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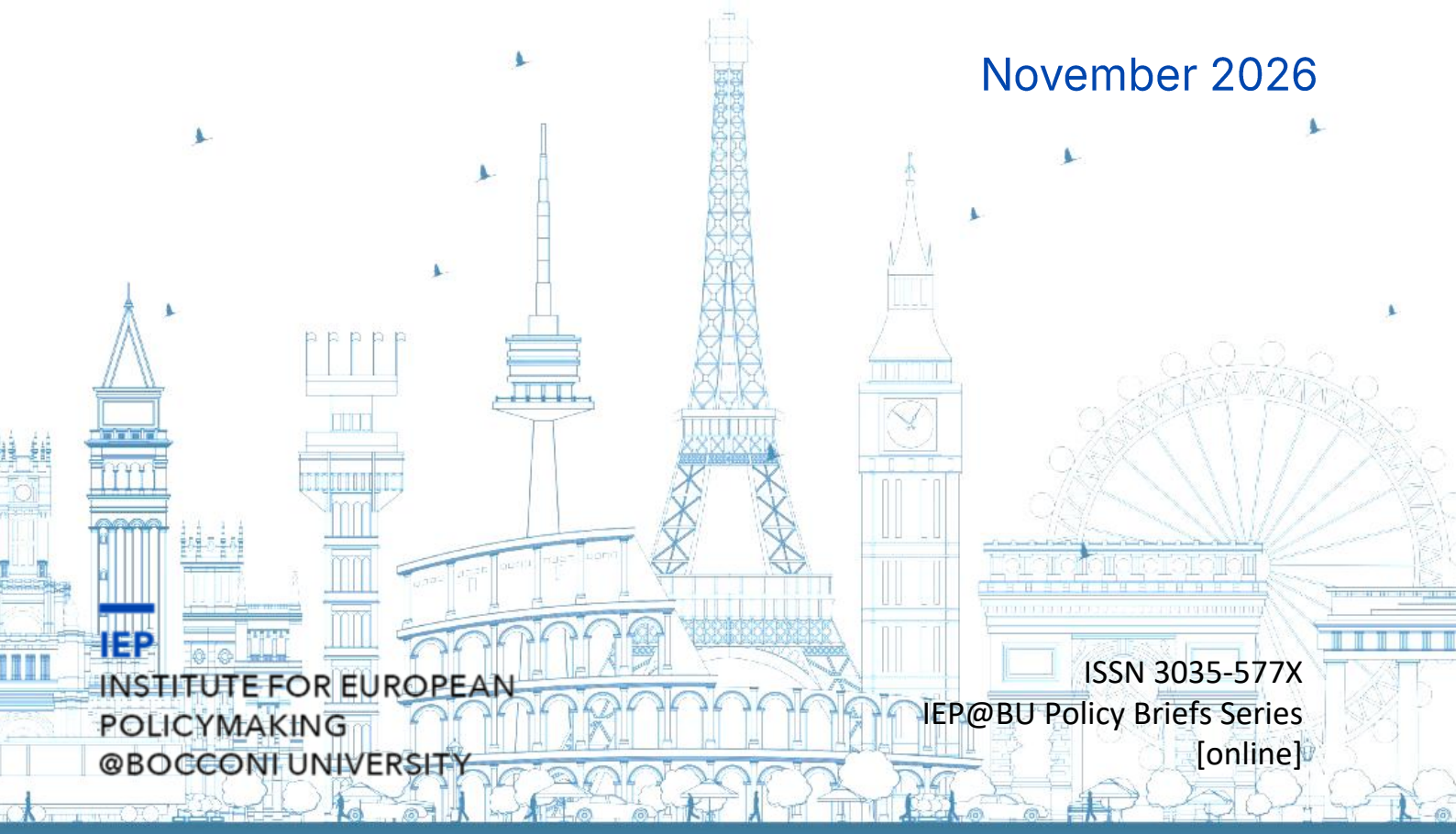
PARLIAMENTARY SCRUTINY OF THE RECOVERY AND RESILIENCE FACILITY:
CHECKING PAST PERFORMANCE, OR SHAPING THE FUTURE?

How Limited Public Scrutiny Weakens Pressure on the Commission to Improve Performance

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Abstract

This article analyses whether the European Parliament plays a meaningful watchdog role on the implementation of the Recovery and Resilience Facility, one of the Commission's flagship initiatives given its financial weight, redistributive impact and strategic relevance. Empirically, the analysis is based on all oral questions asked in the Recovery and Resilience Dialogues and written questions presented in 2019-2024. Our findings support the evidence that the Dialogues are a weak instrument of accountability *per se*. However, the article argues that they should be understood in a broader systemic context, where the different tools available to the European Parliament are holistically considered.

Key words

Accountability, European Commission, European Parliament, Next Generation EU, Parliamentary Questions, Recovery and Resilience Dialogues



Conflicts of interest

Marcel Magnus is employed by the European Parliament, but he contributes here in his personal capacity

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Executive Summary

This article analyses whether the European Parliament played a meaningful watchdog role in overseeing the implementation of the Recovery and Resilience Facility (RRF). The RRF sought to mitigate the economic and social impact of the pandemic. It was unprecedented in terms of size, funding, governance and performance orientation; it also had considerable redistributive impact and undoubtedly strategic relevance.

The Recovery and Resilience Dialogues (RRDs) are the main tool for establishing democratic oversight of RRF implementation: representing the executive, the two Commissioners in charge regularly appeared before Parliament to report on progress and respond to related questions from Members of the Committee on Budgets and the Committee on Economic and Monetary Affairs.

To assess whether the RRDs are an effective scrutiny mechanism, we distinguish between questions that are backward-looking, seek information, demand justification or call for changes in conduct, and those that are forward-looking and seek policy views. Empirically, our analysis is based on all oral questions asked during RRDs held in the ninth parliamentary term.

The analysis offers a nuanced assessment of Parliament's watchdog role. First, in line with previous research, we find evidence that the RRDs are a weak instrument of accountability per se, despite their strong legal foundation. The RRDs rarely feature probing scrutiny questions; most interventions seek information rather than challenge the Commission's decisions or demand corrective action.

