

Targeted public consultation - draft guidance on the application of the 'do no significant harm' principle under the 2028-2034 Multiannual Financial Framework (MFF)

Introduction

The Commission proposal for a Performance Regulation sets out that the Commission is to issue a simple and single guidance on the application of the Do No Significant Harm (DNSH) principle to the Multiannual Financial Framework (MFF) 2028-2034.

In this context, this targeted consultation aims to gather feedback from stakeholders on the Commission's envisaged approach to applying the principle, presented in the concept paper (attached to this questionnaire). The following survey follows the structure of the concept paper.

This targeted consultation will be open for 9 weeks, until 16 September 2026. It follows the Call for Evidence published on the "[Have your say](#)" portal in March 2026.

Profile of respondents

Language of my contribution:

English

I am giving my contribution as:

- ☐ National authority
- ☐ Regional authority
- ☐ National agency
- ☐ Implementing partner of EU funds
- ☒ Business organisation / company
- ☐ Industry or trade association
- ☐ Small and medium-sized enterprise (SME)
- ☐ NGO / Civil society organisation
- ☐ Consumer organisation
- ☐ Trade union / workers' organisation
- ☐ Academic or research organisation

- ☐ International organisation
- ☐ EU citizen
- ☐ non-EU citizen
- ☐ Other

Please specify the name of your organisation:

1000 character(s) maximum

Finnish Energy

What is the size of your organisation?

- ☐ Micro (fewer than 10 employees)
- ☒ Small (10-49 employees)
- ☐ Medium-sized (50-249 employees)
- ☐ Large (250 employees or more)

First name

Surname

Email address

Country of origin

FI - Finland

In which sector(s) are you primarily active?

Maximum 3 selection(s)

- ☐ Agriculture and food
- ☒ Energy and mining
- ☐ Environment and climate
- ☐ Financial Services
- ☐ Health
- ☐ Digital / ICT
- ☐ Transport and mobility
- ☐ Consumer markets / retail
- ☐ Manufacturing / industry
- ☐ Construction / infrastructure

- ☐ Education
- ☐ Media / culture
- ☐ Justice / legal services
- ☐ Public administration
- ☐ Social services
- ☐ Defence / security
- ☐ Consulting services
- ☐ Cross-sectoral
- ☐ Other

Please indicate your level of familiarity with the 'Do No Significant Harm' (DNSH) principle.

- ☒ Very high – direct and regular practical experience
- ☐ High – good knowledge and some practical experience
- ☐ Moderate – general knowledge
- ☐ Limited – only partial familiarity
- ☐ No knowledge

What is the main basis for your replies?

- ☐ Practical experience in applying DNSH rules
- ☐ Experience in enforcement, auditing or supervision of DNSH rules
- ☐ Academic research
- ☒ Representative of an undertaking, industry association, NGO, or other stakeholder organisation
- ☐ Other

General questions on the proposed approach

Overall, do you think that the framework presented in the concept paper strikes a good balance between ensuring an adequate level of environmental protection and remaining proportionate and simple to apply?

- ☐ 1 – not at all
- ☐ 2 – to a limited extent
- ☐ 3 – to some extent
- ☒ 4 – to a great extent
- ☐ Do not know

Please justify your answer, providing examples where possible

2000 character(s) maximum

We consider the Commission's overall approach well-founded and support the simplification of the DNSH principle. A clear and proportionate DNSH framework is important for ensuring that EU funding supports solutions consistent with the green transition and is not directed to activities that cause significant harm to the Union's climate and environmental objectives. At the same time, the framework should remain technology-neutral and recognise the full range of solutions needed to deliver the energy transition, system resilience and security of supply.

General principles applicable to the DNSH approach (section 1 of the concept paper)

Do you have any comments on the concept paper's section on the principles of reduced administrative burden and proportionality (section 1.A)?

- ☐ Yes
☒ No

Do you have any comments on the concept paper's section on the principle of 'where feasible or appropriate' (section 1.B)?

- ☐ Yes
☒ No

Do you consider that additional criteria for climate change adaptation are necessary (section 1.C of the concept paper)?

