoing.

In particular, as prescribed by the methodology, the following assessment was carried out for each SOE on the basis of the KPIs reported on the dashboard at the time of the evaluation:

- the degree of achievement of the minimum KPI thresholds approved by Order of the President of AMEPIP No. 641/2024 for each SOE (Evidence No. 5);
- the financial and non-financial KPIs in the year under review compared to the previous year;
- the financial and non-financial KPIs in the year under review compared to the average of the previous three years;
- a qualitative analysis of the achievement of each KPI.

**Recommendations for selling or listing SOEs shall be put forward by the task force based on the evaluation of all SOEs.**

AMEPIP's recommendations regarding the sale or listing of SOEs have been published on AMEPIP's website as Annex 6 to the evaluation report (Evidence No. 3).

Based on AMEPIP's evaluation of the reported KPIs, the dashboard generated a list of SOEs that met the requirements for listing on the stock exchange (Annex 4 to the evaluation report, Evidence No. 3), in accordance with capital market legislation.<sup>13</sup>

In addition to the minimum requirements for listing, AMEPIP applied a homogeneous set of additional criteria designed to reflect the financial and operational soundness of the SOEs analysed (pages 7-8 of the evaluation report, Evidence No. 3). The additional criteria considered were the following:

- Profitability: positive net profit over three consecutive years (2022-2024), indicating stability and continuity in financial performance;
- Capitalisation: positive equity over the same period (2022-2024), indicative of a healthy financial structure and ability to sustain long-term development;
- Financial structure for 2024: debt ratio between 0 and 1 reflecting a moderate level of debt to equity; current liquidity greater than 1 confirming the ability to cover short-term

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<sup>13</sup> Law No. 24/2017 on issuers of financial instruments and market operations, published in Official Journal No. 772 of 10 August 2021. Under Article 57(1) thereof, for a company's shares to be admitted to trading on a regulated market, that company must, *inter alia*:

- have an early capitalisation of at least the equivalent in RON of EUR 1 000 000 or, in so far as the capitalisation cannot be anticipated, have the capital and reserves (including the result of the last financial year) of at least the equivalent in RON of EUR 1 000 000, calculated according to the reference rate communicated by the National Bank of Romania on the date of the application for admission to trading;
- have been in operation for the last 3 years preceding the application for admission to trading and have drawn up and communicated the financial statements for the same period, in accordance with the legal provisions.

obligations; positive EBITDA as evidence of the operational capacity to generate cash flows from the current business;

- Additional criteria: turnover exceeding EUR 50 million; total assets greater than EUR 43 million; number of staff in excess of 250. Meeting at least two of these thresholds indicates operational maturity and the ability to continue meeting capital market requirements.

Depending on the sectors in which these SOEs operate, AMEPIP has also considered potential regulatory constraints that may prevent or restrict the listing of certain SOEs. AMEPIP has also taken into account broader market conditions, the competitive landscape, and other relevant factors that may warrant a more in-depth assessment of the performance of specific SOEs and any actions that may be required for those entities. This assessment is included on pages 3-4 of the addendum to the evaluation report, Evidence No. 3).

Based on the application of the criteria described above, and the results of the assessment of financial and non-financial KPIs set out in the annexes to the evaluation report, AMEPIP recommended that the public supervisory authorities initiate pre-listing procedures for minority shareholdings in the 11 SOEs listed in Annex 6 to the evaluation report.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C15]-R[R1.0]-M[452] Entry into force of the package of legal acts for the application of the “Educated Romania” project

**Related Measure:** RO-C[C15]-R[R1.0] Elaboration and adoption of the package of legal acts for the application of the “Educated Romania” project

**Qualitative Indicator:** Provision in the package of legal acts indicating the entry into force of the “Educated Romania” project

**Time:** Q3 2023

### 1. Context:

The objective of this reform is the adoption and entry into force of the package of legal acts for the “Educated Romania” project, which is the overarching strategy for reforming the education system of Romania.

The objective of milestone 452 is the entry into force of the package of legal acts for the application of the “Educated Romania” project.

Milestone 452 is the only milestone of this reform.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                      | Short description                                                                                                                                                                                                                       |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                | Summary document duly justifying how the target (including all the constitutive elements) has been satisfactorily fulfilled.                                                                                                            |
| 2 | Copy of Law No. 198/2023 of 4 July on pre-university education, published in the Official Journal No. 613 on 5 July 2023 (hereinafter referred to as “Law No. 198/2023”). |                                                                                                                                                                                                                                         |
| 3 | Copy of Law No. 199/2023 of 4 July on higher education, published in the Official Journal No. 614 on 5 July 2023 (hereinafter referred to as “Law No. 199/2023”).         |                                                                                                                                                                                                                                         |
| 4 | Copy of Ministerial Order No. 3069 of 15 January 2024 amending Annexes 1 and 2 to the Order of the Minister of Education No. 6072/2023 on the approval of                 | The Ministerial Order amends Annex 1 (Timeline for implementing the provisions of Law No. 198/2023) and Annex 2 (Timeline for implementing the provisions of Law No. 199/2023) to the Order of the Minister of Education No. 6072/2023. |

|   |                                                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                     |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | transitional measures applicable to the national pre-university and higher education system, published in the Official Journal No. 124 of 13 February 2024 (hereinafter referred to as "Ministerial Order No. 3069/2024"). |                                                                                                                                                                                                                                                                                                                                                                                     |
| 5 | Reference to the Memorandum for the implementation of the "Educated Romania" project.                                                                                                                                      | <a href="#">Memorandum Romania Educata 2021.pdf</a>                                                                                                                                                                                                                                                                                                                                 |
| 6 | Reference to the publication of public consultation on 13 July 2022.                                                                                                                                                       | <a href="#">Consultare publică/Încheiată] Proiectele de legi ale educației - „România Educată”   Ministerul Educației și Cercetării</a>                                                                                                                                                                                                                                             |
| 7 | References to the publication in interinstitutional consultation and results of public consultations published on 27 February 2023.                                                                                        | <a href="#">PROIECTELE de legi ale educației „România Educată”   Ministerul Educației și Cercetării</a><br><a href="#">Microsoft Word - Registru pentru consemnarea și analizarea propunerilor Proiecte de legi (1).docx</a><br><a href="#">Microsoft Word - minuta superior.docx</a><br><a href="#">Minuta dezbateri publice Lege învățământ preuniversitar 23_08_2022_rec.pdf</a> |

