01 December 2025

Positive preliminary assessment of the satisfactory fulfilment of milestones and targets related to the eighth payment request submitted by Italy on 30 June 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 30 June 2025, Italy submitted a request for payment for the eighth instalment of the non-repayable support and the eighth instalment of the loan support. The payment request was accompanied by the required management declaration and summary of audits.

To support its payment request, Italy provided due justification of the satisfactory fulfilment of the 21 milestones and targets of the eighth instalment of the non-repayable support and the 11 milestones and targets of the eighth instalment of the loan support, as set out in Section 2(1)(1.8) and Section 2(2)(2.8) of the Council Implementing Decision of 13 July 2021 on the approval of the assessment of the recovery and resilience plan for Italy[1].

For 8 targets covering a large number of beneficiaries, in addition to the summary documents and official listings provided by Italy, Commission services have assessed a statistically significant sample of individual files. The sample size has been uniformly set at 60 which corresponds to a confidence level of 95% or above in all cases.

In its payment request, Italy 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 Italy, the Commission has made a positive preliminary assessment of the satisfactory fulfilment of all 32 milestones and targets.

The milestones and targets positively assessed as part of this payment request demonstrate significant steps in the implementation of Italy’s Recovery and Resilience Plan. They notably highlight the continuation of the reform momentum in key policy areas. This includes, among others, reforms of incentives to firms, as well as, follow-up measures to keep up the implementation efforts concerning the already adopted reforms on permitting on renewables, reforms in the areas of public administration, late payments by public administrations, public procurement and spending reviews. The milestones and targets also confirm progress towards the completion of investment projects related to research and innovation, the digitalization of public administration and the digital transition of firms, climate adaptation and the environmental transition, energy poverty, STEM, digital and vocational education, home care services for patients .

[1] ST 10160/21; ST 10160/21 ADD 1 REV 2; ST 12259 2023 INIT; ST 16051 2023 INIT; ST 16051 2023 ADD 1; ST 9399 2024 INIT; ST 9399 2024 ADD 1; ST 15114 2024 INIT; ST 15114 2024 ADD 1 REV 1; ST 9587 2025 INIT; ST 9587 2025 ADD 1; ST 15106/25; ST 15106/25 ADD 1 + COR 1, not yet published.

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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Non-repayable support

[M1C1-23]: Mobility as a Service solutions M2

Related Measure: IT-C[M1C1]-I[I1.4]: Digital services and citizen experience

Qualitative Indicator: Implementation of seven pilot projects

Baseline: N/A

Time: Q2 2025

1. **Context:**

The objective of this investment is to develop an integrated and citizen-oriented ecosystem of digital public services, ensure their widespread adoption across central and local administrations and enhance overall user experience. The sub-investment 1.4.6 "Mobility as a Service for Italy" promotes the adoption of Mobility as a Service (MaaS) in metropolitan areas to digitalise local transport and offer users integrated mobility from trip planning to payment.

Milestone M1C1-23 concerns the testing of MaaS solutions through seven pilot projects, of which at least three located in the South of Italy. Mobility as a Service shall provide users, through a single technological platform, with the best travel solution based on their needs, by integrating different mobility options (for example, public transport, sharing services, taxis, car rental) and optimising travel planning and overall user experience.

Milestone M1C1-23 is the last step of the implementation of the sub-investment, and it follows the completion of M1C1-13 related to the implementation of three pilot projects aimed at testing Mobility as a Service solutions in technologically advanced metropolitan cities.

2. **Evidence provided:**

1. Summary document duly justifying how the milestone, including all the constitutive elements, was satisfactorily fulfilled
2. Public notice for the submission of proposals to conduct pilot projects for M1C1-23
3. Decree No. 150/2023 – PNRR published on 28/10/2023 by the Presidency of the Council of Ministers approving the final ranking of selected regions
4. Agreement containing the commitments of the Implementing Entity, including the operational plan of the MaaS4Italy project, for each selected region
5. List of users of MaaS solutions, for each selected region
6. List of MaaS operators, for each selected region
7. Description of onboarding process for users prepared by each selected region
8. Report produced by the Ministry of Infrastructure and Transport (MIT) and the University of Naples on 17/06/2025 on the implementation of the pilot projects
9. Report produced by Ministry of Infrastructure and Transport (MIT) and the Department of Digital Transformation (DTD) on the overall MaaS for Italy project dated 31/03/2025, and annex with consolidated data produced on 16/06/2025
10. Certificates of project completion signed by each region
11. Evaluation report on the completion of activities foreseen under the pilot project, produced by each of the seven selected regions

12. Report on the creation of the infrastructure “Data Sharing Repository for MaaS” (DSRM) produced by the Ministry of Infrastructure and Transport (MIT)

3. Analysis:

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

Seven pilot projects, of which at least three in the South, shall test Mobility as a Service (MaaS) solutions.

Following the first Mobility as a Service (MaaS) pilot in the metropolitan areas of Rome, Milan, and Naples (assessed under target M1C1-13), the MaaS pilot initiative was expanded to seven regions: Abruzzo, the autonomous province of Bolzano, Campania, Emilia-Romagna, Piemonte, Puglia and Veneto, of which the last three are located in Southern Italy (evidence no. 3). The regions were selected through a public call for proposals under the “MaaS4Italy” project (evidence no. 2). The final ranking of the selected regions was published on 28 October 2023 by the Presidency of the Council of Ministers via Decree No. 150/2023 (evidence no. 3). Each selected region subsequently signed an agreement with the Department of Digital Transformation (DTD) as the implementing entity. These agreements set out the arrangements for carrying out the MaaS4Italy project, defining the respective roles, responsibilities, financial and reporting procedures of the parties involved. Each agreement includes a regional operational plan describing in detail the project design, operational methods, and implementation schedule (evidence no. 4).

To confirm that the testing phase of the pilot projects took place, user data were provided (evidence no. 5). This user data includes, for each region, anonymised user information, the name of the MaaS operator and indicators such as the number of trips booked through the application. Each region also submitted a detailed description of the of user onboarding process (evidence no. 7), demonstrating how users were engaged and integrated into the MaaS platforms during the pilot phase. In addition, a list of MaaS operators participating in the pilot projects was submitted (evidence no. 6). The list identifies the Maas operator and the corresponding application name, along with the transport operators available for each application, the type of data supported (static or dynamic) and information on whether payment functionality is available. To attest the implementation and completion of the activities carried out under each pilot, the participating regions issued certificates of completion of works, duly signed by the competent authorities (evidence no. 10). In addition to the certificates themselves, each region provided an annexed report detailing the specific actions carried out, such as the identification of MaaS operators, a communication campaign to inform citizens on the MaaS project, the progress achieved and the results delivered (evidence no. 11). Finally, a report produced by the Ministry of Infrastructure and Transport (MIT) and the University of Naples on 17 June 2025 (evidence no. 8) provides extensive details on the implementation of the pilot projects in each of the seven regions. It describes the ex-ante conditions of the national and local architecture, communication campaigns for user engagement, incentive policies used, monitoring activities based on selected KPIs and questionnaires addressed to MaaS and transport operators. The report concludes with the results achieved for each of the regions and future prospects of the MaaS4Italy project.

Mobility as a Service shall provide users, through a single technological platform, with the best travel solution based on their needs, by integrating different mobility options (for example, public

transport, sharing services, taxis, car rental) and optimising travel planning and overall user experience.

MaaS is a mobility concept based on the integration of multiple public and private transport services, across different modes of transport (including public transport, car sharing services, taxis and car rental) and operated by various providers, all accessible to the end user through a single digital channel. As reported by the Ministry of Infrastructure and Transport (MIT) and the Department of Digital Transformation (DTD), these services are managed through intermediation platforms that offer a range of functionalities such as multimodal travel information, trip planning and booking, travel management, unified payment of services and post-travel operations. Such platforms provide personalised solutions tailored to users' specific mobility needs, enhancing freedom of movement and user experience (evidence no. 9). This investment promotes, through data sharing and cooperation among operators, the reusability and interoperability of transport systems by means of intermediary platforms. Users can plan, book and pay for multiple mobility options through MaaS operator applications participating in the "MaaS4Italy" project, thereby supporting a more digital, inclusive and sustainable mobility system. The project, described in detail in the report prepared by MIT and DTD (evidence no. 9), represents the first nationwide pilot implementing the MaaS concept. It foresees the following phases under the RRF: a first wave involving the cities of Milan, Naples and Rome (assessed under target M1C1-13) and a second wave involving seven pilot regions (target M1C1-23).

In order to optimise travel planning and user experience, MaaS systems rely on two main types of data: static data, based on the NeTEx standard (e.g., routes and timetables), and dynamic data, based on the SIRI standard (e.g., vehicle positions and service availability). This ensures that different travel solutions are supported, responding to the mobility needs of users. To support this architecture and enable data transfer between the transport operators and the MaaS operators, the national authorities established with target M1C1-13 a single technological platform called "Data and Services Repository MaaS" (DRSM), previously "Data Sharing and Service Repository Facilities" (DS&SRF). The DSRM has been updated to improve existing functionalities and create new ones, such as KPI-based analytics, registration and accreditation of different users profiles (administrator, MaaS operator, user). Technical details of the platform are provided in a report produced by MIT (evidence no. 12). The Commission services carried out a virtual on-the-spot check on 6 November 2025 to verify the existence and functionalities of the single technological platform, the DSRM. This check was successfully completed, confirming that the DSRM infrastructure contains a number of functionalities, such as registration and accreditation, KPI-based analytics and trip management, and that it supports B2B data flows between the transport and the MaaS operators, therefore allowing the integration of data related to different mobility options.

The regional evaluation reports (evidence no. 11) describe in detail how the DRMS interacts with regional mobility data infrastructure. The DSRM acts as a single national layer between MaaS operators and transport operators. Transport operators (such as local public transport companies, railway providers and shared mobility services) exchange their data with the Regional Access Points (RAPs), which collect and organise transport data within each region and transmit it to the national level. The RAPs interface with the National Access Point (NAP), which serves as the central gateway for all transport data at national level in this pilot. The NAP harmonises and translates the information received from the RAPs into a common, standardised format compliant with EU standards, enabling data interoperability, consultation and dissemination through a single national platform, the DSRM, accessible to MaaS operators. Through this layered architecture (RAP → NAP → DSRM), a coherent and interoperable flow of transport data between local and national systems can be ensured, allowing MaaS operators to access harmonised, real-time information essential for optimising travel planning and overall user experience. Based on the technical requirements outlined in the regional evaluation reports and on the assessment of the DSRM infrastructure in the virtual-on-the-spot-check carried out on 6 November 2025, it is concluded that the single technological platform provides users of the MaaS solutions with the best travel solution based on their needs.

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

Non-repayable support

[M1C1-25]: Release of new functionalities of the information systems in use for fighting economic crime.

Related Measure: IT-C[M1C1]-I[I1.6]: Digital transformation of large central administrations

Qualitative Indicator: IT systems with new functionalities

Baseline: N/A

Time: Q2 2025

1. **Context:**

The objective of this investment is to increase the efficiency and simplify the procedures of the main central administrations – including including (i) the Ministry of Interior, (ii) the Ministry of Justice, (iii) the National Social Security Institute (INPS) and National Institute for Insurance against Accidents at work (INAIL), (iv) the Ministry of Defence, (v) the Council of State, and (vi) the Finance Police. This part of the measure focuses on the digitisation of the Finance Police.

Milestone M1C1-25 concerns the release of new functionalities of the information systems in use for fighting economic crime.

Milestone M1C1-25 is the third and final target for Investment 1.6.6, and it follows the completion of target M1C1-11 related to the purchase of professional data science services by contracting with a consulting service provider involving five human resources, and the publication of awarded contract and of target M1C1-15 related to the purchase of professional data science services by contracting with a consulting service provider involving five additional human resources (ten in total).

2. **Evidence provided:**

1. Summary document duly justifying how the target, including all the constitutive elements, was satisfactorily fulfilled
2. Description sheet of the Mo.Co.P 2 (Monitoring of public contracts) system issued by the Finance Police and the Department for the Digital Transition
3. Description sheet of the additional functionalities developed for the S.I.Va.3 (Valutario Information System) issued by the Finance Police and the Department for the Digital Transition
4. Compliance verification report of 12 June 2025 signed by the Finance Police, the service provider and the executive director for the Mo.Co.P 2 (Monitoring of public contracts) system
5. Circular No 192635 of 19 June 2025, issued by the General Command of the Finance Policy, which determines the issue of the new Mo.Co.P.2. platform, with a definition of the functionalities and methods of use by the various regional operational components
6. Compliance verification report of 19 June 2025 signed by the Finance Police, the service provider and the executive director for the the S.I.Va.3
7. Direct Purchase Order No 7030149 of 18/11/2022, formalised vis-à-vis Accenture Technology Solutions (in RTI), under the Consip Framework Agreement
8. Direct Purchase Order No 7339456 of 20/07/2023, formalised vis-à-vis Italware S.r.l., under the Consip Agreement

9. Direct Purchase Order No 7377144 of 13/10/2023 formalised to ITD Solutions S.p.A. (in RTI), under the Consip Agreement
10. Direct Purchase Order No 7585405 of 12/01/2024, formalised vis-à-vis Almaviva S.p.A. (in RTI), under the Consip framework agreement
11. Executive Contract No 381462 of 20/12/2024 concluded with So.Ge.I. S.p.a. for the management of the Taxation Information System, including the project 'Development of the computerised systems used to combat economic crime

3. **Analysis:**

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

Release of new functionalities of the information systems in use for fighting economic crime.

The Finance Police released the following new functionalities for fighting economic crime: (i) the new information system called Mo.Co.P 2 (Monitoring of public contracts), together with the release of the 'analysis module' in the 'IT backbone' environment of the Finance Police, all with the overall aim of strengthening the work of analysing public procurement and combating related offences (evidence no.2); (ii) the development of new functionalities of the IT system S.I.Va.3 (Valutario Information System) making it possible the interaction among different databases. , S.I.Va.3 has been develope as a strategic platform used by the corps for the management of Anti-Money Laundering Information and the related analytical and in-depth work processes (evidence no.3).

In relation to the Mo.Co.P 2 (Monitoring of public contracts) system, Italy has developed the following functionalities: i) loading of data from ANAC (anti corruption) database; ii) development of procurement risk indexes; iii) navigation and search; iv) data analysis. To evidence the development of the above functionalities, the Italian authorities have provided the compliance verification report (evidence no.4) and the circular determining the issue of the new Mo.Co.P.2. platform (evidence no.5).

In relation to S.I.Va.3 (Valutario Information System), Italy has developed the following functionalities: monitoring user access; audit; data exchange with other national datatases; reporting. To evidence the development of the above functionalities, the Italian authorities have provided the compliance verification report (evidence no.6).

For the construction and development of the new functionalities, the Finance Police has relied on several contracts (evidence no.7 to 11).

The new functionalities support (i) reorganising databases; (ii) introducing Data Science within the operational and decision-making processes. In particular, the new functionalities developed with the Mo.Co.P 2 (Monitoring of public contracts) system allow the Finance Police to access public procurement data, analyse such data with other already available to the Finance Police and apply data science to extract information, identify analysis and support criminal economic investigation (evidence no.2). The new functionalities developed with the S.I.Va.3system allow the access and analysis of criminal data from other national databases and data available on the web; and the application of data science/artificial intelligence techniques to extract, classify and analyse information (evidence no.3).

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

Non-repayable support

[M1C1-62]: Increase absorption of investment

Related Measure: IT-C[M1C1]-R[R1.9]: Reform of the public administration

Qualitative Indicator: Publication of a report by the Ministry of finance

Baseline: N/A

Goal: N/A

Time: Q2 2025

1. **Context:**

The main objectives of the reform are to improve the effectiveness of the public administration at central and local levels, and to simplify and digitalise administrative procedures affecting citizens and businesses.

Milestone M1C1-62 requires the publication of a report that measures the absorption of resources of the Complementary Fund (PNC) allocated up to 2024. Milestone M1C1-62 is part of Reform 1.9: Reform of the Public Administration, and it follows the completion of Milestone M1C1-55, related to the extension of the methodology applied to the Italian recovery and resilience plan to the national budget to increase absorption of investment.

2. **Evidence provided:**

i. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled;
ii. Implementation report: "PNRR – Attuazione della M1C1-62. Relazione finale (IGAE/RGS), 09/06/2025", issued by the Ministry of Economy and Finance (Ragioneria Generale dello Stato), framing the Piano Nazionale Complementare (PNC), in line with milestone M1C1-62, recalling documents methods, data and results.

3. **Analysis:**

Publication of a report to measure absorption of resources of the Complementary Fund allocated until 2024.

Italy has submitted an implementation report measuring the absorption of resources of the Complementary Fund (hereafter referred as "PNC") allocated until 2024.

The report highlights the data on the absorption of resources of the PNC on page 7. In particular:
- National Budget-execution performance (64,97%) above the historic baseline (58,54%)
- PNC project-level cash evidence showing meaningful advancement (24,16% overall; 40,85% for PNC-only)

The implementation report bases its analysis on the baseline calculated as the average absorption rate of national capital spending over 2011–2020, using RGS statistical data (ratio of *Pagato Conto Competenza (CP)* to *Stanziamenti CP*, excluding initial *residui* to ensure comparability with the PNC), excluding initial *residui* to maintain comparability with PNC). The exclusion of *residui iniziali* was necessary to ensure methodological consistency, as the PNC data are measured on a *conto competenza* basis (current-year appropriations and payments). Including residual appropriations from previous years would distort the 2011–2020 baseline and overstate absorption relative to the PNC reference period.

As shown on page 8 of the report, the baseline (*Valore A*) is 58,54% on a total of €660,9bn of definitive appropriations and €386,9bn paid. Sources, coverage, and extraction standards are described on pages 7-9 of the report, ensuring replicability. Using the same budget classification and metric for 2021–2024 PNC appropriations, Italy computes *Valore B* as 64,97% (€13,986bn paid / €21,526bn appropriated), with a transparent breakdown by economic categories (including *acquisizioni di attività finanziarie* at 100%). This exceeds the 2011 – 2020 baseline by about 6.4 percentage points, demonstrating an increased absorption of resources capacity.

To complement the evidence related to budget-execution, the implementation report (pages 10-11) also computes the actual payments reaching final beneficiaries, tracked through the *Codice Unico di Progetto (CUP)* system (the unique identifier assigned to every public investment project in Italy). This confirms the amount of funds that has effectively been disbursed on the ground, rather than only recorded in the budget:

- *Valore C*: about €5,2 billion were actually paid to final beneficiaries, compared with €21,5 billion in total allocations for 2021–2024 (about 24% of the available resources);
- *Valore D*: if the calculation is narrowed to the programmes financed exclusively by the PNC (excluding those co-financed by the NRR), the same €5,2 billion represents 40,8% of the budget.

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

Non-repayable support

[M1C1-76]: Average number of days for the central public authorities to pay businesses is reduced

Related measure: IT-C[M1C1]-R[R1.11]: Reduction of late payments by public administrations and health authorities

Quantitative indicator: Weighted average payment time (in days)

Baseline: N/A

Target: 30

Time: Q1 2025

1. **Context:**

The objective of the reform is to address bottlenecks causing delays in the execution of payments from central, regional, local and health public administration and authorities towards businesses.

Target M1C1-76 is the first target of this reform and requires that, for payment from central public authorities *(Amministrazioni centrali*) to businesses and for invoices issued in 2024, the weighted average payment time *(tempo medio di pagamento ponderato)* is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time (*tempo medio di pagamento semplice*) and the weighted average payment time does not exceed 20 days unless the unweighted average payment time is below 30 days.

M1C1-76 follows milestones M1C1-72, which provides for the entry into force of new rules to reduce late payments from the public administration to businesses; M1C1-72bis, which requires the adoption of further legislative and non-legislative measures aimed at improving the payment performance of the Italian public administrations at the central and local level; M1C1-72ter, which provides for the introduction of the possibility to increase human resources dealing with payments, and M1C1-72quater which provides for the adoption of an Audit Plan to verify the adequacy and timeliness of existing payment processes.

Target M1C1-76 is accompanied by: (i) target M1C1-77, which requires that the indicators for payments, from regional public authorities *(Regioni - Province Autonome)* to business, for invoices issued in 2024, the weighted average payment time is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 20 days unless the unweighted average payment time is below 30 days (ii) target M1C1-78, which requires that, for payments from local public authorities (*enti locali*) to business, for invoices issued in 2024, the weighted average payment time is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 20 days unless the unweighted average payment time is below 30 days (iii) target M1C1-79, which requires that, for payments from public health authorities (*enti del Servizio sanitario nazionale*) to business, for invoices issued in 2024, the weighted average payment time is at most 60 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 30 days unless the unweighted average payment time is below 60 days.

Target M1C1-76 is followed by: (i) milestone M1C1-72quinquies, which provides for the publication in a dedicated webpage providing explanations, analyses and data on payments by the public administration (ii) milestone M1C1-72sixies, which provides for the adoption of the final audit report of the Audit Plan (iii) target M1C1-88, which requires that, for payments from central public authorities (*Amministrazioni centrali*) to business, for invoices issued in 2025, the weighted average payment time is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 15 days unless the unweighted average payment time is below 30 days (iv) target M1C1-89, which requires that, for payments from regional public authorities (*Regioni - Province Autonome*) to business, for invoices issued in 2025, the weighted average payment time is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 15 days unless the unweighted average payment time is below 30 days (v) target M1C1-90, which requires that, for payments from local public authorities *(enti locali)*, for invoices issued in 2025, the weighted average payment time is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 15 days unless the unweighted average payment time is below 30 days (vi) target M1C1-91, which requires that, for payments from public health authorities (*enti del Servizio sanitario nazionale*), for invoices issued in 2025, the weighted average payment time is at most 60 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 20 days unless the unweighted average payment time is below 60 days.

2. Evidence provided:

1. Summary document duly justifying how the target, including all the constitutive elements, was satisfactorily fulfilled;
2. Link to the *Cruscotto di Monitoraggio*, providing for the display of data from the Commercial Credit Platform at a given moment in time;
3. Link to the MEF portal providing data on the payment time payment delay and commercial debts per typology of public administration: https://www.rgs.mef.gov.it/VERSIONE-I/tempi_di_pagamento_e_debiti_commerciali_delle_pubbliche_amministrazioni/
4. Cruscotto's technical specifications, drafted by the Società Generale d'Informatica S.p.A. (hereinafter referred to as Sogei), dated 30 November 2023;
5. Cruscotto's user manual, adopted by Sogei and the Ministry of Economy and Finance, dated 30 November 2023;
6. Sogei' explanatory note on the transfer of data from the Commercial Credit Platform ("Piattaforma Crediti Commerciali") to the Cruscotto of 6 November 2025.

3. Analysis:

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

Based on data from the Commercial Credit Platform ("Piattaforma Crediti Commerciali") related to invoices issued in 2024, the following indicators for payments from central public authorities (Amministrazioni centrali) to businesses shall be:

- **for the weighted average payment time ("tempo medio di pagamento ponderato"): at most 30 days;**
- **for the weighted average payment delay ("tempo medio di ritardo ponderato"): at most 0 days.**

Furthermore, the difference between the unweighted average payment time ("tempo medio di pagamento semplice") and the weighted average payment time shall not exceed 20 days, unless the unweighted average payment time is below 30 days.

The Italian authorities provided the link and enabling credentials to the *Cruscotto di Monitoraggio* (hereafter referred to as "Cruscotto"), which allows access to data from the Commercial Credit Platform (*Piattaforma Crediti Commerciali*, hereafter referred to as "PCC") divided by level of the public administration (that is central, regional, local and public health authorities).

PCC is the IT platform of the Ministry of Economy and Finance (hereafter referred to as "MEF") for the management of commercial credits, covering all transactions entailing the emission of a commercial invoice towards the public administration for supplies, services, procurement contracts and professional obligations.

While PCC is a management IT tool, continuously fed with data on transactions and the related payments, the Cruscotto provides for the display of such data at a given moment in time, ensuring their stability and coherence for the yearly analysis required by the Council Implementing Decision. The Cruscotto platform has been created by MEF technical partner, the Società Generale d'Informatica S.p.A. (hereinafter referred to as "Sogei") to present the PCC data in line with the indicative timeline provided by the Council Implementing Decision, namely 31 March 2025. As evidenced by the Cruscotto technical specifications and user manual (see evidence No. 4 and 5), both dated 30 November 2023, and by the explanatory note of 6 November 2025 provided by Sogei (see evidence No. 6), the PCC data, present at the moment of the observation, are integrally transferred to the Cruscotto without applying filtering or limitations beyond the start and end date of the period taken into consideration.

Specifically, for what concerns year 2024, the Cruscotto presents the PCC data related to the invoices issued in 2024, i.e. all documents presenting a date of issuance between 1 January 2024 and 31 December 2024 and the related payments carried out until 31 March 2025, as observed at the moment of the observation (specifically, 14 May 2025). Based on the above-mentioned data, the Cruscotto also provides the value of the indicators required by the target – namely the weighted average payment time, the weighted average payment delay and the unweighted average payment time – for payments from central public authorities (*Amministrazioni centrali*), in line with the requirement of the target description.