- ☐ Yes
☒ No

DNSH areas and criteria (section 2 of the concept paper)

Do you have any comments on point 1) and/or its related exemptions in section 2.A of the concept paper?

- ☐ Yes
☒ No

Do you have any comments on point 2) and/or its related exemptions in section 2.A of the concept paper?

- ☐ Yes
☒ No

Do you have any comments on point 3) and/or its related exemptions in section 2.A of the concept paper?

- ☐ Yes
☒ No

Do you have any comments on point 4) and/or its related exemptions in section 2.A of the concept paper?

- ☐ Yes
☒ No

Do you have any comments on point 5) and/or its related exemptions in section 2.A of the concept paper?

- ☐ Yes
☒ No

Do you have any comments on point 6) and/or its related exemptions in section 2.A of the concept paper?

- ☐ Yes
☒ No

Do you have any comments on point 7) and/or its related exemptions in section 2.A of the concept paper?

- ☐ Yes
☒ No

Do you have any comments on point 8) and/or its related exemptions in section 2.A of the concept paper?

- ☐ Yes
☒ No

Do you have any comments on point 9) and/or its related exemptions in section 2.A of the concept paper?

- ☐ Yes
☒ No

Do you have any comments on point 10) and/or its related exemptions in section 2.A of the concept paper?

- ☐ Yes
☒ No

Do you have any comments on point 11) and/or its related exemptions in section 2.A of the concept paper?

- ☐ Yes
☒ No

Do you have any comments on point 12) and/or its related exemptions in section 2.A of the concept paper?

- ☐ Yes
☒ No

Do you have any comments on point 13) and/or its related exemptions in section 2.A of the concept paper?

- ☐ Yes
☒ No

Do you have any comments on point 14) and/or its related exemptions in section 2.A of the concept paper?

- ☐ Yes
☒ No

Do you have any comments on point 15) and/or its related exemptions in section 2.A of the concept paper?

- ☒ Yes
☐ No

Are the scope and formulation of point 15) and its exemptions clear?

- ☐ 1 – not at all

- ☐ 2 – to a limited extent
- ☒ 3 – to some extent
- ☐ 4 – to a great extent
- ☐ Do not know

Which element(s) need(s) to be further clarified? Please justify your answer, providing examples where possible, and drafting suggestions if relevant

2000 character(s) maximum

Pumped hydro storage (PHS) is essential for providing system flexibility, including through the integration of renewables at scale, to the European power system. PHS also helps deliver the continuous power supply needed to decarbonise European industry.

The guidance should prevent the inadvertent exclusion of PHS projects under activity (15) “New artificial barriers which disrupt river continuity in free-flowing river stretches”. This would prevent divergent national interpretations, additional administrative burden and reduced investment certainty.

Moreover, repowering and modernisation of existing hydropower infrastructure should not be misinterpreted as falling in the scope of “new artificial barriers”.

Finally, with regard to the general principle of avoiding duplication, projects which have demonstrated compliance with the Water Framework Directive and other applicable environmental legislation shall be deemed DNSH-compliant in the MFF with no further requirement.

Do you expect any challenges in the implementation and verification of point 15) and its exemptions?

- ☐ 1 – not at all
- ☐ 2 – to a limited extent
- ☐ 3 – to some extent
- ☐ 4 – to a great extent
- ☒ Do not know

Do you have experience in proving that a project does not disrupt river continuity in free-flowing river stretches?

- ☒ Yes
- ☐ No

Please explain what type of evidence you have used/would use to prove this

1000 character(s) maximum

Do you have any comments on point 16) and/or its related exemptions in section 2.A of the concept paper?

- ☐ Yes
- ☒ No

Do you have any comments on point 17) and/or its related exemptions in section 2.A of the concept paper?

- ☐ Yes
☒ No

Do you have any comments on point 18) and/or its related exemptions in section 2.A of the concept paper?

- ☐ Yes
☒ No

Final questions

Do you consider that any of the criteria included in the concept paper are not necessary?

- ☐ Yes, one or more are not necessary
☒ No, they are all necessary

Do you see the need to include any additional criteria or areas not covered in the concept paper?

- ☐ Yes
☒ No

Background Documents

[DNSH Concept paper 15.7.2026 - for publication.pdf](#)

Contact

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