Brussels, 19th November 2025

German Chamber of Commerce and Industry

Statement

Draft bill COM(2025) 551 final (Regulation of the European Parliament and of the Council establishing Global Europe)

The European Commission opened a consultation on the 19th July 2025 regarding the establishment of the new multiannual financial framework (2028-2034). Among the concerned policy fields is also EU funding for external action, which will be governed by the regulation on establishing the Global Europe Instrument. Prior the European Commission had launched a more general consultation, which the DIHK also participated in.

A. Outline of main facts

- The engagement of the private sector in the EU external action must be integrated from the outset. Thus, mechanisms and formats of consulting the European business community need to be embedded in the regulation.
- As the Global Gateway initiative is a key external action strategy with relevance for market access and competitiveness, it should be anchored as a core element in the Global Europe proposal. A dedicated sub-envelope, accessible to the private sector, especially SMEs, must be established to ensure effective participation.

The new multiannual financial framework (MFF) for the years 2028-2034 will define funding priorities for all EU initiatives for over seven years. Its regulations must ensure a competitive EU by embedding private sector participation, including in the field of offical development assistance (ODA) (see **recital 12, 32**). Under the umbrella of the Global Europe Instrument, the Global Gateway iniatitaive offers a unique opportunity for European businesses to diversify their supply chains, access new markets while establishing new international partnerships and supporting local economies in partner countries (see **recital 15**).

Further ideas for enabling Global Gateway's success can be found in our latest policy paper.

Vertretung der DIHK | Deutsche Industrie- und Handelskammer bei der EU
19 A-D, Avenue des Arts | B-1000 Bruxelles
Tel. +32 2 286-1611 | Fax +32 2 286-1605 | Internet: www.dihk.de

B. Detailed explanation

Laying the groundwork for Global Gateway and enhancing private sector engagement

It remains of utmost importance to lay the groundwork in the next MFF for a successful implementation of Global Gateway beyond the current Commission's mandate. This requires a sufficient amount of financial ressources and corresponding instruments for a smooth transition in 2028. However, so far the initiative is only briefly mentioned in **recital 24**, alluding to its importance for achieving ,,*EU strategic and economic interests''*. Additionally, a corresponding fund similar to the European Fund for Sustainable Development Plus (EFSD+) should be set up in the proposal, allocating specific financial ressources (e.g. a sub-enevlope) to Global Gateway (**recital 76**).

Consulations with the German business community show that EU programmes under Global Gateway are still not considered to be accessible to the private sector. The final regulation for the Global Europe Instrument should thus provide a clear framework for applying for financial support (e.g. project take-off financing, guarantess or grants) and for distributing said support under Global Gateway. Hence, in **recital 56**, which addresses enhanced coordination (e.g. blending) between the members of the Team Europe initiative, relevant stakeholders such as the private sector should be explicitly mentioned. This would ensure that the access to finance can be tailored to business needs and exchanges are thus facilitated. The installation of a one-stop-shop remains a top priority in this context. Furthermore, the option of including private sector representatives in the to be founded Global Europe Investment Board should be reserved in **recital 83** and codified in **article 25 paragraph 6.**

The explicit mention of the private sector in **article 9 paragraph 11** is to be endorsed by the Germen business community. A valuable addition to the *enhanced dialogue* mentioned therein would be, as previously done in **article 9 paragraph 9,** to add the following wording to **article 9 paragraph 11**: ,,[the private sector is] *duly consulted and* [has] *timely access to relevant information allowing* [it] *to play a meaningful role during the design* [and] *implementation under the instrument''*.

To ensure that the needs for private sector investment are met, consultations as proposed for civil society organisations in **recital 46** should include businesses as well. The recital should be amended as followed: ,,[Relevant stakeholders such as civil society organisations and the private sector] *should have timely access to relevant information* [such as tenders and early project information] *allowing them to be adequately engaged''*.

Furthermore, regarding the Interinstitutional Agreement on Better Law Making, consultations on the amendments to this regulation, should consider all relevant stakeholders as pointed out in **recital 86** as well as in **article 30**. Impact assessments should be performed.

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Team Europe

The external appearance of Team Europe, as referred to in **recital 90,** is highly important within in the framework of the Global Europe Instrument and the Global Gateway Initiative. Only if a strategy-based and unified approach is guaranteed, the EU's efforts can be implemented effectively. So far, the private sector is not an official member of Team Europe. Moreover, the 27 Team Nationals do not yet cohesively include the private sector. **Article 11** could remedy that, if **paragraph 3** were to define ,,*like-minded partners and stakeholders''* further.

Grants

The provision of grants without a call for proposals in case of strategic EU interests is to be endorsed by the German business community (**recital 70**). In particular, the emphasis on financing feasibility studies could help stiumlate private sector investments. However, the flow of information needs to be ensured.

Clean Trade and Investment Partnerships

The brief mention of Clean Trade and Investment Partnerships , which should seek synergies with the Global Europe Instrument as well as the European Competitiveness Fund (ECF), raises the question of how useful these non-binding partnerships will be in enhancing economic cooperation between EU and third country businesses, and what kind of (financial) contribution from the MFF can be expected (**recital 32**).

Flexibility

Allowing programmes and their funding to be combined (**recital 34**), could, in certain cases, help provide a more compelling financial offer to businesses active under Global Gateway – especially if the flexible implementation leads to enhanced coordination of all financial tools available across the MFF's headings (e.g. combining the Global Europe Instrument's resources with the ECF). Furthermore, if the flexibility of financial instruments is strengthened by lowering the ODA-threshhold from 93 to 90 percent, the regulation could enable a better private sector engagement (**article 6, paragraph 5**).

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Contact person

Sandra Zwick
Director European Policy, EU Trade Promotion
Europe | International Economic Policy
Zwick.sandra@dihk.de
+49 151 11314650

Katharina Wittke
Director South- and Southeast Asia, Pacific | Asia-Pacific Committee of German Business (APA)
International Economic Relations
Wittke.katharina@dihk.de
+49 30 20308 2316

Who we are:

The 79 Chambers of Commerce and Industry (IHKs) are incorporated under the umbrella of the German Chamber of Commerce and Industry (DIHK). Our joint aim: to obtain the best conditions for successful business.

The DIHK represents the interests of the entire commercial economy in dealings with decision makers, administrations and the public at federal and European level. Several million companies representing trade, industry and services are legal members of an IHK, ranging from kiosk owners to DAX companies. The DIHK and the IHKs therefore provide a platform for a whole range of corporate concerns. We group them together in an organised procedure on a statutory basis to formulate the general interest of the commercial economy and thus contribute to the formation of opinions in economic policy.

Our statements are based on economic policy positions and position papers adopted by the DIHK taking into account the comments received from IHKs and their member companies prior to the submission of the statement.

The DIHK also coordinates the network of 150 German Chambers of Commerce Abroad, delegations and representative offices of the German economy in 93 countries.

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