The Commission services accessed the link to the Cruscotto provided by the Italian authorities, and in particular the '2024' tab therein, on 21 November 2025 to verify the fulfilment of the conditionalities of target M1C1-76, and namely that, based on data related to invoices issued in 2024 and for payments from central public authorities (*Amministrazioni centrali*) to businesses: i) the weighted average payment time ("tempo medio di pagamento ponderato") is at most 30 days; ii) the weighted average payment delay ("tempo medio di ritardo ponderato") is at most 0 days; iii) the difference between the unweighted average payment time (“tempo medio di pagamento semplice”) and the weighted average payment time does not exceed 20 days, unless the unweighted average payment time is below 30 days.

This check yielded the following results:

- the indicator “weighted average payment time” (*tempo medio di pagamento ponderato*) for central public authorities (*Amministrazioni centrali*) based on data related to invoiced issued in 2024 (i.e. in the tab related to 2024, as explained above) is 27,16 days, i.e. below 30 days – hence in line with the requirement of the target.
- the indicator “weighted average payment delay” (*tempo medio di ritardo ponderato*) for central public authorities (*Amministrazioni centrali*) based on data related to invoiced issued in 2024 (i.e. in the tab related to 2024, as explained above) is -8,40 days, i.e. below 0 days – hence in line with the requirement of the target.
- the unweighted average payment time (*tempo medio di pagamento semplice*) for central public authorities (*Amministrazioni centrali*) based on data related to invoiced issued in 2024 (i.e. in the tab related to 2024, as explained above) is 27,67 days, i.e. below 30 days. Pursuant to the Council Implementing Decision, the requirement that the difference between the unweighted average payment time and the weighted average payment time shall not exceed 20 days does not apply where the unweighted average payment time is below 30 days. As, in this case, the unweighted average payment time is below this threshold, it is concluded that the conditionality concerning the maximum 20-day difference between the two indicators is not applicable.

Therefore, the check was successfully completed, confirming that the requirements of the target description, mentioned above, are fulfilled.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Non-repayable support

[M1C1-77]: Average number of days for the regional public authorities to pay businesses is reduced

Related Measure: IT-C[M1C1]-R[R1.11]: Reduction of late payments by public administrations and health authorities

Quantitative indicator: Weighted average payment time (in days)

Baseline: N/A

Target: 30

Time: Q1 2025

1. Context:

The main objective of the reform is to address bottlenecks causing delays in the execution of payments from central, regional, local and health public administration and authorities towards businesses.

Target M1C1-77 is the second target of this reform and requires that, for payments from regional public authorities (*Regioni - Province Autonome*) to businesses and for invoices issued in 2024, the weighted average payment time *(tempo medio di pagamento ponderato* is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time (*tempo medio di pagamento semplice*) and the weighted average payment time does not exceed 20 days unless the unweighted average payment time is below 30 days.

M1C1-77 follows milestones M1C1-72, which provides for the entry into force of new rules to reduce late payments from the public administration to businesses; M1C1-72bis, which requires the adoption of further legislative and non-legislative measures aimed at improving the payment performance of the Italian public administrations at the central and local level; M1C1-72ter, which provides for the possibility to increase human resources dealing with payments, and M1C1-72quater which provides for the adoption of an Audit Plan to verify the adequacy and timeliness of existing payment processes.

Target M1C1-77 is accompanied by: (i) target M1C1-76, which requires that the indicators for payments, from central public authorities *(Amministrazioni centrali*) to businesses, for invoices issued in 2024, the weighted average payment time is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 20 days unless the unweighted average payment time is below 30 days (ii) target M1C1-78, which requires that, for payments from local public authorities and for invoices issued in 2024, the weighted average payment time is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 20 days unless the unweighted average payment time is below 30 days (iii) target M1C1-79, which requires that, for payments from public health authorities and for invoices issued in 2024, the weighted average payment time is at most 60 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 30 days unless the unweighted average payment time is below 60 days.

Target M1C1-77 is followed by: (i) milestone M1C1-72quinquies, which provides for the publication in a dedicated webpage of explanations, analyses and data on payments by the public administration (ii) milestone M1C1-72sixies, which provides for the adoption of the final audit report of the Audit Plan (iii) target M1C1-88, which requires that, for payments from central public authorities *Amministrazioni centrali*) to business, for invoices issued in 2025, the weighted average payment time is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 15 days unless the unweighted average payment time is below 30 days (iv) target M1C1-89, which requires that, for payments from regional public authorities *Regioni - Province Autonome*) to business, for invoices issued in 2025, the weighted average payment time is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 15 days unless the unweighted average payment time is below 30 days (v) target M1C1-90, which requires that, for payments from local public authorities *(enti locali)*, for invoices issued in 2025, the weighted average payment time is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 15 days unless the unweighted average payment time is below 30 days (vi) target M1C1-91, which requires that, for payments from public health authorities (*enti del Servizio sanitario nazionale*), for invoices issued in 2025, the weighted average payment time is at most 60 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 20 days unless the unweighted average payment time is below 60 days.

2. Evidence provided:

1. Summary document duly justifying how the target, including all the constitutive elements, was satisfactorily fulfilled;
2. Link to the Cruscotto di Monitoraggio, providing for the display of data from the Commercial Credit Platform at a given moment in time;
3. Link to the MEF portal providing data on the payment time payment delay and commercial debts per typology of public administration: https://www.rgs.mef.gov.it/VERSIONE-I/tempi_di_pagamento_e_debiti_commerciali_delle_pubbliche_amministrazioni/
4. Cruscotto's technical specifications, drafted by the Società Generale d'Informatica S.p.A. (hereinafter referred to as Sogei), dated 30 November 2023;
5. Cruscotto's user manual, adopted by Sogei and the Ministry of Economy and Finance, dated 30 November 2023;
6. Sogei' explanatory note on the transfer of data from the Commercial Credit Platform ("Piattaforma Crediti Commerciali") to the Cruscotto of 6 November 2025.

3. **Analysis:**

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

Based on data from the Commercial Credit Platform (“Piattaforma Crediti Commerciali”) related to invoices issued in 2024, the following indicators for payments from regional public authorities (Regioni – Province Autonome) to businesses shall be:

- **for the weighted average payment time (“tempo medio di pagamento ponderato”): at most 30 days;**
- **for the weighted average payment delay (“tempo medio di ritardo ponderato”): at most 0 days.**

Furthermore, the difference between the unweighted average payment time (“tempo medio di pagamento semplice”) and the weighted average payment time shall not exceed 20 days, unless the unweighted average payment time is below 30 days.

The Italian authorities provided the link and enabling credentials to the *Cruscotto di Monitoraggio* (hereafter referred to as “Cruscotto”), which allows access to data from the Commercial Credit Platform (*Piattaforma Crediti Commerciali*, hereafter referred to as “PCC”) divided by level of the public administration (that is central, regional, local and public health authorities).

PCC is the IT platform of the Ministry of Economy and Finance (hereafter referred to as “MEF”) for the management of commercial credits, covering all transactions entailing the emission of a commercial invoice towards the public administration for supplies, services, procurement contracts and professional obligations.

While PCC is a management IT tool, continuously fed with data on transactions and the related payments, the Cruscotto provides for the display of such data at a given moment in time, ensuring their stability and coherence for the yearly analysis required by the Council Implementing Decision. The Cruscotto platform has been created by MEF technical partner, the Società Generale d'Informatica S.p.A. (hereinafter referred to as “Sogei”) to present the PCC data in line with the indicative timeline provided by the Council Implementing Decision, namely 31 March 2025. As evidenced by the Cruscotto technical specifications and user manual (see evidence No. 4 and 5), both dated 30 November 2023, and by the explanatory note of 6 November 2025 provided by Sogei (see evidence No. 6), the PCC data, present at the moment of the observation, are integrally transferred to the Cruscotto without applying filtering or limitations beyond the start and end date of the period taken into consideration.

Specifically, for what concerns year 2024, the Cruscotto presents the PCC data related to the invoices issued in 2024, i.e. all documents presenting a date of issuance between 1 January 2024 and 31 December 2024 and the related payments carried out until 31 March 2025, as observed at the moment of the observation (specifically, 14 May 2025). Based on the above-mentioned data, the Cruscotto also provides the value of the indicators required by the target – namely the weighted average payment time, the weighted average payment delay and the unweighted average payment time – for payments from regional public authorities (*Regioni – Province Autonome*), in line with the requirement of the target description.

The Commission services accessed the link to the Cruscotto provided by the Italian authorities, and in particular the ‘2024’ tab therein, on 21 November 2025 to verify the fulfilment of the conditionalities of target M1C1-77, and namely that, based on data related to invoices issued in 2024 and for payments from regional public authorities (*Regioni – Province Autonome*) to businesses: i) the weighted average payment time ("tempo medio di pagamento ponderato") is at most 30 days; ii) the weighted average payment delay ("tempo medio di ritardo ponderato") is at most 0 days; iii) the difference between the unweighted average payment time ("tempo medio di pagamento semplice") and the weighted average payment time does not exceed 20 days, unless the unweighted average payment time is below 30 days.

This check yielded the following results:

- the indicator "weighted average payment time" (*tempo medio di pagamento ponderato*) for regional public authorities (*Regioni – Province Autonome*) based on data related to invoiced issued in 2024 (namely on the tab related to 2024, as explained above) is 18,35 days, thus below 30 days – hence in line with the requirement of the target.
- the indicator "weighted average payment delay" (*tempo medio di ritardo ponderato*) for regional public authorities (*Regioni – Province Autonome*) based on data related to invoiced issued in 2024 (namely on the tab related to 2024, as explained above) is -17,68 days, thus below 0 days – hence in line with the requirement of the target.
- the unweighted average payment time (*tempo medio di pagamento semplice*) for regional public authorities (*Regioni – Province Autonome*) based on data related to invoiced issued in 2024 (namely on the tab related to 2024, as explained above) is 22,35 days, thus below 30 days. Pursuant to the Council Implementing Decision, the requirement that the difference between the unweighted average payment time and the weighted average payment time shall not exceed 20 days does not apply where the unweighted average payment time is below 30 days. As, in this case, the unweighted average payment time is below this threshold, it is concluded that the conditionality concerning the maximum 20-day difference between the two indicators is not applicable.

Therefore, the check was successfully completed, confirming that the requirements of the target description, mentioned above, are fulfilled.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Non-repayable support

[M1C1-78]: Average number of days for the local public authorities to pay businesses is reduced

Related Measure: IT-C[M1C1]-R[R1.11]: Reduction of late payments by public administrations and health authorities

Quantitative indicator: Weighted average payment time (in days)

Baseline: N/A

Target: 30

Time: Q1 2025

1. **Context:**

The main objective of the reform is to address bottlenecks causing delays in the execution of payments from central, regional, local and health public administration and authorities towards businesses.

Target M1C1-78 is the third target of this reform and requires that, for payments from local public authorities (*enti locali*) to businesses and for invoices issued in 2024, the weighted average payment time *(tempo medio di pagamento ponderato)* is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time (*tempo medio di pagamento semplice*) and the weighted average payment time does not exceed 20 days unless the unweighted average payment time is below 30 days.

M1C1-78 follows milestones M1C1-72, which provides for the entry into force of new rules to reduce late payments from the public administration to businesses; M1C1-72bis, which requires the adoption of further legislative and non-legislative measures aimed at improving the payment performance of the Italian public administrations at the central and local level; M1C1-72ter, which provides for the possibility to increase human resources dealing with payments, and M1C1-72quater which provides for the adoption of an Audit Plan to verify the adequacy and timeliness of existing payment processes.

Target M1C1-78 is accompanied by: (i) target M1C1-76, which requires that the indicators for payments, from central public authorities *(Amministrazioni centrali*) to businesses, for invoices issued in 2024, the weighted average payment time is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 20 days unless the unweighted average payment time is below 30 days (ii) target M1C1-77, which requires that, for payments from regional public authorities and for invoices issued in 2024, the weighted average payment time is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 20 days unless the unweighted average payment time is below 30 days (iii) target M1C1-79, which requires that, for payments from public health authorities and for invoices issued in 2024, the weighted average payment time is at most 60 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 30 days unless the unweighted average payment time is below 60 days.

Target M1C1-78 is followed by: (i) milestone M1C1-72quinquies, which provides for the publication in a dedicated webpage of explanations, analyses and data on payments by the public administration (ii) milestone M1C1-72sixies, which provides for the adoption of the final audit report of the Audit Plan (iii) target M1C1-88, which requires that, for payments from central public authorities *Amministrazioni centrali*) to business, for invoices issued in 2025, the weighted average payment time is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 15 days unless the unweighted average payment time is below 30 days (iv) target M1C1-89, which requires that, for payments from regional public authorities *Regioni - Province Autonome*) to business, for invoices issued in 2025, the weighted average payment time is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 15 days unless the unweighted average payment time is below 30 days (v) target M1C1-90, which requires that, for payments from local public authorities *(enti locali)*, for invoices issued in 2025, the weighted average payment time is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 15 days unless the unweighted average payment time is below 30 days (vi) target M1C1-91, which requires that, for payments from public health authorities (*enti del Servizio sanitario nazionale*), for invoices issued in 2025, the weighted average payment time is at most 60 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 20 days unless the unweighted average payment time is below 60 days.

2. Evidence provided:

1. Summary document duly justifying how the target, including all the constitutive elements, was satisfactorily fulfilled;
2. Link to the Cruscotto di Monitoraggio, providing for the display of data from the Commercial Credit Platform at a given moment in time;
3. Link to the MEF portal providing data on the payment time payment delay and commercial debts per typology of public administration: https://www.rgs.mef.gov.it/VERSIONE-I/tempi_di_pagamento_e_debiti_commerciali_delle_pubbliche_amministrazioni/ ;
4. Cruscotto's technical specifications, drafted by the Società Generale d'Informatica S.p.A. (hereinafter referred to as Sogei), dated 30 November 2023;
5. Cruscotto's user manual, adopted by Sogei and the Ministry of Economy and Finance, dated 30 November 2023;
6. Sogei' explanatory note on the transfer of data from the Commercial Credit Platform ("Piattaforma Crediti Commerciali") to the Cruscotto of 6 November 2025.

3. Analysis:

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

Based on data from the Commercial Credit Platform ("Piattaforma Crediti Commerciali") related to invoices issued in 2024, the following indicators for payments from local public authorities (enti locali) to businesses shall be:

- **for the weighted average payment time ("tempo medio di pagamento ponderato"): at most 30 days;**
- **for the weighted average payment delay ("tempo medio di ritardo ponderato"): at most 0 days.**

Furthermore, the difference between the unweighted average payment time ("tempo medio di pagamento semplice") and the weighted average payment time shall not exceed 20 days, unless the unweighted average payment time is below 30 days.

The Italian authorities provided the link and enabling credentials to the *Cruscotto di Monitoraggio* (hereafter referred to as "Cruscotto"), which allows access to data from the Commercial Credit Platform (*Piattaforma Crediti Commerciali*, hereafter referred to as "PCC") divided by level of the public administration (that is central, regional, local and public health authorities).

PCC is the IT platform of the Ministry of Economy and Finance (hereafter referred to as "MEF") for the management of commercial credits, covering all transactions entailing the emission of a commercial invoice towards the public administration for supplies, services, procurement contracts and professional obligations.

While PCC is a management IT tool, continuously fed with data on transactions and the related payments, the Cruscotto provides for the display of such data at a given moment in time, ensuring their stability and coherence for the yearly analysis required by the Council Implementing Decision. The Cruscotto platform has been created by MEF technical partner, the Società Generale d'Informatica S.p.A. (hereinafter referred to as "Sogei") to present the PCC data in line with the indicative timeline provided by the Council Implementing Decision, namely 31 March 2025. As evidenced by the Cruscotto technical specifications and user manual(see evidence No. 4 and 5), both dated 30 November 2023, and by the explanatory note of 6 November 2025 provided by Sogei (see evidence No. 6), the PCC data, present at the moment of the observation, are integrally transferred to the Cruscotto without applying filtering or limitations beyond the start and end date of the period taken into consideration.

Specifically, for what concerns year 2024, the Cruscotto presents the PCC data related to the invoices issued in 2024, namely all documents presenting a date of issuance between 1 January 2024 and 31 December 2024 and the related payments carried out until 31 March 2025, as observed at the moment of the observation (specifically, 14 May 2025). Based on the above-mentioned data, the Cruscotto also provides the value of the indicators required by the target – namely the weighted average payment time, the weighted average payment delay and the unweighted average payment time – for payments from local public authorities (*Enti locali*), in line with the requirement of the target description.

The Commission services accessed the link to the Cruscotto provided by the Italian authorities, and in particular the '2024' tab therein, on 21 November 2025 to verify the fulfilment of the conditionalities of target M1C1-78, and namely that, based on data related to invoices issued in 2024 and for payments from regional public authorities (*Regioni – Province Autonome*) to businesses: i) the weighted average payment time (“tempo medio di pagamento ponderato”) is at most 30 days; ii) the weighted average payment delay (“tempo medio di ritardo ponderato”) is at most 0 days; iii) the difference between the unweighted average payment time (“tempo medio di pagamento semplice”) and the weighted average payment time does not exceed 20 days, unless the unweighted average payment time is below 30 days.

This check yielded the following results:

- the indicator “weighted average payment time” (*tempo medio di pagamento ponderato*) for local public authorities (*Enti locali*) based on data related to invoiced issued in 2024 (namely on the tab related to 2024, as explained above) is 25,75 days, thus below 30 days – hence in line with the requirement of the target.
- the indicator “weighted average payment delay” (*tempo medio di ritardo ponderato*) for local public authorities (*Enti locali*) based on data related to invoiced issued in 2024 (namely on the tab related to 2024, as explained above) is -7,01 days, thus below 0 days – hence in line with the requirement of the target.
- the unweighted average payment time (*tempo medio di pagamento semplice*) for local public authorities (*Enti locali*) based on data related to invoiced issued in 2024 (namely on the tab related to 2024, as explained above) is 28,41 days, thus below 30 days. Pursuant to the Council Implementing Decision, the requirement that the difference between the unweighted average payment time and the weighted average payment time shall not exceed 20 days does not apply where the unweighted average payment time is below 30 days. As, in this case, the unweighted average payment time is below this threshold, it is concluded that the conditionality concerning the maximum 20-day difference between the two indicators is not applicable.

Therefore, the check was successfully completed, confirming that the requirements of the target description, mentioned above, are fulfilled.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Non-repayable support

[M1C1-79]: Average number of days for the public health authorities to pay businesses is reduced

Related Measure: IT-C[M1C1]-R[R1.11]: Reduction of late payments by public administrations and health authorities

Quantitative Indicator: Weighted average payment time (in days)

Baseline: N/A

Target: 60

Time: Q1 2025

1. **Context:**

The main objective of the reform is to address bottlenecks causing delays in the execution of payments from central, regional, local and health public administration and authorities towards businesses.

Target M1C1-79 is the fourth target of this reform and requires that, for payments from public health authorities (*enti del Servizio sanitario nazionale*) to businesses and for invoices issued in 2024, the weighted average payment time *(tempo medio di pagamento ponderato)* is at most 60 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time (*tempo medio di pagamento semplice*) and the weighted average payment time does not exceed 30 days unless the unweighted average payment time is below 60 days.

M1C1-79 follows milestones M1C1-72, which provides for the entry into force of new rules to reduce late payments from the public administration to businesses; M1C1-72bis, which requires the adoption of further legislative and non-legislative measures aimed at improving the payment performance of the Italian public administrations at the central and local level; M1C1-72ter, which provides for the the possibility to increase human resources dealing with payments, and M1C1-72quater which provides for the adoption of an Audit Plan to verify the adequacy and timeliness of existing payment processes.

Target M1C1-79 is accompanied by: (i) target M1C1-76, which requires that the indicators for payment, for central public authorities *(Amministrazioni centrali*) to businesses, for invoices issued in 2024, the weighted average payment time is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 20 days unless the unweighted average payment time is below 30 days (ii) target M1C1-77, which requires that, for payments from regional public authorities and for invoices issued in 2024, the weighted average payment time is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 20 days unless the unweighted average payment time is below 30 days (iii) target M1C1-78, which requires that, for payments from local public authorities *(enti locali)*, for invoices issued in 2024, the weighted average payment time is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 20 days unless the unweighted average payment time is below 30 days.

Target M1C1-79 is followed by: (i) milestone M1C1-72quinquies, which provides for the publication in a dedicated webpage of explanations, analyses and data on payments by the public administration (ii) milestone M1C1-72sixies, which provides for the adoption of the final audit report of the Audit Plan (iii) target M1C1-88, which requires that, for payments from central public authorities *Amministrazioni centrali*) to business, for invoices issued in 2025, the weighted average payment time is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 15 days unless the unweighted average payment time is below 30 days (iv) target M1C1-89, which requires that, for payments from regional public authorities *Regioni - Province Autonome*) to business, for invoices issued in 2025, the weighted average payment time is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 15 days unless the unweighted average payment time is below 30 days (v) target M1C1-90, which requires that, for payments from local public authorities and for invoices issued in 2025, the weighted average payment time is at most 30 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 15 days unless the unweighted average payment time is below 30 days (vi) target M1C1-91, which requires that, for payments from public health authorities (*enti del Servizio sanitario nazionale*), for invoices issued in 2025, the weighted average payment time is at most 60 days; the weighted average payment delay is at most 0 days; and the difference between the unweighted average payment time and the weighted average payment time does not exceed 20 days unless the unweighted average payment time is below 60 days.

2. Evidence provided:

1. Summary document duly justifying how the target, including all the constitutive elements, was satisfactorily fulfilled;
2. Link to the Cruscotto di Monitoraggio, providing for the display of data from the Commercial Credit Platform at a given moment in time;
3. Link to the MEF portal providing data on the payment time payment delay and commercial debts per typology of public administration: https://www.rgs.mef.gov.it/VERSIONE-I/tempi_di_pagamento_e_debiti_commerciali_delle_pubbliche_amministrazioni/ ;
4. Cruscotto's technical specifications, drafted by the Società Generale d'Informatica S.p.A. (hereinafter referred to as Sogei), dated 30 November 2023;
5. Cruscotto's user manual, adopted by Sogei and the Ministry of Economy and Finance, dated 30 November 2023;
6. Sogei' explanatory note on the transfer of data from the Commercial Credit Platform ("Piattaforma Crediti Commerciali") to the Cruscotto of 6 November 2025.

3. Analysis:

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

Based on data from the Commercial Credit Platform ("Piattaforma Crediti Commerciali") related to invoices issued in 2024, the following indicators for payments from public health authorities (enti del Servizio sanitario nazionale) to businesses shall be:

- **for the weighted average payment time ("tempo medio di pagamento ponderato"): at most 60 days;**
- **for the weighted average payment delay ("tempo medio di ritardo ponderato"): at most 0 days.**

Furthermore, the difference between the unweighted average payment time ("tempo medio di pagamento semplice") and the weighted average payment time shall not exceed 30 days, unless the unweighted average payment time is below 60 days.

The Italian authorities provided the link and enabling credentials to the *Cruscotto di Monitoraggio* (hereafter referred to as "Cruscotto"), which allows access to data from the Commercial Credit Platform (*Piattaforma Crediti Commerciali*, hereafter referred to as "PCC") divided by level of the public administration (that is central, regional, local and public health authorities).

PCC is the IT platform of the Ministry of Economy and Finance (hereafter referred to as "MEF") for the management of commercial credits, covering all transactions entailing the emission of a commercial invoice towards the public administration for supplies, services, procurement contracts and professional obligations.

While PCC is a management IT tool, continuously fed with data on transactions and the related payments, the Cruscotto provides for the display of such data at a given moment in time, ensuring their stability and coherence for the yearly analysis required by the Council Implementing Decision. The Cruscotto platform has been created by MEF technical partner, the Società Generale d'Informatica S.p.A. (hereinafter referred to as "Sogei") to present the PCC data in line with the indicative timeline provided by the Council Implementing Decision, namely 31 March 2025. As evidenced by the Cruscotto technical specifications and user manual (see evidence No. 4 and 5), both dated 30 November 2023, and by the explanatory note of 6 November 2025 provided by Sogei (see evidence No. 6), the PCC data, present at the moment of the observation, are integrally transferred to the Cruscotto without applying filtering or limitations beyond the start and end date of the period taken into consideration.

Specifically, for what concerns year 2024, the Cruscotto presents the PCC data related to the invoices issued in 2024, namely all documents presenting a date of issuance between 1 January 2024 and 31 December 2024 and the related payments carried out until 31 March 2025, as observed at the moment of the observation (specifically, 14 May 2025). Based on the above-mentioned data, the Cruscotto also provides the value of the indicators required by the target – namely the weighted average payment time, the weighted average payment delay and the unweighted average payment time – for payments from local public authorities (*Enti locali*), in line with the requirement of the target description.