Yet, the RRDs are not without purpose. MEPs use forward-looking questions to test ideas, signal policy preferences and build support. This agenda-shaping function provides a different perspective on the RRDs, beyond their effectiveness as a pure accountability mechanism.

As the RRDs are not the only scrutiny instrument available to Parliament, we broaden the analysis by collecting and examining all RRF-related written questions presented during the ninth legislature. Here, we find that MEPs pursue specific concerns in greater detail and do engage in meaningful scrutiny.

We furthermore argue that any criticism of the ineffectiveness of the RRDs must be grounded in evidence that significant problems existed, were known to MEPs, but were nevertheless not raised in that forum. To illustrate that the RRDs could have been more effective, we discuss some publicly known implementation problems, in particular payment delays, the revision of national recovery plans, lower-than-expected demand for loans, limited cross-border cooperation, and shortcomings in measuring overall performance and long-term impact.



Finally, we place the RRDs within the broader context of the instruments that the EP uses to hold the Commission accountable for RRF implementation: at the level of Parliament as a whole ('own-initiative' implementation reports), at subcommittee level (the RRF working group) and at the level of individual MEPs (written questions). We argue that accountability cannot (and should not) be assessed by looking at any instrument in isolation; instead, a broader systemic perspective is needed.

Our findings have several policy implications, particularly if the next EU budget adopts a performance-based framework modelled on the RRF. Improving performance requires calling out underperformance. Effective public scrutiny would therefore require more probing questions that Commissioners can prepare for in advance, enabling them to provide substantiated answers that can be followed up. Parliament should make better use of the complementary strengths of its oversight instruments, ensuring that all issues raised are addressed by the Commission and followed by appropriate action.



Introduction

This article analyses whether the European Parliament (EP) plays a meaningful watchdog role as regards the implementation of the Recovery and Resilience Facility (RRF), one of the Commission's flagship initiatives.

In order to understand the relevance of this initiative, one may recall that in July 2020, three months after the World Health Organisation had declared that the Coronavirus was causing a pandemic, the EU Heads of state or government endorsed a plan to jointly tackle the related challenges and top up the regular EU budget with significant additional funds.

That agreement was remarkable, as the plan was unprecedented in terms of size and funding approach, and as it used novel features in terms of governance and monitoring. EU leaders agreed to invest almost EUR 800 billion (in current prices), in addition to the EU's regular budget, to get the economies off the ground again; the main spending programme in that plan was the so-called RRF.

To finance the plan, EU leaders authorised the Commission to borrow the required funds on the capital markets, hence for the first time allowed to issue EU bonds at a significant scale. The agreement says that the RRF is a temporary instrument. Still, many observers believe that the issuance of EU debt at large scale will not be a one-off and assumed early on that EU common debt "*has come to stay*" (Thöne 2021, see also Hodson and Howarth 2024), pondering whether it will eventually be repaid as announced or just rolled-over (Schramm et al. 2022).

The agreed allocation of RRF funds showed "*collective responsibility and solidarity*" (Michel 2020), helping particularly those member states that were hit the hardest by the pandemic. That resulted in a considerable redistribution; in absolute numbers, most of the funds were allocated to Italy and Spain, and in relative terms, compared to the gross domestic product, to Greece, Romania and Croatia.[1]

In order to implement the plan and to increase national ownership, Member States were asked to each draft national Recovery and Resilience Plans (RRPs) that outline concrete structural reforms and investment projects. Moreover, Member States had to agree with the Commission how the achievement of agreed reforms and investment shall be measured, using qualitative milestones or quantitative targets to that end. Content wise, Member States had to ensure that the measures proposed in their RRPs fell into six broad policy areas considered of European relevance. The draft RRPs were subject to the Commission's and Council's final approval.

Given the size, funding approach, allocation, and strategic relevance of that plan, the EP sought an active watchdog role on the implementation of the RRF. After intense negotiations, it

[1] For the detailed figures, see European Commission, *Recovery and Resilience Scoreboard.* 11.06.2025. https://ec.europa.eu/economy_finance/recovery-and-resilience-scoreboard/index.html last accessed on 24.08.2026.



achieved to insert several additional elements to the RRF Regulation, the legal framework adopted in February 2021 that sets out all applicable terms and conditions (Fasone 2022). Some of its amendments impacted on the Parliament's watchdog role. Notably, the EP managed to obtain a provision that allows for a close monitoring, introducing in Article 26 of the Regulation the so-called Recovery and Resilience Dialogue[2] (RRDs) that enables it to regularly discuss with the Commission, every two months, all matters related to the implementation of the RRF. Other relevant amendments ensured Parliament's improved and timely access to information, established a so-called Recovery and Resilience Scoreboard that displays the progress of the implementation of the RRPs, and ensured that the RRF is subject to a discharge procedure.

From a governance, audit and control perspective, the Commission introduced in the RRF a remarkable deviation from previous practice by using the concept of "financing-not-linked-to-costs" for the first time at large scale, meaning that payments to Member States are solely based on evidence that agreed milestones and targets have been achieved, rather than on proof that money has been spent in line with all applicable conditions, as in other programmes. The Commission hence markets the RRF as a "performance-based" instrument. However, as discussed in more detail below, the European Court of Auditors (ECA) essentially questions the performance-based nature of the RRF.

The Commission is at least very transparent about each payment tranche that it authorises and publishes detailed technical information (so-called "preliminary assessments") that set out on which grounds it considers the agreed milestones and targets to have been successfully achieved.

To complement the background, one should finally mention that one year after the RRF Regulation had been adopted, Russia's war of aggression against Ukraine made it necessary to quickly add additional projects to the RRPs aiming to phase out dependency from Russian fossil fuel imports, resulting in changes to all national plans. That situation surely contributed to considerable delays in the overall implementation of the RRF, and there are concerns that not all investment projects and reforms will be completed within the RRF's five-year lifetime

[2] In the context of economic and monetary affairs, the so-called Monetary Dialogue (MD) held with the European Central Bank is probably the best-known example of a structured dialogue organised in the EP. The first MD was held in 1998 and it has since received ample analysis (e.g. Maricut-Akbik 2022; Kreppel & Tomasi 2025). In the MD, MEPs ask broad question about monetary policy decisions, the economic situation and outlook, and economic governance (Dreher at al. 2024). Interestingly, the exact rules governing that dialogue and corresponding accountability obligations had for a long time not been spelled out in more detail, there was no formal underpinning other than the articles of the Treaty, and the established practice has only been reaffirmed by an Exchange of Letters that was formally signed by the Presidents of the ECB and the European Parliament in June 2023. In comparison, the legal base of the RRDs is established in secondary law, anchored in Article 26 of Regulation (EU) 2021/241 establishing the RRF, and the accountability obligations are therefore set out in more detail. Those differences need to be seen in the context of the very different roles that the ECB and the European Commission hold: the independence of monetary policy decisions is usually a key concern for central banks, while the Commission is tasked with the implementation of a programme, for which it cannot claim the same room for manoeuvre and independency.