### 3. Analysis:

The Commission considers that there is a clerical error in the text of the Council Implementing Decision as regards the qualitative indicator of milestone 452, *“Entry into force of the package of legal acts for the application of the “Educated Romania” project”* and has undertaken the assessment on a revised basis. The indicator refers to the provision in the package of legal acts indicating the entry into force of the “Educated Romania” project. However, the description of the measure indicates that the objective of the reform is the adoption and entry into force of the package of legal acts for the “Educated Romania” project. Moreover, as evidenced in the Memorandum for the implementation of the “Educated Romania” project (Evidence No. 5, page 7), it consists of a report proposing that a package of legal acts is adopted for the implementation of the “Educated Romania” project. Therefore, the indicator should refer to the provision in the package of legal acts indicating its entry into force.

Against this background, the justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

#### **Provision in the package of legal acts indicating the entry into force of the “Educated Romania” project.**

The “Educated Romania” project is an overarching reform initiative to modernise and transform the education system of Romania, with objectives and targets linked to increasing the quality of the Romanian education system at all levels. The Memorandum for the implementation of the “Educated Romania” project (Evidence No. 5) proposes that a package of legal acts is adopted for the implementation of the “Educated Romania” project.

The Law No. 198/2023 of 4 July on pre-university education (hereinafter referred to as "*Law No. 198/2023*") (Evidence No. 2) was published in the Official Journal No. 613 of Romania on 5 July 2023. According to its article 248, Law No. 198/2023 entered into force 60 days after its publication on 3 September 2023.

Law No. 199/2023 on higher education (hereinafter referred to as "*Law No. 199/2023*") (Evidence No. 3) was published in the Official Journal No. 614 of Romania on 5 July 2023. According to its Article 260, the Law No. 199/2023 entered into force 60 days after its publication on 3 September 2023.

The two laws contain provisions that guarantee the right to education, regulate institutional structures and staff status and align the educational system with contemporary socio-economic demands, in line with the objectives of the "Educated Romania" project as further detailed below.

In line with the provisions of Article 248 (2) of Law No. 198/2023 and with the provisions of Article 260 (2) of Law No. 199/2023, the Ministry of Education established methodologies, regulations and other legal acts for implementing Law No. 198/2023 and Law No. 199/2023. The Ministerial Order No. 3069 of 15 January 2024 amending Annexes 1 and 2 to the Ministerial Order No. 6072/2023 on the approval of transitional measures applicable to the national pre-university and higher education system (hereinafter referred to as "*Ministerial Order No. 3069/2024*") (Evidence No. 4) was published in the Official Journal No. 124 of Romania on 13 February 2024. The Ministerial Order No. 3069/2024 entered into force on the same day, in accordance with Article 12(3) of Law No. 24/2000 on the rules of legislative technique for the drafting of legislative acts.

The Ministerial Order No. 3069/2024 amends Annex 1 (Timeline for implementing the provisions of Law No. 198/2023) and Annex 2 (Timeline for implementing the provisions of Law No. 199/2023) to the Ministerial Order No. 6072/2023 on the approval of transitional measures applicable to the national pre-university and higher education system.

### **The package of legal acts shall ensure the application of the project "Educated Romania".**

The priority action areas of the "Educated Romania" project, as presented in the Memorandum for the implementation of the "Educated Romania" project (Evidence No. 5), were incorporated into provisions from chapters of Law No. 198/2023 and Law No. 199/2023:

- Teaching career: in Title III Status and career of teaching staff, Chapter VIII In-service training of pre-university teachings staff of Law No. 198/2023 and in Title I Higher education, Chapter XII Initial training for a career in pre-university education of Law No. 199/2023;
- Management and governance: in Title I Organisation of the pre-university education system, Chapter IX Management of the national education system of Law No. 198/2023 and in Title I Higher education, Chapter XVII Management of higher education institutions of Law No. 199/2023;
- Funding: in Title I Organisation of the pre-university education system, Chapter X Financing and assets of pre-university education, Section 1 Financing of pre-university education establishments and Section 2 Financing of out-of-school education establishments of Law No. 198/2023 and in Title I Higher education, Chapter III University autonomy and Chapter XVIII Financing and assets of public higher education institutions of Law No. 199/2023;
- Infrastructure: in Title I Organisation of the pre-university education system, Chapter X Financing and assets of pre-university education, Section 3 Assets of pre-university education of Law No. 198/2023 and in Title I Higher education, Chapter XVIII Financing and assets of public higher education institutions of Law No. 199/2023;

- Curriculum: in Title I Organisation of the pre-university education system, Chapter VI National curriculum of Law No. 198/2023 and in Title I Higher education, Chapter V Organisation of university studies, Section 2 University study programmes of Law No. 199/2023;
- Inclusive education: in Title I Organisation of the pre-university education system, Chapter V Quality inclusive education for all primary beneficiaries of education of Law No. 198/2023 and in Title I Higher education, Chapter XVI Promoting student-centred higher education of Law No. 199/2023;
- Functional literacy and STEAM Education: in Title I Organisation of the pre-university education system, Chapter VII Scope, structure and characteristics of assessments of Law No. 198/2023 and in Title I Higher education, Chapter XVI Promoting student-centred higher education of Law No. 199/2023;
- Digitalisation: in Title I Organisation of the pre-university education system, Chapter IX Management of the national education system, Section 4 Digital transformation in pre-university education of Law No. 198/2023 and in Title I Higher education, Chapter III University autonomy of Law No. 199/2023;
- Resilience: in Title I Organisation of the pre-university education system, Chapter V Quality inclusive education for all primary beneficiaries of education, Section 6 Priority education investment areas of Law No. 198/2023 and in Title IV Quality assurance in higher education of Law No. 199/2023.

Therefore, the provisions of Law No. 198/2023 and Law No. 199/2023 ensure the application of the "Educated Romania" project.

