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Innovation Council



**The Draghi Observatory
Implementation Index Update**
Assessing EU Delivery of the Draghi Report

January 2026

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EPIC is an independent Brussels-based think tank dedicated to connecting research with policy. Its mission is to strengthen Europe's competitiveness through forward-looking, evidence-based dialogue between academics, policymakers, and industry leaders. The Draghi Observatory & Implementation Index, launched by EPIC in September 2025, follows up on the implementation of the Report on the Future of European Competitiveness, tracking reforms and identifying new ideas to sustain Europe's growth model. Our Index has been widely covered by global media, including the Financial Times, The Economist, and Politico, and has quickly become the reference point for evaluating the progress of reforms across the EU.

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Executive Summary

This report presents the **January 2026 update of the Draghi Observatory and Implementation Index**, assessing how far the recommendations of the Draghi Report on European competitiveness have been translated into binding EU law since the first audit conducted in September 2025.

The Draghi Observatory tracks implementation exclusively through **adopted EU legal acts**, assessing delivery at the level of individual measures rather than political intent or policy ambition. This update applies a conservative and cumulative methodology: only those recommendations that newly appear as **Implemented** or **Partially Implemented** as of January 2026 are counted as progress, while all others retain their previous status. No retroactive reclassification is applied.

Key findings

Between September 2025 and January 2026, the EU adopted **38 Ordinary Legislative Procedure (OLP) acts**. Legislative activity during this period was intense but uneven in its engagement with the Draghi competitiveness agenda.

Only around **60% of adopted acts show medium or high relevance** to Draghi recommendations, and **high-impact legislation remains limited**, with just six acts qualifying as structurally significant. Legislative volume does not correlate with competitiveness impact: months with the highest number of adopted acts do not necessarily deliver the most Draghi-relevant outcomes. Where competitiveness-relevant delivery does occur, it is overwhelmingly channelled through **regulations**, rather than directives or decisions.

At the level of implementation outcomes, **29 Draghi measures** moved into implemented or partially implemented status as a result of newly adopted legislation. This confirms that implementation is advancing, but across a **narrow subset** of the overall recommendation universe of 383 measures.

Updated Implementation Index

As of January 2026:

- **58 recommendations (15.1%)** are fully implemented, up from 43 (11.2%) in September 2025.
- **91 recommendations (23.8%)** are partially implemented, up from 77 (20.1%).
- **234 recommendations (61.1%)** remain in progress or not implemented.

This represents a **net increase of 7.5 percentage points** in combined implementation over five months, and a **3.9 percentage point increase** in fully implemented measures.

What is driving progress

Progress since September 2025 is **incremental and consolidative**, rather than transformational. Most newly implemented measures reflect the **operationalisation of existing policy tracks**, upgrades from partial to full delivery, or the confirmation of delivery through binding legal acts.

Implementation is strongest where EU-level delivery can rely on:

- **funding and financial instruments** (ERDF, ESF+, InvestEU),
- **programme creation and operationalisation**, particularly in defence,
- **regulatory streamlining, enforcement, and digital infrastructure**.

By contrast, recommendations requiring **structural Single Market integration, state-aid reform, or outcome-forcing market rules** remain largely partially implemented or untouched.

Sectoral patterns

Implementation is highly concentrated in a small number of policy domains. **CBAM-related measures, defence industrial policy, and enforcement and compliance frameworks** show the highest degree of legal and operational maturity. These areas are characterised by strong external pressure—geopolitical, trade-related, or credibility-driven—which appears to accelerate delivery.

In domains such as **skills, labour, and data**, progress is largely enabling rather

than operational: legal acts improve data availability or funding flexibility but stop short of creating binding delivery mechanisms. Energy and infrastructure measures similarly advance through financing facilitation rather than structural reform.

Overall assessment

Taken together, the January 2026 update shows that the Draghi agenda is being implemented primarily as **delivery infrastructure**. The EU is building the legal, financial, and administrative foundations required for action at scale, but has not yet shifted into a phase of system-wide execution or **structural transformation**.

The direction of travel is clearly positive, and progress recorded in this update is legally durable. At the same time, more than **six out of ten Draghi recommendations remain unimplemented**, underscoring the scale of the task ahead.

A full re-audit of all Draghi recommendations under uniform criteria will be undertaken in a subsequent assessment cycle. Until then, the Draghi Implementation Index will continue to track progress cumulatively, providing a transparent and evidence-based benchmark for European competitiveness delivery.

1. Introduction

1.1 The Draghi Observatory and the Implementation Index

The Draghi Observatory was established to track how the recommendations of the Draghi Report on European competitiveness are translated into binding EU law. Its core analytical tool, the [Draghi Implementation Index](#), provides a structured and transparent framework for monitoring legislative delivery over time.

The methodology treats each recommendation of the Draghi Report as a discrete policy commitment and assesses its implementation based on adopted EU legal acts. The approach combines pledge-tracking logic with expert-led legal analysis and draws on established international precedents in policy monitoring and accountability. Progress is assessed at measure level, not at the level of political intent, policy ambition, or expected economic impact.