(final milestones and targets have to be completed no later than the end of August 2026). In general terms, the RRF Regulation includes a provision (Article 21) that specifies under which circumstances Member States can amend or change their RRP, or change milestones and targets that are no longer achievable. Such a provision is obviously important to prevent that changes are only requested to "shift the goalpost" and mask under-performance.

In sum, the very ambitious plan and its legal framework were fleshed out in short time, had to be subject to considerable changes soon thereafter, and came with novel features such as the performance-based approach. Against that background – and building on previous research on that matter (Bressanelli et al. 2023) – this article provides a systematic assessment of the capacity of the EP to live up to its role as watchdog of the Commission. Specifically, it evaluates whether and to what extent the discussion in the RRDs contributes to the Parliament's scrutiny role, what reasons may explain shortcomings in that role, and what other instruments, beyond the RRDs, may need to be considered if one wants to make an all-round assessment of the EP's performance in scrutinizing the RRF implementation.

Data and methods

To address our research questions, we analysed all RRDs that took place from 10th May 2021 – when the first RRD was held – to 22 April 2024 – the date of the 15th and last RRD in the ninth legislature (2019-2024). As dialogues include interventions in all the official EU languages, we downloaded the audio file with the English translation from the website of the EP and, with the support of the automatic speech recognition system Whisper (Radford et al. 2022), transcribed it.[3] Building on previous work by Bressanelli *et al.* (2023), we extracted all questions asked by MEPs in all RRDs, together with all answers provided by Commissioners.[4] By doing so, we extended the existing dataset to the full population of dialogues in the ninth legislature. Based on an established research tradition, we singled out and analysed "claims", that is "*a sentence or a set of sentences on a particular topic*" (Maricut-Akbik, 2021, 551). Each question and each answer collected in our dataset contains a single claim. When an oral intervention by a Member includes multiple claims, different questions/claims are identified and accordingly coded.

We assessed the oversight role of the EP by adapting a coding scheme that was originally developed by Maricut-Akbik (2021). We identified four types of questions that MEPs can

[3] It should be noted that the Commissioners, if they are asked questions in other languages than English or their mother language, will usually also listen to the same audio stream, i.e. the real-time simultaneous interpretation provided by the EP's interpreters. On such grounds, it could even be argued that the English audio stream is more important than the original audio stream: Commissioners reply to what they are told MEPs have asked, which is sometimes not what MEPs have actually asked.

[4] We are grateful to Nicola Chelotti and Matteo Nebbiai for sharing the original data with us.



address to the Commission:

(a) *request information* about a decision or action taken;

(b) *justification* of a decision or action;

(c) *change* a decision or conduct;

(d) *request policy views*, when the question does not focus on the past conduct of the addressees but rather on future developments.

Furthermore, as in Bressanelli *et al.* (2023), we used the additional category '*irrelevant questions*' for those questions that lie completely outside the scope of the dialogues (as specified by Art. 26 of the RRF regulation).

We also coded qualitatively the substantive content of each question, based on the following overarching categories having an institutional (categories i to v) or a policy focus (vi to ix): (i) Commission's assessment of plans, (ii) RRF rules, (iii) implementation, (iv) transparency and (v) future financing; (vi) climate and environment, (vii) digital, (viii) energy and (ix) social. Questions with a different substantive focus have been coded as (x) other. Categories have been identified combining a deductive and an inductive approach. We identified the most important categories based on the literature and our substantive knowledge of the RRF, but we refined them through the process of coding. We opted for a parsimonious – rather than detailed – number of categories to strengthen comparability across dialogues and over time.[5]

Finally, next to the questions we also coded the answers given by the Commissioners, either by Vice-President Dombrovskis or by Commissioner Gentiloni. Differently from previous research, to capture the Commissioners' engagement with the question we decided to count the number of words in each response-claim and thus measure the length (and, arguably, depth) of their replies.

Analysing parliamentary questions: What do MEPs ask?

The empirical analysis of the RRDs shows that the tone in the room is overall respectful, in line with the general style of debate in the EP (Lord and Tamvaki 2013). The questions raised in the RRDs are almost always put forward in a non-confrontational style.[6] MEPs do not normally mention specific shortcomings of individual projects set out in national RRPs, do not challenge

[5] Questions could sometimes be coded as belonging to more than one substantive category, but the first (and, based on the coder's judgement, most important) category was identified as the 'primary' one.

[6] In contrast, comparable events in the British House of Commons – a parliament used to more confrontational debates (Ilies 2006) – occasionally take a different path. For instance, Matthews and Flinders (2015, 154) found that committees that hold pre-appointment scrutiny hearings of candidates for ministerial posts are "engaging in inappropriate, even aggressive, cross-examination".



the Commission's preliminary assessments as to whether agreed milestones and targets have been successfully achieved – a precondition for the disbursement of any payment *tranche* to Member States – and hardly ever point directly to discrepancies or show open disagreement.

There are, of course, some exceptions. For instance, the RRD that took place in April 2024 saw one of the rare interventions where a question raised was not only quite detailed and specific, but also phrased in a more confrontational style. In that hearing, the Spanish MEP Eva Poptcheva (Renew Europe) notably challenged the soundness of the contentious Spanish pension reform (one of the key reform projects in the Spanish RRP) and explicitly asked whether the Commission was contradicting itself in its related assessments, one made in the context of RRF payment processing, another made in the context of budgetary long-term projections (the Commission's 2024 Aging Report). Since the question pointed to specific technical details, the Commissioner responding (Vice-President Dombrovskis) could not provide an answer right away but instead assured her to double-check with experts on the matter and ask them to revert with a methodological clarification. That example illustrates that if one expects Commissioners to come up with spontaneous answers, questions cannot go into very much detail. Given the technical breadth and depth of the many projects that all RRPs entail, detailed questions that refer to specific projects would have to be communicated upfront, before the hearing, to give the Commissioners a chance to prepare and to have detailed information at hand. From that perspective, the high-level and general nature of the questions raised during the RRDs seems adequate to enable Commissioners to respond off the top of the head.