#### **Stakeholders' consultations shall be organised for the preparation of the package of legal acts**

From 13 July to 24 August 2022, the Ministry of Education published for public consultation the draft Law No. 198/2023 and the draft Law No. 199/2023, together with explanatory memoranda and summary presentations of the proposed reform elements (Evidence No. 6). The comments received were analysed for their possible integration into the draft laws, as evidenced by the register for recording and analysing received proposals, opinions, or recommendations (Evidence No. 7). Public debates were held with the participation of stakeholders (like representatives of pupils, students, parents, teachers, trade unions, employers, non-governmental organisations, local, county and national public authorities), as evidenced by the minutes of the public debate of 23 August 2022 on the draft law on pre-university education and the minutes of the public debate of 24 August 2022 on the draft law on university education (Evidence No. 7). After the completion of the public debate process, meetings were held with representatives of the structures involved in the working groups of the "Romania Educated" Project, as well as other relevant social partners. The draft laws were published on the Ministry of Education website from 27 February 2023 until 6 March 2023 for interinstitutional consultation (Evidence No. 7) The Commission services accessed the links provided by the authorities (Evidence No. 6 and 7) on 25 February 2026 to verify that the draft Law No. 198/2023 and draft Law No. 199/2023 were published for public consultation from 13 July to 24 August 2022 and for interinstitutional consultation from 27 February 2023 to 6 March 2023, that the comments received following public consultation were recorded and analysed and that minutes of public debates were drafted. This check was completed successfully, confirming that stakeholder consultations were organised for the preparation of the package of legal acts.

#### **4. Commission Preliminary Assessment: Satisfactorily fulfilled.**

**Number and name of the Milestone:** RO-C[C15]-I[I5.0]-M[469] Online training course delivered to users of the Romanian Integrated Education Information System (SIIR) and the MATE IT tool

**Related Measure:** RO-C[C15]-I[I5.0] Trainings for users of the Romanian Integrated Education Information System (SIIR) and the Early Warning Mechanism (MATE) IT tool and systemic interventions to reduce early school leaving

**Qualitative Indicator:** Online training course delivered to users of the Romanian Integrated Education Information System (SIIR) and the MATE IT tool

**Time:** Q3 2025

### 1. Context:

The investment aims to prepare and deliver a training for the users in schools of the Romanian Integrated Education Information System (hereinafter referred to as “SIIR”) and the Early Warning Mechanism (hereinafter referred to as “MATE”) IT tool.

Milestone 469 concerns the delivery of an online training course to users of SIIR and MATE IT tool. The training modules will be tailored to student needs and skills (inclusive education), student-centred teaching approaches, intercultural competence and formative assessments; improving teaching conditions; providing training for the use of the MATE computer module; awareness campaigns for students and teachers; supporting students' socio-emotional skills for completing compulsory education. The number of training participants will be visible on <https://mate.edu.ro/harta-formare/>.

Milestone 469 is the only milestone of this investment.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                           | Short description                                                                                                                          |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                                                                     | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.            |
| 2 | Copy of the report prepared by World Bank titled “Report on the EWM Training” deliverable 6 of Reimbursable Advisory Services Agreement on Assistance for Education Recovery in Romania (P178400) dated April 2023 (hereinafter referred to as “the World Bank | The report covers the design, implementation and evaluation of the MATE training and includes as an annex the training course description. |

|   |                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|---|---------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   | report”).                                   |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| 3 | The School Success Assessment Tool (SASAT). | A questionnaire that is applied to all students within the school in order to assess the risks of school dropout at the beginning of the school year.                                                                                                                                                                                                                                                                                                                                |
| 4 | SASAT indicator scoring system.             | Scoring for the SASAT questionnaire.                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| 5 | Number of training participants.            | <a href="https://mate.edu.ro/harta-formare/">https://mate.edu.ro/harta-formare/</a><br>Platform that functions as a repository for all the information and resources related to MATE and consists of four sections (i) the online course, (ii) useful resources related to the MATE instrument, including regulations, (iii) a real-time training map displaying the number of registered participants and participants that completed the training course, and (iv) a contact page. |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

**Online training course delivered to users of the Romanian Integrated Education Information System (SIIR) and the MATE IT tool. Description of the specifications of an online training course to users of SIIR and MATE IT tool. The number of training participants shall be visible on <https://mate.edu.ro/harta-formare/>.**

The main goal of MATE is to support the Romanian Ministry of Education and Research, education units and school inspectorates in identifying students prone to school dropout and to implement prevention, intervention, and compensation measures needed to combat school drop-out and early school leaving. MATE IT module in SIIR is fed by data collected and reported at the school level. With assistance from World Bank, the Ministry of Education developed and made available an online training course for the users of SIIR and MATE in which participants study and complete tests at their own pace, over an estimated 20 hours. A completion certificate is automatically issued by the online platform for each user that finishes the training successfully.

The training course is mainly addressed to teachers, school directors, administrative and auxiliary school staff, but also to staff with guidance and control functions in the county inspectorates directly involved in the coordination, support and monitoring of MATE, as well as to staff of the Ministry of Education and Research involved in the monitoring of projects using the MATE tool. This is confirmed in the report prepared by World Bank titled “Report on the EWM Training” deliverable 6 of Reimbursable Advisory Services Agreement on Assistance for Education Recovery in Romania (P178400) dated April 2023 (hereinafter referred to as “*the World Bank report*”) (Evidence No. 2, page 16). Annex 1 to the World Bank report (Evidence No. 2, pages 33-39) provides a description of the specifications of the online training course.

The number of registered participants and participants that completed the training course, detailed per educational establishment is visible on real-time basis online on <https://mate.edu.ro/harta-formare/> (Evidence No. 5). This is confirmed in the World Bank report (Evidence No. 2, page 19). The

Commission services accessed the link provided by the authorities (Evidence No. 5) on 25 February 2026 to verify the total number of participants that have completed the training. This check was completed successfully, confirming that 47 249 participants, which are SIIR and MATE users, completed the training. As the training course was made available to participants and there is evidence that participants, which include SIIR and MATE users (Evidence No. 2, page 22) have accessed and completed the training course, it follows that the training course was delivered to SIIR and MATE users.