Implementation is determined exclusively through legal text. Only provisions contained in binding EU legislation are considered evidence of delivery. Political declarations, recitals, strategies, and anticipated future action are not treated as implementation.

The result is a cumulative implementation benchmark that allows comparison across policy sectors and over time, and that distinguishes clearly between legislative activity and legally effective delivery.

1.2 The September 2025 Audit: Establishing the Baseline

The September 2025 audit constituted the first full implementation assessment of the Draghi Report. It covered **383 individual measures** across all policy domains addressed in the report and established the baseline against which subsequent updates are measured.

The audit showed that, while EU legislative activity was extensive, effective delivery was limited and uneven. A small share of measures had been fully implemented through binding law, a larger group showed partial progress, and most recommendations remained either in progress or untouched. Implementation outcomes varied significantly across sectors, reflecting differences in political urgency, regulatory complexity, and institutional ownership.

Crucially, the September 2025 audit fixed the scope, methodology, and scoring logic of the Draghi Implementation Index. These parameters are locked and remain unchanged in subsequent updates to ensure full comparability across audit cycles.

1.3 Logic and Scope of the January 2026 Update

The January 2026 update of the Draghi Implementation Index builds directly on the September 2025 baseline audit and is designed to measure change over time, rather than to re-score the full universe of Draghi recommendations.

For the purpose of this update, all Draghi measures that are newly assessed as Implemented or Partially Implemented as of January 2026 are treated as progress since the first audit. All other measures retain their September 2025 status and are considered unchanged. No retroactive reclassification is applied.

The update is based on a legal-text analysis of 38 EU legal acts adopted during the reference period. These acts were mapped against the original universe of 383 Draghi-relevant measures to determine whether newly adopted provisions result in a change of implementation status.

To ensure clarity and comparability across audit cycles, implementation outcomes in this update are aggregated into three categories only:

- Implemented
- Partially Implemented
- In Progress / Not Implemented

This aggregation allows the Index to capture legislative consolidation and advancement between audits while avoiding double counting or methodological drift. It also ensures that changes in the Index reflect newly adopted law rather than changes in interpretation.

A full re-audit of all Draghi recommendations under uniform criteria will be undertaken in a subsequent assessment cycle.

2. Overall Legislative Assessment (38 Legal Acts)

This section assesses the general direction of EU legislative activity between **September 2025 and January 2026**, based on the **38 Ordinary Legislative Procedure (OLP) acts** adopted during the period (see Annex 1 for a full list).

The objective is not to assess individual measures, but to identify structural patterns in how far recent legislation engages with the Draghi competitiveness agenda.

2.1 Volume, Timing, and Legal Form of Legislative Activity

Between September 2025 and January 2026, **38 OLP acts** were adopted, with legislative activity peaking in **November (15 acts)** and remaining high in **December (9 acts)**. The distribution by legal form shows a strong dominance of regulations, particularly amending regulations.

Table 1 – OLP Acts Adopted by Month and Legal Form (Baseline)

Month	Regulations (New)	Regulations (Amending)	Directives (New)	Directives (Amending)	Decisions (New)	Decisions (Amending)	Total Acts
Sep 2025	0	2	0	1	1	0	4
Oct 2025	0	6	1	1	0	0	8
Nov 2025	7	3	1	4	0	0	15
Dec 2025	2	6	0	1	0	0	9
Jan 2026	0	1	0	0	1	0	2
Total	9	18	2	7	2	0	38

Two structural features stand out:

- **Regulations account for 27 of the 38 acts**, confirming that legally binding, directly applicable instruments remain the primary vehicle for Draghi-relevant delivery.
- **Decisions (2 acts) and new directives (2 acts)** play a marginal role in this window and show no material contribution to competitiveness-relevant implementation.

2.2 Draghi Relevance Across the Legislative Pipeline

Not all legislative activity in this period engages meaningfully with the Draghi agenda. When acts are classified by relevance, only around **60%** show **high or medium relevance** to competitiveness-related recommendations.

Table 2 – OLP Acts by Month and Draghi Relevance

Month	Total Acts	High	Medium	Low	None	% High+Medium
Sep 2025	4	0	3	1	0	75%
Oct 2025	8	3	1	2	2	50%
Nov 2025	15	0	8	2	5	53%
Dec 2025	9	3	4	0	2	78%
Jan 2026	2	0	0	0	2	0%
Total	38	6	16	5	11	≈60%

Two observations are relevant for the implementation analysis:

- **High-impact acts are limited in number:** only **6 acts** qualify as high relevance across the entire period.
- Legislative volume does not correlate with competitiveness impact. November accounts for the highest number of acts but contains **no high-relevance legislation**.

This suggests that recent EU legislative output is dense but uneven in its engagement with structural competitiveness reforms.