The Commission services accessed the link to the Cruscotto provided by the Italian authorities, and in particular the '2024' tab therein, on 21 November 2025 to verify the fulfilment of the conditionalities of target M1C1-79, and namely that, based on data related to invoices issued in 2024 and for payments from public health authorities (*enti del Servizio sanitario nazionale*) to businesses: i) the weighted average payment time ("tempo medio di pagamento ponderato") is at most 60 days; ii) the weighted average payment delay ("tempo medio di ritardo ponderato") is at most 0 days; iii) the difference between the unweighted average payment time ("tempo medio di pagamento semplice") and the weighted average payment time does not exceed 30 days, unless the unweighted average payment time is below 60 days.

This check yielded the following results:

- the indicator "weighted average payment time" (*tempo medio di pagamento ponderato*) for public health authorities (*enti del Servizio sanitario nazionale*) based on data related to invoiced issued in 2024 (namely on the tab related to 2024, as explained above) is 35,43 days, thus below 60 days – hence in line with the requirement of the target.
- the indicator "weighted average payment delay" (*tempo medio di ritardo ponderato*) for public health authorities (*enti del Servizio sanitario nazionale*) based on data related to invoiced issued in 2024 (namely on the tab related to 2024, as explained above) is -23,25 days, thus below 0 days – hence in line with the requirement of the target.
- the unweighted average payment time (*tempo medio di pagamento semplice*) for public health authorities (*enti del Servizio sanitario nazionale*) based on data related to invoiced issued in 2024 (namely on the tab related to 2024, as explained above) is 44,47 days, thus below 60 days. Pursuant to the Council Implementing Decision, the requirement that the difference between the unweighted average payment time and the weighted average payment time shall not exceed 30 days does not apply where the unweighted average payment time is below 60 days. As, in this case, the unweighted average payment time is below this threshold, it is concluded that the conditionality concerning the maximum 30-day difference between the two indicators is not applicable.

Therefore, the check was successfully completed, confirming that the requirements of the target description, mentioned above, are fulfilled.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Non-repayable support

[M1C1-98bis]: Civil servants trained through the Public Buyers Professionalization Strategy

Related Measure: IT-C[M1C1]-R[R1.10]: Reform of the public procurement legislative framework

Quantitative Indicator: Number

Baseline: 40 000

Goal: 60 000

Time: Q2 2025

1. **Context:**

Target M1C1-98bis is part of Reform 1.10 - Reform of the public procurement legislative framework, a comprehensive package of measures aimed at simplifying the Italian public procurement system, increasing its efficiency, ensuring professionalization and qualification of contracting authorities and ensuring legal certainty for businesses. Two of the main objectives of the reform are also those of accelerating the award of public contracts and their execution (i.e. the execution and completion of the works).

Target M1C1-98bis focuses on the training of civil servants through the Public Buyers Professionalization Strategy for the professionalization of contracting authorities, ensuring the training of a significant portion of civil servants, including for example those registered in e-platforms such as CONSIP or central purchasing bodies.

Target M1C1-98bis follows the completion of milestones M1C1-69, M1C1- 70, M1C1-71, M1C1-73 and M1C1-74 related to the adoption of measures in 2022 and 2021 and the legislation for the public procurement reform, milestone M1C1-75 on the full operationalisation of the National e-Procurement System, milestones M1C1-73quater related to the entry into force of guidelines on below-EU threshold procurement, target M1C1-84 on the reduction of the average time for the award procedures for contracts above the thresholds of the EU public procurement directives, target M1C1-86 related to the training of 20 000 of civil servants, targets M1C1-87 and M1C1-99 on the percentage of Central Government Contracting Authorities using dynamic purchasing systems (at least 15% and 20%), milestone M1C1-73bis related to the adoption of a circular providing guidance on the qualification system for contracting authorities and target M1C1-85 on the reduction of the average time between contract award and realization of the infrastructure, M1C1-73ter on incentives to qualification and professionalisation of contracting authorities, M1C1-73quinquies on the entry into force of new legal provisions on project financing, M1C1-75bis on the support to Qualification and eProcurement, M1C1-84 bis on measures to improve decision speed in contract award of contracting authorities and M1C1-98 the intermediate target on the training of civil servants in line with the Public Buyers Professionalization Strategy.

Target M1C1-98bis is the final target related to the professionalization of civil servants. It will be followed by target M1C1-96 in Q4 2025 on the reduction of the average award time and milestone M1C1-97ter on actions to improve the execution time.

2. **Evidence provided:**

1. Summary document duly justifying how the target, including all the constitutive elements, was satisfactorily fulfilled;
2. Dataset from the Presidency of the Council of Ministers with full list of civil servants trained through the Public Buyers Professionalization Strategy, with information on the public entity to which the civil servants belong, on the entity issuing the training, and on the type of training;
3. Decision from the Coordination Body (Cabina di Regia) of the Presidency of the Council of Ministers of 3 December 2021 approving the Buyers Professionalization Strategy on public procurement.

The authorities also provided:

4. The renewal of the agreement for the issuing of trainings in the context of the Public Buyer Professionalization Strategy, so-called PNRR Academy, between the Ministry of Infrastructure and Transport, the National School of Public Administration (SNA), ITACA and IFEL, as signed on 18 July 2024.
5. Attestation from the General Secretariat of the National School of Administration (hereinafter also referred to as SNA), signed on 24 May 2024 pursuant to the powers contained in the PCdM's decision of 3 December 2021 approving the Buyers Professionalization Strategy on public procurement certifying that "Scuola di Formazione Capitolina" is a subject entitled to carry out trainings in line with the requirements set out by the Buyers Professionalization Strategy.
6. Agreements ("Convenzioni") between SNA and several administrations (i.e., Ministries, Universities, Consip S.p.A.) for the purpose of the monitoring of public procurement training carried out by those administrations.
7. Attestations by the public procurement platform managing entities (ANAC, CONSIP, PNRR Academy, ReGiS and other regional platforms, namely SATER, SINTEL and START) that the civil servants in the dataset, as shared by the Presidency of the Council of Ministers are enrolled in the platforms they manage, together with guidelines for enrolment and profiling to the platforms attached.

In the context of the sampling analysis, additional evidence provided for a sample of 60 units including:

8. training certificates indicating the issuing entity and the type of training provided;
9. evidence related to the civil servant status at the time of training;
10. Evidence that the issuing entity belongs to the list of entities entitled to carry out the Public Buyers Professionalization Strategy;

3. **Analysis:**

At least 60 000 civil servants have been trained through the Public Buyers Professionalization Strategy.

The target ensures that civil servants active in public procurement in Italian public entities increase their skills and technical knowledge on public procurement through the Buyers Professionalization Strategy (hereinafter also referred to as the "Strategy"), as approved by the Recovery and Resilience Plan coordination body (the "Cabina di Regia") of the Presidency of the Council of Ministers (hereinafter referred to as “PCdM”) on 3 December 2021 in compliance with Milestone M1C1-71, assessed in the context of the 1st payment request.

The PCdM developed the Public Buyers Professionalization Strategy in conjunction with all main authorities involved in public contracts, such as ANAC (the national Anticorruption Authority), CONSIP (the national central purchasing body), the National School of Administration (SNA), the Ministry for Infrastructures and Transport (MIT), the Conference Regions-Autonomous Provinces, the unions of Italian Municipalities and Provinces.

The Strategy has provided for the implementation of training activities aimed at developing knowledge and skills of staff involved in public administration procurement procedures. Training measures are designed following a progressive approach, based on three levels: (1) Basic training, (2) Specialized training, and (3) Advanced training. The strategy contained a detailed assessment of the training needs of the officials and employees of both central public administrations and local authorities, responsible for the management and tendering of public contracts at different levels, identifying different training curricula for each specific professional category, different level of proficiency, and with different degrees of education. The Strategy also provides for the launch of several specialised mentoring initiatives to support public officials/employees, through the development of operational guidelines and a monitoring and control system.

The target for the current payment request provides that at least 60 000 civil servants had to be trained through the Strategy, following target M1C1-86 in the 5th payment request that required the training of 20 000 civil servants and target M1C1-98 in the 7th payment request that required the training of 40 000 civil servants.

The Italian authorities provided the full list of trained civil servants with information on the public entity to which the civil servants belong, on the entity issuing the training and indicating the type of training, which was the basis for the sampling.

The trainings were issued by the following entities SNA (Scuola Nazionale dell’Amministrazione), ITACA (Istituto per l’Innvazione e Trasparenza degli Appalti e la Compatibilità Ambientale), IFEL (Istituto per la Finanza e l'Economia Locale), Scuola di Formazione Capitolina as well as by the Recovery and Resilience Plan Academy (hereinafter referred to as “PNRR Academy”), all belonging to the Strategy as approved by the PCdM on 3 December 2021 (pages 13, 14 and 15 and subsequent attestations by SNA pursuant to the powers contained in the PCdM’s decision).

The Italian authorities also provided the agreements (“Convenzioni”) between SNA and several administrations (i.e., Ministries, Universities, Consip S.p.A.) for the purpose of providing trainings in accordance with the individual administrations’ needs and efficiently monitoring public procurement training activities carried out by those administrations. The Italian authorities also provided a complete list of all subjects attending the trainings as well as the supporting evidence that the civil servants included in the dataset are registered on procurement platforms (e.g. ANAC, CONSIP, the PNRR Academy, ReGiS and other regional platforms, such as SATER, SINTEL, and START). In addition, the Italian authorities provided evidence on the criteria and guidelines on the registration and profiling of the civil servants to the platforms, thus evidencing their attachment to a public administration.

The total number may include civil servants who have already been trained in previous years and whose training has been reported for the M1C1-86 and M1C1-98 targets, only if they have obtained a higher-level, specialized or advanced training

In line with the organization in three progressive levels of the Professionalization Strategy – which are basic, specialised and advanced training as indicated in the section above - the full list of civil servants provided by the Italian authorities contains information on the public entity to which the civil servants belong, on the entity issuing the training and indicating the type of training. Whenever the civil servants has carried out an additional training on a level higher than the previous one, its name appears twice in the list. This is in line with the objective of progressive professionalization embedded in the Strategy, which aims to qualitatively train a significant number of servants dealing with public buying starting with a basic knowledge courses and envisaging specialised and advanced trainings where needed.

Following the selection of a random sample of 60 units, Italy submitted the training certificates of the sampled individuals showing the name of the entity, the type/content of the training, and the certification from the relevant public administration/entity on the civil servant status at the time of training (on top of what already provided with the main evidence for all individuals eligible for the target). Whether the name sampled had carried out a training of a higher level than the previous one (in line with the with the progressive levels of the Public Buyers Professionalisation strategy), the Italian authorities provided the two certificates regarding the two types (level) of trainings. The evidence provided for a sample of 60 units confirmed that the requirements of the target have been met.

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

Non-repayable support

[M1C1-115]: Completion of the yearly spending review for 2024, with reference to the saving target set in 2022 and 2023 for 2024

Related Measure: IT-C[M1C1]-R[R1.13]: Reform of the spending review framework

Qualitative Indicator: Adoption of the Finance Ministry report on the spending review in 2024, certifying the completion of the process and the achievement of the target.

Time: Q2 2025

1. **Context:**

Milestone M1C1-115 is the sixth milestone or target of Reform 1.13 whose objective is to increase the efficacy of the national spending review framework. This milestone M1C1-115 concerns the adoption of the Finance Ministry report on the spending review in 2024, certifying the completion of the process and the achievement of the target set in 2023.

It follows the completion of the following milestones: milestone M1C1-102, which required the publication of a report prepared by the Accounting Department of the Finance Ministry in cooperation with selected administrations assessing their practices in the formulation and implementation of saving plans and defining guidelines for all public administrations; milestone M1C1-100, which required the reform of the existing national framework for yearly spending reviews, in particular by strengthening the role of the Finance Ministry; milestone M1C1-104, which required the adoption of savings targets for spending reviews for the aggregate central state administrations for the years 2023-2025; Milestone M1C1-110 which required the reclassification of the general State budget with reference to the environmental expenditure and to the expenditure that promotes gender equality; and milestone M1C1-111 which required the adoption of the Finance Ministry report on the spending review in 2023, certifying the completion of the process and the achievement of the target set in 2022.It will be followed by milestoneM1C1-122, which is related to the completion of spending reviews and the achievement of the corresponding savings for the year 2025.

2. **Evidence provided:**

i. Summary document duly justifying how the milestone, including all the constitutive elements, was satisfactorily fulfilled;
ii. The report by the Ministry of Economy and Finance on the spending review in 2024, certifying the completion of the process and the achievement of the target (*Relazione del Ministero dell'economia e delle finanze sull'attuazione della revisione della spesa per l'esercizio 2024 e il conseguimento degli obiettivi di risparmio definiti nel Documento di economia e finanza 2022 e 2023*");
iii. As Annex to the Report, for each Ministry, the list of measures planned for the spending review in 2024 (*Allegato 2 – Le misure dei ministeri oggetto di monitoraggio nell'anno 2024*);
iv. Copy of the press release of the Council of Ministers of 14 July 2025;
v. Signed declaration of the Secretary of the Council of Ministers concerning the presentation by the Minister of Economy and Finance of the result of the 2024 spending review to the Council of Ministers during the meeting of 14 July 2025;
vi. Document of Economy and Finance 2022;

vii. Press release of the meeting of the Council of Ministers of 6 April 2022, during which the Council of Ministers adopted the Document of Economy and Finance 2022;
viii. Document of Economy and Finance 2023;
ix. Press release of the meeting of the Council of Ministers of 11 April 2023, during which the Council of Ministers adopted the Document of Economy and Finance 2023;
x. Document of Economy and Finance 2025;
xi. Annex to the Document of Economy and Finance 2025, "Ministries' reports on the achievement of the savings targets 2023-2025 and 2024-2026";
xii. Press release of the meeting of the Council of Ministers of 9 April 2025, during which the Council of Ministers adopted the Document of Economy and Finance 2025;
xiii. Copy of decree-law n. 90 of 2016;
xiv. Copy of decree-law n. 93 of 2016;
xv. Copy of law n. 163 of 2016;
xvi. Copy of law n. 196 of 2009;
xvii. Copy of law 197 of 2022;
xviii. Copy of law 213 of 2023;
xix. Copy of the "Guidelines for the planning and the implementation of measures for the achievement of spending review targets";
xx. Resolution of the General State Accountant in the Ministry of Economy and Finance of 29 December 2022 adopting the "Guidelines for the planning and the implementation of measures for the achievement of spending review targets";
xxi. Copy of the decree of the President of the Council of Ministers of 4 November 2022;
xxii. Copy of the decree of the President of the Council of Ministers of 7 August 2023.

3. Analysis:

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

- **The reform consists in the commitment to undertake yearly spending reviews over the 2023-2025 period.**

- **Completion of the yearly spending review for 2024, with reference to the saving target set in 2022 and 2023 for 2024**

- **Adoption of the Finance Ministry report on the spending review in 2024, certifying the completion of the process and the achievement of the target.**
- **The Finance Ministry report to be transmitted to the Council of Ministers as provided for by decree-laws 90 and 93 of 2016 and law 163/2016 shall:**
    - **certify the completion of the spending review process for 2024 in respect of the provision for the spending review framework.**

The commitment to undertake yearly spending reviews over the 2023-2025 period is contained in the 2022 and 2023 Documents of Economy and Finance (evidence vi and viii, respectively), adopted by the Council of Ministers on 6 April 2022 and 11 April 2023 (as demonstrated by evidence vii and ix, respectively). As demonstrated by evidence iv and v, on 14 July 2025 the Minister of Economy and Finance transmitted the report on the spending review in 2024 to the Council of Ministers and informed the Council of Ministers on the results of the spending review in 2024 during the meeting of Council of Ministers on the same day. The report (evidence ii) explains that the 2024 spending review has been completed in line with law 196/2009 (evidence xvi), as amended by law 163/2016 (evidence xv), which requires: the government to set overall targets for the spending reviews of central administrations in the Document of Economy and Finance to be transmitted by the government to the Parliament by 10 April each year; a decree of the President of the Council of Ministers, which shall be proposed by the Minister of Economy and Finance and approved by the Council of Ministers by 31 May each year, allocating saving targets across Ministries; Ministries to propose interventions to achieve their savings targets with the draft Budget Law; following the adoption of the Budget Law, agreements between the Minister of Economy and Finance and each Minister setting modalities to monitor the achievement of the saving targets, which shall be set by interministerial decrees by 1 March each year (from 2024, this requirement has been amended by law 213 of 30 December 2023, Art. 1, comma 526, evidence xviii - requiring the monitoring process to be conducted in line with the "Guidelines for the planning and the implementation of measures for the achievement of spending review targets" - evidence xix and xx); by 15 July each year, the Minister of Economy and Finance shall inform the Council of Ministers on the state of implementation of the agreements with each Minister; by 31 March of the following year, each Ministry shall transmit to the President of the Council of Ministers and to the Minister of Economy and Finance a report illustrating the achievement of the saving targets for the previous year, which shall be published as annex to the Document of Economy and Finance . The report (evidence ii, pages 6-7 and 8-9) explains that the above-mentioned steps have been implemented for the 2024 spending review, in particular: the 2022 Document of Economy and Finance (evidence vi) and 2023 Document of Economy and Finance (evidence viii), adopted by the Council of Ministers on 6 April 2022 and 11 April 2023 (as demonstrated by evidence vii and ix respectively), have set saving targets for the aggregate central state administrations to be achieved in 2024; the decrees of the President of the Council of Ministers (DPCM) of 4 November 2022 and 7 August 2023 (evidence xxi and xxii respectively) distributed the savings to be achieved in 2024 among Ministries; in 2022 and in 2023 each Ministry has transmitted to the Ministry of Economy and Finance proposals for spending reductions in 2024, which have been assessed by the Ministry for Economy and Finance and included, concerning the saving targets set in 2022, in the 2023 Budget Law (law 197 of 29 December 2022, evidence xvii) and, concerning the saving targets set in 2023, in the 2024 Budget Law (law 213 of 30 December 2023, evidence xviii); for the saving targets set in 2022 for 2024, monitoring agreements between the Ministry of Economy and Finance and each Ministry have been set with interministerial decrees (available at this link); for the saving targets set in 2023 for 2024, in line with the provisions of the 2024 Budget Law (law 213 of 30 December 2023, Art. 1, comma 526, evidence xviii) the monitoring process has been conducted in line with the "Guidelines for the planning and the implementation of measures for the achievement of spending review targets" (evidence xix and xx); each Ministry has transmitted a report on the achievement of the saving targets for 2024, which has been published as annex to the 2025 Document of Economy and Finance (evidence x, xi and xii).

- **certify the achievement of the target set in 2022 and 2023.**

The report adopted by the Ministry of Economy and Finance (evidence ii) explains, in pages 10-12, that the total saving target set in 2022 and in 2023 with the 2022 and 2023 Documents of Economy and Finance for the spending review in 2024 amounts to EUR 1500 million for the aggregate central state administrations. With the 2023 and 2024 Budget Laws (evidence xvii and xviii respectively), the savings target for 2024 was further increased slightly to EUR 1501.4 million. The report adopted by the Ministry of Economy and Finance (evidence ii) certifies that the total savings achieved with the spending review in 2024 amount to EUR 1501.4 million, thus exceeding the target set by the 2022 and 2023 Documents of Economy and Finance (pages 12-13).

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Loan Support

[M1C1-146]: National Digital Identity platforms (SPID)

Related Measure: IT-C[M1C1]-I[I1.4]: Digital services and citizen experience

Quantitative Indicator: Number

Baseline: 0

Target: 10 217

Time: Q2 2025

1. **Context:**

The objective of the measure is to, inter alia, foster the adoption of National Digital Identity platforms, (Sistema Pubblico di Identità Digitale, SPID and Carta d'Identità Elettronica, CIE) and of the national registry (Anagrafe nazionale della popolazione residente, ANPR).

Target M1C1-146 concerns the adoption of the SPID electronic identity (eID) system for Single Sign-On by 10 217 entities.

Target M1C1-146 is the first one for this measure, and will be followed by target M1C1-145 concerning the registration of 42.3 million individuals in the eID CIE platform.

2. **Evidence provided:**

1. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled;
2. Excel file with extracted from the official registry of the SPID platform, listing all the entities registered on the SPID platform as of 25 September 2025;

3. **Analysis:**

10 217 entities adopted the electronic identification (eID) via the Public Digital Identity System (SPID) after 3 December 2021.

Italian authorities provided a list of the entities adopting the SPID as an identification mechanism as an extract from the official SPID registry managed by AgID. Although SPID has been active since 2016, the official SPID registry was established only on 3rd December 2021. Consequently, for all entities already listed in the registry at the time it was created, it was not possible to reliably determine their SPID adoption date. Therefore, these entities were excluded from the target calculation to avoid RRP eligibility issues (i.e., entities that may have adopted SPID before February 2020). In addition, some of the entities were no longer active, especially schools that merged or were closed at the beginning of the academic year 2025-2026. After filtering out these two categories of entities, the number of entities that can be considered eligible for the target is equal to 10372.

Following the selection of a random sample of 60 units, the Commission services conducted a virtual on-the-spot check on 20 November 2025 to verify, on the SPID platform managed by AgID, that the sample of 60 units adopted the SPID after 3rd December 2021 as an electronic identification mechanism for people accessing their services. The virtual on-the-spot check was completed successfully, confirming that the requirement of the target has been met and that 10 372 entities adopted SPID as an electronic identification mechanism, thus exceeding the target of 10 217 entities by 155 units.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Non-repayable support

[M1C2-3]: Transition 4.0 tax credits granted to firms based on tax returns presented in 2021-2023

Related Measure: IT-C[M1C2]-I[I1]: Transition 4.0

Quantitative Indicator: Number

Baseline: 69 900

Target: 111 700

Time: Q2 2025

1. **Context:**

The objective of the measure is to support the digital transformation of businesses by incentivising private investment in assets and activities supporting digitalisation. The measure consists of a tax credit scheme.

Target M1C2-3 concerns the granting of tax credits to at least 111 700 firms in relation to 4.0 tangible capital goods, 4.0 intangible capital goods, standard intangible capital goods, research, development and innovation activities, or training activities, based on tax returns presented between 1 January 2021 and 31 December 2023 (for firms whose tax year does not correspond to the calendar year, the end of the considered period for the presentation of the tax returns related to all the above-listed tax credits shall be extended from 31 December 2023 to 30 November 2024). For this target, no firms operating in sectors of activity identified by ATECO codes 05, 06, 07 and 09 shall be considered. In addition, concerning investments in 4.0 tangible capital goods as well as in development and innovation activities, no firms operating in sectors of activity identified by ATECO codes 30, 22, 29, 38, 41, 42, 43, 17, 01, 50, 19, 20, 51, 24, 49, 23 and 35 shall be considered.

Target M1C2-3 follows the completion of milestone M1C2-1, related to the entry into force of legal acts to make the tax credits available to potential beneficiaries, identify the relevant tax codes by the Revenues Agency and set up a Scientific Committee to assess the economic impact of tax credits, and target M1C2-2 related to the granting of at least 69 900 Transition 4.0 tax credits to firms in relation to 4.0 tangible capital goods, 4.0 intangible capital goods, standard intangible capital goods, research, development and innovation activities, or training activities, based on tax returns presented between 1 January 2021 and 31 December 2022 (for firms whose tax year does not correspond to the calendar year, the end of the relevant period for the presentation of the tax returns related to all the above-listed tax credits shall be extended from 31 December 2022 to 30 November 2023).

2. **Evidence provided:**

1. Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled;

2. Recognition Resolutions 68/E of 30/11/2021 and 13/E of 1/3/2021 of the Revenue Agency (“AdE”) on the tax codes to use the tax credits;

3. Excel sheet listing all tax credits granted, broken down by credit category, including the name of the beneficiary companies, as prepared by the Ministry for Enterprises and Made in Italy (MIMIT) based on data collected by the Revenue Agency.

In the context of the sampling exercise, additional evidence was provided for a sample of 60 units:

4. Tax returns presented by companies containing information on the application of Transition 4.0 tax credits.

5. Companies' registration reports ("Visure Camerali").

6. Instructions for completing the tax declaration by Agenzia delle Entrate for the years 2021, 2022 and 2023.

3. Analysis:

At least 111 700 Transition 4.0 tax credits have been granted to firms in relation to 4.0 tangible capital goods, 4.0 intangible capital goods, standard intangible capital goods, research, development and innovation activities, or training activities. A tax credit shall be considered granted with the presentation of a tax return. Tax returns shall be presented between 1 January 2021 and 31 December 2023. For firms whose tax year does not correspond to the calendar year, the end of the considered period for the presentation of the tax returns related to all the above-listed tax credits shall be extended from 31 December 2023 to 30 November 2024. The baseline refers to the number of Transition 4.0 tax credits that have been granted to firms, based on tax returns presented between 1 January 2021 and 31 December 2022 for 4.0 tangible capital goods, 4.0 intangible capital goods, and standard intangible goods and based on tax returns presented between 1 January and 31 December 2022 for research, development and innovation activities, and training activities. For firms whose tax year does not correspond to the calendar year, also tax returns presented up to 30 November 2023 shall be included in the baseline for all the above-listed tax credits.