In this context, it seems likewise important to mention that the speaking time available to MEPs to ask questions – usually two minutes – and to Commissioners to come up with replies – usually four minutes each – does not allow going into much detail anyway. In terms of word count, we find that the average reply is just 100 words long in the case of VP Dombrovskis or 80 words long for Commissioner Gentiloni or, in other words, about the length of this paragraph, which may illustrate well how much detail one can expect from an average reply.[7]

At the same time, the empirical analysis suggests that the Commissioners aim to treat MEPs from different political groups in an equal way, as we observe only relatively small differences as to how long (in terms of word count) their responses on average are, if analysed group by group. There is no systematic pattern suggesting that certain political groups are treated differently than others, although the political groups placed at the right of the hemicycle get some additional attention.[8] In addition, there are no topics that seem to be systematically dodged by the Commissioners, and the main factor that increases the chance of not getting an

[7] Cumulatively, the answer of both Commissioners comprises about 172 words

[8] The average length of the Commissioners' replies to MEPs of the EPP, S&D, Renew and the Greens/EFA are similar (162, 171, 178 and 165 words, respectively). The highest score is for the ECR group (226 words), followed by the ID group (195 words).



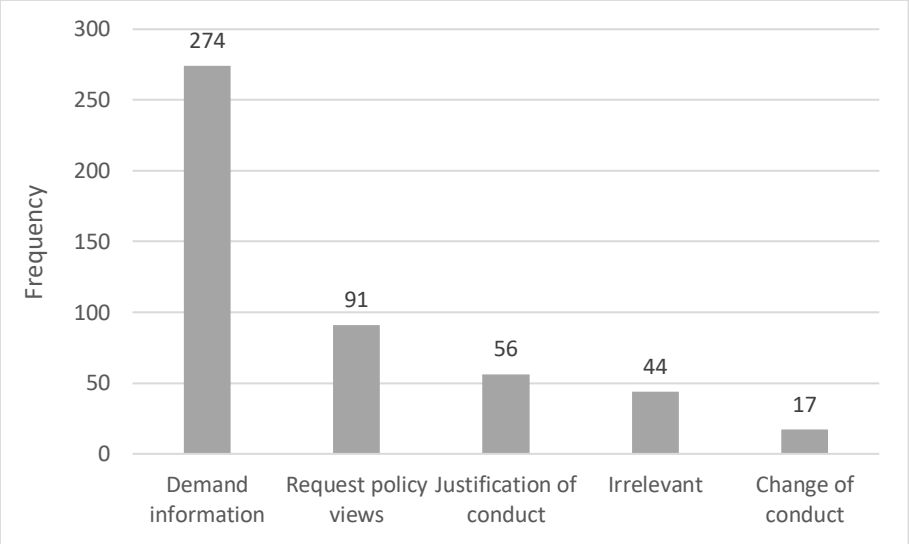
answer seems to be the total number of questions raised in one intervention: if a MEP raises several questions all at once, there is a good chance that the last question in particular will be ignored, presumably just for lack of time. Overall, however, there is no evidence suggesting that the Commissioners are discriminatory in how they respond to questions, and there are no signs that Commissioners cherry-pick certain questions they are more comfortable with or that they try to "game the show" in some other way. We also find that it is rather exceptional that Commissioners do not give an answer to a question: unanswered questions only make up for 11% of the total.

Moving to our core research interest, we observe that questions that just seek basic information – the weakest or least effective form of questions for the purposes of parliamentary oversight (Maricut-Akbik 2021) – are far more frequent than those that ask for a justification of decisions or actions taken, the stronger or more effective form of parliamentary oversight (Figure 1). Furthermore, a considerable part of questions raised in the RRDs are actually not checking past performance, do not ask what has been done, but are rather forward-looking, ask the Commissioners what they intend to do or what they think about future policy alternatives. In our empirical analysis, those questions are categorized as "request policy views" and they represent approximately 19% of all questions raised, ranking in second place in terms of frequency

Conceptually, those questions fall outside the scope of accountability as defined by Bovens (2007), who treats policy making and accountability exercises – which can only be retrospective from his point of view – as two distinctive concepts. Requesting policy views is hence not part of an accountability exercise, as those questions "do not challenge the executive's past decisions or conduct in any way" (Maricut-Akbik 2021, 545). Coming back to the observed respectful tone in the RRDs, we would argue that this tone is more conducive to an open exchange of views regarding future policy decisions, while a confrontational approach would presumably not achieve that. And we highlight the frequency of those questions to underline that, more generally speaking, the RRDs are not a "single-track scrutiny exercise", but they are de facto a forum for both accountability and policy making purposes.