2.3 New vs Amending Acts: Incremental Rather Than Transformational Delivery

The balance between new and amending legislation further clarifies the nature of recent progress.

Table 3 – OLP Acts by New/Amending Type and Draghi Relevance

Type	Total Acts	High	Medium	Share High+Medium
New acts	12	3	5	67%
Amending acts	26	4	11	58%
Total	38	7	16	≈60%

While new acts show a slightly higher share of Draghi relevance, **amending acts dominate in absolute terms**. This points to an implementation pattern

characterised by **incremental consolidation** rather than the introduction of entirely new policy frameworks.

From an implementation perspective, this matters because amending acts are more likely to generate **partial delivery**—tightening, extending, or operationalising existing frameworks—rather than fully implementing new Draghi recommendations.

2.4 Legal Form and Competitiveness Delivery

The relationship between legal form and Draghi relevance is particularly pronounced.

Table 4 – Legal Form and Draghi Relevance

Legal Form	Total Acts	High	Medium	Low/None
Regulations (New)	9	3	4	2
Regulations (Amending)	18	4	8	6
Directives (New)	2	0	0	2
Directives (Amending)	7	0	4	3

Competitiveness-relevant legislation in this period is **overwhelmingly delivered through regulations**, particularly in areas linked to **scale, speed, capital markets, and defence**. Directives, by contrast, remain largely concentrated in social, environmental, or distributive domains and show limited alignment with the Draghi agenda.

Decisions play no material role in competitiveness delivery in this update window.

2.5 General Legislative Signal

Taken together, the 38 adopted OLP acts suggest a legislative cycle that is **active but selective** in its engagement with the Draghi competitiveness agenda.

Between September 2025 and January 2026, Draghi-relevant legislation clustered primarily in **finance and defence** and was delivered predominantly through **regulations**. At the same time, a substantial share of legislative activity occurred in domains with **limited or no competitiveness relevance**, diluting the overall implementation signal.

From an implementation perspective, this legislative profile points to **incremental progress driven by a limited number of structurally relevant acts**, rather than broad-based or accelerated delivery across the Draghi recommendation set.

3. Patterns of Implementation and Status Change

This section reviews the Draghi recommendations whose implementation status changed as a result of EU legislation adopted between September 2025 and January 2026. A complete list of measures, including their status, legal acts, legal anchors, and detailed justifications, is provided in Annex 2. The analysis below synthesises the key patterns that emerge from the consolidated implementation table.

3.1 Implementation Is Advancing but Remains Narrow in Scope

The January 2026 update confirms that implementation of the Draghi agenda is taking place, but across a highly limited subset of the recommendation universe. Only 29 measures out of the original 383 show any level of implementation following the adoption of new legal acts.

This pattern points to selective delivery rather than broad execution. Progress is concentrated in specific files and policy domains, while the majority of recommendations remain unchanged since the September 2025 baseline.

3.2 Progress Reflects Consolidation of Existing Tracks

Most measures upgraded in this update reflect consolidation rather than expansion. Improvements are driven primarily by the transition from partial to full implementation and by the confirmation of delivery through binding legal acts.

Newly adopted legislation tends to operationalise or reinforce pre-existing policy approaches, rather than open new areas of Draghi-relevant action. Implementation therefore advances incrementally, file by file, rather than through a systemic shift.

3.3 Legal Anchoring Is the Key Determinant of Implementation

Measures assessed as Implemented are consistently supported by binding legal instruments with clear and enforceable anchors. These include explicit obligations, operational funding rules, digital infrastructures, or enforcement mechanisms embedded directly in EU law.

Where such legal anchors are absent or diluted, measures remain partially implemented. The evidence shows a strong correlation between legal clarity and operational enforceability on the one hand, and implementation outcomes on the other.

3.4 Funding, Programmes, and Enforcement Outperform Structural Reform

The distribution of implemented measures reveals a clear delivery bias. Progress is strongest where implementation can be achieved through funding flexibility and financial instruments (ERDF, ESF+, InvestEU), programme creation and operationalisation, particularly in defence, and regulatory streamlining and enforcement architectures.

By contrast, recommendations that require structural market integration, state-aid reform, or outcome-forcing Single Market rules remain largely partially implemented or untouched. EU-level delivery is fastest where money, programmes, or enforcement tools can be mobilised within existing frameworks.