**Modules of the training course shall be tailored to:**

- **student needs and skills (inclusive education), student-centered teaching approaches, intercultural competence and formative assessment;**

According to Annex 1 to the World Bank report (Evidence No. 2, pages 35-39), Chapter 1 of the training course sets the basis for a better understanding of MATE and provides information regarding at-risk groups and various MATE tools, including the School Success Assessment Tool (SASAT) used to collect information directly from students on various characteristics that may increase the risk of dropout. A copy of the SASAT questionnaire and a scoring system for the answers to the questionnaire are provided. Chapter 3 of the training course provides comprehensive methodological suggestions for school and classroom-based interventions for students at risk. The aim is to equip trainees with the skills to create positive classroom climate, motivate students, facilitate learning, understanding, and critical thinking and help teachers better understand their students' needs and tailor their instruction to meet those needs. Examples of student-centered teaching activities that can be considered at the classroom and school levels are included in the course (for example in Lesson 2. Positive educational climate, Content Quality relationships in school and Lesson 3. Designing authentic, active-participatory learning experiences, Content What do we do when learning difficulties arise? And What is authentic learning? - Equal opportunities). The specific interventions to support students at risk of dropping out outlined in the course also focus on intercultural competences (for example in Lesson 3. Designing authentic, active-participatory learning experiences, Content What do we do when learning difficulties arise? And What is authentic learning? - Equal opportunities). The SASAT questionnaire can be used as a diagnostic tool for formative assessment which would take the form of timely feedback to improve learning (Lesson 1. Getting to know students; SASAT questionnaire and other useful tools, contents Risk signals - source of possible support strategies, How to use SASAT questionnaire data, What educational interventions can be planned based on the cumulative results of SASAT application).

- **improving teaching conditions;**

The SASAT questionnaire is useful for teachers to better understand their students' needs and tailor their instruction to meet those needs. Based on the interpretation of the information from the SASAT questionnaires, teachers plan actions they can take in the classroom to improve results and therefore teaching conditions. According to the World Bank report (Evidence No. 2, page 15), the training course helps teachers build their capacity to use data in other areas of their teaching practice, such as monitoring student progress and evaluating the effectiveness of their instruction. Chapter 3 of the course thus provides useful insights on improving teaching conditions and outcomes (Lesson 1. Getting to know students; SASAT questionnaire and other useful tools, contents Risk signals - source of possible support strategies, How to use SASAT questionnaire data, What educational interventions can be planned based on the cumulative results of SASAT application).

- **providing training for the use of the MATE computer module;**

According to Annex 1 to the World Bank report (Evidence No. 2, pages 35-39), Chapter 2 of the course is dedicated to the use of the MATE computer module in SIIR with its functionalities, user

roles, types of data to be entered, analyses and reports to be generated, and details on how to use the data in monitoring and evaluation of the MATE interventions.

- **awareness campaigns for students and teachers, which could be adapted to students from disadvantaged groups;**

According to Annex 1 to the World Bank report (Evidence No. 2, pages 35-39), Chapter 3 of the course details the role of the SASAT questionnaire in the development and implementation of awareness campaigns for students and teachers, which could be adapted for children from disadvantaged groups. Examples of activities implicating not only the school or the teaching staff but also the parents are provided (for example in Lesson 6: Involving Community Resources. Parents' School, contents Family-School-Community Coordination, Activities at Parents' School, How can a Parents' School be organised?).

- **support students' socio-emotional skills for completing compulsory education.**

According to Annex 1 to the World Bank report (Evidence No. 2, pages 35-39), Chapter 3 of the course presents measures and interventions to improve students' socio-emotional skills to complete compulsory education (for example Lesson 5. Developing social-emotional skills and managing possible crises and behavioural problems, content What can be done at school to improve pupils' behaviour and support them emotionally).

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C15]-R[R5.0]-M[479] Entry into force of the legal acts setting out the National Digital Skills Reference Framework for pre-university education

**Related Measure:** RO-C[C15]-R[R5.0] Adoption of the legal framework for the digitalisation of education

**Qualitative Indicator:** Provision in the legal act indicating the entry into force of the National Digital Skills Reference Framework

**Time:** Q2 2024

## 1. Context

This reform aims to ensure the necessary legal framework for the development of digital competences for pupils by defining the competency profile for education professionals. The reform consists in the entry into force of legal acts for digitalisation of educational processes and content and for conducting online assessments and in setting the minimum and optimal standards for quality of online educational activities and the National Reference Framework for increasing the digital skills of pre-university pupils.

Milestone 479 requires the entry into force of the legal acts setting out the National Reference Framework for increasing the digital skills of pre-university pupils in line with DigComp: European Digital Competence Framework for Citizens.

Milestone 479 is the last step in the implementation of the reform and it follows the completion of milestone 477 related to the entry into force of the legislative act defining the minimum standards of technical equipment for schools to ensure the quality of educational activities carried out in the virtual environment and by means of virtual technology and milestone 478 related to the entry into force of the law setting out the profile of the future teacher on digital competences and how to assess digital competences in school examinations.

## 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                            | Short description                                                                                                               |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                                      | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled. |
| 2 | Copy of Ministerial Order No. 6466 of 30 August 2024 approving the digital competence framework for pupils, published in the Official Journal No.1057bis on 22 October 2024 with the digital competence framework for pupils as | <a href="#">OM 6466 2024.pdf</a>                                                                                                |

|  |                                                                                                         |  |
|--|---------------------------------------------------------------------------------------------------------|--|
|  | annex to the Ministerial Order (hereinafter referred to as “ <i>Ministerial Order No. 6466/2024</i> ”). |  |
|--|---------------------------------------------------------------------------------------------------------|--|

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

#### **Entry into force of the legal acts that shall set out the National Reference Framework for increasing the digital skills of pre-university pupils in line with DigComp: European Digital Competence Framework for Citizens<sup>14</sup>**

The Ministerial Order No. 6466 of 30 August 2024 approving the digital competence framework for pupils (hereinafter referred to as “*Ministerial Order No. 6466/2024*”) (Evidence No. 2) was published in the Official Journal No. 1057 of Romania on 22 October 2024. The Ministerial Order No. 6466/2024 entered into force on the same day of its publication in the Official Journal, in accordance with Article 12(3) of Law 24/2000 on the rules of legislative technique for the drafting of legislative acts.