Figure 1. Type of questions asked by MEPs

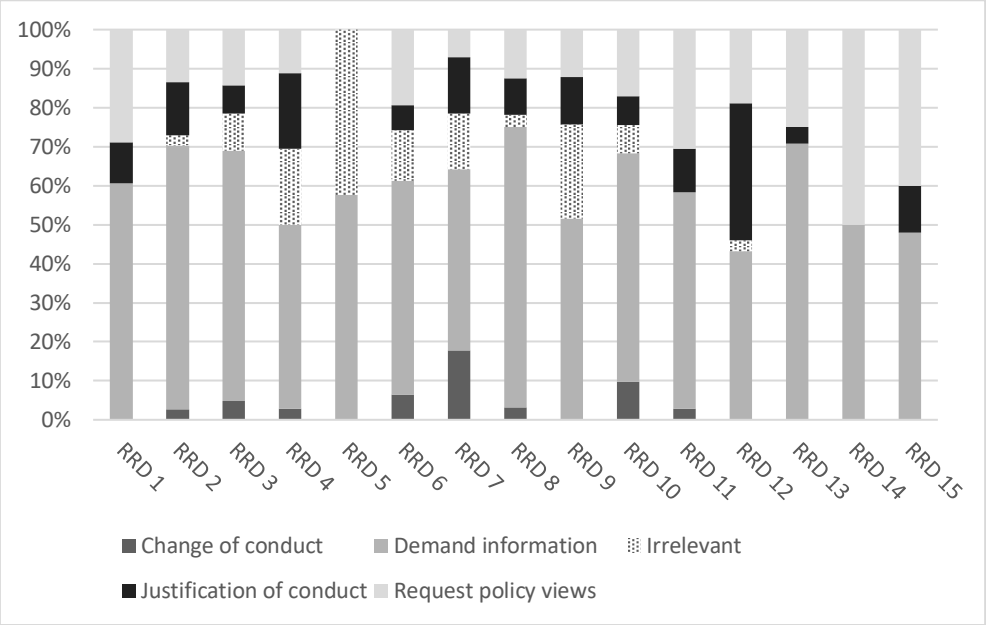


Digging deeper into the qualitative content of the questions, the analysis also reveals another aspect that seems likewise relevant: Only a fraction of the questions that seek information were geared to get a better understanding about what the Commission is doing. Member States and third parties, on the other hand, were the subject of interest of about one-fourth of all questions. One could argue that questions about Member States and third parties are generally off-topic, as the parliamentary oversight role of the EP is strictly speaking limited to the monitoring and evaluation of activities and decisions taken by the European Commission. However, the Commission's activities and decisions have of course to be seen and understood in the context of what Member States are doing as regards the implementation of the RRF, which from a scrutiny perspective creates a certain dilemma: the Parliament is on the one hand supposed to act as an independent watchdog of the Commission, while on the other, it depends on the Commission as a key source of information about activities in Member States. That dependency could be one of the reasons why the tone in the RRDs resembles more that of a respectful dialogue than that of a cross-examination. Open confrontation might simply undermine the Commissioners' willingness to share related information.

Analysing the variation of the type of questions over time (Figure 2), the share of questions seeking information tends to (slightly) decrease, suggesting that the RRDs may have gradually become somewhat more effective. Most evidently, however, questions raised in the RRDs have become more pertinent over time. In their analysis of the first ten RRDs, Bressanelli *et al.* (2023) found that a significant part of the questions initially sought to discuss matters that had no obvious relationship to the topics for which the RRD was created and were hence

categorized as irrelevant.[9] The analysis of the last five RRDs shows that this is no longer the case: more recently, nearly all questions were focussed on issues that are clearly relevant.

Figure 2. Type of questions over time



One may speculate whether this development is indicative of a learning process, or whether only the concept of the RRF instrument has become clearer. It seems fair to assume that at the beginning, the overall picture was opaquer from the outside, given that information about how the RRF's many novel features are implemented was not equally distributed but highly asymmetric, to the advantage of the Commission and Member States.[10] And trivial as it may sound, it is still true mentioning that one can only address problems of which one is aware. Parliamentary scrutiny effectively depends on the availability of some reliable information in the first place, it would otherwise be impossible to ask meaningful questions about the implementation of a programme, or to ask for a justification of actions taken. For instance, the European Court of Auditors (ECA), which has notably access to information that is not publicly available, published its first report about the Commission's assessment of national RRPs only shortly before the seventh RRD, at the beginning of September 2022, highlighting therein a

[9] RRD 5 presents by far the highest share of "irrelevant" questions (about 40%). As the dialogue was held on 7 March 2022, soon after the start of Russia's war of aggression against Ukraine, the latter topic understandably captured the attention of MEPs.

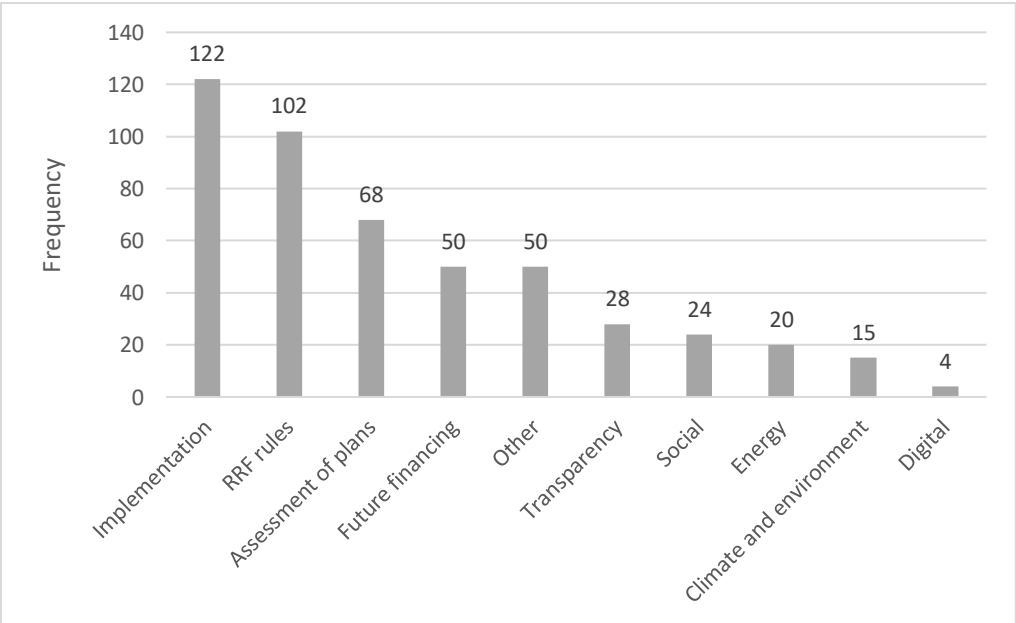
[10] The informal, non-public exchange of information between the Commission and the Member States becomes even more important during the final phase of the RRF, when the information concerned is particularly sensitive, as milestones and targets not achieved in the agreed form before the closure of the RRF should lead to suspended payments. Given the acute time pressure under which it must carry out its assessments, the Commission explicitly encourages such informal exchanges during the final phase of the RRF (see European Commission 2026) thereby making any external "watchdog" role more difficult to exercise.

first set of risks to a successful implementation of the RRF. That report was later followed by many other ECA reports that point to an even wider array of potential problems of the RRF. Yet, in the absence of such input, the early RRDs have likely been affected by a lack of reliable information about the implementation of the RRF and related problems, making it more likely that questions raised early on were not always to the point

Given the importance of reliable information for parliamentary scrutiny, it will not come as a surprise that in terms of substance, questions related to the transparency of the RRF instrument and of actions have grown in importance over time, growing by about ten percentage points in the last five RRDs compared to the previous nine RRDs. As shown by Figure 3, however, overall questions related to the actual implementation of the instrument have clearly been the most prominent subject.