Table 5 – Measures with Status Change (January 2026) by Delivery Mechanism

Delivery mechanism	Imple- mented	Partially imple- mented	Total measures
Funding & financial instruments (ERDF, ESF+, InvestEU)	5	6	11
Programmes & institutional architecture (EDIP, defence, crisis tools)	4	2	6
Enforcement & compliance (CBAM, market surveillance, EPR)	4	2	6
Data, registries & digital infrastructure	2	4	6
Total	15	14	29

Table 6 – Implemented and Partially Implemented Measures by Policy Domain

Policy domain	Imple- mented	Partially imple- mented	Total measures
CBAM & energy-intensive industries	5	4	9
Defence & crisis resilience	4	2	6
Capital markets & finance	3	0	3
Circular economy & waste	3	3	6
Energy, grids & infrastructure	1	4	5
Skills, labour & data	0	5	5
Clean tech, industry & chemicals	2	2	4
Total	15	14	29

3.5 Implementation Is Focused on Infrastructure Rather Than Transformation

Taken together, the measures upgraded in this update show that the Draghi agenda is being implemented primarily as delivery infrastructure. The EU is building the legal, financial, and administrative foundations needed for action at scale, but has not yet moved decisively toward transformational reallocation or integration.

This pattern suggests that Europe is preparing to act, but has not yet chosen to force outcomes across the full competitiveness agenda.

4. Conclusions and Updated Implementation Index

The January 2026 update of the Draghi Implementation Index confirms that implementation of the Draghi competitiveness agenda has **advanced measurably** since the first audit in September 2025. The update captures change conservatively, counting only those recommendations that newly appear as implemented or partially implemented following the adoption of EU legislation during the reference period.

4.1 Updated Draghi Implementation Index (January 2026)

Based on the updated assessment, the implementation status of the Draghi recommendations is as follows:

Table 7 – Draghi Implementation Index: September 2025 vs January 2026

Status category	September 2025	January 2026	Net change
Implemented	43 (11.2%)	58 (15.1%)	+15
Partially implemented	77 (20.1%)	91 (23.8%)	+14
Implemented + Partially	120 (31.4%)	149 (38.9%)	+29
In progress / Not implemented	263 (68.6%)	234 (61.1%)	-29
Total measures	383	383	—

The table shows that **29 recommendations** moved into implemented or partially implemented status between the two audits. All other recommendations retain their previous classification, ensuring full comparability across reporting cycles.

4.2 Headline Index Movement

Table 8 – Index Evolution

Index	September 2025	January 2026	Change
Strict Index (Implemented only)	11.2%	15.1%	+3.9 pp
Strict + Partial Index	31.4%	38.9%	+7.5 pp

The increase in both indices confirms a positive direction of travel, with partial implementation accounting for the larger share of progress over the period.

4.3 What the Numbers Show

The updated Index points to several substantive conclusions about the state of Draghi implementation.

First, the increase in the Strict Index from 11.2% to 15.1% indicates that **fully binding delivery is expanding**, albeit gradually. New EU legislation is not only

enabling future action but, in a growing number of cases, completing the legal requirements necessary for implementation.

Second, the larger rise in the combined Implemented and Partially Implemented Index—from 31.4% to 38.9%—shows that **most momentum currently comes from partial delivery**. This reflects a legislative pattern in which frameworks, programmes, funding rules, and enforcement mechanisms are put in place, while more demanding elements—such as outcome-forcing targets, market integration, or structural reform—remain incomplete.

Third, despite measurable progress, the overall distribution of implementation status underscores the **unfinished nature of the Draghi agenda**. As of January 2026, more than 60% of recommendations remain in progress or not implemented. Legislative activity has therefore not yet translated into broad execution across the recommendation set.

Fourth, the nature of progress observed in this update is **incremental and cumulative**, rather than accelerative. The Index improves because existing tracks are consolidated and operationalised, not because implementation has widened across new policy areas. This confirms that the EU is strengthening delivery capacity but has not yet shifted into a phase of systemic rollout.

Finally, the update demonstrates the value of tracking implementation through **adopted law rather than political intent**. The observed movement in the Index is directly attributable to legally binding acts, not to announced strategies or anticipated future measures. This makes the progress recorded in January 2026 durable, but also highlights the limits of what has been delivered to date.

4.4 Outlook

The January 2026 update shows that the Draghi agenda is **moving forward**, but at a pace consistent with consolidation rather than transformation. The legislative foundations for competitiveness-oriented action are increasingly in place. Whether this translates into accelerated implementation in future cycles will depend on the extent to which forthcoming EU legislation moves beyond enabling frameworks toward outcome-forcing delivery.

A full re-audit of all Draghi recommendations under uniform criteria will be undertaken in a subsequent assessment cycle. Until then, successive updates will continue to measure progress as cumulative change relative to the September 2025 baseline.