The digital competence framework for pupils is included as annex which forms integral part of the Ministerial Order No. 6466/2024, as specified in Article 1 of the Ministerial Order No. 6466/2024. Article 2 of the Ministerial Order No. 6466/2024 provides that the digital competence framework for pupils is included in the competency profiles of pre-university pupils from school year 2024-2025.

Article 1(2) of the annex to the Ministerial Order No. 6466/2024 states its scope, which is to provide the National Reference Framework for increasing digital skills of pupils, aligned with national and international standards. Article 1(3) of the annex to Ministerial Order No. 6466/2024 states “The development of the digital competence framework for pupils has as its reference model the digital competence framework for Romanian citizens (DigCompRo), a document developed on the basis of the DigComp 2.2 European Framework”. The digital competence framework for pupils’ details (i) the main areas of competence pursued, (ii) the specific skills and expected performance levels per education cycle and (iii) the descriptors for each specific competence based on DigCompRo.

Article 2(1) of the annex to Ministerial Order No. 6466/2024 refers to the objective of the framework which is “to define a competence profile in the field of digital education for primary, lower-secondary and upper-secondary school graduates”. Pupils’ digital competences cover six main areas which are set out in Annex 1 of the framework. The competence levels of DigComp 2.2 are presented in Annex 2 of the framework. Annex 3 of framework sets up the expected performance levels for each competence area for each level of education. These performance levels were adapted from DigComp 2.2. The descriptors of specific skills are detailed for each level of education in annex 4 (primary level), annex 5 (lower-secondary level) and annex 6 (upper-secondary level).

#### **4. Commission Preliminary Assessment: Satisfactorily fulfilled.**

<sup>14</sup> <https://publications.jrc.ec.europa.eu/repository/handle/JRC106281>.

**Number and name of the Milestone:** RO-C[C16]-R[R2.0]-M[523] Entry into force of legal and regulatory acts for the establishment of OSS offices to provide energy advisory services

**Related Measure:** RO-C[C16]-R[R2.0] Setting up one-stop-shops (OSS) to provide energy advisory services

**Qualitative Indicator:** Provision on entry into force

**Time:** Q1 2024

### 1. Context:

The reform objective is to establish dedicated one-stop-shop (OSS) offices for energy advisory services to raise awareness and facilitate energy efficiency renovations and renewable energy installations among homeowners.

Milestone 523 concerns the entry into force of legal and regulatory acts providing the framework for the establishment of physical OSS offices.

Milestone 523 is the first step of the implementation of the reform. It is accompanied in the same payment request by target 524 related to training of OSS staff and target 525 related to the opening of physical OSS office.

### 2. Evidence provided:

|   | Name of the evidence                                                                                                                                                                                                                                                         | Short description                                                                                                          |
|---|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                                                                                                                                                                                                                                                   | Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled. |
| 2 | Copy of Government Emergency Ordinance No. 92 of 28 June 2024, regarding the establishment of the national network of one-stop shops (OSS) for energy efficiency, published in the Official Journal No. 613 on 29 June 2024 (hereinafter referred to as " <i>the GEO</i> "). | The GEO provides the legal framework for the OSS organization as a network formed by 42 OSS at the national level.         |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the milestone.

**Entry into force of legal and regulatory acts providing the framework for the establishment of physical OSS offices, tasked with providing energy advisory services to homeowners.**

Government Emergency Ordinance No. 92/2024 regarding the establishment of the national network of one-stop shops (OSS) for energy efficiency (“the GEO”) was published in the Official Journal No. 613 on 29 June 2024. It entered into force on the same day, in accordance with Article 12(2) of Law 24/2000 on legislative technique rules for drafting legal acts. The GEO establishes the national network of one-stop-shops (hereinafter referred to as “OSS”) for energy advisory services.

In particular, Article 1(1) of the GEO establishes the national network of OSS for energy efficiency with the aim of facilitating access to financing programmes and information on energy efficiency in buildings and households. The legal framework for the establishment of physical offices is regulated by Article 4(1) of the GEO, which mandates that an OSS must be set up within the specialised apparatus of the 41 county councils and of the General Mayor of Bucharest within 30 days of the GEO’s entry into force. Article 6(1)(a) of the GEO stipulates that the service of information and technical advice will be provided at the OSS premises, thereby establishing their physical nature. Furthermore, Article 6(1)(a) also identifies individual or collective homeowners and homeowners’ associations as beneficiaries having access to services provided by the OSS, i.e., the primary recipients of the OSS services, while Article 6(1)(b) of the GEO tasks the OSS with advice on energy renovation projects and access to public funding. Article 3 of the GEO provides that the offices are to offer energy efficiency and renewable energy advisory services to natural persons, consumers, and prosumers.

**The framework established by the legal acts shall contain provisions specifying:**

- **the tasks of the OSS offices:** Article 6(1) of the GEO defines the general tasks of the OSS offices, which include providing public services for information and technical advice to individual or collective homeowners regarding energy efficiency projects and renewable energy usage, as well as advising citizens on developing energy renovation projects. Article 3 further establishes that OSS provide advisory services to natural and legal persons, including energy communities and potential beneficiaries of investment programmes. Specific tasks are set out in Articles 6(1) and 6(4) of the GEO: monitoring and reporting on the REPowerEU investments (6(1)(g)) and supporting beneficiaries in accessing funds and implementing projects for 2024–2026 (6(4)).
- **the governance of the OSS offices:** the governance mechanism for the national network of OSS is outlined in Articles 1 and 7 of the GEO, providing responsibilities at both central and local levels. According to Article 1(2) of the GEO, the Ministry of Development, Public Works and Administration is responsible for coordinating the national network and providing methodological guidance on energy efficiency. The responsibility for establishing the offices at the local level lies with the county councils and with the General Mayor of Bucharest. Article 4(1) of the GEO mandates that these offices be established within the specialised apparatus of these authorities within 30 days of the Ordinance's entry into force. Furthermore, Article 7 of the GEO stipulates that the organisational structure, function state, and number of staff are established by the decision of the respective county councils or the General Council of Bucharest.
- **the financing structure of the OSS offices:** the financing mechanism for the OSS operation is regulated by Article 8 of the GEO. Article 8(2) provides that the costs of staff and utilities required for the operation of the OSS at the county level are financed from the county's own budget, while those for the office at the level of the Bucharest General Mayor's Office are covered by its budget. Moreover, Article 8(3) stipulates that the running costs of the energy efficiency OSS will be borne entirely from the own budget of the administrative-territorial units, their subdivisions, or inter-community development associations, as well as from other legally established sources.