Based on the data provided by the Revenue Agency (evidence no. 3), relating to the tax returns presented between 1 January 2021 and 31 December 2023, and, for firms whose tax year does not correspond to the calendar year, between 31 December 2023 and 30 November 2024, a total of 230 193 tax credits have been granted, thus exceeding the goal of 111 700 by 118 493 tax credits. The resolution of the Revenue Agency (evidence no. 2), which was already considered in the Commission preliminary assessment of the first payment request of the Recovery and Resilience Plan, defined the relevant tax codes for the different categories of tax credits. Based on the list of granted tax credits provided by Italy (evidence no. 3), the tax credits have been granted to firms according to the following distribution, as reflected in the tax codes reported in the relevant tax declarations in line with the resolution of the Revenue Agency: 131 319 tax credits for 4.0 tangible capital goods (tax code "2L" and "2H"), 20 592 tax credits for 4.0 intangible capital goods (tax codes "3H" and "3L"), 40 873 tax credits for standard intangible capital goods (tax code "L3"), 17 497 tax credits for research, development and innovation activities (tax code "L1"), 19 912 tax credits for training activities (tax code "F7"). Further, the baseline of 69 900 tax credits refers to the number of Transition 4.0 tax credits that have been granted to firms, based on tax returns presented between 1 January 2021 and 31 December 2022 for 4.0 tangible capital goods, 4.0 intangible capital goods, and standard intangible goods and based on tax returns presented between 1 January and 31 December 2022 for research, development and innovation activities, and training activities. For firms whose tax year does not correspond to the calendar year, also tax returns presented up to 30 November 2023 have been included in the baseline for all the above-listed tax credits. Based on the data provided by the Revenue Agency (evidence no. 3), a total of 142 527 tax credits have been granted based on tax returns presented between 1 January 2021 and 31 December 2022. Following the selection of a random sample of 60 units from the 230 193 tax credits that have been granted to firms, Italy submitted the tax returns presented by beneficiary firms (evidence no. 4). The tax returns include information on the beneficiary firm name, its fiscal code and the tax credit type, showing that the tax credits granted to firms correspond to 4.0 tangible capital goods, 4.0 intangible capital goods, standard intangible capital goods, research, development and innovation activities, or training activities, as the tax codes reported in the tax returns to claim the tax credits correspond to the codes defined by the resolution of the Revenue Agency (evidence no. 2). Furthermore, the dates indicated on the tax returns confirmed that they were presented between 1 January 2021 and 31 December 2023. The evidence provided for the sample confirms that the requirements of the target have been met, and that Italy has granted 230 193 tax credits to firms, thus exceeding the goal of the target of 111 700 tax credits granted by 118 493 tax credits. For each of the 60 random sampled units, the beneficiary firm name, the fiscal code and the tax credit type correspond to the one provided in the list of granted tax credits provided by Italy (evidence no. 3).

No firms operating in sectors of activity identified by ATECO codes 05, 06, 07 and 09 shall be considered for the target. In addition, concerning investments in 4.0 tangible capital goods as well as in development and innovation activities, no firms operating in sectors of activity identified by ATECO codes 30, 22, 29, 38, 41, 42, 43, 17, 01, 50, 19, 20, 51, 24, 49, 23 and 35 shall be considered for the target.

Based on the list of granted tax credits provided by Italy (evidence no. 3), no firms operating in sectors of activity identified by ATECO codes 05, 06, 07 and 09 have been considered for the counting of target. In addition, for investments in 4.0 tangible capital goods and development and innovation activities, no firms operating in sectors of activity identified by ATECO codes 30, 22, 29, 38, 41, 42, 43, 17, 01, 50, 19, 20, 51, 24, 49, 23 and 35 have been considered for the counting of this target.

Following the selection of a random sample of 60 units from the 230 193 tax credits that have been granted to firms, Italy submitted the tax returns presented by beneficiary firms as well as the companies' registration reports ("visure camerali") (evidence no. 4 and 5). The evidence provided for a sample of 60 units confirmed that the above-mentioned requirement of the target has been met for 52 units.

For the 60 random sampled units, none of the ATECO codes included in the tax returns (evidence no.4) belong to the above-mentioned excluded sectors. Based on the rules for filing the tax declaration from the Italian Tax authority (evidence no. 6), firms shall include as relevant ATECO code in the tax declaration the code related to the main activity operated by the firms, defined as the activity generating most revenues in the relevant tax year.

For eight out of the 60 sample units, the "visure camerali" (evidence no. 5) reported additional ATECO codes belonging to the excluded sectors. As it was not possible to rule out that the tax credit was used for an activity of the firm referred to the ATECO codes belonging to the excluded sectors, a conservative approach was adopted, and all eight units were considered as not compliant. On this basis, a statistical analysis was carried out taking into account the overachievement of the target of 118 493 for a required 111 700. The conclusion is that 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.

Non-repayable support

[M1C2-14bis]: Entry into force of an enabling act:

Number and name of the Milestone: M1C2-14bis - Entry into force of an enabling act

Related Measure: M1C2.R3 Rationalization and simplification of firms' incentives

Qualitative Indicator: Entry into force of an enabling act for the reform of firms' incentives

Time: Q2 2025

1. Context:

The reform aims to review, simplify, and streamline the system of national incentives for firms. The reform consists in the entry into force of legal acts and in restructuring and further implementing (a) the RNA (National registry of State aids) and (b) the *incentivi.gov.it* Platform.

Milestone M1C2-14bis requires the entry into force of an enabling act (legge delega) mandating the government to revise the firms' incentives system.

Milestone M1C2-14bis is the first step of the implementation of the reform. It will be followed by milestone M1C2-14ter, related to rationalization of incentives for firms and the restructuring of the national registry of State aid and the *incentivi.gov.it* Platform.

2. Evidence provided:

- A summary document duly justifying how the milestone, including all the constitutive elements, was satisfactorily fulfilled;
- Copy of the publication in the official Gazzette No. 267 of 15 November 2023, of Law No. 160 of 27 October 2023 mandating the Government to revise and streamline the incentive framework for firms.

3. Analysis:

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

Entry into force of an enabling act (legge delega) mandating the government to revise the firms' incentives system.

Law No. 160 of 27 October 2023, was published in the official Gazzette No. 267 of 15 November 2023 and, in line with the national legal framework (art 10, Royal Decree No. 26 of 16 March 1942) , after 15 days from the publication in the official gazette, entered into force on 30 November 2023.

Article 1, comma 2 of Law No. 160, provides for the exercise of legislative delegation for the establishment of an organic system of incentives for businesses and also introduces measures aimed at the immediate improvement of the regulatory aspects of the matter.

Article 3 of Law No. 160 defines the scope of the mandate.
Accordingly, the Government shall:

- Rationalize the offer of incentives by identifying a defined, limited, and organized set of aid models, excluding incentive measures in favour of the agricultural and forestry sectors as well as fisheries and aquaculture;

- Harmonize the regulations concerning business incentives, coordinating them in a main legislative text, named the "incentives code".

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Loan Support

[M1C3-16]: M1C3-16 Adoption of decree(s) listing firms awarded support in Small Historic Towns

Related Measure: IT-C[M1C3]-I[I2.1]: Attractiveness of small historic towns

Qualitative Indicator: Adoption of decree(s) listing firms awarded support

Time: Q2 2025

1. **Context:**

The measure aims to support the economic and social development of disadvantaged areas based on the cultural regeneration of small towns and the growth of local economies and tourism in particular. The investment consists in supporting cultural, social and tourism-related infrastructure, services and activities**.**

Milestone M1C3-16 requires the adoption of decree(s) listing at least 1 800 firms awarded support in Small Historic Towns.

M1C3-16 is the second Milestone of the investment, and it follows the completion of Milestone M1C3-12, related to the entry into force of the Ministry of Culture decree for the allocation of resources to municipalities for the attractiveness of Small Historic Towns. It will be followed by target M1C3-16bis, which is the last target of the investment, and requires the completion of projects in cultural and touristic sites.

2. **Evidence provided:**

    1. Summary document duly justifying how the milestone, including all the constitutive elements, was satisfactorily fulfilled.
    2. Decree of the Secretary General no. 497 of 12/05/2023 approving the Public Notice for the support of entrepreneurial initiatives.
    3. Decree of the Secretary General no. 731 of 18/06/2024, Decree of the Department of General Administration no. 93 of 18/02/2025, Decree of the Secretary General no. 549 of 10/05/2024, Decree of the Department of General Administration no. 946 of 22/04/2025 and Decree of the Department of General Administration no. 2050 of 12/09/2025 awarding support to entrepreneurial initiatives.
    4. Decree of the Department of General Administration No. 2099 of 19/11/2025 providing the final list of beneficiaries financed by the measure.
    5. Public Notice of 20/12/2021 for the submission of cultural and social regeneration projects.

3. **Analysis:**

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

Adoption of decree(s) listing at least 1 800 firms awarded support in Small Historic Towns.

A Public Notice was launched by the Ministry of Culture on 12/05/2023 (Decree of the Secretary-General no. 497) to support entrepreneurial initiatives carried out in Small Historic Towns financed under line B (Art. 1(3) of the public notice). Public Notice of 20/12/2021 defines Small Historic Towns as “those historical settlements that are clearly identifiable and recognizable in their original typological and morphological characteristics, due to the persistence of a prevailing continuity of historic building fabrics and for the value of their historical-cultural and landscape heritage”. Art. 1 of Decree of the Secretary-General no. 497 specifies that all entrepreneurial initiatives supported belong to the Small Historic Towns identified in the context of Public Notice of 20/12/2021.

The Council Implementing Decision required the adoption of decree(s) listing at least 1 800 firms supported in Small Historic Towns. Italy adopted the following decrees awarding support to entrepreneurial initiatives in Small Historic Towns: Decree of the Secretary General no. 731 of 18/06/2024, Decree of the Department of General Administration no. 93 of 18/02/2025, Decree of the Department of General Administration no. 946 of 22/04/2025 and Decree of the Department of General Administration no. 2050 of 12/09/2025. A total of 2 657 entrepreneurial initiatives and 2 645 firms were awarded support, as indicated in the Decree of the Department of General Administration No. 2099 of 19/11/2025, thus overachieving the number of firms awarded support by 845 units.

Furthermore, in line with the measure description: The investment consists in supporting cultural, social and tourism-related infrastructure, services and activities.

Art. 1 of Decree of the Secretary-General no. 497 specifies that this line of intervention finances entrepreneurial initiatives carried out in municipalities receiving resources for Local Projects to support the cultural and social regeneration of Small Historic Towns. The entrepreneurial initiatives, in synergy with the Local Projects of Cultural and Social Regeneration, are aimed at economic and employment revitalization and counteracting depopulation, through interventions that promote new residential opportunities and encourage the creation of diversified services for the population, which are currently lacking or absent, contributing to addressing specific territorial needs. Specifically, art. 6 specifies that the support is intended for entrepreneurial projects aimed at revitalizing local economies in the fields of cultural, creative, tourist, commercial, agri-food, and artisanal activities, enhancing the products, knowledge, and techniques of the territory.

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

Non-repayable Support

[M2C1-12]: Audio-visual material on environmental transition

Related Measure: IT-C[M2C1]-I[I3.3]: Culture and awareness on environmental topics and challenges

Quantitative Indicator: Podcasts on environmental transition

Baseline:

Target:

Time: Q2 2025

1. **Context:**

Target M2C1-12 is part of Investment 3.3 Culture and awareness on environmental topics and challenges.

The investment consists in the design and production of digital content to raise awareness of environmental and climate challenges.

The target requires the publication of 180 podcasts on the environmental transition.

Target M2C1-12 is the second step of the implementation of this investment. It is preceded by M2C1-11 requiring the creation of an online subscription-free platform to create a repository of educational and recreational materials on environment-related topics.

2. **Evidence provided:**

1. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled;
2. Link to the publication of podcast episodes on the web platform here: https://culturaeconsapevolezza.mase.gov.it/

3. **Analysis:**

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

At least 180 podcasts published on the web platform.

The Ministry of the Environment and Energy Security has published on its platform "Dipende da noi" 180 informational podcasts on the environmental transition, covering topics such as renewable energy, energy communities, biodiversity, waste and recycling, energy bills, and energy efficiency.

As specified on the platform, this digital content has been produced in collaboration with expert public institutions such as the energy regulator ARERA and the research institute on the protection of the environment ISPRA as well as prominent figures in sports and journalism.

The Commission services accessed the link provided by the authorities on 03.11.2025 to verify that 180 podcasts were published on the platform covering themes related to the environmental transition. This check was completed successfully, confirming that 180 podcasts are available and covering topics concerning the environmental transition as specified in the CID.

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

Loan Support

[M2C4-9]: The monitoring and forecast system is accessible

Related Measure: IT-C[M2C4]-I[I1.1]: Implementation of an advanced and integrated monitoring and forecasting system

Qualitative Indicator: System is accessible online.

Baseline: N/A

Time: Q2 2025

1. **Context:**

The objective of this investment is to set-up a monitoring system to identify and predict risks stemming from climate change impact and inadequate spatial planning and to enable remote monitoring of large territorial areas, support the identification of illegal disposal of waste, and provide information for development of risk prevention plans.
Milestone M2C4-9 concerns the online activation of a monitoring and forecasting system designed to identify hydrological risks and illegal disposal of waste.

Milestone M2C4-9 is the second and final target for Investment 1.1, and it follows the completion of target M2C4-8 related to the approval of the operational plan for the implementation of the system.

2. **Evidence provided:**

1. Summary document demonstrating satisfactory fulfillment of the milestone including all constitutive elements
2. Link to the integrated monitoring system: "https://sim-pnrr.mase.gov.it".
3. Certificate of cloud infrastructure activation from Polo Strategico Nazionale, signed on 3 October 2025
4. A report from an independent engineer, dated 21 November 2025 certifying the fulfilment of the milestone in all its components.
5. The list of users authorized to access the system and its components, dated 19 November 2025.
6. The log of the users' accesses to the system, dated 19 November 2025.

3. **Analysis:**

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

The monitoring and forecasting system to identify hydrological risks and illegal disposal of waste is accessible online.

The monitoring and forecasting system (*"Sistema integrato di monitoraggio"*, henceforth "SIM") is accessible online at the dedicated link (evidence 2).

Access to the SIM is structured through different operational modalities. Specific functionalities are accessible to authorised users in selected administrations through dedicated virtual environments and specialised applications, depending on the administration or user concerned, as well as on the sensitivity and security level of the information processed. The documentation issued by the Polo Strategico Nazionale (evidence 3) confirms the activation of the cloud infrastructure, the operational status of the system's architecture, and the full functionality of the virtual machines, thereby demonstrating the system's activation and operability. The list of active users (evidence 5) and the extract of their access logs (evidence 6) further substantiate that the system is effectively accessible to the competent administrations.

The SIM provides a dedicated thematic area (*"Monitoraggio dell'Instabilità Idrogeologica"*) which enables the identification and analysis of hydrogeological risks. It enables to monitor and identify risk areas in relation to heavy rainfall hazards, emerging drought conditions, landslide susceptibility and flood risks in small water basins. It integrates a comprehensive set of use cases, including: generation of thematic maps from satellite data and orthophotos; calculation of rainfall probability curves and forecasting of meteorological variables; mapping of landslide susceptibility; and indicators for assessing drought and water scarcity; analytical support to hydrological and hydraulic models; and analysis and extraction of data from fixed and mobile observation networks. All these functionalities are active and accessible on the platform by authorised users.

A second dedicated thematic area, *"Monitoraggio e Identificazione di Illeciti Ambientali"*, supports the detection of illegal disposals of waste. The use cases *"Gestione Illecita dei Rifiuti"* and "*Tool per l'analisi di immagini multispettrali"* enable the identification of territorial anomalies through thematic maps and geospatial indicators, supporting competent authorities in planning and conducting field investigations. These functionalities are also active and accessible to authorised users.

The Italian authorities also provided a report of an independent engineer (evidence 4) further verifying the completion of the milestone. The independent engineer verified that the platform and the functionalities required to fulfil all the requirements of the milestone are online and accessible. The independent engineer also confirmed that the documentation issued by the Polo Strategico Nazionale (evidence 3) provided evidence of the activation of the cloud system, of the operational status of the system's architecture and the full functionality of the virtual machines.

The Commission services conducted a virtual on-the-spot check on 19 November 2025 to verify the activation and accessibility of the system, as well as the extraction of the authorised users list and of the log of accesses to the system. This check was completed successfully, confirming that the system exists and is accessible online, including the functionalities aimed to identify hydrogeological risks and illegal disposal of waste.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Loan Support

[M2C4-26]: Restoration and protection of seabed and marine habitats

Related Measure: IT-C[M2C4]-I[I3.5]: Restoration and protection of the seabed and marine habitats

Quantitative Indicator: Number

Baseline: 0

Target: 10

Time: Q2 2025

1. **Context:**

The objective of this measure is to contribute to reversing the degradation of seabed and marine habitats. The measure consists in supporting projects mapping seafloor habitats and environmental monitoring, planning and large-scale restoration and protection measures, and enhancing marine observation platforms.

Target M2C4-26 is the only one under this measure and relates to the execution of 10 activities aimed at the restoration and protection of seabed and marine habitats as well as at implementing coastal observation systems.

2. **Evidence provided:**

(1) Summary document duly justifying how the target, including all the constitutive elements, was satisfactorily fulfilled;

(2) Document on the progress of works signed by the Director of the works on 12 June 2025 and having as an annex a set of documents signed by the contractors for the placing of oyster restoration sites in Lignano;

(3) Document on the progress of works signed by the Director of the works on 12 June 2025 and having as an annex a set of documents signed by the contractors for the placing of oyster restoration sites in Riccione;

(4) Report of 30 June 2025 on progress of works for the planting of seabed vegetation in Lazio and Campania, as signed by the contractor;

(5) Report of 30 June 2025 on progress of works for the planting of seabed vegetation in Calabria and Sicilia, as signed by the contractor;

(6) Set of five installation certificates for mooring fields equipped with buoys in Western Mediterranean;

(7) Set of four installation certificates for mooring fields equipped with buoys in Central and Southern Mediterranean;

(8) Report of 19 May 2025 on progress of works for the removal of ghost nets in the region of Sicilia, as signed by the contractor;

(9) Report of 16 July 2025 on progress of works for the removal of ghost nets in the regions of Campania and Lazio, as signed by the contractor;

(10) Report of 17 September 2025 on progress of works for the removal of ghost nets in the regions of Marche, Emilia Romagna, and Puglia, as signed by the contractor;

(11) Two reports of 10 June 2025 on the completion of works for the maintenance, installation or equipment with elaboration software of coastal radial stations in two locations in Naples area, as signed by the contractor;

(12) Report of July 2025 on the maintenance, installation or equipment with elaboration software of coastal radial stations in three locations in Sicily, as signed by the contractor;

(13) Report of April 2025 on the maintenance, installation or equipment with elaboration software of coastal radial stations in four locations in Toscana, as signed by the contractor;

(14) Delivery report of 14 April 2025 on the set-up and delivery of a Mobile Oceanographic Research Unit, as signed by the contractor;

(15) Report of 27 May 2025 on the launch of wave measuring buoys, as signed by the contractor;

(16) Report of 28 July 2025 on the maintenance or installation of new sensors in tide gauge network stations, as signed by the contractor;

(17) Report of 29 January 2025 on the maintenance and installation of marine-weather stations in the Venice Lagoon area, as signed by the contractor;

(18) Report of 16 July 2025 on the installation of fixed stations for continuous monitoring of chemical-physical and trophic parameters in the Venice Lagoon, as signed by the contractor;

(19) Report of 14 July 2025 on the installation of fixed stations for continuous monitoring of chemical-physical and trophic parameters in the Venice Lagoon, as signed by the contractor;

(20) Report of April 2025 on the installation of fixed stations for continuous monitoring of chemical-physical and trophic parameters in the Lagoon of Marano and Grado, as signed by the contractor;

(21) Report of 10 June 2025 on the production of data of an observation software system for the monitoring of marine and coastal habitats, as signed by the contractor;

(22) Report of 17 April 2025 on the production of data of an observation software system for the monitoring of marine and coastal habitats, as signed by the contractor;

(23) Report of 9 June 2025 on the production of data of an observation software system for the monitoring of marine and coastal habitats, as signed by the contractor;

(24) Two reports of 31 May 2025 on the production of data of an observation software system for the monitoring of marine and coastal habitats, as signed by the contractor;

(25) Report of 8 June 2025 on the production of data of a modelling system on high-resolution hydrodynamic analysis of short-term pollution events, as signed by the contractor;

(26) Tender documents for the purchase of an oceanographic vessel published on 16 May 2025;

(27) Contract signed on 31 January 2025 for the purchase of an oceanographic vessel;

(28) An Independent engineer report signed on 20 November 2025.

3. Analysis:

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

The following 10 activities have been carried out:

Oyster restoration sites have been placed in at least one site for each of the following regions: Friuli Venezia Giulia and Emilia Romagna.

The Italian authorities provided evidence that oyster restoration sites have been placed in Friuli Venezia Giulia and Emilia Romagna.

For the site in Friuli Venezia Giulia located in Lignano, the Italian authorities provided a document on the progress of works signed by the Director of the works and having as an Annex a set of documents signed by the contractors (evidence 2). In particular, the reports in annex 2 to the document on progress of works, countersigned by the contractors, provide evidence that 72 frames with substrate for oyster settlement, including more than 1000 kg of oysters, were placed in the site between 30 May 2025 and 7 June 2025 (evidence 2, annex 2, pp. 78 – 93).

For the site in Emilia Romagna located in Riccione, the Italian authorities provided a document on the progress of works signed by the Director of the works and having as an Annex a set of documents signed by the contractors (evidence 3). In particular, the reports in annex 2 to the document on progress of works, countersigned by the contractors, provide evidence that 72 frames with substrate for oyster settlement, including more than 2000 kg of oysters, were placed in the site between 29 May 2025 and 5 June 2025 (evidence 3, annex 2, pp. 77 -106).

Seabed and marine vegetation has been planted in at least one site for each of the following regions: Lazio, Campania, Calabria, Sicilia.

The Italian authorities provided evidence that seabed and marine vegetation has been planted in at least one site in the regions Lazio, Campania, Calabria and Sicilia.

For the interventions in Lazio and Campania, the Italian authorities have provided a report on the progress of works signed by the contractor on 9 July 2025 (evidence 4). The report demonstrates that, as of 30 June 2025, "Posidonia oceanica" had been planted in selected areas at the site of Santa Marinella (Lazio) (page 16), and that "Cystoseira" had been planted in selected areas at the site of Costa degli Infreschi (Campania) (page 17).

For the interventions in Calabria and Sicilia, the Italian authorities have provided a report on the progress of works signed by the contractor on 9 July 2025 (evidence 5). The report demonstrates that, as of 30 June 2025, "Posidonia oceanica" had been planted in selected areas at the site of Capo Rizzuto (Calabria) (page 18), and that "Posidonia oceanica" had been planted in selected areas at the site of Capo Feto (Sicilia) (page 19).

Mooring fields equipped with buoys have been installed in the areas of the Western, Central and Southern Mediterranean.

The Italian authorities provided evidence that mooring fields equipped with buoys have been installed in the areas of the Western, Central and Southern Mediterranean.

For the interventions in Western Mediterranean, the Italian authorities have provided installation certificates, signed by the implementing parties, for 29 mooring fields equipped with buoys in the areas of Milazzo (certificate of 6 June 2025), Egadi Islands (certificate of 9 June 2025), Regional sea parks of Calabria (certificate of 9 June 2025), Piana island (certificate of 30 June 2025), Capo testa – punta falcone (certificate of 10 June 2025) (evidence 6).

For the interventions in Central and Southern Mediterranean, the Italian authorities have provided installation certificates for 20 mooring fields quipped with buoys in the areas of Plemmirio (certificate of 6 June 2025), Capo Rizzuto (certificate of 4 June 2025), Ciclopi Islands (certificate of 4 June 2025), regional sea parks of Calabria (certificate of 9 June 2025) (evidence 7).

Ghost nets have been removed in a total of at least 15 sites located across Sicily, Campania, Lazio, Puglia, Marche and Emilia Romagna.

The Italian authorities provided evidence that in 15 sites (5 in Sicilia, 2 in Campania, 3 in Lazio, 1 in Puglia, 2 in Marche and 2 in Emilia-Romagna) ghost nets and abandoned fishing gear have been identified and removed.