When the RRF Regulation had to be amended in 2023 in order to include more projects that phase out dependency from Russian fossil fuel imports (adding REPowerEU chapters – incidentally, energy policy is another topic covered in the RRDs), the EP used its position as co-legislator to call for improved transparency of payment flows, eventually achieving a provision that requires Member States to regularly publish a list of the 100 final recipients that receive the largest amount of RRF resources. That list – and the information that can, or rather cannot, be derived from it, due to problems in the way the underlying requirements were designed (in Article 25a of the amended RRF Regulation EU 2023/435) and implemented – is one of the specific issues that is frequently brought up in recent RRDs, at the crossroad between the design of the rules, implementation and transparency.

Figure 3. The topics covered in the RRDs



As mentioned before, the format of the dialogue – and specifically the time that is available to raise and respond to questions – poses an obstacle to scrutiny questions that would go into more detail, or challenge the Commission on specific issues. If one questions to what extent the RRDs ensure the Commission's accountability before the European Parliament and measures the strength of parliamentary questions, the academic assessment holds that those dialogues only serve as a weak instrument of political accountability. That assessment, however, interestingly differs from what MEPs themselves say about the RRDs: In the last dialogue that was held in the 9th parliamentary term in April 2024, the two Co-chairs and MEPs from all political groups took stock of what had been achieved so far and explicitly thanked the Commissioners for the good cooperation they had shown in their appearances, highlighting the importance of that for the Parliament's scrutiny role; the two Commissioners, Vice President Valdis Dombrovskis and Commissioner Paolo Gentiloni, echoed that perception in their opening statements. Are those involved in the RRDs hence just too complacent about their performance as watchdogs, are there any important issues that could or should have been addressed but weren't? We will turn to this question in the next section.

Negative agenda: What issues could have been raised?

The empirical analysis looks at questions that have been asked and categorises them by strength of scrutiny power. A complementary aspect to that is to think about questions that could have been asked, conceding that one can only raise issues one is aware of, and conceding that the format of the dialogue only allows for high-level questions. This section is not meant to present an exhaustive set of unsettled questions, but rather to complement the picture about the extent to which the Commission has been held to account, highlighting some areas where it has been spared from criticism on issues which MEPs could have, instead, addressed ('negative agenda'). To that end, we briefly outline five major issues which, from our perspective, could have been emphasised more in the dialogues, namely: (i) whether the Commission actually designed the RRF as a performance-based instrument, (ii) whether missing or ill-designed procedures were one of the causes of delayed payments, (iii) whether the Commission is too lenient in its assessment of "objective circumstances" to change RRPs, (iv) whether the Commission made a planning mistake when forecasting the overall use of loans and, finally, (v) whether the Commission has done a good job to foster cross-border cooperation.

To start with the alleged performance-based nature of the RRF instrument, which is regarded as one of its key novel features, there was so far surprisingly little discussion in the RRDs about



whether that claim is actually correct. In October 2023, the ECA published a Special report that had exactly looked into that question, and the auditors came to a rather bleak verdict: "We conclude that the Recovery and Resilience Facility's (RRF) monitoring framework measures implementation progress but is not sufficient for measuring the RRF's overall performance. The elements it contains only partially allow the Commission to assess how well the RRF is fulfilling its general and specific objectives. [...] Milestones and targets also largely focus on outputs rather than results [...]" (European Court of Auditors 2023). The auditors essentially criticise[11] that the milestones and targets that the Commission and Member States agreed on are usually just measuring an input of resources or the direct results of projects, while they fall short of measuring the achievement of policy objectives and long-term impacts. The Commissioners have indeed been asked – by MEP Olbrycht and MEP Hübner in the RRD of April 2024 – whether the performance-based concept is from their point of view a useful model for future initiatives, but in none of the RRDs they have been directly confronted with the rather sceptical view of the ECA, or pressed on the point whether 'performance-based' is an overselling claim.

Moving to the next issue, one should first mention that several MEPs have brought up and expressed their concern about the fact that the implementation of RRF projects and the processing of payment tranches runs behind schedule, which can partially be explained by the delay caused by the need to incorporate REPowerEU chapters into the RRPs, as mentioned before. However, in case MEPs asked for the underlying reasons of the observed delays, they have typically sought the culprit in (their own) Member States, and they have never questioned whether the Commission was to blame for missing or ill-designed procedures. One can for example argue that the bundling of many projects into one payment tranche is in general problematic if there is no methodology in place how to deal with mishaps and delays, because a single missing milestone or target (of which there are many) will otherwise block the whole payment procedure (Magnus et al. 2023a). It took the Commission a long time to come up with a methodology for partial payments, that was published only in February 2023, two years after the RRF Regulation had been adopted (as annex to the Communication COM(2023) 99 final). Nevertheless, the Commission has never been asked in the RRDs whether missing guidance or ill-designed procedures, for which it bears responsibility, contributed to the situation that many payments to Member States are delayed.

Another issue that could have seen more questions from a scrutiny perspective is that of changes that Member States have made to their RRPs based on "objective circumstances". As mentioned above, according to Article 21 of the RRF Regulation, Member States can make

[11] Around the same time, similar criticism was also raised by academic researchers. Zeitlin et al. (2024), for example, questioned whether the RRF's performance-based financing model genuinely enhanced the effective implementation of reforms or merely encouraged formalistic "on-paper" compliance.

reasoned requests to the Commission to change their RRPs if relevant milestones and targets are no longer achievable because of objective circumstances, yet the regulation gives no further definition of such objective circumstances. In February 2023, the Commission published a notice (2023/C 80/01) in which it *inter alia* set out its understanding of objective circumstances, with some concrete examples, one of them referring to price increases in a specific sector (construction). Several Member States have subsequently changed their RRPs on grounds of inflation. It seems, however, that there is only a weak correlation between the level of inflation in certain Member States and the extent to which they have evoked that argument to change their RRPs (Magnus et al. 2023b; Antonini & Loi 2025). Moreover, even if inflation did actually matter in some Member States, one could also have questioned whether the concept of financing-not-linked-to-cost is compatible at all with the justification to change targets on grounds of cost increases. The general reasoning in that respect, set out in the Commission's guidance, has never been challenged in the RRDs, though.