**4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Milestone:** RO-C[C16]-R[R2.0]-T[524] Training of OSS staff

**Related Measure:** RO-C[C16]-R[2.0] Set-up of one-stop-shops (OSS) to provide energy advisory services

**Quantitative Indicator:** Number

**Baseline:** 0

**Target:** 84

**Time:** Q1 2024

### 1. Context:

The reform objective is to establish dedicated one-stop-shop (hereafter referred to as “OSS”) offices for energy advisory services to raise awareness and facilitate energy efficiency renovations and renewable energy installations among homeowners.

The reform consists in the set-up of physical offices and an online contact point to streamline the documentation process for the renovations and installations of renewables.

Target 524 concerns the completion of trainings by the OSS staff for performing their work.

Target 524 is the first target of the reform, and it follows the completion of milestone 523 related to the entry into force of legal and regulatory acts for the establishment of OSS offices to provide energy advisory services. It is accompanied in this payment request by target 525, related to the opening of physical OSS offices.

### 2. Evidence provided:

|   | Name of the evidence                          | Short description                                                                                                                                                                                                                                                                       |
|---|-----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note                                    | Summary document duly justifying how the milestone (including all the constitutive elements) has been satisfactorily fulfilled.                                                                                                                                                         |
| 2 | Certificates of training on energy efficiency | 89 certificates confirming the completion of the energy efficiency training between 28 and 30 January 2026. All certificates were issued on 10 February 2026 and signed by the President of the Romanian National Institute of Administration, the entity which organised the training. |
| 3 | List of training participants                 | List of participants of the training between 28 and 30 January 2026, outlining the staff members’ functions in the OSS as well as the counties they work in.                                                                                                                            |

|   |                    |                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|---|--------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4 | County OSS Reports | 42 County OSS Reports dated and signed by representatives of the 41 Romanian county councils and the municipality of Bucharest on behalf of the local OSS offices, submitted to the Ministry of Investments and European Projects and Ministry of Development, Public Works and Administration. The reports consist of an overview of the names and roles of staff allocated to each OSS office and the numbers of files processed. |
| 5 | Training Plan      | Curriculum for the training programme organised from 28 to 30 January 2026, according to GEO No. 92/2024.                                                                                                                                                                                                                                                                                                                           |

### 3. Analysis:

The justification and substantiating evidence provided by the Romanian authorities cover all constitutive elements of the target.

#### **Certificates of completion of training for 84 OSS staff members to perform different roles in OSS offices.**

According to the evidence provided by Romania, 89 training certificates were issued to individuals who successfully completed training on energy efficiency between 28 and 30 January 2026 and completed an assessment (Evidence No. 2), thus exceeding the goal of the target 84 by five certificates. The Commission services verified that all 89 certificates were duly dated and signed by the President of the Romanian National Institute of Administration, which organised the training. To confirm that the 89 training participants are employees of the OSS, the Commission services confirmed that their names match with the OSS County Reports (Evidence No. 4), which, besides the numbers of files processed, include the names and roles of staff working in the OSS offices.

According to the training plan (Evidence No. 5), the programme, which was held in an online format, was aimed at civil servants and contractual staff of the Romanian public administration who perform tasks in the OSS. The training focused on enhancing the staff's expertise on renewable energy sources and energy efficiency, covering EU and national legislation and energy efficiency implementation strategies. It informed the staff about the establishment of OSS as points of contact on renewable energy and energy efficiency, while addressing technical aspects related to building energy performance, in particular the refurbishment and renovation process, to provide participants with practical examples and lessons learned. Thereby, the training prepared the participants to perform different roles in OSS offices.

#### **4. Commission Preliminary Assessment:** Satisfactorily fulfilled.

**Number and name of the Target:** RO-C[C16]-R[2.0]-T[525] Opening of physical OSS offices

**Related Measure:** RO-C[C16]-R[2.0] Setting up one-stop-shops (OSS) to provide energy advisory services for energy efficiency renovations and energy production from renewable sources for prosumers

**Quantitative Indicator:** Number

**Baseline:** 0

**Target:** 42

**Time:** Q1 2026

### 1. Context:

The reform objective is to establish dedicated one-stop-shop (hereafter referred to as “OSS”) offices for energy advisory services to raise awareness and facilitate energy efficiency renovations and renewable energy installations among homeowners.

The reform consists in the set up of physical offices and an online contact point to streamline the documentation process for these renovations and installations of renewables.

Target 525 requires the opening of physical OSS offices service-ready and accessible to citizens.

Target 525 is the second target of the reform and is accompanied in the same payment request by target 524 related to the training of OSS staff. Target 525 follows the completion of milestone 523 related to the entry into force of legal and regulatory acts for the establishment of OSS offices to provide energy advisory services.