For the five sites in Sicily, the Italian authorities have provided a report on the progress of works signed by the contractor on 22 May 2025 (evidence 8). The report demonstrates that, as of 19 May 2025, 2.79 tons of ghost nets and abandoned fishing gear had been identified in five sites across Sicily and subsequently removed.

For the total of five sites in Campania and Lazio, the Italian authorities have provided a report on the progress of works signed by the contractor on 18 July 2025 (evidence 9). The report demonstrates that, as of 16 July 2025, 1.86 tons of ghost nets and abandoned fishing gear had been identified in two sites in Campania and three sites in Lazio and subsequently removed.

For the total of five sites in Marche, Emilia Romagna, and Puglia, the Italian authorities have provided a report on the progress of works signed by the contractor on 17 September 2025 (evidence 10). The report demonstrates that, as of 17 September 2025, 6.26 tons of ghost nets and abandoned fishing gear had been identified in two sites in Marche, two sites in Emilia Romagna and one site in Puglia and subsequently removed.

Coastal radial stations have been maintained or installed or equipped with elaboration software in at least 9 locations, and a Mobile Oceanographic Research Unit has been purchased.

The Italian authorities have provided evidence that coastal radial stations have been maintained or installed or equipped with elaboration software in a total of at least 9 locations across Tuscany, Sicily and Naples.

The Italian authorities have provided two reports on the progress of works signed by the contractor on 10 June 2025 (evidence 11), demonstrating that coastal radial stations have been maintained or installed or equipped with elaboration software in two locations in Naples area.

The Italian authorities have provided a maintenance report signed by the contractor on 31 October 2025 (evidence 12), demonstrating that coastal radial stations have been maintained or installed or equipped with elaboration software in three locations in Sicily (Licata, Pozzallo and Marina di Ragusa).

The Italian authorities have provided a maintenance report signed by the contractor on 31 October 2025 (evidence 13), demonstrating that coastal radial stations have been maintained or installed or equipped with elaboration software in four locations in Tuscany (Castiglione della Pescaia, San Vincenzo, Isola del Tino and Livorno).

For the Mobile Oceanographic Research Unit, the Italian authorities have provided a delivery report signed by the contractor on 14 April 2025 (evidence 14). The report provides evidence that, as of 14 April 2025, the Mobile Oceanographic Research Unit as part of the procurement contract for the "Supply, installation, training, maintenance, and management assistance of a mobile oceanographic research unit" has been equipped with the required monitoring and radar technology and delivered.

At least 12 wave measuring buoys have been launched.

The Italian authorities have provided a report on the progress of works signed by the contractor on 29 October 2025 (evidence 15), demonstrating that 16 wave measuring buoys had been launched (see list on page 7) in different locations in the Adriatic Sea, the western and central Mediterranean, and Ionian Sea.

Maintenance or installation of new sensors has taken place in at least 25 tide gauge network stations.

The Italian authorities have provided a report on the progress of works signed by the contractor on 28 July 2025 (evidence 16), demonstrating that maintenance or installation of new sensor in 30 tide gauge network stations (see list on page 4) had taken place as of 28 July 2025.

Installation of at least 3 new marine weather stations and maintenance of at least 25 marine-weather stations in the Venice Lagoon area.

The Italian authorities have provided a report on the progress of works signed by the contractor on 29 January 2025 (evidence 17), demonstrating that maintenance had been carried out for a total of 28 marine-weather stations (page 6) and a total of four new marine-weather stations had been installed (page 5) in the Venice Lagoon area, as of 29 January 2025.

At least 10 fixed stations for continuous monitoring of chemical-physical and trophic parameters in lagoons have been installed.

The Italian authorities have provided a report on the progress of works signed by the contractor on 28 October 2025 (evidence 18), demonstrating that 8 new fixed stations for continuous monitoring of chemical-physical and trophic parameters in the Venice Lagoon had been installed, as of 16 July 2025.

The Italian authorities have provided a report on the progress of works signed by the contractor on 28 October 2025 (evidence 19), demonstrating that additional 5 new fixed stations for continuous monitoring of chemical-physical and trophic parameters in the Venice Lagoon had been installed, as of 14 July 2025.

The Italian authorities have provided a report on the progress of works signed by the contractor in 28 October 2025 (evidence 20), demonstrating that 2 new fixed stations for continuous monitoring of chemical-physical and trophic parameters in the Lagoon of Marano and Grado had been installed, as of 16 April 2025.

At least 5 observation software systems for the monitoring of marine and coastal habitats have produced data.

The Italian authorities have provided a report on the progress of works signed by the contractor on 10 June 2025 (evidence 21), demonstrating that the production of data of an observation software system for oceanographic monitoring had been achieved.

The Italian authorities have provided a system engineering report signed by the contractor on 17 April 2025 (evidence 22), demonstrating that a modelling system for ocean bio-geo-chemistry and for simulating the effects of discharges into the sea had been implemented and produced data.

The Italian authorities have provided a report on the progress of works signed by the contractor on 28 October 2025 (evidence 23), demonstrating that a sea level forecasting system on national level had been implemented and produced data.

The Italian authorities have provided two reports on the progress of works signed by the contractors on 28 October 2025 and 4 June 2025 (evidence 24), respectively, demonstrating that the two components of an ecological modelling system of lagoon environments had been implemented and produced data.

The Italian authorities have provided a report on the progress of works signed by the contractor on 28 October 2025 (evidence 25), demonstrating that the maritime and coastal data component has been implemented and produced data for a system on high-resolution hydrodynamic analysis of short-term pollution events.

Any purchase of ships or vessels shall be of the best available technology with the lowest environmental impacts in the sector.

The Italian authorities provided the contract signed on 31 January 2025 for the purchase of an oceanographic vessel for the purposes of long-range monitoring of maritime ecosystem (evidence 27). As outlined in the tender documents (evidence 26) for the purchase, the vessel shall be able to be operational for 200 days a year, with 10-30 days autonomy. The technical specifications of the vessel, including its equipment with an Integrated Full Electric Propulsion (IFEP) system, are outlined in the contract. The report from an independent engineer issued on date 20 November 2025 (evidence 28) confirms that the vessel is built using the best available technology. In particular the report concludes that “the combination of these requirements places the ship among the best technologies available in the industry, characterized by the lowest environmental impact, in full accordance with the principle of sustainability and with the environmental, regulatory, and contractual obligations outlined by the National Recovery and Resilience Plan (PNRR)”.

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

Non-repayable support

[M4C1-16]: Adoption of grant award decision(s) for the activation of STEM projects

Related Measure: IT-C[M4C1]-I [I3.1]: New skills and new languages

Qualitative Indicator: Adoption of grant award decision(s)

Baseline: NA

Time: Q2 2025

1. **Context:**

Milestone M4C1-16 relates to the adoption of grants award decision(s) for the activation of STEM projects in at least 8000 schools. This milestone is part of investment 3.1 "New skills and new languages". The objective of this investment is to enhance multilanguage, STEM, digital, and innovation skills within curricula across all school levels and strengthen the Erasmus+ program.

M4C1-16, together with M4C1-17, are the first and last steps in the implementation of investment 3.1. M4C1-17 relates to the activation of language and/or methodological courses and strengthening of the Erasmus+ program, addressed to students and/or school staff.

2. **Evidence provided:**

1) Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled
2) Ministerial Decree No. 65/2023, constituting the grant awarding decision allocating resources for STEM and linguistic competence projects
3) Annex 1 to Ministerial Decree No. 65/2023, defining the resource allocation among 8,171 public schools for the activation of STEM projects
4) Operational guidelines ref. no 0132935 for the development of the STEM projects, adopted on 15 November 2023 as per indicated by Ministerial Decree No. 65/2023
5) *Avviso Pubblico* of 9 November 2023, allocating resources for the activation of STEM projects in private schools
6) Annex 1 to *Avviso Pubblico* of 9 November 2023, listing the resource allocation among 570 private schools for the activation of STEM projects

3. **Analysis:**

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

Adoption of grant award decision(s) for the activation of STEM projects in at least 8000 schools

8,171 public schools and 570 private schools, for a total of 8,741 schools have been allocated resources for activating STEM projects in 2024 and 2025, overachieving the required number of 8,000, as evidenced by (i) Ministerial Decree No. 65 of 12 April 2023 (evidence no. 2) and related annex 1, the latter listing the schools' resources allocation for 8,171 public schools (evidence no. 3) and (ii) a grant awarding decision, as evidenced by *Avviso Pubblico* of 9 November 2023, allocating resources for the activation of STEM projects in 570 private schools (evidence no. 5 and 6). The grant awarding decision establishes that the funding is made available for the implementation of STEM projects in schools.

Furthermore, as per indicated in the grant awarding decision, the implementation of STEM projects must be in line with the provisions of paragraphs 547–554 of Law No. 197/2022 and related STEM Operational Guidelines (evidence no. 4). The Operational Guidelines, establish that STEM projects must include key elements and strategy to strengthen STEM education, incorporating gender equality measures, personalized tutoring, and family involvement to promote STEM studies and careers among students.

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

Non-repayable support

[M4C1-17]: Adoption of grant award decision(s)

Related Measure: IT-C[M4C1]-I [I3.1]: New skills and new languages

Qualitative Indicator: Adoption of grant award decision(s)

Baseline: NA

Time: Q2 2025

1. **Context:**

Milestone M4C1-17 relates to the adoption of grants award decision(s) for supporting the activation of language and/or methodological courses for improving linguistic and methodological competences among teachers in at least 8000 schools and increasing opportunities for educational mobility via Erasmus+. This forms part of investment 3.1 "New skills and new languages," which aims to enhance multilanguage, STEM, digital and innovation skills across all school levels.

M4C1-17, together with M4C1-16, are the first and last steps in the implementation of investment 3.1. M4C1-16 relates to the activation of STEM projects in at least 8000 school.

2. **Evidence provided:**

1) Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled
2) Ministerial Decree No. 65/2023, constituting the grant awarding decision allocating resources for annual language/methodological training courses for school staff
3) Annex 1 to Ministerial Decree No. 65/2023, defining the resource distribution between 8,171 public schools for the activation of language and methodological courses
4) Ministerial Decree No. 61/2023, allocating resources for Erasmus+ program enhancement for 2023-2025, supporting international mobility projects not financed under the regular EU funds
5) *Avviso Pubblico* of 9 November 2023, allocating resources for the activation of language and methodological courses to private schools
6) Annex 1 to *Avviso Pubblico* of 9 November 2023, defining the resource distribution private schools for the activation of language and methodological courses
7) Operational Guidelines ref. no 0132935 for the development of language and methodological courses, adopted on 15 November 2023 as per indicated by Ministerial Decree No. 65/2023

3. **Analysis:**

The justification and substantiating evidence provided by the Italian authorities cover all constitutive elements of the milestone:

Adoption of grant award decision(s) for:

The activation of language and/or methodological courses, destined to school staff, in at least 8000 schools.8,171 public schools and 570 private schools, for a total of 8,741 schools, have been allocated resources for activating language and methodological courses for school staff, overachieving the required number of 8,000, as evidenced by (i) Ministerial Decree No. 65 of 12 April 2023 (evidence no.2) and related Annex 1, the latter listing the schools' resources allocation for 8,171 public schools (evidence no. 3); and (ii) a grant awarding decision, as evidenced by *Avviso Pubblico* of 9 November 2023, allocating resources for the activation of language and/or methodological courses in 570 private schools (evidence no. 5 and 6). The grant awarding decision establishes that the funding is made available for the implementation of language and methodological courses, destined to school staff.

Furthermore, the grant awarding decision establishes that the implementation of language and methodological courses must be done in line with the provisions of indicated in the National Operational guidelines (evidence 7). In line with the before mentioned decrees' provisions, the activation of language and methodological courses consist in the signature of the 'Accordo di concessione' (Concessional Agreement) between the school principal/legal representative and the Coordinator of the PNNR Mission Structure under the Presidency of the Council. The Concessional Agreement, includes all the details of the language and methodological courses proposed by each school unit, which must be aligned with the objectives as per established in the National Guidelines.

Furthermore, as per indicated in the grant awarding decision, the implementation of language and methodological courses must be in line with the provisions of paragraphs 547–554 of Law No. 197/2022 and related Operational Guidelines (evidence no. 7). The Operational Guidelines, establish that methodological courses should focus on strengthening the CLIL teaching methodology among teachers currently in service, including enhance teachers' abilities to design and manage CLIL learning paths collaboratively with other teachers, using specific educational materials, resources, and technologies to promote learning subject content through a foreign language. The Operational Guidelines also establish that language courses should focus on strengthening teacher's foreign language proficiency up to advanced CEFR levels (B1, B2, C1, C2).

(ii) The strengthening of the Erasmus+ program, addressed to students and/or school staff, for the years 2023, 2024, and 2025.

The grant award decision for the expansion of the Erasmus+ program, benefitting both teachers and students, was adopted and formalized via Ministerial Decree No. 61/2023 (evidence 4).

The grant award decision allocated additional 150 million resources to strengthen the Erasmus+ program for the years 2023, 2024 and 2025 by increasing the funding for those years. In particular, the grant award decision established that additional funding is made available for retroactively targeting unmet demand for international mobility that was not covered by Erasmus+ funding in 2023 and 2024 and expand the coverage of the program for 2025.

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

Non-repayable support

[M4C1-19]: Adoption of grant award decision(s) for the purchase of digital devices and/or the creation of digital laboratories

Related Measure: IT-C[M4C1]-I[I3.2]: School 4.0: innovative schools, wiring, new classrooms and workshops

Qualitative indicator: Adoption of grant award decision(s)

Baseline: N/A

Time: Q2 2025

1. **Context:** The objective of this investment is to transform school facilities to allow digital learning. This measure consists in equipping at least 8000 primary and secondary schools, covering at least 100 000 classrooms, with digital tools.

   Milestone M4C1-16 concerns the adoption of grant award decisions for transforming classrooms into innovative learning environments and/or creating digital laboratories in at least 8,000 schools. This milestone marks the final step in the implementation of investment 3.2. It follows the completion of milestone M4C1-4, which concerned the adoption by the Ministry of Education of the "School 4.0" plan aimed at promoting the digital transition of the Italian education system.

2. **Evidence provided:**

   1. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled;

   2. Ministerial Decree No. 218 of 8 August 2022, allocating resources among schools for the implementation of the "School 4.0" Plan, including Annex 1 on the funds allocated for the transformation of classrooms and Annex 2 on the funds allocated for the creation of digital laboratories.

   3. Operational guidelines ref. no. 107624 of 21 December 2022 for the implementation of the projects of the 'School 4.0' Plan, the latter adopted by Decree of the Minister of Education no. 161 of 14 June 2022.

3. **Analysis:** The justification and substantiating evidence provided by the Italian authorities cover all constitutive elements of the milestone.

   Adoption of grant award decision(s) for the transformation of classrooms into innovative environments and/or the creation of digital laboratories in at least 8 000 schools.

   Article 1, paragraph 1 of Ministerial Decree No. 218 of 8 August 2022 regulates the grant award for transforming at least 100 000 classrooms into innovative learning environments and/or creating digital laboratories in at least 8,000 schools, ensuring the allocation of resources to all eligible schools.

A total of 8,254 primary and secondary level schools were allocated funding for the transformation of 100 000 classrooms into innovative learning environments, thus also overachieving the required number of 8,000, as shown in Annex 1 of the aforementioned decree. On top of the 8254 schools that were allocated funding for the transformation of classrooms into innovative learning environments, a total of 2,820 public upper secondary schools were awarded resources for the creation of laboratories, as indicated in Annex 2 of the same decree.

The grant awarding decision establishes that the funding is made available for the transformation of 100 000 classrooms into innovative environments and/or the creation of digital laboratories. Furthermore, the grant awarding decision establishes that transformation of classrooms into innovative environments and/or the creation of digital laboratories must be done in line with the Piano "Scuola 4.0", adopted by decree of the Minister of Education on June 14, 2022, and related operational guidelines. The guidelines establish that transforming classrooms into innovative learning environments and/or creating digital laboratories consists in redesigning spaces to support flexible, technology-enhanced learning, and integrating advanced digital tools.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Non-repayable support

[M4C2-1bis]: Publication of the decree(s) awarding the funding to young researchers

Related Measure: IT-C[M4C2]-I[I1.2]: Funding projects presented by young researchers

Qualitative indicator: Publication of the decree(s)

Time: Q2 2025

1. **Context:**

This measure consists in supporting the research activities of young researchers, with the aim of retaining them in Italy.

Milestone M4C2-1bis requires the publication of decree(s) awarding funding to support at least 550 young researchers. The milestone also specifies that young researchers shall respect the following conditions: being aged up to 40 years old at the date when the call was launched (profiles that are 40 years old at the date of the publication of the call for projects are eligible until turning 41 years old) or, for profiles aged between 41 years old and 45 years old, having completed the PhD maximum 7 years earlier (profiles that are 45 years old at the date of the publication of the call for projects are eligible up until turning 46 years old).

Milestone M4C2-1bis follows the completion of target M4C2-1, related to the award of at least 300 research grants.

2. **Evidence provided:**

- Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled;
- Directorial Decree No. 201 of 3 July 2024, providing the call for projects for the SoE/MSCA line;
- Directorial Decree No. 47 of 20 February 2025, providing the call for projects for the Post-Doc line;
- Directorial Decree No. 72 of 7 April 2025, providing the call for projects for the ERC line;
- Directorial Decree No. 308 of 13 October 2024, awarding decree for the SoE line;
- Directorial Decree No. 20 of 21 January 2025, awarding decree for the SoE line;
- Directorial Decree No. 110 of 8 May 2025, awarding decree for the SoE line;
- Directorial Decree No. 127 of 26 May 2025, awarding decree for the SoE line;
- Directorial Decree No. 112 of 13 May 2025, awarding decree for the MSCA line;
- Directorial Decree No. 185 of 5 August 2025, awarding decree for the MSCA line;
- Directorial Decree No. 115 of 14 May 2025, awarding decree for the Post-Doc line;
- Directorial Decree No. 120 of 20 May 2025, awarding decree for the Post-Doc line;
- Directorial Decree No. 129 of 6 June 2025, awarding decree for the Post-Doc line;
- Directorial Decree No. 131 of 16 June 2025, awarding decree for the Post-Doc line;
- Directorial Decree No. 130 of 16 June 2025, awarding decree for the ERC line;
- Directorial Decree No. 14 of 26 November 2025, consolidated decree.

3. **Analysis:**

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

Publication of the decree(s) awarding the funding to support at least 550 young researchers. Young researchers shall respect the following conditions: being aged up to 40 years old at the date when the call was launched (profiles that are 40 years old at the date of the publication of the call for projects are eligible until turning 41 years old) or, for profiles aged between 41 years old and 45 years old, having completed the PhD maximum 7 years earlier (profiles that are 45 years old at the date of the publication of the call for projects are eligible up until turning 46 years old).

To implement this measure, the Italian authorities published on the website of the Ministry of University and Research (hereafter referred to as "MUR") the calls for projects related to each of the four lines of Investment 1.2, namely Seal of Excellence line (hereafter referred to as "SoE line"), Marie Sklodowska-Curie Actions line (hereafter referred to as "MSCA line"), Post-Doc line (hereafter referred to as "Post-Doc line"), and European Research Council line (hereafter referred to as "ERC line"). Such calls for projects provide the framework applicable to each of the aforementioned lines of investment 1.2, including the definition of "young researcher" in line with the requirement of the milestone. Specifically:

- With reference to the SoE line: as requested by the Council Implementing Decision, Article 1, paragraph 11, of Directorial Decree No. 201 of 3 July 2024 provides that are comprised within the definition of "young researcher" all the researchers that, at the date of the launch of the call for projects of the aforementioned decree 201/2024, are aged up to 40 years old (to be understood as up to turning 41 years old at the date of the adoption of the Public Call) or, for profiles older than 40 years old and up to 45 years old (to be understood as up to turning 46 years old at the date of the adoption of the Public Call), have completed the PhD maximum 7 years earlier.
- With reference to the MSCA line: as requested by the Council Implementing Decision, Article 1, paragraph 11, of Directorial Decree No. 201 of 3 July 2024 provides that are comprised within the definition of "young researcher" all the researchers that, at the date of the launch of the call for projects of the aforementioned decree 201/2024, are aged up to 40 years old (to be understood as up to turning 41 years old at the date of the adoption of the Public Call) or, for profiles older than 40 years old and up to 45 years old (to be understood as up to turning 46 years old at the date of the adoption of the Public Call), have completed the PhD maximum 7 years earlier.
- With reference to the Post-Doc line: as requested by the Council Implementing Decision, Article 1, paragraph 8, of Directorial Decree No. 47 of 20 February 2025 provides that are comprised within the definition of "young researcher" all the researchers that, at the date of the launch of the call for projects of the aforementioned decree 47/2025, are aged up to 40 years old (to be understood as up to turning 41 years old at the date of the adoption of the Public Call) or, for profiles older than 40 years old and up to 45 years old (to be understood as up to turning 46 years old at the date of the adoption of the Public Call), have completed the PhD maximum 7 years earlier.
- With reference to the ERC line: as requested by the Council Implementing Decision, Article 1, paragraph 13, of Directorial Decree No. 72 of 7 April 2025 provides that are comprised within the definition of "young researcher" all the researchers that, at the date of the launch of the call for projects of the aforementioned decree 72/2025, are aged up to 40 years old (to be understood as up to turning 41 years old at the date of the adoption of the Public Call) or, for profiles older than 40 years old and up to 45 years old (to be understood as up to turning 46 years old at the date of the adoption of the Public Call), have completed the PhD maximum 7 years earlier.

In line with the framework provided by the calls for projects for each line of Investment 1.2 referred to above, the Italian authorities published on the website of MUR decrees awarding the funding to support a total of 631 young researchers. Specifically:

- With reference to the SoE line: Directorial Decree No. 308 of 13 October 2024 awarded the funding to 54 young researchers; Directorial Decree No. 20 of 21 January 2025 awarded the funding to 74 young researchers; Directorial Decree No. 110 of 8 May 2025 awarded the funding to 31 young researchers; Directorial Decree No. 127 of 26 May 2025 awarded the funding to 13 young researchers. The Italian authorities therefore published decrees awarding the funding to support a total of 172 young researchers under the SoE line of this investment.
- With reference to the MSCA line: Directorial Decree No. 112 of 13 May 2025 awarded the funding to 85 young researchers; Directorial Decree No. 185 of 5 August 2025 awarded the funding to 4 young researchers. The Italian authorities therefore published decrees awarding the funding to support a total of 89 young researchers under the MSCA line of this investment.
- With reference to the Post-Doc line: Directorial Decree No. 115 of 14 May 2025 awarded the funding to support the hiring by Host Institutions (i.e. – as provided by Article 1, comma 9, of Directorial Decree No. 47 of 20 February 2025 (call for projects for this line of investment) – universities and public research entities) of 305 young researchers; Directorial Decree No. 120 of 20 May 2025 awarded the funding to support the hiring by Host Institutions (i.e. – as provided by Article 1, comma 9, of Directorial Decree No. 47 of 20 February 2025 (call for projects for this line of investment) – universities and public research entities) of 54 young researchers; Directorial Decree No. 129 of 6 June 2025 awarded the funding to support the hiring by Host Institutions (i.e. – as provided by Article 1, comma 9, of Directorial Decree No. 47 of 20 February 2025 (call for projects for this line of investment) – universities and public research entities) of 9 young researchers; Directorial Decree No. 131 of 16 June 2025 awarded the funding to support the hiring by Host Institutions (i.e. – as provided by Article 1, comma 9, of Directorial Decree No. 47 of 20 February 2025 (call for projects for this line of investment) – universities and public research entities) of 1 young researcher. The Council Implementing Decision states that the name of milestone M4C2-1bis is "Publication of the decree(s) awarding the funding to young researchers". However, the description of the measure in the Council Implementing Decision states that "the measure consists in supporting the research activities of young researchers", and the description of milestone M4C2-1bis states "Publication of the decree(s) awarding the funding to support at least 550 young researchers". Moreover, the Recovery and Resilience Plan of Italy establishes that "the measure shall support the research activities" of young researchers. In light of the contextual interpretation of the requirement from the name of the milestone from the Council Implementing Decision, it is therefore interpreted that this requirement calls for the publication of decrees that award funding destined to the support of the research activities of young researchers. Italy published decrees awarding the funding to support the hiring of young researchers by Host Institutions, in line with the requirements of the measure description, the milestone description and the aim of the measure. In particular, based on Article 13, paragraph 2, of the aforementioned decree 47/2025 (call for projects for the Post-Doc line of investment), Host Institutions are bound to hire the young researchers at the latest by 15 May 2025. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled. It is therefore concluded that the Italian authorities

published decrees awarding funding to support a total of 369 young researchers under the Post-Doc line of this investment.

- With reference to the ERC line: Directorial Decree No. 130 of 16 June 2025 awarded the funding to 1 young researcher. The Italian authorities therefore published decrees awarding the funding to support a total of 1 young researchers under the ERC line of this investment.