Next, the question whether the Commission made a planning mistake when forecasting the overall use of loans could have been asked. In fact, at the time the RRF Regulation was adopted, the Commission proudly declared that it had agreed with Member States "*The largest stimulus package ever",* a statement that refers to the combined EU's long-term budget and the temporary instrument NextGenerationEU (NGEU), at the heart of which the RRF was meant to provide grants and loans Member States at a total value of EUR 724 billion, EUR 386 billion thereof in form of loans. However, it turned out that the actual take-up of loans, to be requested until the end of August 2023, was considerably smaller than expected by the Commission: as displayed in the Commission's final overview (European Commission 2023a), Member States had only asked for a total volume of EUR 293 billion, or EUR 93 billion less than expected. In the RRDs, MEPs frequently raised the issue of the unused loan volume, wanted to know why there was such a lack of interest, and asked whether the loan volume could be used for other purposes, e.g. strategic technologies. The Commissioners' standard reply to those questions was that the unrequested loan volume was not lying around in the coffers of the Commission but has not yet been raised in the financial markets, that the entitlement to raise that amount of money in the markets is restricted to the purposes of the RRF, and that the lack of demand by Member States was due to the increase of interest rates. That explanation, however, deflects from a discussion whether the Commission's initial estimate was plausible. Not surprisingly, an analysis of which Member States have or have not requested any loans shows that none of the countries that had better refinancing conditions at the time than the EU (i.e. Germany, Denmark, Netherlands, Ireland, France, and Finland) asked for loans. It seems perfectly rational not to ask for loans if one can directly refinance oneself on the financial markets more cheaply, without the strings and conditions attached that come with the RRF programme. The fact that several Member States have better refinancing conditions than the EU (Magnus et al.



2023a), however, has apparently not fed into the Commission's estimate, and it is one of those issues that could have been raised in the RRDs, but wasn't.

That brings us to the final point that we want to mention, namely the question whether the Commission has done a good job to foster cross-border cooperation. The European Parliament already highlighted in its first own initiative report on the implementation of the RRF, adopted in June 2022, that cross-border projects, in particular in the context of European energy networks, should be further promoted, and expressed its disappointment that revised RRPs did not include a higher number of cross-border projects (European Parliament, 2022). In subsequent RRDs, the Commissioners were asked twice about the status-quo of cross-border projects, and Commissioner Gentiloni, in his last appearance in the RRD in September 2024, reflecting about the lessons-learned when talking to the new parliament, explicitly mentioned the insufficient number of cross-border projects as one of the RRF's relevant shortcomings. The disappointment with what has been achieved in terms of cross-border cooperation, voiced early on by the Parliament and eventually also by the Commissioner, maybe somewhat astonishing, as the respective benchmark set by the Commission – namely that countries were to include measures with a cross-border dimension representing at least 30% of the total estimated costs of their REPowerEU chapters – was vastly exceeded by all countries (except Italy), with one third of the Member States even showing a cross-border dimension of 100% in their REPowerEU chapters (see RRF scoreboard). The reason for the discrepancy between the disappointment on the one hand as compared to the high-sounding praise of success on the other could root in the methodology that the Commission used to categorise measures as having a cross-border dimension or effect, which explicitly said that "The cross-border or multi-country dimension or effect of measures in the REPowerEU chapter should not be understood in a narrow sense as being limited to projects involving cross-border infrastructure."[12] In fact, measures that only reduced energy demand nationally were counted in as having such effect (Magnus et a. 2023b), based on the simple equation that a national reduction would also contribute to a reduced consumption in the Union as a whole.[13] Such broad understanding of cross-border effects is in all likelihood not what MEPs had in mind when they asked for more cross-border projects. Still, the Commission's methodology to calculate cross-border effects, questionable from our perspective, has never been raised in one of the RRDs.

[12] See https://ec.europa.eu/economy_finance/recovery-and-resilience-scoreboard/assets/methodology/scoreboard_methodology_to_calculate_the_REPowerEU_cross-border_target.pdf (last accessed on 21 August 2025).

[13] Compare, for example, the Commission's approval of the updated RRP of the Netherlands (European Commission, 2023b).



A complementary aspect of scrutiny: Written questions

RRDs, though legally enshrined in the RRF Regulation, appear to be a weak instrument of accountability, as MEPs raise questions that are only of high-level and general nature, rarely addressing past performance. Would this finding allow one to conclude that MEPs are not scrutinizing the implementation of the RRF in more detail? In this section, we want to draw attention to the fact that RRDs are only one of the scrutiny instruments available. More specifically, MEPs are also entitled to ask questions in written form, individually, as a group or committee, and the Commission is expected to reply within six weeks (three weeks if the question was designated to take priority; the exact procedure for written questions is spelt out in rule 138 in the EP's Rules of Procedure). All questions and replies are publicly available on the Parliament's websites. Using the EP search engine[14] with the keywords "*RRF*", "*Recovery*", "*Resilience*", "*NGEU*" and "*Fund*", and validating the results based on the substance of the questions raised, we came up with a list of 212 written questions that were sent during the ninth parliamentary term and that we deem to be related to different aspects of the RRF implementation. As for the oral questions, the unit of analysis is the individual question, with the final dataset ending up with 465 observations. Each "Question for written answer", or the letter sent in the name of one or more MEPs, may include more than one question, with each MEP on average raising two questions.

The overall number of "questions for written answers" already indicates that this scrutiny instrument is widely used. In terms of group affiliation, written questions were mostly asked by members of the EPP group and, next, by members of the The Left, the ECR and the ID groups. As for the type of questions being asked, a large majority – similarly to the RRDs – is to demand information, while more future-oriented questions ("request policy views") are less present than in the RRDs.