ANNEX 1 – EU Legal Acts Analysed (September 2025 – January 2026)

	Month	Act type	New / Amending	CELEX	Title (short)	Adoption date	Policy domain	Draghi relevance (final)	Notes (concise)
1	Sep-25	Decision	New	2025/1904	Energy Charter Treaty interpretation	10.09.2025	Energy / external law	NONE	Legal coherence only; no competitiveness effect
2	Sep-25	Directive	Amending	2025/1892	Waste Framework Directive amendment	10.09.2025	Circular economy	MEDIUM	Harmonisation with cost effects; no simplification
3	Sep-25	Regulation	Amending	2025/1914	ERDF & Cohesion mid-term review	18.09.2025	Cohesion / investment	MEDIUM	Budgetary enabler; no structural reform
4	Sep-25	Regulation	Amending	2025/1913	ESF+ strategic measures	18.09.2025	Skills / labour	MEDIUM	Skills financing enabler; outcome-dependent
5	Oct-25	Directive	New	2025/2205	Driving licences (recast)	22.10.2025	Transport / mobility	LOW	Harmonisation & safety, not competitiveness
6	Oct-25	Directive	Amending	2025/2206	Driving disqualifications	22.10.2025	Transport enforcement	LOW	Technical follow-up
7	Oct-25	Regulation	Amending	2025/2088	Financial services reporting	08.10.2025	Capital markets	HIGH	Core Draghi regulatory simplification
8	Oct-25	Regulation	Amending	2025/2073	Insolvency annexes update	08.10.2025	Insolvency law	NONE	Maintenance legislation only
9	Oct-25	Regulation	Amending	2025/2083	CBAM simplification	08.10.2025	Trade / industry	HIGH	Cost, burden & predictability recalibration
10	Oct-25	Regulation	Amending	2025/2082	Eurojust CMS timeline	08.10.2025	Justice agencies	NONE	Operational extension only
11	Oct-25	Regulation	Amending	2025/2077	Non-sustainable fishing measures	08.10.2025	Fisheries / trade	NONE	External sustainability enforcement
12	Oct-25	Regulation	Amending	2025/2075	T+1 settlement cycle	08.10.2025	Capital markets	HIGH	Structural CMU reform
13	Nov-25	Directive	New	2025/2360	Soil Monitoring Law	12.11.2025	Environment	NONE	Compliance-driven

	Month	Act type	New / Amending	CELEX	Title (short)	Adoption date	Policy domain	Draghi relevance (final)	Notes (concise)
14	Nov-25	Regulation	New	2025/2434	EMSA recast	26.11.2025	Transport agency	NONE	Institutional housekeeping
15	Nov-25	Regulation	New	2025/2458	Population & housing statistics	26.11.2025	Data / statistics	MEDIUM	Horizontal data enabler
16	Nov-25	Regulation	New	2025/2518	GDPR enforcement procedures	26.11.2025	Digital / Single Market	MEDIUM	Enforcement coherence, scale predictability
17	Nov-25	Regulation	New	2025/2445	European political parties	26.11.2025	Democratic governance	NONE	Non-economic
18	Nov-25	Regulation	New	2025/2365	Plastic pellet losses	12.11.2025	Environment / industry	NONE	Pure compliance
19	Nov-25	Regulation	New	2025/2509	Toy Safety Regulation	26.11.2025	Product safety	LOW	Internal market baseline
20	Nov-25	Regulation	New	2025/2455	Chemicals data platform	26.11.2025	Chemicals governance	MEDIUM	Regulatory architecture, not scale
21	Nov-25	Directive	Amending	2025/2482	River Information Services	26.11.2025	Transport / logistics	MEDIUM	Digital efficiency & interoperability
22	Nov-25	Directive	Amending	2025/2450	European Works Councils	26.11.2025	Labour law	NONE	Social rights, no productivity logic
23	Nov-25	Directive	Amending	2025/2459	Zero-emission HDV tolls	26.11.2025	Transport / industry	MEDIUM	Cost incentive for transition
24	Nov-25	Directive	Amending	2025/2456	RoHS tasks → ECHA	26.11.2025	Chemicals governance	MEDIUM	“One substance, one assessment”
25	Nov-25	Regulation	Amending	2025/2457	Chemicals agency cooperation	26.11.2025	Chemicals	MEDIUM	Governance streamlining
26	Nov-25	Regulation	Amending	2025/2441	Visa suspension mechanism	26.11.2025	Migration	NONE	Security-driven
27	Nov-25	Regulation	Amending	2025/2439	CLP transitional provisions	26.11.2025	Better regulation	MEDIUM	Explicit burden deferral

	Month	Act type	New / Amending	CELEX	Title (short)	Adoption date	Policy domain	Draghi relevance (final)	Notes (concise)
28	Dec-25	Regulation	New	2025/2643	European Defence Industry Programme	16.12.2025	Defence industry	HIGH	Scale, procurement & finance
29	Dec-25	Regulation	New	2025/2645	Compulsory licensing (crisis)	16.12.2025	IP / resilience	MEDIUM	Emergency-only internal market tool
30	Dec-25	Directive	Amending	2025/2647	Consumer ADR update	16.12.2025	Consumer law	NONE	Redress governance
31	Dec-25	Regulation	Amending	2025/2649	CAP simplification	19.12.2025	Agriculture	MEDIUM	Burden reduction (sectoral)
32	Dec-25	Regulation	Amending	2025/2005	InvestEU efficiency	16.12.2025	Investment / finance	HIGH	Capital mobilisation & simplification
33	Dec-25	Regulation	Amending	2025/2611	Europol mandate	16.12.2025	Internal security	NONE	Non-economic
34	Dec-25	Regulation	Amending	2025/2650	Deforestation obligations	19.12.2025	Trade / sustainability	MEDIUM	Compliance relief logic
35	Dec-25	Regulation	Amending	2025/2014	Trade measures (WB)	16.12.2025	External trade	NONE	External support
36	Dec-25	Regulation	Amending	2025/2653	Defence investment / ReArm	19.12.2025	Defence / budget	HIGH	Cross-programme scaling logic
37	Jan-26	Decision	New	2026/188	MFA to Jordan	20.01.2026	External action	NONE	External stabilisation
38	Jan-26	Regulation	Amending	2026/211	Brexit Adjustment Reserve	20.01.2026	Budget	NONE	Financial reallocation only