Based on the above, it is concluded that the Italian authorities published decrees awarding the funding to support a total of 631 young researchers, where young researchers are defined by the calls for projects of each line of Investment 1.2 coherently with the provisions of the milestone description, as explained above. Furthermore, the Italian authorities published Directorial Decree No. 14 of 26 November 2025, which provides a consolidated list of the young researchers supported taking into account withdrawals. As evidenced by the afore-mentioned decree No. 14/2025, the total number of young researchers supported taking into account withdrawals is 581.

Therefore, it is concluded that the requirement of the milestone to publish decrees awarding the funding to support at least 550 young researchers is met.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Loan Support

[M4C2-6]: Publication of the decree(s) awarding the projects

Related Measure: IT-C[M4C2]-I[I1.1]: Research Projects of Significant National Interest (PRIN)

Qualitative Indicator: Publication of the decree(s) awarding the projects

Baseline: n/a

Time: Q2 2025

1. **Context:**

Investment 1.1 has the objective of financing research projects of major national interest (PRIN) entailing the collaboration among university research units and research bodies and the hiring of fixed-term researchers. Milestone M4C2-6 concerns the publication of the decree(s) awarding at least 5350 research projects of national interest (Progetti di ricerca di interesse nazionale).

Milestone M4C2-6 is the final milestone of Investment 1.1, and it follows the completion of target M4C2-5, related to the awarding at least 3150 research projects. This previous target was assessed in the framework of the 5th payment request and was due by Q4 2023.

2. **Evidence provided:**

1. Summary document duly justifying how the target was satisfactorily fulfilled in line with the requirements set out in the Council Implementing Decision;
2. Directorial Decree n. 104 of 2 February 2022 "Bando PRIN 2022" (call for projects). Including its annexes, and its link on the Ministry's website: https://www.mur.gov.it/sites/default/files/2022-02/DD%20n.%20104%20del%2002-02-2022.pdf
3. Directorial Decree n. 1409 of 14 September 2022 "Bando PRIN PNRR" (call for projects), including its annexes, and its link on the Ministry's website https://www.mur.gov.it/sites/default/files/2022-09/Decreto%20Direttoriale%20n.%201409%20del%2014-09-2022.pdf
4. Directorial Decrees awarding the projects n. 957, 958,959, 960, 961, 962, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974 of 30 June 2023, n. 1015, 1016, 1017 of 7 July 2023, n.1048 of 14 July 2023, n.1060 of 17 July 2023, n. 1064 and 1065 of 18 July 2023, n.1079 of 19 July 2023, n. 1109, 1110, 1111 of 20 July 2023, n. 1433, 1434, 1435, 1436 of 13 September 2023, and n.1672 of 4 October 2023 and their annexes, published on the Ministry's website at the following link: https://www.mur.gov.it/it/atti-e-normativa/decreti-di-ammissione-al-finanziamento-bando-prin-2022-decreto-direttoriale-n-104
5. Directorial Decrees awarding the projects n. 1363, 1364, 1365, 1366, 1367, 1368, 1369, 1370, 1371, 1372, 1373, 1374, 1375, 1376, 1377, 1378, 1379, 1380, 1381, 1382, 1383, 1384, 1385, 1386, 1387, 1388 and 1389 of 1 September 2023 and their annexes, published on the Ministry's website https://www.mur.gov.it/it/atti-e-normativa/decreti-di-ammissione-al-finanziamento-bando-prin-pnrr-decreto-direttoriale-n-1409
and Decree n. 1523 of 15 September 2023 published on the Ministry's website https://www.mur.gov.it/it/atti-e-normativa/decreti-di-ammissione-al-finanziamento-bando-prin-2022-pnrr-decreto-direttoriale-n

3. **Analysis:**

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

Publication of the decree(s) awarding at least 5350 Research Projects of National Interest (Progetti di Ricerca di Interesse Nazionale).

As already verified in the context of the 5th payment request for target M4C2-5, 3 753 Research Projects of National Interests (hereafter referred as ''PRIN'') were awarded funding through the call for projects No. 104 of 2 February 2022 "Bando PRIN 2022", as evidenced by the decrees awarding the projects (Directorial Decrees n. 957, 958, 959, 960, 961, 962, 965, 966, 967, 968, 969, 970, 971, 972, 973, 974 of 30 June 2023, n. 1015, 1016, 1017 of 7 July 2023, n.1048 of 14 July 2023, n. 1060 of 17 July 2023, n. 1064 and 1065 of 18 July 2023, n. 1079 of 19 July 2023, n. 1109, 1110, 1111 of 20 July 2023, n. 1433, 1434, 1435, 1436 of 13 September 2023 and n.1672 of 4 October 2023). Additional 1 780 PRIN projects were awarded funding through the call for projects No. 1409 of 14 September 2022 (Bando PRIN PNRR) as evidenced by the decrees awarding the projects (Directorial Decrees n. 1363, 1364, 1365, 1366, 1367, 1368, 1369, 1370, 1371, 1372, 1373, 1374, 1375, 1376, 1377, 1378, 1379, 1380, 1381, 1382, 1383, 1384, 1385, 1386, 1387, 1388, 1389 of 1 September 2023 and Directorial Decree 1523 of 15 September 2023). The above-mentioned Directorial Decrees have been published on the Ministry's website on 13 October 2023.

The total number of Research Projects of National Interest awarded through the two calls is 5 533, which exceeds the final target of 5 350.

The call for projects shall specify that the duration of the project shall be at least two years, and require the collaboration among university research units and research bodies.

Art. 1 comma 2 of Directorial Decree n. 104 of 2 February 2022 and of Directorial Decree n. 1409 of 14 September 2022 specify that the programmes PRIN finance biannual projects and that the research group of each project shall be composed of at least two research units belonging to different universities and research bodies. Through the abovementioned awarding decrees, a total of 5 533 projects have been financed, corresponding to 14 719 research units.

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

Loan Support

[M4C2-7]: Number of fixed-term researchers hired

Related Measure: IT-C[M4C2]-I[I1.1]: Research Projects of Significant National Interest (PRIN)

Quantitative Indicator: Number of fixed-term researchers hired

Baseline: N/A

Target: 900

Time: Q2 2025

1. **Context:**

Investment 1.1 has the objective of financing research projects of major national interest (PRIN) entailing the collaboration among university research units and research bodies and the hiring of fixed-term researchers.Target M4C2-7 concerns the hiring of at least 900 fixed-term researchers. The activities of the hired researchers shall concern topics coherent with the six clusters of the European Framework Programme for Research and Innovation 2021-2027.

Target M4C2-7 is one of the two final targets of Investment 1.1, together with Target M4C2-6, which relates to the publication of decrees awarding at least 5 350 research projects of national interest. These targets follow the completion of Target M4C2-5, that required the award of at least 3 150 research projects.

2. **Evidence provided:**

1. Summary document duly justifying how the milestone was satisfactorily fulfilled in line with the requirements set out in the Council Implementing Decision;
2. Ministerial Decree No. 856 of 16 November 2020 laying down the criteria for allocating the resources to universities for the hiring of fixed-term researchers;
3. In the context of the sampling analysis, additional evidence was provided for a sample of 60 units including:
   - The fixed-term contract signed by the researcher .
   - Copy of the signed agreement (so-called ''atto d'obbligo'') or engagement letter ("lettera d'incarico"), together with an extract of the project, to demonstrate that the researchers works on topics coherent with the six clusters of the European Framework Programme for Research 2021-2027.

3. **Analysis:**

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

At least 900 fixed-term researchers shall be hired. Hired researchers' activities shall concern topics coherent with the six clusters of the European Framework Programme for Research and Innovation 2021-2027.
To achieve target M4C2-7, Ministerial Decree No. 856/2020 was adopted, granting resources to universities to hire fixed-term researchers. A total of 916 researchers working on topics coherent with the six clusters of the European Framework Programme for Research and Innovation 2021-2027 were hired.
Following the selection of a random sample of 60 units, Italy submitted the signed contracts with the researchers, the engagement letters and the signed agreements, together with an extract of the

relevant project, to demonstrate that the researcher works on topics coherent with the six clusters of the European Framework Programme for Research and Innovation 2021-2027. A review of the signed contracts for the sampled researchers confirmed that all researchers were hired by the relevant universities under fixed-term contracts. The engagement letter and the signed agreements, together with the extracts of the projects, also demonstrate that all hired researchers counted for the target were also involved in research activities on topics coherent with the six clusters of the European Framework Programme for Research and Innovation (2021–2027), namely: i) health; ii) humanistic culture, creativity, social transformations, a society of inclusion; iii) security for social systems; iv) digital, industry, aerospace; v) climate, energy, sustainable mobility; vi) food products, bioeconomics, biodiversity, agriculture, environment.
The evidence provided for a sample of 60 units confirmed that the requirements of the target have been met.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Loan Support

[M4C2-8]: Number of research partnerships signed

Related Measure: IT-C[M4C2]-I[I1.3]: Partnerships extended to universities, research centers, companies and funding of basic research projects

Quantitative Indicator: Number

Baseline: n/a

Target: 14

Time: Q2 2025

1. **Context:**

Investment 1.3 aims to finance at least 14 major basic research programmes carried out by networks of public and private subjects.

Target M4C2-8 requires the signature of the agreements for at least 14 research partnerships, and it represents the only target of Investment 1.3.

2. **Evidence provided:**

   1. Summary document duly justifying how the target was satisfactorily fulfilled in line with the requirements set out in the Council Implementing Decision;
   2. Directorial Decree n. 341 of 15 March 2022 (call for programmes for the selection and financing of extended partnerships), including its annexes, and its link on the Ministry's website: https://www.mur.gov.it/it/atti-e-normativa/avviso-n-341-del-15-03-2022;https://www.mur.gov.it/it/atti-e-normativa/avviso-n-341-del-15-03-2022
   3. Directorial Decrees n. 1549, 1550, 1551, 1552, 1553, 1554, 1555, 1556, 1557, 1558, 1559, 1560, 1561, 1564 of 11 October 2022, and their annexes, and its link on the Ministry's website: https://www.mur.gov.it/it/atti-e-normativa/decreti-di-ammissione-al-finanziamento-avviso-dd-341-del-15032022
   4. Agreements signed (atto d'obbligo) for 14 partnerships;
   5. DNSH checklists signed by the evaluation commission;
   6. Detailed breakdown of the number of researchers hired for each partnership, including partnership codes and personal identification details.

3. **Analysis:**

Signature of the agreements ("atto d'obbligo") for at least 14 research partnerships.
To achieve the target, a call for programmes was published through Directorial Decree n. 341 of 15 March 2022 to select the partnerships. As a result of the call, 14 partnerships were funded, as evidenced by Directorial Decrees No. 1549, 1550, 1551, 1552, 1553, 1554, 1555, 1556, 1557, 1558, 1559, 1560, 1561, and 1564 of 11 October 2022.
For each partnership, a signed agreement was provided by the Italian authorities demonstrating the fulfilment of the target.

The call for programmes shall require each partnership to hire at least 100 fixed-term researchers.

In line with the Council Implementing Decision, Art, 7(2) of the Directorial Decree No. 341 of 15 March 2022 (call for programmes) indicated that, to be eligible for funding, each partnership shall require the hiring of at least 100 new fixed-term researchers.
According to the information provided by the authorities, a total of 1,698 fixed-term researchers were hired by the 14 extended partnerships. A detailed breakdown of the number of researchers hired for each partnership, including partnership codes and personal identification details, has been provided by the Italian authorities.

The call for programmes shall require the commitment that the climate contribution of the investment as per the methodology in Annex VI of the Regulation (EU) 2021/241 shall account for at least 42% of the total cost of the investment supported by the RRF.
The call for programmes (Directorial Decree No. 341 of 15 March 2022) includes a commitment to ensure a climate contribution of at least 42 % of the total cost of the investment. In particular, Article 3(2) provides that the financial resources shall be allocated to the following Intervention Fields: 022 – research and innovation processes, technology transfer and business cooperation focused on the low-carbon economy, resilience and climate change adaptation (€483 million); 023 – research and innovation processes, technology transfer and business cooperation focused on the circular economy (€483 million); and 006 – investments in intangible assets in public research centres and in public higher education directly linked to research and innovation activities (€644 million), as specified in Annex VI to Regulation (EU) 2021/241. To ensure a climate contribution of at least 42%, Art 7 (2) required that, to be eligible for funding, each proposal had to respect a minimum tagging percentage for each of the above-mentioned intervention fields. This condition was verified for each project by the evaluation commission, as evidenced by the signed DNSH checklists provided. As indicated by the information provided by the authorities and confirmed by the checklist, the climate contribution of the investment amounts to 46%.

4. Commission Preliminary Assessment: Satisfactorily fulfilled

[M4C2-22]: Number of projects supported

Related Measure: IT-C[M4C2]-I[I2.1]: IPCEI

Quantitative Indicator: Award concession decrees are issued by Ministry of Enterprises and Made in Italy to support at least 20 IPCEI projects.

Baseline: 0

Target: 20

Time: Q2 2025

1. **Context:**

The objective of Investment 2.1 Important Project of Common European Interest (IPCEI) is to provide the current IPCEI fund, referred to in Article 1 (232) of the 2020 Budget Law, with additional resources.

Milestone M4C2-22 envisages that award concession decrees are issued by Ministry of Industry and Made in Italy to support at least 20 IPCEI projects.

Milestone M4C2-22 is the final target for Investment 2.1. It follows M4C2-10, which consisted in the launch of the call for expression of interest for the identification of the national projects; milestone M4C2-11, which foresees the entry into force of the national legal act allocating the necessary funding to provide support to project participants; and milestone M4C2-12, which concerns the finalization of the list of admitted participants in the IPCEI projects.

The investment has a final expected date for implementation in Q2 2025.

2. **Evidence provided:**

1. Summary document duly justifying how the Milestone (including all the constitutive elements) was satisfactorily fulfilled.
2. For each IPCEI project, the award decree ("Decreto di aggiudicazione") from the Ministry of Enterprises and Made in Italy.

Beneficiary	IPCEI Name	Award concession date
ENEA - Agenzia nazionale per le nuove tecnologie, l'energia e lo sviluppo economico sostenibile	H2 Technology	6/28/2023
Alstom Ferroviaria S.p.A.	H2 Technology	7/3/2023
Fincantieri S.p.A. & Isotta Fraschini Motori S.p.A.	H2 Technology	03/08/2023
Fondazione Bruno Kessler	H2 Technology	8/3/2023
RINA Consulting - Centro Sviluppo Materiali S.p.A.	H2 Industry	8/3/2023
NEXTCHEM TECH S.P.A.	H2 Industry	8/3/2023
UFI Hydrogen	IPCEI Hy2Move	19/11/2025
Engineering Ingegneria Informatica Spa	Cloud Infrastructure and Services ("CIS")	8/8/2024
Fincantieri S.p.A.	CIS	9/27/2024
Reply Spa	CIS	10/14/2024
Tim Spa	CIS	8/8/2024

ENEA - Agenzia nazionale per le nuove tecnologie, l’energia e lo sviluppo economico sostenibile	CIS	8/8/2024
Fondazione Bruno Kessler	CIS	8/8/2024
Tiscali Italia Spa	CIS	9/27/2024
CONSIGLIO NAZIONALE DELLE RICERCHE - ISTITUTO PER LA MICROELETTRONICA E MICROSISTEMI	Microelectronics and Communication Technology (“ME/CT”)	6/18/2024
SIAE Microelettronica S.p.A.	ME/CT	4/8/2024
STMicroelectronics S.R.L.	ME/CT	3/27/2024
Fondazione Bruno Kessler	ME/CT	4/10/2024
MEMC ELECTRONIC MATERIALS S.P.A.	ME/CT	5/8/2024
Menarini Silicon Biosystems S.p.A.	ME/CT	4/12/2024

3. Analysis:

The justification and substantiating evidence provided by the Italian authorities covers all constitutive elements of the milestone.

- **Award concession decrees are issued by Ministry of Enterprises and Made in Italy to support at least 20 IPCEI projects.**

Italy has provided 20 award concessions decrees issued the Ministry of Enterprises and Made in Italy for 20 IPCEI projects (evidence no.2). Each award concession decree includes the name of the IPCEI (e.g. H2 Technology, H2 Industry, Microelectronics, Cloud Infrastructure and Services), the name of the beneficiary, the amount of the funding, the characteristics of the projects, the obligations on the beneficiary (see evidence no.2).

The issuance of award concessions decrees demonstrates that the Ministry of Enterprises and Made in Italy has formally awarded the grants to the beneficiaries, thereby establishing a definitive and enforceable relationship between the Ministry and the contracting parties.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Non-repayable support

[M5C1-15]: Certificates issued through the dual education system

Related Measure: IT-C[M5C1]-I[I3]: Strengthening the dual system

Quantitative Indicator: Number

Baseline: 0

Target: 90 000

Time: Q2 2025

1. **Context:**

Investment 3 "Strengthening the dual system" has the objective of supporting access to employment opportunities for young people and adults without secondary education. The investment consists in expanding the participation to the dual system for students in formal and vocational education and training (VET), including through apprenticeships.

Target M5C1-15 relates to the issuance of 90 000 certificates attesting the participation for the years 2020-2021, 2021-2022, 2022-2023, 2023-2024 or 2024-2025 by students enrolled in the dual education system, which combines formal education and learning experience in the workplace.

Target M5C1-15 is the sole and final target related to this investment.

2. **Evidence provided:**

1) Summary document duly justifying how the target (including all the constitutive elements) was satisfactorily fulfilled;
2) Ministerial Decree n. 139/2022 adopting guidelines for the planning and implementation of vocational education and training (IeFP) and higher technical education and training (IFTS) in the dual system;
3) Ministerial Decree n. 226/2021 identifying the criteria for the allocation of the financial resources for the year 2021;
4) Ministerial Decree n. 52/2023 identifying the criteria for the allocation of the financial resources for the year 2022;
5) Ministerial Decree n. 38/2024 identifying the criteria for the allocation of the financial resources for the year 2023;
6) Directorial Decree n. 54/2022 determining the allocation of the resources to the Regions and autonomous Provinces for the year 2021;
7) Directorial Decree n. 120/2023 determining the allocation of the resources to the Regions for the year 2022;
8) Directorial Decree n. 100/2024 determining the allocation of the resources to the Regions for the year 2023;
9) Regional Programming Document of the training offer for the dual system and related Annex I, for each region for the years 2021, 2022 and 2023.
10) XXII Monitoring report on education and vocational training system and on dual education pathways in vocational education and training (IeFP) published by National Institute for the Analysis of Public Policies (INAPP);

11) Monitoring reports n. 1/2024 and 2/2024 on the implementation of dual education in vocational education and training (IeFP) and in higher technical education (IFTS) published by the Ministry for Labour and Social Policies (MLPS).

In the context of the sampling analysis, additional evidence was provided for a sample of 60 units.

3. Analysis:

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

At least 90 000 participation certificates issued for years 2020-2021, 2021-2022, 2022-2023, 2023-2024 or 2024-2025 to students combining formal education and learning experience in the workplace.

The target requires the issuance of at least 90 000 certificates attesting the participation in any one of the academic years 2020-2021, 2021-2022, 2022-2023, 2023-2024 or 2024-2025 by students enrolled in the dual education system. The dual education system combines vocational education and training with on-the-job experience to foster employability. Dual education pathways refer to vocational education and training (VET) programs, lasting three or four years, at the end of which the beneficiary acquires a professional qualification or a diploma (*Percorsi di Istruzione e Formazione Professionale - IeFP*)) and one-year specialisation programs at the end of which the beneficiary receives a certificate of specialisation *(Istituti di Istruzione e Formazione Tecnica Superiore - IFTS*).

Different regulatory measures were adopted, either at ministerial or regional level, to lay down the operational framework. The Ministerial Decree n. 139/2022 (evidence n. 2) adopted by the Ministry of Labour and Social Policies on 2 August 2022 established guidelines for the planning and implementation of dual education system pathways. The Decree identifies the certifications that are relevant for the assessment of the target, provides a list of different actions that the Regions and autonomous Provinces may undertake, and sets out a list of the educational paths considered relevant under the investment. In addition, the Decree lays down criteria for the identification of the beneficiaries and service providers that are covered by the measure and clarifies the framework for the allocation of the financial resources between the different Regions and autonomous Provinces. The guidelines are operationalised by different Ministerial Decrees, adopted by the Ministry of Labour and Social Policies, that define the relevant criteria for the allocation of the financial resources for the years 2021 (evidence n. 3), 2022 (evidence n. 4), 2023 (evidence n. 5). On the basis of the criteria laid down in these Ministerial Decrees, different Directorial Decrees, issued by the Directorate-General for the Active Labour Market Policies, identify and allocate to each Region and autonomous Provinces the respective resources (evidence n. 6, 7 and 8). These decrees also specify the operational arrangements for the disbursement of the funds to the Regions and autonomous Provinces. At decentralised level, and as required by the abovementioned Guidelines, each Region and autonomous Province has adopted a Document of Regional Planning (evidence n. 9). These documents present the regional regulatory framework for dual education in place, provide a list of the accredited service providers, and include data on the job market in the Region.

Following the selection of a random sample of 60 units, Italy submitted for each unit either a professional diploma, a professional qualification certificate, a record of the final examination or a certificate attesting the completion of training in the relevant academic year. The evidence provided for a sample of 60 units confirmed that the requirements of the target have been met, as there is correspondence with the name of the individual, the year of training and proof of enrolment in the dual system. Additional documents have been provided to ensure alignment between the name and the tax code ("codice fiscale"). In the instances where the EU logo referred to European funds other than the RRF, Italy provided supplementary evidence demonstrating that the project code associated to the selected units was financed exclusively under the RRF or national resources. In addition, the Commission carried out a virtual-on-the-spot-check of the regional systems of Lombardia and Piemonte on 24 November 2025 and Veneto on 25 November 2025. The check confirmed, for selected units, that there was no overlap between different types of EU funding for a single beneficiary. The virtual check of 24 November 2025 for Lombardia and Piemonte also illustrated the functioning of the respective regional systems and demonstrated that it is possible to retrieve duplicates of official documents, given that the original copy is signed by hand by the legal representative, delivered to the beneficiary and therefore not stored in the system.

Furthermore, in line with the measure description: This investment consists in expanding participation in the "dual system" for students in formal and vocational education and training (VET).

According to the figures of the monitoring report of the National Institute for the Analysis of Public Policies (INAPP) for the year 2022-2023 published in May 2025, the impact of the investment on participation in the dual system has been substantial. During the period 2022-2023, enrolment in the dual education system has more than doubled (evidence n. 10). This growth has been especially pronounced in Southern Italy, where participation has tripled compared to the year 2020-2021, and even quintupled in 2023-2024 (evidence n. 11).

The expansion of the dual system in Italy was formalised through Ministerial Decree No. 226/2021, Ministerial Decree n. 52/2023, Ministerial Decree n. 38/2024. These decrees provide funding to strengthen the dual system and, on an experimental basis, to expand participation to a new category of beneficiaries. The eligible group now includes not only young people but also adults without a secondary education qualification.

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

Loan support

[M6C1-6]: People treated in home care

Related Measure: IT-C[M6C1]-I[I1.2]: Home as the first place of care and telemedicine

Quantitative Indicator: Number

Baseline: 645 590

Target: 1 487 590

Time: Q2 2025

1. **Context:**

Target M6C1-6 is part of Investment 1.2 whose objective is to boost home care and the large-scale adoption of telemedicine solutions and support healthcare innovation.

The investment consists of hardware and increased service provision, the establishment of Territorial Coordination Centres ("Centrali Operative Territoriali"), financing projects for diagnostics and monitoring, creating a national platform for screening telemedicine projects, and ad-hoc research initiatives on digital health and care technologies.

Target M6C1-6 concerns the number of people over 65 that have been delivered home care treatment that shall reach a value of at least 1 487 590 people over 65 as measured by the SIAD05bis indicator – "Over 65s Treated in SIAD (Sistema informativo Assistenza domiciliare) in Relation to the Elderly Population" in the Agenas (National Agency for Regional Health Services) dashboard. Home care services are defined according to Articles 22 and 23 of the Decree of the President of the Council of Ministers (DPCM) of 12 January 2017.

Target M6C1-6 is the fourth step of the implementation of the investment. It follows the completion of milestone M6C1-4, assessed in Q2 2022, which concerned the approval of the Guidelines containing the digital model for the implementation of Home Care; milestone M6C1-5, assessed in Q2 2022, which concerned the approval of an Institutional Development Contract (Contratto Istituzionale di Sviluppo), by Ministry of Health and regions; target M6C1-8, assessed in Q4 2023, which concerned the approval of at least one telemedicine project assigned to each region (considering both projects that will be implemented in the individual region and those that may be developed as part of consortia among regions); target M6C1-7, assessed in Q4 2024 which concerned the entry in operation of at least 480 Territorial Coordination Centres ("Centrali Operative Territoriali").