### 2. Evidence provided:

|   | Name of the evidence     | Short description                                                                                                                                                                                                                                                                                                                                             |
|---|--------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1 | Cover note               | Summary document duly justifying how the target (including all the constitutive elements) has been satisfactorily fulfilled.                                                                                                                                                                                                                                  |
| 2 | County Council Decisions | Local normative administrative acts ( <i>Hotărârea Consiliului Județean</i> ) adopted by representatives of the 41 Romanian county councils and the municipality of Bucharest formally creating the OSS offices as an administrative structure within the County Councils, in accordance with Government Emergency Ordinance 92/2024.                         |
| 3 | Links to OSS websites    | Links to all 42 OSS websites, offering an overview for each office of the contact points, the address and opening hours and the information published on the websites for citizens: <ul style="list-style-type: none"><li>Alba: <a href="https://judetul-alba.ro/ghiseul-unic-de-eficienta-">https://judetul-alba.ro/ghiseul-unic-de-eficienta-</a></li></ul> |

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|  |  | <p><a href="#">energetica-guee</a></p> <ul style="list-style-type: none"> <li>• Arad: <a href="https://www.cjarad.ro/informatii-interes-public/ghiseul-unic-de-eficienta-energetica/">https://www.cjarad.ro/informatii-interes-public/ghiseul-unic-de-eficienta-energetica/</a></li> <li>• Argeș: <a href="https://www.cjarges.ro/en/ghiseul-unic-de-eficienta-energetica">https://www.cjarges.ro/en/ghiseul-unic-de-eficienta-energetica</a></li> <li>• Bacău: <a href="https://www.csjbacau.ro/dm_cj/portalweb.nsf/AllByUNID/ghiseul-unic-de-eficienta-energetica-00033082?OpenDocument">https://www.csjbacau.ro/dm_cj/portalweb.nsf/AllByUNID/ghiseul-unic-de-eficienta-energetica-00033082?OpenDocument</a></li> <li>• Bihor: <a href="https://www.cjbihor.ro/guee/">https://www.cjbihor.ro/guee/</a></li> <li>• Bistrița-Năsăud: <a href="https://www.portalbn.ro/portal/bistrita-nasaud/portal.nsf/AllByUNID/ghiseu-unic-de-eficienta-energetica-0001e5d2?OpenDocument">https://www.portalbn.ro/portal/bistrita-nasaud/portal.nsf/AllByUNID/ghiseu-unic-de-eficienta-energetica-0001e5d2?OpenDocument</a></li> <li>• Botoșani: <a href="https://www.cjbotosani.ro/informatii-publice/ghiseul-unic-de-eficienta-energetica/">https://www.cjbotosani.ro/informatii-publice/ghiseul-unic-de-eficienta-energetica/</a></li> <li>• Brașov: <a href="https://addjb.ro/ghiseu-energie">https://addjb.ro/ghiseu-energie</a></li> <li>• Brăila: <a href="https://cjbraila.ro/dm_cj/portal.nsf/AllByUNID/0004028E?OpenDocument">https://cjbraila.ro/dm_cj/portal.nsf/AllByUNID/0004028E?OpenDocument</a></li> <li>• Buzău: <a href="https://cjbuzau.ro/ghiseul-unic-de-eficienta-energetica/">https://cjbuzau.ro/ghiseul-unic-de-eficienta-energetica/</a></li> <li>• Caraș-Severin: <a href="https://www.cjcs.ro/dm_cjcs/portal.nsf/pagini/font+colorredghiseul+unic+de+eficienta+energeticafont-0000D936">https://www.cjcs.ro/dm_cjcs/portal.nsf/pagini/font+colorredghiseul+unic+de+eficienta+energeticafont-0000D936</a></li> <li>• Călărași: <a href="https://www.calarasi.ro/ghiseul-unic-de-eficienta-energetica/">https://www.calarasi.ro/ghiseul-unic-de-eficienta-energetica/</a></li> <li>• Cluj: <a href="https://cjcluj.ro/ghiseul-de-eficienta-energetica/">https://cjcluj.ro/ghiseul-de-eficienta-energetica/</a></li> <li>• Constanța: <a href="https://www.cjc.ro/sectiune.php?s=106">https://www.cjc.ro/sectiune.php?s=106</a></li> <li>• Covasna: <a href="https://www.cjcv.ro/ro/informatii-utile-guee.html">https://www.cjcv.ro/ro/informatii-utile-guee.html</a></li> <li>• Dâmbovița: <a href="https://adideseuridb.ro/ghiseul-unic-de-eficienta-energetica-guee">https://adideseuridb.ro/ghiseul-unic-de-eficienta-energetica-guee</a></li> <li>• Dolj: <a href="https://www.cjdolj.ro/dm_dolj/site.nsf/pagini/ghiseul+unic+de+eficienta+energetica-0000FF1E">https://www.cjdolj.ro/dm_dolj/site.nsf/pagini/ghiseul+unic+de+eficienta+energetica-0000FF1E</a></li> <li>• Galați: <a href="https://cjgalati.ro/ro-gu-despre/">https://cjgalati.ro/ro-gu-despre/</a></li> <li>• Giurgiu: <a href="https://cjgiurgiu.ro/oss-consiliul-judetean-giurgiu/">https://cjgiurgiu.ro/oss-consiliul-judetean-giurgiu/</a></li> <li>• Gorj: <a href="https://www.cjgorj.ro/ghiseul_unic_de_eficienta_energetica/">https://www.cjgorj.ro/ghiseul_unic_de_eficienta_energetica/</a></li> <li>• Harghita: <a href="https://judetulharghita.ro/eficienta-energetica/">https://judetulharghita.ro/eficienta-energetica/</a></li> <li>• Hunedoara: <a href="https://cjhunedoara.ro/index.php/ghiseul-unic-de-eficienta-energetica-guee">https://cjhunedoara.ro/index.php/ghiseul-unic-de-eficienta-energetica-guee</a></li> <li>• Ialomița: <a href="https://cjialomita.ro/informatii-de-interes-public/guee-informatii-utile/?hilite=guee">https://cjialomita.ro/informatii-de-interes-public/guee-informatii-utile/?hilite=guee</a></li> <li>• Iași: <a href="https://guee-iasi.github.io/guee-iasi/">https://guee-iasi.github.io/guee-iasi/</a></li> <li>• Ilfov: <a href="https://cjilfov.ro/informare-publica/ghiseul-unic-de-energetica-guee">https://cjilfov.ro/informare-publica/ghiseul-unic-de-energetica-guee</a></li> </ul> |
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|   |                    | <p><a href="#">eficienta-energetica/</a></p> <ul style="list-style-type: none"> <li>• Maramureș: <a href="https://www.cjmaramures.ro/organizare/ghiseu-unic-de-eficienta-energetica">https://www.cjmaramures.ro/organizare/ghiseu-unic-de-eficienta-energetica</a></li> <li>• Mehedinți: <a href="https://www.cjmehedinti.ro/ghiseu-unic-guee">https://www.cjmehedinti.ro/ghiseu-unic-guee</a></li> <li>• Mureș: <a href="https://ro.cjmures.ro/ghiseul-unic-de-eficienta-energetica/?doing_wp_cron=1763991709.0409588813781738281250">https://ro.cjmures.ro/ghiseul-unic-de-eficienta-energetica/?doing_wp_cron=1763991709.0409588813781738281250</a></li> <li>• Neamț: <a href="https://cjneamt.ro/ro/informatii-de-interes-public/guee/">https://cjneamt.ro/ro/informatii-de-interes-public/guee/</a></li> <li>• Olt: <a href="https://cjolt.ro/ghiseului-unic-de-eficienta-energeticagueue/">https://cjolt.ro/ghiseului-unic-de-eficienta-energeticagueue/</a></li> <li>• Prahova: <a href="https://cjph.ro/proiecte-programe-si-strategii/ghiseului-unic-de-eficienta-energetica-ghiseul-unic-de-eficienta-energetica-guee/">https://cjph.ro/proiecte-programe-si-strategii/ghiseului-unic-de-eficienta-energetica-ghiseul-unic-de-eficienta-energetica-guee/</a></li> <li>• Sălaj: <a href="https://www.cjsj.ro/index.php/component/content/article/2-uncategorised/697-ghiseul-unic-de-eficienta-energetica?Itemid=101">https://www.cjsj.ro/index.php/component/content/article/2-uncategorised/697-ghiseul-unic-de-eficienta-energetica?Itemid=101</a></li> <li>• Satu Mare: <a href="https://www.cjsm.ro/ghiseul-unic-de-eficienta-energetica">https://www.cjsm.ro/ghiseul-unic-de-eficienta-energetica</a></li> <li>• Sibiu: <a href="https://www.cjsibiu.ro/fara-categorie/ghiseu-unic-de-eficienta-energetica/">https://www.cjsibiu.ro/fara-categorie/ghiseu-unic-de-eficienta-energetica/</a></li> <li>• Suceava: <a href="https://cjsuceava.ro/ghiseul-unic-de-eficienta-energetica">https://cjsuceava.ro/ghiseul-unic-de-eficienta-energetica</a></li> <li>• Teleorman: <a href="https://cjteleorman.ro/guee/10/meniu.html">https://cjteleorman.ro/guee/10/meniu.html</a></li> <li>• Timiș: <a href="https://www.cjtimis.ro/informatii-publice/ghiseul-unic-de-eficienta-energetica/">https://www.cjtimis.ro/informatii-publice/ghiseul-unic-de-eficienta-energetica/</a></li> <li>• Tulcea: <a href="https://www.cjtulcea.ro/sites/cjtulcea/PrezentareaJudetului/Pages/home.aspx">https://www.cjtulcea.ro/sites/cjtulcea/PrezentareaJudetului/Pages/home.aspx</a></li> <li>• Vâlcea: <a href="https://cjvalcea.ro/alte-informatii-publice/ghiseul-unic-de-eficienta/">https://cjvalcea.ro/alte-informatii-publice/ghiseul-unic-de-eficienta/</a></li> <li>• Vaslui: <a href="https://cjvs.eu/guee-test/">https://cjvs.eu/guee-test/</a></li> <li>• Vrancea: <a href="https://cjvrancea.ro/ghiseul-unic-de-eficienta-energetica/">https://cjvrancea.ro/ghiseul-unic-de-eficienta-energetica/</a></li> <li>• București: <a href="https://www.pmb.ro/programe/1/menu-page/ghiseul-unic-de-eficienta-energetica">https://www.pmb.ro/programe/1/menu-page/ghiseul-unic-de-eficienta-energetica</a></li> </ul> |
| 4 | County OSS reports | <p>42 County OSS Reports dated and signed by representatives of the 41 Romanian county councils and the municipality of Bucharest on behalf of the local OSS offices, submitted to the Ministry of Investments and European Projects and Ministry of Development, Public Works and Administration. The reports consist of an overview of the names and roles of staff allocated to each OSS office and the numbers of files processed.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |

### 3. Analysis:

The justification and substantiating evidence provided by the Romania authorities cover all constitutive elements of the target.

**42 physical OSS Offices shall be service-ready and open to citizens.**

**Furthermore, in line with the description of the measure, the reform consists in the set up of physical offices and an online contact point to streamline the documentation process for these renovations and installations of renewables.**

To demonstrate the formal establishment of the 42 OSS offices, Romania provided County Council Decisions (Evidence No. 2), which legally create these structures within the organisational framework and physical premises of the county council administrations.

Romania also provided links (Evidence No. 3) to websites corresponding to all 42 OSS offices containing the addresses of each office. The Commission services accessed the links provided by the authorities on 3 March 2026 to verify whether they were accessible and each contained the addresses of the respective OSS office. This check was completed successfully, confirming that the websites are accessible and contain the addresses, which further proves the physical existence of each OSS office. In addition to the addresses, the websites contain the contact details, including telephone number and email addresses, of the OSS offices and thus serve as online contact points for citizens to streamline the documentation process for renovations and installations of renewables.

To prove that all 42 OSS offices are service-ready, Romania provided County OSS reports (Evidence No. 4) for each office, detailing the names and roles of staff allocated to each office and the numbers of files processed. The Commission services confirmed that the staff was trained to provide energy advisory services under target T524, thereby verifying the presence of staff in the OSS offices in all 42 counties. In addition to the presence of trained staff and physical existence, the websites of all 42 OSS (Evidence No. 3) show an overview of the services provided by the OSS offices, including information on energy efficiency and renewable energy sources, further demonstrating that the OSS are service-ready.

The links (Evidence No. 2) to websites corresponding to all 42 OSS offices that Romania provided also prove that all 42 OSS offices are open to citizens. Through the check outlined above, the Commission services confirmed that the websites provide information necessary for citizens to access the services offered by the OSS offices, such as the opening hours of the physical offices, contact details to take appointments and identification details of the OSS offices staff.

**4. Commission Preliminary Assessment: Satisfactorily fulfilled.**