ANNEX 2 – Draghi Recommendations with Implementation Status and Legal Anchors

Proposal ID corresponds to the initial codification of measures by the Draghi Observatory. Full measure description at <https://draghiobservatory.eu/>

Proposal ID	Measure (Draghi)	Policy domain	Legal act(s)	Legal anchor(s)	Type of anchor	Status	Justification
38	Reinforce interconnection funding	Energy, grids & infrastructure	Reg. (EU) 2025/1914 – ERDF & Cohesion mid-term review measures	Art. 6(1)(d); Art. 7(3); Art. 11a; Recitals 18, 22	Binding funding objective	Partially implemented	The act creates a new ERDF/Cohesion Fund specific objective to support energy interconnectors and related transmission, distribution, storage and supporting infrastructure and grants additional one-off pre-financing (20%) and higher co-financing for dedicated priorities, improving liquidity for cross-border energy infrastructure. It does not, however, create or reinforce a dedicated EU-level interconnection budget tool comparable to CEF.
40	Innovative financing for grids	Energy, grids & infrastructure	Reg. (EU) 2025/1914 – ERDF & Cohesion mid-term review measures	Art. 11a; Art. 14(2); Recital 21	Financing enabler	Implemented	The act operationalises innovative financing routes for grid deployment by explicitly allowing ERDF/Cohesion Fund resources to be channelled to the Member State compartment of InvestEU and by embedding private-finance leverage as a functional delivery option within cohesion priorities.
125	Steer secondary markets for recyclates	Circular economy & waste	Dir. (EU) 2025/1892 – Waste Framework Directive amendment	–	–	Partially implemented	Eco-modulation of EPR fees linked to sustainability and ecodesign parameters is introduced, and EPR funding may support fibre-to-fibre recycling R&D. However, no EU-wide incentive scheme or market-pull mechanism for recyclates is created.
126	Enforce regulation & prevent circumvention	Circular economy & waste	Dir. (EU) 2025/1892 – Waste Framework Directive amendment	Art. 22a(1), 22b(3), 22d; Art. 30(1)	Binding obligation	Implemented	The Directive fully operationalises enforcement through mandatory producer registration as a condition for market access, authorised representatives for non-EU producers, and binding due-diligence obligations for online platforms and fulfilment service providers.
176	Fast-track IPCEIs	Energy, grids & infrastructure	Reg. (EU) 2025/1914 – ERDF & Cohesion mid-term review measures	Art. 6(4); Art. 11a; Annex IV	Procedural / financing enabler	Partially implemented	The act explicitly allows ERDF support for projects participating in an IPCEI across all region categories and provides simplified selection procedures for IPCEI-linked operations. It facilitates financing but does not create a distinct EU “fast-track IPCEI” approval regime with shortened State-aid timelines.