It will be followed by target M6C1-9, which concerns the indicator on assistance by telemedicine tools, based on National Telemedicine Platform's (PNT) indicators and monitored through the Agenas dashboard, that shall reach a value of at least 300 000 people.

The investment has a final expected date for implementation in Q4 2025.

2. **Evidence provided:**

i) Summary document duly justifying how the target was satisfactorily fulfilled.

ii) Agenas (National Agency for Regional Health Services) dashboard including the monitoring of the SIADbis indicator "Over 65s Treated in SIAD (Sistema informativo

Assistenza domiciliare, Home Care Information System) in Relation to the Elderly Population" (link https://www.agenas.gov.it/pnrr/missione-6-salute/monitoraggio-adi).

iii) Decree of the President of the Council of Ministers (DPCM) of 12 January 2017 defining the home care services.

iv) Ministerial Decree of 17 December 2008 (GU No 6 of 9 January 2009) establishing the SIAD flow.

v) Ministerial Decree of 23 January 2023 (GU No 55 of 6 March 2023) entrusting Agenas with the task of collecting and treating data underlying the SIAD information system.

vi) Legislative Decree No. 266 of 30 June 1993 establishing Agenas.

vii) Document by the Ministry of Health describing the SIAD Indicators.

3. Analysis:

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

Delivery of home care treatment for people over 65, shall reach an annual value of at least 1 487 590 as measured by the SIAD05bis indicator – "Over 65s Treated in SIAD (Sistema informativo Assistenza domiciliare) in Relation to the Elderly Population" in the Agenas dashboard.

The investment aims to increase the number of patients receiving care at home, with the goal of reaching an annual value of at least 1 487 590 patients over 65, compared to 645 590 patients over 65 recorded in 2019, which represents the baseline for the target.

The home care services are defined by the Decree of the President of the Council of Ministers (DPCM) of 12 January 2017, Articles 22 and 23 (evidence iii).

The delivery of home care treatment for people over 65 is measured by the SIAD05bis indicator - "Over 65s Treated in SIAD (Sistema informativo Assistenza domiciliare) in Relation to the Elderly Population" in the Agenas (National Agency for Regional Health Services) dashboard (evidence ii)).

The SIAD flow, established by Ministerial Decree of 17 December 2008 (GU No 6 of 9 January 2009) (evidence iv), constitutes an integrated national database, patient-centered, for home care services.

The SIAD05bis indicator, described in the document of SIAD indicators (evidence vii), part of the SIAD database counts the number of unique patients over 65 receiving home care, in the reference period, considering all levels of care intensity (CIA), ranging from basic CIA to palliative home care, as outlined in Articles 22 and 23 of the Decree of the President of the Council of Ministers (DPCM) of 12 January 2017 (evidence iii).

The collection and treatment of data underlying the SIAD information system, including the SIAD05bis indicator, is under the remit of the National Agency for Regional Health Services (Agenas), in accordance with Art.3 Par.3 of Ministerial Decree of 23 January 2023 (GU No 55 of 6 March 2023) (evidence v).

Agenas is a *non-economic public body of national importance*, established by Legislative Decree No. 266 of 30 June 1993 (evidence vi), which carries out activities of research, monitoring, evaluation, training, and technical-operational support for the Ministry of Health, the Regions, and the Autonomous Provinces of Trento and Bolzano. In fact, Agenas is endowed with statutory, regulatory, organizational, administrative, financial, and accounting autonomy in performing its technical and scientific functions.

The Commission services conducted a virtual-on-the-spot-check on 10 November 2025 to visualise the operation and backoffice of Agenas's dashboard (evidence ii) showing the values of the SIAD05bis indicator – "Over 65s Treated in SIAD (Sistema informativo Assistenza domiciliare) in Relation to the Elderly Population". The virtual on-the-spot check was completed successfully, confirming that 1 546 443 people over 65 were treated in home care, thus exceeding the target of 1 487 590 people treated by 58 853 units.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Non-repayable support

[M6C2-2]: Research projects funded on rare cancers and diseases

Related Measure: IT-C[M6C2]-I[I2.1]: Strengthening and enhancement of the NHS biomedical research

Quantitative Indicator: Number

Baseline: 0

Target: 200

Time: Q2 2025

1. Context:

The objective of this investment is to increase the financing of the biomedical research system through the following interventions: i) financing of Proof of Concept (PoC) projects, ii) funding of research projects in the field of rare diseases and rare cancers and iii) funding of research projects in the field of diseases with a high impact on health.

Target M6C2-2 consists in the award of funding for at least 200 projects Proof of Concept (PoC) and in the field of rare diseases and rare cancers. The target also requires that the first tranche of funding to the projects is disbursed by the Ministry of Health to the beneficiary implementing body (e.g., research organisation or Region). The other target related to this measure is M6C2-3 which consists in the award of funding for research projects in the field of diseases with a high impact on health.

Target M6C2-2 is the sole and final target related to this sub-investment.

2. Evidence provided:

1. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled;
2. List of the 213 awarded research projects in biomedical research (projects Proof of Concept and projects in the field of rare cancers and rare diseases);
3. Public notice for biomedical research projects of 20 April 2022 and Public notice for biomedical research projects of 14 April 2023;
4. Directorial Decree no. 27 of 2 November 2022 approving the ranking of projects in biomedical research following the Public notice of 20 April 2022;
5. Directorial Decree no. 5 of 29 March 2024 approving the ranking of projects in biomedical research following the Public Notice of 14 April 2023.
6. For each project (evidence for sampling):
    a. Signed “Convenzione Attuativa” (Project Execution Agreement) among the Ministry of Health, the beneficiary implementing body and the researcher in charge of the project. The “Convenzione Attuativa” also includes the project application form.
    b. Proof of disbursement of a tranche of funding by the Ministry of Health to the beneficiary implementing body.
    c. Proof of reception of the disbursement of a tranche of funding by the beneficiary implementing body.

3. Analysis:

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

Award of funding to research projects in the field of rare diseases and rare cancers and Proof of Concept (PoC).

The Directorial Decree no. 27 of 2 November 2022 and the Directorial Decree no. 5 of 29 March 2024 approved the rankings of projects selected for funding, following the public notice of 20 April 2022 and of 24 April 2023.

In particular,

- Following the publication of the ranking as per the Directorial Decree no. 27 of 2 November 2022, a total of 226 Project Execution Agreements ("Convenzioni Attuative") that include the funding amount have been signed for projects of biomedical research, out of which 37 projects Proof of Concept (PoC) and 50 projects in the field of rare diseases.
- Following the publication of the ranking as per the Directorial Decree no. 4 of 29 March 2024, a total of 330 Projects Execution Agreements ("Convenzioni Attuative") that include the funding amount have been signed for projects of biomedical research, out of which 51 projects Proof of Concept (PoC) and 75 projects in the field of rare diseases and rare cancers.

In total, 213 projects have been awarded for funding, notably 88 projects PoC (Proof of Concept) and 125 projects in the fields of rare cancers and rare diseases. The rankings specify the research field of the projects in their respective categories (Proof of Concept, Rare Cancers, and Rare Diseases).

Granting of funding for research projects PoC and on rare diseases and rare cancers shall be undertaken through a public tender procedure.

The granting of funding for the research projects has been undertaken through public tender procedures, notably through Public notice for biomedical research projects of 20 April 2022 (1st Public notice) and Public notice for biomedical research projects of 14 April 2023 (2nd Public notice).

The 1st Public notice admitted project applications for projects, *inter alia*, Proof of Concept and projects in the field of rare diseases (Art. 5). The notice includes eligibility criteria (Artt. 6, 7 and 8), the financing support, duration and conditions of implementation (Art 9), the requirements for compiling the project application and the required documentation (Art. 11), and a description of the evaluation criteria (Art. 12).

The 2nd Public notice admitted project applications for projects, *inter alia*, Proof of Concept and projects in the field of rare diseases and rare cancers (Art. 5). The notice includes eligibility criteria (Artt. 6, 7 and 8), the financing support, duration and conditions of implementation (Art 9), the requirements for compiling the project application and the required documentation (Art. 11), and a description of the evaluation criteria (Art. 12).

At least 200 research projects shall have received a first tranche of financing.

As outlined above, 213 projects have been awarded for funding. All projects received a first tranche of financing, notably 88 projects PoC (Proof of Concept) and 125 projects in the field of rare cancers and rare diseases.

In line with the verification mechanism of the operational arrangements, Italy provided a list of the 213 biomedical research projects Proof of Concept and in the field of rare cancers and diseases that have been granted for funding and have received a first tranche of financing.

Following the selection of a random sample of 60 units from the list of 213 projects in bio-medical research, Italy submitted for each extracted unit the signed Project Execution Agreement ("Convenzione Attuativa"), the proof of the disbursement of the first tranche of financing to the beneficiary research institution for the project at stake as well as a proof of reception of the first tranche of financing by the beneficiary implementing body.

The "Convenzione Attuativa" of a given project is signed by the Ministry of Health, the beneficiary research institution and by the researcher responsible of the project proposal (Principal Investigator), and certifies the terms of implementation of the project as well as the obligations for the beneficiaries.

The evidence provided for a sample of 60 units confirmed that the requirements of the target have been met – the funding of 213 biomedical research projects Proof of Concept (PoC) and in the field of rare cancers and diseases and that the projects have received a first tranche of financing, thus exceeding the goal of Target M6C2-2 of 200 biomedical research projects by 13 units.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Non-repayable support

[M6C2-3]: Research projects funded on diseases with a high impact on health

Related Measure: IT-C[M6C2]-I[I2.1]: Strengthening and enhancement of the NHS biomedical research

Quantitative Indicator: Number

Baseline: 0

Target: 324

Time: Q2 2025

1. Context:

The objective of this investment is to increase the financing of the biomedical research system through the following interventions: i) financing of Proof of Concept (PoC) projects, ii) funding of research projects in the field of rare diseases and rare cancers and iii) funding of research projects in the field of diseases with a high impact on health.

Target M6C2-3 consists in the award of funding for at least 324 projects in diseases with a high impact on health. The target also requires that the first tranche of funding to the projects is disbursed by the Ministry of Health to the beneficiary implementing body (e.g., research organisation or Region). The other target related to this measure is M6C2-2 which consists in the award of funding for research projects in the field of rare diseases and rare cancers and Proof of Concept (PoC).

Target M6C2-3 is the sole and final target related to this sub-investment.

2. Evidence provided:

1. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled;
2. List of the 341 awarded research projects in biomedical research (projects in diseases with a high impact on health);
3. Public notice for biomedical research projects of 20 April 2022 and Public notice for biomedical research projects of 14 April 2023;
4. Directorial Decree no. 27 of 2 November 2022 approving the ranking of projects in biomedical research following the Public notice of 20 April 2022;
5. Directorial Decree no. 5 of 29 March 2024 approving the ranking of projects in biomedical research following the Public Notice of 14 April 2023.
6. For each project (evidence for sampling):
   a. Signed “Convenzione Attuativa” (Project Execution Agreement) among the Ministry of Health, the beneficiary implementing body and the researcher in charge of the project. The “Convenzione Attuativa” also includes the project application form.
   b. Proof of disbursement of a tranche of funding by the Ministry of Health to the beneficiary implementing body.
   c. Proof of reception of the disbursement of a tranche of funding by the beneficiary implementing body.

3. Analysis:

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

Award of funding to research projects in diseases with a high impact on health.

The Directorial Decree no. 27 of 2 November 2022 and the Directorial Decree no. 5 of 29 March 2024 approved the rankings of projects selected for funding, following the public notice of 20 April 2022 and of 24 April 2023.

In particular,

- Following the publication of the ranking as per the Directorial Decree no. 27 of 2 November 2022, a total of 226 Project Execution Agreements ("Convenzioni Attuative") that include the funding amount have been signed for projects of biomedical research, out of which 137 related to "highly disabling diseases" (MAD) with a high impact on health and social care systems, split into projects regarding: (i) risk factors and prevention (MAD-C1); and (ii) etiopathogenesis and disease mechanisms (MAD-C2).
- Following the publication of the ranking as per the Directorial Decree no. 4 of 29 March 2024, a total of 330 Projects Execution Agreements ("Convenzioni Attuative") that include the funding amount have been signed for projects of biomedical research, out of which 204 related to "non-communicable chronic diseases" (MCnT) with a high impact on health and social care systems, split into projects regarding: (i) innovation in diagnostics or innovation in therapeutics (MCnT-1); and (ii) risk factors and prevention or etiopathogenesis and disease mechanisms (MCnT-2).

In total, 341 projects in diseases with a high impact on health have been awarded for funding. The rankings specify the research field of the projects in their respective categories (MAD-C1 and MAD-C2, MCnT-1 and MCnT-2).

Granting of funding for research projects on diseases with a high impact on health shall be undertaken through a public tender procedure.

The granting of funding for the research projects has been undertaken through public tender procedures, notably through the Public notice for biomedical research projects of 20 April 2022 (1st Public notice) and the Public notice for biomedical research projects of 14 April 2023 (2nd Public notice).

The 1st Public notice admitted project applications for projects, *inter alia*, with a high impact on health, related to "highly disabling diseases" (MAD) (Art. 5). The notice includes eligibility criteria (Artt. 6, 7 and 8), the financing support, duration and conditions of implementation (Art 9), the requirements for compiling the project application and the required documentation (Art. 11), and a description of the evaluation criteria (Art. 12).

The 2nd Public notice admitted project applications for projects, *inter alia*, with a high impact on health, related to "non-communicable chronic diseases" (MCnT) (Art. 5). The notice includes eligibility criteria (Artt. 6, 7 and 8), the financing support, duration and conditions of implementation (Art 9), the requirements for compiling the project application and the required documentation (Art. 11), and a description of the evaluation criteria (Art. 12).

At least 324 research projects shall have received a first tranche of financing.

As outlined above, 341 projects have been awarded for funding. All projects received a first tranche of financing, notably, following the first Public notice, 137 projects related to “highly disabling diseases” (MAD) and, following the second Public notice, 204 projects related to “non-communicable chronic diseases” (MCnT), both in the field of research projects with high impact on health.

In line with the verification mechanism of the operational arrangements, Italy provided a list of the 341 biomedical research projects with a high impact on health (MAD and MCnT) that have been granted for funding and have received a first tranche of financing.

Following the selection of a random sample of 60 units from the list of 341 projects in bio-medical research, Italy submitted for each extracted unit the signed Project Execution Agreement (“Convenzione Attuativa”), the proof of the disbursement of the first tranche of financing to the beneficiary implementing body for the project at stake as well as a proof of reception of the first tranche of financing by the beneficiary implementing body.

The “Convenzione Attuativa” of a given project is signed by the Ministry of Health, the beneficiary implementing body and by the researcher responsible of the project proposal (Principal Investigator), and certifies the terms of implementation of the project as well as the obligations for the beneficiaries.

The evidence provided for a sample of 60 units confirmed that the requirements of the target have been met – the funding of 324 biomedical research projects on diseases with a high impact on health and that the projects have received a first tranche of financing, thus exceeding the goal of Target M6C2-3 of 324 biomedical research projects by 17 units.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Non-repayable support

[M7-2]: Entry into force of the legal act (Testo Unico)

Related Measure: IT-C[M7]-R[R1]: [REPowerEU] Streamlining permitting procedures for renewable energy

Qualitative Indicator: Provision in the law indicating the entry into force of the legal act

Time: Q2 2025

1. **Context:**

The reform consists in the adoption and entry into force of a single legal act (also known as Testo unico), collecting, compiling and consolidating the norms regulating the permitting of renewables, and superseding past legislation on that matter.

Milestone M7-2 is the second step in the implementation of reform 1 and requires the entry into force of a legal act collecting, compiling and consolidating the norms regulating the permitting of renewables. It follows milestone M7-1 that concerned the entry into force of the legal framework for the identification of ''renewable acceleration areas''. It will be followed by Milestone M7-3 requiring the establishment of the single-entry digital platform for authorizations related to renewables.

2. **Evidence provided:**

    1. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactory fulfilled.
    2. Copy of legislative decree No. 190 of 25 November 2024, regulating the permitting for the production of energy from renewable energy sources, implementing Art. 26 (4 and 5, lett. b and d of law No. 118 of 5 August 2022 [Disciplina dei regimi amministrativi per la produzione di energia da fonti rinnovabili, in attuazione dell'art. 26 (4 e 5), lett. b and d, della legge 5 agosto 2022, n. 118], published in the Official Gazzette No. 291 of 12 Decembre 2024, and entered in force on 30 December 2024 (Art. 17).
    3. Copy of decree law No. 73 of 21 May 2025, converted into law by law No. 105 of 18 July 2025, adopting urgent measures to ensure the continuity of the implementation of strategic infrastructural investments and of the management of public contracts, the proper functioning of the railways and road network, the orderly management of the maritime and port assets as well as the implementation of the binding commitments related to the National Recovery and Resilience Plan and to the participation in the European Union on transport and infrastructure topics [Misure urgenti per garantire la continuità nella realizzazione di infrastrutture strategiche e nella gestione di contratti pubblici, il corretto funzionamento del sistema di trasporti ferroviari e su strada, l'ordinata gestione del demanio portuale e marittimo, nonchè l'attuazione di indifferibili adempimenti connessi al Piano nazionale di ripresa e resilienza e alla partecipazione all'Unione europea in materia di infrastrutture e trasporti], published in the Official Gazzette No. 166. of 19 July 2025, entered into force on 21 May 2025 (Art. 17).
    4. Copy of the Decree Law no 175 of 21 November 2025, adopting urgent measures concerning the Plan 'Transizione 5.0' and the production of energy from renewable

sources [Misure urgenti in materia di Piano Transizione 5.0 e di produzione di energia da fonti rinnovabili], amending legislative decree No. 190 of 25 November 2024 and transposing into the legislative decree No. 190 of 25 November 2024 the legal framework for suitable areas, published in the Official Gazzette No. 271 of 21 November 2025, entered into force on 22 November 2025 (Art.3).

5. Copy of the legislative decree No. 178 of 26 November 2025 ('decreto correttivo'), amending legislative decree No. 190 of 25 November 2024, published in the Official Gazzette No.275 of 26 November 2025, entering into force on 11 December 2025.

3. Analysis:

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

Entry into force of the legal act (Testo Unico) collecting, compiling and consolidating the norms regulating the permitting of renewables, and superseding past legislation on that matter.

- In line with the Council Implementing Decision, a single-legislative-text [hereafter referred to as ''Testo unico''] collecting, compiling and consolidating the norms regulating the permitting of Renewable Energy Projects [hereafter referred to as ''RES''] was created, with the entry into force of Legislative decree No. 190 of 25 November 2024, as amended by decree law No. 73 of 21 May 2025, converted into law by law No. 105 of 18 July 2025, by legislative decree No 178 of 26 November 2025 and Decree Law No. 175 of 21 November 2025. The Testo unico was published in the Official Gazzette of Italy on 12 Decembre 2024. According to its Art. 17, the Testo unico has entered into force on 30 December 2024. The Council Implementing Decision required the entry into force of the legal act (Testo Unico) collecting, compiling and consolidating the norms regulating the permitting of renewables and superseding past legislation on that matter. To achieve the milestone, Italy has adopted legislative decree No. 190 of 25 November 2024. This legislative decree entered into force on 30 December 2024, was further amended by (1) decree law No. 73 of 21 May 2025, the latter converted into law by law No. 105 of 18 July 2025, (2) by legislative decree No 178 of 26 November 2025 and (3) by Decree Law No. 175 of 21 November 2025. Whilst Decree Law No. 73 of 21 May 2025, converted into law by law No. 105 of 18 July 2025, and Decree Law No. 175 of 21 November 2025 have entered into force respectively on 21 May 2025 and on 22 November 2025, legislative decree No. 178 of 26 November 2025, published in the official Gazzette No. 275 of 26 November 2025, will enter into force, in line with the national legal framework (Art. 10 of the Royal decree No. 262 of 16 Marzo 1942), the fifteenth day after its publication in the Official Gazzette, namely on 11 December 2025. Whilst this constitutes a minimal temporal deviation from the requirement of the Council Implementing Decision, the delay between the publication of this law and the actual application of the provisions is considered both limited and proportional, notably because this delay corresponds to the general rule on vacatio legis established under Italian law. This 15-day vacatio legis rule provides for a standard 15-day delay between the publication of a law and the commencement of its legal effects, to ensure legal certainty and allow citizens and administrations adequate time to become aware of the new legal provisions and adjust their conduct accordingly. Additionally, it ensures certainty of application of the new law, as it clearly establishes the moment when the law begins to produce its legal effects. On this basis, it is considered that this constitutive element of the milestone is satisfactorily fulfilled.
- Compared to the previous legal framework, where rules related to permitting of renewable energy projects were scattered in several pieces of legislation, following the entry into force of the Testo Unico, the authorization procedures linked to the construction and entry into

operation of energy production plants and storage as well as their modification (including revamping and repowering) (Art. 1), are now included in a single-legislative-text, contributing to improve clarity and stability of the national legal framework for operators.

- In particular, the Testo unico is composed of 24 articles and 5 annexes:
    - Art. 1 to 4 define the general principles applicable to permitting for RES projects, provide definitions and introduce in the national legal framework the principle of prevalent public interest.
    - Art. 5 concerns the digitalization of procedures and the creation of the single digital platform through which renewable permitting requests will need to be submitted.
    - Art. 6 to 9 define the rules for the three permitting procedures, the single authorization procedure, the simplified administrative procedure and free construction activities [so-called ''edilizia libera'']. To improve clarity for all operators, Annex A, B and C, indicate the type of administrative procedures to follow for each typology of project.
    - Art.9bis introduces special rules for revamping and repowering of existing plants, specifying that, in case of repowering and revamping projects that do not require a power increase higher than 15%, the deadline for the completion of the single authorization procedure is reduced from 120 to 40 days and the new environmental assessments shall only assess the potential environmental impact stemming from the change in power.
    - Art. 10, 13 and 14 provide coordination rules with other administrative processes, including for public concessions and the environmental assessments while art. 11 concerns the administrative sanctions in case of violation of the Testo unico rules, for example in case of installation of a plant without the necessary authorization.
    - Art. 11.bis, 11ter, 11quater, 11quinquies and 12 define the rules for suitable areas and Renewable Acceleration Areas (RAAs), that are now consolidated in a single text and better coordinated with each other, ensuring that the principle of prevalent interest is put concretely into effect. In this sense:
        - in line with Art.7(1) and 8(2), amended by Art. 6 and 7 of legislative decree No. 178 of 26 November 2025, all projects subject to edilizia libera and simplified administrative procedure and located in RAAs or suitable areas are now considered compatible with the relevant urban planning tools. Therefore, those projects will not require building permits.
        - the legal framework for the identification of suitable and unsuitable areas, previously defined in Art. 20, 22 and 23 of legislative decree No. 199 of 8 November 2021 as well as in Inter-Ministerial Decree of 21 June 2024 is now superseded by Art.11bis, 11ter, 11 quarter and 11quinquies of the testo unico. As indicated in Art.11bis(3) and Art.12(5), regions and autonomous provinces will have until respectively 120 days from the entry into force of the Decree No. 175 of 21 November 2025 and until 21 February 2026, to identify suitable and RAAs areas. To perform the identification exercise, regions and autonomous provinces will have the digital platform for suitable and renewable acceleration areas at their disposable (Art. 12bis).
    - Art. 12ter provides for a faster judicial review for disputes linked to permitting for RES projects and sets out alternative dispute resolution mechanisms to reduce legal disputes. In particular:
        - Art. 12ter makes applicable the shortened proceeding (''rito abbreviato'') set out in Art. 119 of legislative decree No. 104 of 2 July 2010 (Code of administrative trial) to legal disputes for RES projects, to speed up the resolution of legal disputes;

        - Art. 12ter also entrusts ARERA to define alternative dispute resolution mechanisms, to be managed by Acquirente unico S.p.A., to reduce judicial disputes related, for example, to the submission of the authorization requests and the application of the correct administrative procedure.
    - Art. 15, 16 and 17 concern the abrogation of relevant conflicting rules, the financial invariance clause and the entry into force of the testo unico. In line with Art. 15, from the date of the entry into force of the testo unico, all permitting rules indicated in annex D were abrogated and superseded and any other reference related to permitting of RES projects would need to be considered as referring to the Testo Unico. Among others, the following relevant norms were abrogated and superseded:
        - Art. 12 of legislative decree No. 387/2003, previously regulating the single authorization procedure;
        - Art.4, 5, 6, 6bis, 7-bis and 8bis of legislative decree No. 28/2011, regulating the single authorization procedure and the communication for free construction activities and some special regimes for authorizations to produce biomethane, for energy efficiency interventions and small renewable energy production plants.
        - Art. 18, 20, 21, 22, 22-bis, 23 (1), 24(1), 25(1, 2, 6 and 6ter) and 38 of legislative decree No. 199/2021, regulating the legal framework for suitable areas and some special regimes for the installation of RES plants on buildings and for the construction and entry into service of electrolysers.