Propo- s- al ID	Measure (Draghi)	Policy domain	Legal act(s)	Legal anchor(s)	Type of anchor	Status	Justification
203	Simplify sus- tainable finance & compli- ance	Clean tech, indus- try & chemi- cals	Reg. (EU) 2025/2088; Reg. (EU) 2025/2439	Art. 4–6 (2088); Art. 1–3 (2439)	Horizontal simplifica- tion	Partially imple- mented	Regulation (EU) 2025/2088 in- troduces a binding “request once / reuse” reporting principle and mandates the elimination of dupli- cate reporting, materially reducing compliance costs. Regulation (EU) 2025/2439 defers disproportiona- te labelling obligations. Together they reduce regulatory burden but do not amend the EU Taxonomy itself.
211	Improve CBAM design	CBAM & ener- gy-in- tensive indus- tries	Reg. (EU) 2025/2083 – CBAM simplification & strength- ening	Art. 1(2); Art. 5; Art. 35; Recitals 6–9	Structural correction	Partially imple- mented	The Regulation introduces struc- tural corrections based on the CBAM transitional phase, including improved definitions, thresholds, enforcement logic and penalties. It strengthens design and monitoring but does not address the free ETS allowance phase-out contingency referenced in the Draghi recom- mendation.
212	CBAM IT & digital infrastruc- ture	CBAM & ener- gy-in- tensive indus- tries	Reg. (EU) 2025/2083; Reg. (EU) 2025/2088	Art. 14–18; Art. 20; Annex II	Binding IT system	Imple- mented	The Regulation substantially expands and operationalises the CBAM Registry, enabling operator, verifier and declarant registra- tion, data exchange with customs, delegation of reporting, interoper- able public access and automated monitoring, fully delivering EU-level digital infrastructure.
213	Simplify CBAM MRV	CBAM & ener- gy-in- tensive indus- tries	Reg. (EU) 2025/2083; Reg. (EU) 2025/2088	Art. 7–13; Art. 21; Annex III	Binding simplifica- tion	Imple- mented	Major simplifications are introduced, including a single mass-based de-minimis threshold, default carbon prices, clarified system boundaries aligned with EU ETS, verifier access to the registry, dele- gated declarations and proportional penalties.
217	Harmon- ise carbon footprints	CBAM & ener- gy-in- tensive indus- tries	Reg. (EU) 2025/2083	Art. 7; Art. 28; Annex III	Method- ological harmoni- sation	Partially imple- mented	Embedded-emissions methodol- ogies, default values and system boundaries are further harmonised across CBAM sectors and aligned with EU ETS logic. However, the act does not establish a Single-Mar- ket-wide product carbon footprint framework beyond CBAM goods.
218	Digital product carbon footprints	CBAM & ener- gy-in- tensive indus- tries	Reg. (EU) 2025/2083	Art. 14–18; Art. 20	Digital delivery	Imple- mented	While not branded as a Digital Product Passport, the Regula- tion effectively delivers digitally available, verified carbon-footprint data through the CBAM registry in interoperable form.

Proposal ID	Measure (Draghi)	Policy domain	Legal act(s)	Legal anchor(s)	Type of anchor	Status	Justification
220	Improve recycling of end-of-life materials	Circular economy & waste	Dir. (EU) 2025/1892	Art. 8a(1)–(7); Annex VI	Partial binding obligation	Implemented	Mandatory extended producer responsibility for textiles is established across collection, sorting, reuse and recycling, with binding operational scope and quality safeguards, making the core obligation fully applicable at EU level despite the absence of EU-wide recycling targets.
221	Broaden Single Market for circularity	Circular economy & waste	Dir. (EU) 2025/1892	Art. 8a; Art. 22a; Recital 21	Harmonisation framework	Partially implemented	Harmonised EPR rules, definitions, governance and reporting obligations reduce fragmentation and support EU-level interoperability, but cross-border shipment facilitation and end-of-waste rules remain absent.
223	Reduce food waste	Circular economy & waste	Dir. (EU) 2025/1892	Art. 9a(4)–(7); Annex V	Binding target	Implemented	Binding national food-waste reduction targets for 2030 are introduced, supported by monitoring, reporting, review mechanisms and national programmes.
228	Strategic trade defence	CBAM & energy-intensive industries	Reg. (EU) 2025/2083	Art. 25–27; Art. 31–33	Enforcement & anti-circumvention	Implemented	CBAM is reinforced with anti-circumvention rules, penalties, customs integration and enforcement mechanisms, strengthening the EU’s capacity to respond to trade distortions.
230	Secure reliable value-chain data	Skills, labour & data	Reg. (EU) 2025/2458	Art. 1–5; Annex I	Statistical infrastructure	Partially implemented	The Regulation modernises EU population and housing statistics, strengthening timeliness, comparability and use of administrative data, improving foundational data infrastructure relevant for value-chain planning.
232	Operationalise NZIA Academies	Skills, labour & data	Reg. (EU) 2025/1913	Art. 12a(1)–(3); Recital 8	Funding eligibility	Partially implemented	ESF+ resources may support skills in net-zero technologies and learning programmes created by Skills Academies, but the act does not define governance, curricula or delivery mechanisms.
244	Mobilise private/public clean-tech finance	Capital markets & finance	Reg. (EU) 2025/2005	Art. 4–6; Art. 9; Recital 14	Financial enabler	Implemented	The Regulation materially strengthens InvestEU delivery by improving guarantee efficiency, enabling blending and simplifying reporting, making public and private clean-tech financing operationally available at EU level.
246	Competitiveness IPCEI instrument	Energy, grids & infrastructure	Reg. (EU) 2025/1914	Art. 6(4); Art. 11a	Financing support	Partially implemented	Cohesion policy rules strengthen financing capacity for IPCEI-participating projects but do not create a new State-aid instrument or approval category.

Proposal ID	Measure (Draghi)	Policy domain	Legal act(s)	Legal anchor(s)	Type of anchor	Status	Justification
249	Incentivise institutional investors	Capital markets & finance	Reg. (EU) 2025/2005	Art. 5; Art. 8; Recital 11	Capital-market enabler	Implemented	By increasing leverage and usability of the EU guarantee and simplifying implementation conditions, the Regulation strengthens InvestEU's attractiveness for long-term institutional investors.
250	Public guarantee & counter-guarantee schemes	Capital markets & finance	Reg. (EU) 2025/2005	Art. 6–8; Annex II	Binding guarantee mechanism	Implemented	The Regulation enhances EU guarantee risk-bearing capacity and enables new guarantee products under InvestEU, fully operationalising the de-risking logic.
256	Strengthen market surveillance	Clean tech, industry & chemicals	Dir. (EU) 2025/2456; Reg. (EU) 2025/2457; Reg. (EU) 2025/2439	Art. 1–3 (2456); Art. 4–7 (2457)	Institutional enforcement	Implemented	The reattribution of scientific and technical tasks to ECHA and the introduction of mandatory inter-agency cooperation mechanisms establish a coherent and operational EU-level enforcement architecture for chemicals regulation.
259	Map skill needs	Skills, labour & data	Reg. (EU) 2025/2458	Art. 1–5; Annex I	Data backbone	Partially implemented	Harmonised demographic and household data improve the evidence base for skills forecasting but do not create skills-mapping instruments or training mechanisms.
261	Prioritise EU funding for clean-tech skills	Skills, labour & data	Reg. (EU) 2025/1913	Art. 5a; Art. 12c; Art. 12d	Binding funding flexibility	Implemented	Binding legal flexibility allows ESF+ reprogramming toward clean-tech skills with higher pre-financing and co-financing ceilings, making funding operational at EU level.
262	Mobilise funding for clean-tech skills	Skills, labour & data	Reg. (EU) 2025/2458	Art. 1–5	Evidence enabler	Partially implemented	Improved statistical capacity supports evidence-based funding allocation but does not itself mobilise or reallocate funding.
263	Monitor supply chains via data	Clean tech, industry & chemicals	Reg. (EU) 2025/2458; Dir. (EU) 2025/2456; Reg. (EU) 2025/2457; Dir. (EU) 2025/2482	Multiple acts	Analytical capacity	Partially implemented	Data interoperability, shared methodologies and digital transport platforms strengthen analytical capacity across value chains, without establishing a full supply-chain monitoring framework.
265	Optimise regulation for manufacturing	Clean tech, industry & chemicals	Dir. (EU) 2025/2456; Reg. (EU) 2025/2457; Reg. (EU) 2025/2439	Art. 1–4; Art. 1–6; Art. 2–5	Regulatory coherence	Implemented	The “one substance, one assessment” principle and the deferral of disproportionate obligations reduce duplication, improve coherence and lower compliance costs for manufacturing.

Proposal ID	Measure (Draghi)	Policy domain	Legal act(s)	Legal anchor(s)	Type of anchor	Status	Justification
283	Recharging infrastructure (HDV / low-demand)	Energy, grids & infrastructure	Reg. (EU) 2025/1914; Dir. (EU) 2025/2459	Art. 6(1)(e); Art. 11a; Art. 4–7	Mixed incentive	Implemented	Cohesion funding flexibility combined with binding toll exemptions for zero-emission heavy-duty vehicles materially improves the economic case for recharging and refuelling infrastructure deployment.
292	Extend CBAM if distortions arise	CBAM & energy-intensive industries	Reg. (EU) 2025/2083	Art. 35; Art. 36; Recital 32	Review & monitoring	Partially implemented	Strengthened monitoring, data collection and review clauses establish analytical preconditions to detect downstream leakage, without extending CBAM scope.
293	Implement EDIS / EDIP	Defence & crisis resilience	Reg. (EU) 2025/2643; Reg. (EU) 2025/2653	Art. 3–6; Art. 10–15; Art. 2–4	Programme establishment	Implemented	The acts establish EDIP and the supporting financial and programme architecture, fully operationalising this recommendation.
294–301	Defence industrial scale-up	Defence & crisis resilience	Reg. (EU) 2025/2643	–	–	Partially implemented	EDIP provides a programme framework for coordination, capacity and demand aggregation, but does not yet constitute a full medium-term industrial policy architecture.
297	Defence access to finance	Defence & crisis resilience	Reg. (EU) 2025/2653	Art. 5–9; Annex I	Binding financial access	Implemented	EU financial instruments are opened to defence and dual-use projects, lowering barriers for SMEs and scale-ups and directly improving access to finance.
300	Defence R&D and dual-use spillovers	Defence & crisis resilience	Reg. (EU) 2025/2653	Art. 12–15; Recital 19	Dual-use R&D eligibility	Implemented	Dual-use eligibility and synergies between EDF, Horizon and EIC deliver the civilian–defence spill-over logic envisaged by Draghi.
333	Crisis access to medicines	Defence & crisis resilience	Reg. (EU) 2025/2645	Art. 1(1)–(3); Art. 4(1)–(4); Art. 6; Art. 8; Annex I	Crisis-triggered mechanism	Implemented	The Union compulsory licensing mechanism is legally established and can be activated under EU crisis frameworks to ensure coordinated manufacturing and supply at Union level.



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