The testo unico shall also set out ''ceiling rules'' on permitting such that regions cannot implement stricter rules than those set out in national legislation.

- In line with the national legislation, the Testo unico sets out principles and rules for streamlining and harmonising procedures for RES projects that shall be respected at sub-national level. In this sense, as indicated in Art. 1(3), regions and local authorities shall comply and align their permitting rules with the principles and rules set out in the legislative decree No. 190 of 25 November 2024, by 180 days from the date of the entry into force of the Testo unico (Art. 1(3)). In case regionals and local rules will not be amended by the deadline, the rules set out in the Testo unico will apply. Regions and the local authorities will be able to introduce different rules only to further simplify the legal framework, for example by increasing the thresholds indicated in the annexes A, B and C for a broader application of a faster administrative procedure. Therefore, no stricter permitting rules could be set out at sub-national level.

The assessment of the compliance of legislative decree No. 190 of 25 November 2024, as amended by decree law No. 73 of 21 May 2025, converted into law by law No. 105 of 18 July 2025, by legislative decree No. 178 of 26 November 2025 and Decree Law No. 175 of 21 November 2025, with the EU directive 2018/2001, as amended by the EU directive 2023/2413, for the purposes of payments from the Recovery and Resilience Facility is without prejudice to the assessment by the Commission in any other proceedings regarding the conformity of Italian law with EU law including the aforementioned EU legislation.

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

Non-repayable support

[M7-25]: Publication of the report on the future needs for CRM and the potential of eco-design to reduce the demand of critical raw materials

Related Measure: IT-C[M7]-I[I8]: [REPowerEU] Sustainable, circular and secure supply of Critical Raw Materials

Qualitative Indicator: Publication of the report

Baseline:

Time: Q2 2025

1. **Context:**

The investment consists in analysing future CRM needs and the potential of eco-design to reduce their demand as well as in supporting the creation of a public database for the localisation of ''urban mines'' and waste in abandoned mines. It also consists in financing R&D projects on eco-design and recycling of waste electrical and electronic equipment as well as in equipping laboratories to create a single hub for Urban Mining and Eco-design.

The milestone requires the publication of a report analysing the future needs for critical raw materials and the potential of eco-design to reduce the demand for critical raw materials.

Milestone M7-25 is the first step of the implementation of this investment. It will be followed by

-milestone M7-26 requiring the development of a geographic information system platform identifying recyclable materials in urban environments and existing waste in abandoned mines and,

-milestone M7-27 concerning the completion of 10 R&D projects on eco-design and recycling of waste electrical and electronic equipment, as well as the equipment of at least 6 laboratories of the Technological hub for Urban Mining and Eco-design.

2. **Evidence provided:**

    1. Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled;
    2. Report by ENEA 'Fabbisogni di Materie Prime Critiche (MPC) e potenziale dell'ecodesign per ridurre la domanda di Materie Prime Critiche, favorendo un approccio circolare delle filiere industriali legate alla filiera energetica', published on the Ministry's website.(https://www.mase.gov.it/portale/documents/d/guest/rapporto-potenziale-ecodesign-mpc-enea_l2-pdf).

3. **Analysis:**

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

Publication of a report analysing the future needs for critical raw materials and the potential of eco-design to reduce the demand for critical raw materials.

The report analysing the future needs for critical raw materials and the potential of eco-design to reduce the demand for critical raw materials was published on the Ministry of Environment and Energy Security's website. Section 1 of the report ('Italian demand for critical raw materials') describes Italy's expected needs in terms of tons per year of various critical raw materials in 2040, also due to an expected increase in demand linked to national renewable energy objectives. According to the report, Italy's need for critical raw materials could increase fivefold in a situation of high demand, therefore requiring important actions to reduce import by increasing recycling, including through urban mining and extraction of secondary raw materials.

Section 3 of the report ('Ecodesign: its contribution to the reduction in critical raw materials demand') describes various eco-design strategies (design for durability, design for recycling, design for disassembly) aimed at developing a product with a minimal environmental impact across its life cycle, and thus reducing the need for extraction of primary CRM and addressing CRM demand. Various policy initiatives in Italy aimed at promoting eco-design are listed, with a focus on photovoltaics and batteries.

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

Loan Support

[M7-47]: Implementing Agreement

Number and name of the Milestone: M7-47 Implementing Agreement

Related Measure: M7.I17 Financial instrument for energy renovations of public residential housing

Qualitative Indicator: Entry into force of the Implementing Agreement

Time: Q2 2025

1. Context:

The objective of this measure is to support energy efficiency improvements in public residential housing units. It concerns a public investment in a facility, the "Financial Instrument for energy renovations of Public Residential Housing." The investment aims at incentivizing private investment and enhancing access to financing for energy renovations in public residential housing, achieving a minimum 30% improvement in energy efficiency. As part of the Recovery and Resilience Facility (RRF), the initiative provides financial support in the form of grants and loans to Energy Service Companies (ESCOs) to conduct energy renovation projects in public residential housing units.

Milestone M7-47 requires the adoption of the implementing agreement between the Struttura di Missione PNRR and the implementing partners.

Milestone M7-47 is the second step of the implementation of the investment. It follows milestone M7-46, which defined the terms of references of the instrument and it will be followed by milestone M7-48 and target M7-49, respectively the execution of the transfers to the implementing partners and the signing of legal financing agreements with final beneficiaries.

2. Evidence provided:

- Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled;
- A copy of the signed implementing agreement, with reference to the provisions indicating the entry into force;
- A copy of the addendum to the implementing agreement;
- A copy of Law 207/2024 (hereinafter referred to as 'Budget Law") adopted on 30 December 2024 and published in the Official Journal on 31 December 2024;
- A copy of the explanatory note signed by the financial partner Cassa Depositi e Prestiti S.p.a. and explaining its monitoring system.

3. Analysis:

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

Entry into force of the Implementing Agreement(s) in line with the requirements specified in the description of the measure.

According to its article 26, the implementing agreements was signed and adopted by all parties on 26 June 2025. Additionally, an addendum to the agreement was adopted with the Decree of 28 October 2025 and registered to the Court of Auditors "Corte dei Conti" on 6 November 2025.

In particular the Implementing Agreement(s) shall include eligibility criteria concerning the minimum energy efficiency improvement that the instrument shall achieve (on average at least 30% of primary energy demand reduction).

Article 6 and article 7 of the implementing agreements include the eligibility criteria for the selected interventions. In particular, article 6, comma 1 requires the Gestore Servizi Energetici S.p.A. (GSE) to only approve energy efficiency investments for buildings that fall within the scope of the instrument, with the aim of reducing their primary energy consumption by a threshold of no less than 30 percent, and in compliance with the "do no significant harm" principle detailed in Article 7.

The selection criteria shall also prioritize interventions with highest returns in term of energy efficiency.

Article 4, comma 4, of the implementing agreement specifies that the projects shall be selected also on the basis of reward criteria for interventions with greatest returns in terms of energy efficiency.

Furthermore, in line with the following requirements in the description of the measure:

The objective of the measure is to support renovation of public residential housing. This measure shall consist of a public investment in a Facility, the "Financial instrument to alleviate energy poverty", in order to incentivise private investment and improve access to finance.

Article 1 of the implementing agreement outlines the purpose of the facility, aimed at implementing the financial instrument to promote private investments and improve access to financing for energy renovations of public residential buildings, ensuring a minimum energy efficiency improvement of 30%, to combat energy poverty.

The instrument shall target energy renovations in public residential housing achieving on average at least a 30% of primary energy demand reduction.

The implementing agreement requires a minimum of 30% of energy demand reduction target.
In particular,

- Article 6, comma 1 of the Implementing Agreement specifies that GSE can only approve investments in energy efficiency improvements for public residential buildings, with the objective of reducing their energy consumption by no less than 30 percent;
- Article 5, comma 2, letter p), of the Implementing Agreement stipulates that GSE verifies that the actual energy efficiency improvements in the buildings are not less than 30 percent and carries out any consequent recovery activities of the amount received by the beneficiaries as financial support, in the form of a grant and financing based on the CDP Fund;
- Article 9, comma 1, specifies that GSE, to ensure the actual energy efficiency improvement of the targeted buildings, verifies the existence of the declaration issued, upon completion

of the interventions eligible for financial support, by an authorized technician, confirming the completion of the mentioned interventions in accordance with the submitted investment project, accompanied by the post-operation Energy Performance Certificate (APE) that certifies the achieved energy efficiency improvement of the building.

The Facility shall be managed by two Implementing Partners.

- **The Gestore Servizi Energetici (GSE Spa) as technical partner responsible for the grant component;**
- **Cassa Depositi e Prestiti (CDP Spa) as financial partner and responsible for the (optional) loan component;**

Article 513 of the "Budget law" established the financial instrument for energy poverty and defined the terms of reference of the instrument and more specifically, its scope, the implementing partners, the budget of the instrument, the type of support provided, and the eligible interventions.

The implementing partners are:

- Gestore Servizi Energetici SpA as implementing partner,
- Cassa Depositi e Prestiti SpA as financial partner.

Article 2 of the implementing agreement outlines the duties and commitments of the implementing partners, whereas Article 3 refers to the management and transfer of resources to the implementing partners, which make the facility operational.

The facility shall provide financial support in the form of grants and/or loans to Energy Service Companies (ESCOs) for the energy renovation of public residential housing, achieving on average at least a 30% of primary energy demand reduction.

The Facility shall include the following product lines to support public residential housing:

- **A grant component provided by the technical partner Gestore Servizi Energetici Spa covering a maximum of 65% of total costs;**
- **An optional loan component covering 35% of total costs. The loan component can be provided by the financial partner Cassa Depositi e Prestiti**

Article 3 comma 3 of the implementing agreement specifies that:

- EUR 1,331 million euros are allocated to the component of the financial instrument disbursable in the form of a grant and provided by GSE S.p.A, and
- EUR 50 million euros are allocated to CDP S.p.A for the loan component of the financial instrument.

Annex D of the implementing agreement identifies a maximum threshold of 65% for the grant component and provides the methodology for the calculation of the grant.
Article 10 comma 1, specifies that CDP, as the financial partner of the measure, provides loan financing to ESCo(s) applying market terms and conditions (contractual and financial);
Article 10 comma 2, clarifies the conditions to be applied to the loan provided by CDP. In particular, the duration of CDP financing cannot exceed 10 years, including a grace period proportional to the full-year duration of the investment program and, in any case, not exceeding 36 months from the date of signing the financing contract.

In order to implement the investment into the Facility, Italy and the Implementing Partner(s) shall sign Implementing Agreement(s) that shall include the following content:

1. Description of the decision-making process of the Facility:
The final investment decision of the Facility shall be taken by an investment committee or other relevant equivalent governing body and approved by a majority of votes from members who are independent from the government.
Article 5-bis of the implementing agreement, sets up a working group entrusted with the assessment of the investments. In particular, it specifies that the decision of awarding the grant is approved by a majority of members who are independent from the government.

2. Key requirements of the associated investment policy, which shall include:

a. The description of the financial product(s) and eligible final beneficiaries;

The instruments provide grants and loans at markets terms.
In particular:

- Annex D of the implementing agreement describes the methodology for the calculation of the grant which does not exceed 65% of the overall total cost and varies according to the intervention executed.
- Article 10 comma 2, clarifies the conditions to be applied to the loan provided by the private banks which have signed a convention with CDP. More specifically, loans are provided by private banks at market terms and the duration of the financing cannot exceed 10 years, including a grace period proportional to the full-year duration of the investment program and, in any case, not exceeding 36 months from the date of signing the financing contract.

b. The requirement that all investments supported are economically viable.

A multi-stage process, ensure the financial viability of the investments supported.
In particular:

- Article 5, comma 2, letter f, of the implementing agreement requires GSE to assess the investment projects, check the preliminary assessment carried out by local public entities, and verify the projects' documentation including its economic and technical feasibility;
- Article 10, comma 1, letter a, point i), of the implementing agreement requires CDP to assess the credit worthiness of ESCOs;

c. The requirement to comply with the 'Do no significant harm' (DNSH) principle as set out in the DNSH Technical Guidance (2021/C58/01). In particular, the investment policy shall exclude the following list of activities and assets from eligibility:

i. **activities and assets related to fossil fuels, including downstream use ,**
ii. **activities and assets under the EU Emission Trading System (ETS) achieving projected greenhouse gas emissions that are not lower than the relevant benchmarks,**
iii. **activities and assets related to waste landfills, incinerators and mechanical biological treatment plants;**

Article 6 of the implementing agreement identify the eligible interventions and specify that only projects compliant with the Do not significant harm principle outlined in article 7 can be considered.
Article 7 comma 1 of the implementing agreement require the GSE to admit only the investments that respect the principle of "do no significant harm", in accordance with Article 17 of Regulation (EU) 2020/852 of the European Parliament and of the Council, dated June 18, 2020, and with the European Commission Communication 2021/C58/01 providing technical guidance on the application of the "do no significant harm" principle under the Recovery and Resilience Facility.

Article 7, comma 2, excludes:

i. activities and assets related to fossil fuels, including downstream use;
ii. activities and assets within the EU Emissions Trading System (ETS) that generate projected greenhouse gas emissions which are not below the relevant benchmarks;
iii. activities and assets related to waste landfills, incinerators, and mechanical biological treatment plants.

According to the footnotes of the DNSH exclusion list, Article 7 comma 3, indicates the exceptions to the above mentioned exclusions. In particular:

a. assets and activities in the production of electricity and/or heat from natural gas, as well as in related transmission and distribution infrastructures, which comply with the conditions set out in Annex III of the technical guidance on the application of the "do no significant harm" principle (2021/C58/01), as updated with the European Commission Communication C/2023/111;
b. activities and assets referred to in the previous paragraph, point ii), for which the use of fossil fuels is temporary and technically unavoidable for a timely transition to operation without fossil fuels;
c. supported activities that generate projected greenhouse gas emissions that are not significantly below the relevant benchmarks, with justification. The benchmarks for the free allocation of allowances for activities falling under the scope of the emissions trading system are established in the Commission Implementing Regulation (EU) 2021/447;
d. actions provided for by this Measure in plants exclusively dedicated to the treatment of non-recyclable hazardous waste and in existing plants when such actions are intended to increase energy efficiency, capture exhaust gases for storage or use, or recover materials from combustion residues, provided that such actions under this Measure do not result in an increase in the plant's waste treatment capacity or an extension of its lifespan; proof is provided at the plant level;
e. actions provided for by this Measure in existing mechanical biological treatment plants when such actions are intended to increase energy efficiency or improve the recycling operations of sorted waste in order to convert it into composting and anaerobic digestion of organic waste, provided that such actions under this Measure do not result in an increase in the plant's waste treatment capacity or an extension of its lifespan; proof is provided at the plant level.

d. The requirement that final beneficiaries of the Facility shall not receive support from other Union instruments to cover the same cost. The financial support provided via the loan component of the instrument shall not cover the same cost supported by the grant component of this instrument.

- Article 5, comma 5, of the implementing agreement, requires the GSE to conduct risk-based ex-post audits in accordance with a specific audit plan to be adopted within 12 months from the signing of the Implementing agreement. The audit shall also verify the compliance with the prohibition of receiving support from other Union instruments to cover the same cost.
- Article 8, comma 2, of the implementing agreement, requires that the financial support provided by the loan component cannot cover the same costs covered by the grant component.

3. The amount covered by the Implementing Agreement, the fee structure for the Implementing Partner and the requirement to reinvest any reflows according to the investment policy of the Facility unless they are used to service loan repayments of the Recovery and Resilience Facility.

Article 15 of the implementing agreement indicates the applicable fees to the implementing partners of the measure.

In particular,

- Article 15, comma 2, sets a maximum cap of 1% for the overall investment;
- Article 15, comma 3 sets a fee of maximum 0.8% for the GSE on its envelope of EUR 1331 mln corresponding resources;
- Article 15, comma 4 sets a fee of maximum 0.6% for the CDP on its envelope of EUR 50 mln;

Article 3, comma 4, of the implementing agreement introduces the obligation to reinvest any revenues generated from the use of the resources according to the objectives of the purpose of the financial instrument, unless they are used for the repayment of loans from the Recovery and Resilience Facility.

4. Monitoring, audit, and control requirements, including:

a. The description of the implementing partner's monitoring system to report on the investment mobilized.

b. The description of the implementing partner's procedures that shall ensure the prevention, detection and correction of fraud, corruption, and conflicts of interests.

c. The obligation to verify the eligibility of every operation in accordance with the requirements laid out in the Implementing Agreement before committing to finance an operation.

Article 5-ter and quarter describe the audit and monitoring system for the implementation of the financial instrument as well as the procedures to ensure the prevention, detection and correction of fraud, corruption, and conflicts of interests.

In particular:

- The GSE conducts audit activities throughout the entire management cycle of applications submitted by ESCOs, also utilizing the IT Portal to ensure traceability of all steps and the execution of automated first-level controls.
- During the application admission phase, the audit is conducted by the Working Group (WG) and is structured on three different levels: evaluation, validation, and approval. If the evaluation outcome is confirmed, the IT Portal sends the ESCo the admission application result via certified email (PEC).
- Following the positive evaluation of the admission application for benefits, the Protection and Security Function (hereinafter "TUS"), a GSE structure functionally separate from the Working Group (WG), carries out preliminary ex-ante checks for the issuance of the grant act.
- The TUS verifies the absence of conflicts of interest and double financing, as well as compliance with anti-mafia regulations.
- In the event of a positive evaluation and after the successful ex-ante checks, the grant act will be issued.
- During the evaluation phase of advance payment requests, progress reports, and final balances, the audit is carried out by the Working Group (WG) and is structured on three different levels: evaluation, validation, and approval.
- Additionally, the GSE performs verification activities on interventions carried out within the investment projects admitted to the financial instrument through document checks and on-site inspections, even without prior notice, in order to ascertain the truthfulness of the statements made by the ESCo in the admission request to the Measure, and the regularity of the interventions carried out, as well as their functionality.

d. The obligation of carrying out risk-based ex-post audits in accordance with an audit plan of Gestore dei Servizi Energetici (GSE), and of Cassa Depositi e Prestiti (CDP). These audits shall verify i) that the control systems are effective, including the detection of fraud, corruption, and conflict of interests; ii) compliance with the DNSH principle, the State Aid rules, the climate target requirements; and iii) that the requirement that final beneficiaries of the Facility have not received support from other Union instruments to cover the same cost is respected. The audits shall also verify the legality of the transactions and that the conditions of the applicable Implementing Agreement are being respected.

Article 5, comma 5, requires GSE to conduct risk-based ex-post audits in accordance with a specific audit plan to be adopted within 12 months from the signing of this Agreement.
These audits must verify that: 1) the control systems are effective, including for detecting fraud, corruption, and conflicts of interest; 2) compliance with the DNSH principle and the requirements related to climate tagging in accordance with Annex VI of the RRF regulation; and 3) adherence to the prohibition of receiving support from other Union instruments to cover the same cost. The audits must also verify the legality of operations and compliance with the conditions of this Agreement.

The Council Implementing Decision required that monitoring, audit, and control requirements are covered by the implementing partners. The audit and monitoring system of the investment relies on the Gestore Servizi Energetici (GSE) which performs all the eligibility checks and manages the grant component of the investment. Additionally, according to the explanatory note provided by CDP, Cassa Depositi e Prestiti carries out a series of checks on the Partner Banks including:

- Fulfillment of anti-money laundering obligations, including adequate customer verification, according to the provisions of Legislative Decree 231/2007 and subsequent amendments and integrations, and in coherence with its internal policies;
- Acquisition from the Partner Banks and system upload of the contractual documentation related to loans based on the CDP Allocation signed with the ESCo;
- Consistency checks on the contractual documentation received from the Partner Banks with respect to the provisions of the implementing agreement;
- Consistency and completeness checks on the contractual documentation received from the Partner Banks with respect to the granting act adopted by the GSE;
- Acquisition - on a semi-annual basis - of the information flows useful for carrying out monitoring on the CDP Allocation (Admission Decisions by the GSE, progress of stipulations, disbursements, refunds, any recovery activities, etc.).

Whilst this constitutes a minimal deviation from the requirement of the Council Implementing Decision, the system designed by Italy for the instrument relies on the GSE to perform all activities and obligations envisaged in the template, on top of which CDP applies its own set of controls and checks on partner banks. Specifically, according to point 3 of the CDP audit note, the institution verifies the consistency of the documentation received from commercial banks with the provisions of the implementing agreement. 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.

4. Commission Preliminary Assessment: Satisfactorily fulfilled.

Loan Support

[M7-48]: Ministry has completed the investment

Related Measure: IT-C[M7]-I[I17]: [REPowerEU] Financial instrument for energy renovations of public residential housing

Qualitave Indicator: Certificate of transfer

Baseline: 0

Time: Q2 2025

1. **Context:**

The objective of this measure is to support energy efficiency improvements in public residential housing units. It concerns a public investment in a facility, the "Financial Instrument for energy renovations of Public Residential Housing." The investment aims at incentivizing private investment and enhancing access to financing for energy renovations in public residential housing, achieving a minimum 30% improvement in energy efficiency. As part of the Recovery and Resilience Facility (RRF), the initiative provides financial support in the form of grants and loans to Energy Service Companies (ESCOs) to conduct energy renovation projects in public residential housing units.

Milestone M7-48 requires the transfer of the RRF funds to the implementing partners. Milestone M7-48 is the third step of the implementation of the investment. It follows milestones M7-46, and M7-47 which defined the terms of references and the adoption of the implementing agreement for the instrument, and it will be followed by target M7-49, concerning the signing of legal financing agreements with final beneficiaries.

2. **Evidence provided:**

- Summary document duly justifying how the milestone (including all the constitutive elements) was satisfactorily fulfilled;
- A copy of the Decree 41/2025 for the disbursement of the resources “Decreto di erogazione risorse) adopted on 11 November 2025;
- A copy of the “account statement - estratto conto” of Gestore Servizi Energetici dated 17 November 2025;
- A copy of the “account statement - estratto conto” of Cassa Depositi e Prestiti SpA dated 19 November 2025;
- A copy of the approved payment order – “Disposizione di pagamento per beneficiario” for GSE and CDP executed on 17 November 2025;
- A copy of the approved payment order – “Disposizione di pagamento per beneficiario” for CDP signed on 14 November 2025;
- A copy of the communication from the depositary bank to Gestore Servizi Energetici confirming the receipt of EUR 1.331.000.000 and signed on 18 November 2025
- A copy of the communication from the depositary bank to Cassa Depositi e Prestiti confirming the receipt of EUR 50.000.000 and signed on 19 November 2025

3. **Analysis:**

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

Italy shall transfer EUR 1 381 000 000 to the Implementing Partner(s) for the Facility.

In line with the requirements of the milestone, the Italian authorities provided evidence of the execution of a transfer of EUR 1 381 000 000 from the Presidency of the Council's NRRP Mission Structure "Unita' di Missione PNRR, Presidenza del Consiglio" to the Gestore Servizi Energetici SpA (GSE) and to Cassa Depositi e Prestiti SpA (CDP) for the implementation of investiment "Financial instrument for energy renovations of public residential housing"..

Specifically, the Italian authorities provided:

- a copy of the decree 41/2025 adopted on 14 November 2025 which authorizes the disbursement of the resources;

- a copy of the approved payment order 'Disposizione di pagamento per beneficiario' which shows that the transfers of the resources from the account of the Presidency of the Council's NRRP Mission Structure to the account of GSE was executed on 17 November 2025 (evidence approved payment order – "Disposizione di pagamento per beneficiario");

- the approved payment orders 'Disposizione di pagamento per beneficiario' which shows that the transfers of the resources from the account of the Presidency of the Council's NRRP Mission Structure to the account of GSE and CDP was signed on 14 November 2025 (evidence approved payment order – "Disposizione di pagamento per beneficiario");

- a copy of GSE's account statement – "estratto conto" (evidence account statement - estratto conto" 17 November 2025), which certifies the which certify the receipt of funds by GSE for an amount of EUR 1 331 000 000;

- a copy of CDP's account statement – "estratto conto" (evidence account statement - estratto conto" 19 November 2025), which certifies the which certify the receipt of funds by CDP for an amount of EUR 50 000 000;

In particular, the account statement and the approved payment ordersspecify:

- The amount of the transfer which is of EUR 1 381 000 000
- The beneficiary of the transfer which are Gestore Servizi Energetici and Cassa Depositi e Prestiti SpA.
- The motivation for the transfer which is the disbursement to the implementing partner for the implementation of measure "Financial instrument for energy renovations of public residential housing". In this regard, the account statements referto Decree 41/2025 which authorises the disbursement of the resources.

Finally, the implementing agreement indicates the names and the details of the depositary banks both for GSE and CDP, which are private banks independent from the state budget.

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