The comparison with the RRDs points to some interesting differences, though. First, it warrants noticing that a large majority - more than 60% - of the written questions was drafted by MEPs who have not participated or taken the floor in the RRDs, suggesting that written questions are a form of parallel scrutiny exercise. Second, in terms of content we find that written questions have a much stronger focus on transparency, which is the single most important topic (Figure 4). While only about 6% of the oral questions tackled transparency issues, the share for the written questions increases by more than 10 percentage points. Third, we observe that written questions frequently refer to specific projects, milestones or targets in the national RRPs, addressing specific problems or shortcomings. The share of such 'specific' questions has risen over time, with about half of the questions asked in the last year of the

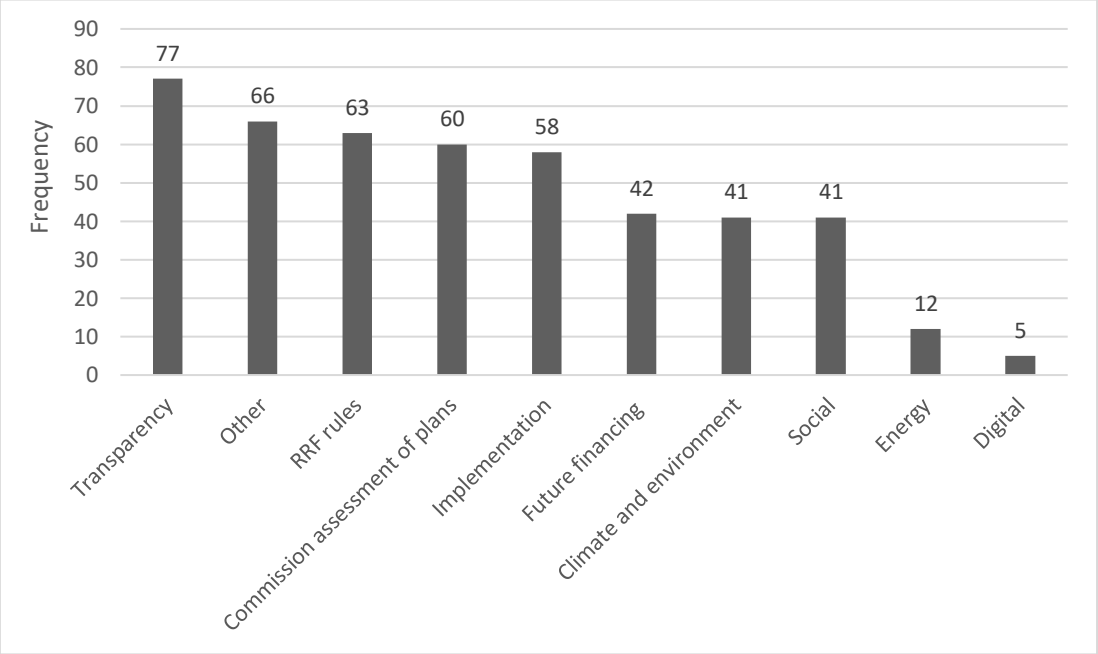
[14] Available at the following hyperlink: https://www.europarl.europa.eu/plenary/en/parliamentary-questions.html?tabType=wq. Last accessed on 07.11.2025.



legislature. Given their level of detail, such questions appear to challenge the Commission and to scrutinize the RRF implementation, contributing therefore to a more meaningful watchdog role of the EP.

To conclude: The pool of MEPs presenting written questions is notably different from those that participate in the RRDs, they emphasize different topics and tend to ask more specific questions of probing nature. In sum, it seems that written questions and RRDs serve different purposes.

Figure 4. The topics covered in the written questions



Discussion and conclusions

This article has empirically analysed all questioned asked by MEPs in the RRDs and all answers provided by Commissioners during the ninth parliamentary term (2019-2024). It has also collected and analysed all written questions on the RRF presented by MEPs during the same period. The coding of the questions – moving from and expanding previous work by Maricut-Akbik (2021) and Bressanelli et al. (2023) – allowed us to capture the extent to which the EP is able to meaningfully scrutinise the European Commission on the RRF. We also coded the topic of the questions, mapping the agenda of the RRDs and comparing them with the written questions.

The empirical analysis confirmed that the RRDs are a weak instrument of accountability. Overall, MEPs' questions are mostly to gather information from the Commission, revealing an information asymmetry between the EU's executive and parliamentary branches. A significant share of questions is about exploring the 'policy views' of the Commission. Being future-looking rather assessing past performance, such questions are not about 'accountability' *stricto sensu*. Questions asking the Commission to justify, or even change, its conduct and behaviour are a small fraction of the total. In terms of style, the RRDs are never confrontational. The exchange with the Commission is almost always courteous and MEPs appear to be genuinely interested in having a 'dialogue' with Commissioners.

Our updated analysis of the RRDs is, therefore, broadly in line with previous (partial) analyses of the Dialogues. Yet, there are some new elements that is worth emphasising. First, judging from the declining number and share of 'irrelevant' questions, dialogues have improved over time. This change can have different explanations: MEPs may have learnt better how to use the instrument newly introduced in 2021; the implementation of the RRF in the Member States made it more relevant; information on the content of RRDs was better circulated and spread out. Whatever the explanation, the fact is that the number and share of 'irrelevant' questions has become negligible. Another evident change regards the main topics of the questions. It is hardly surprising that, over time, questions on the implementation of the RRF became more important than other topics.

We complemented the analysis of the RRDs with an assessment of what could have been asked by MEPs, but was not. The 'negative agenda' illustrates that the Commission could have faced strong accusations of negligence or mishandling. Yet, MEPs chose to spare the Commission from serious criticism – e.g., whether the RRF is a veritable 'performance-based-instrument', as questioned by the ECA – and use the RRDs as an instrument to exchange information, to keep the EP 'in the loop', rather than as an accountability tool.

Finally, analysing the written questions allows us to provide a more systemic perspective on the capacity of the EP to oversee the activity of the Commission on the RRF. It should not be forgotten that dialogues are only one of the instruments available to MEPs. Indeed, written questions have a much stronger focus on transparency and are often more specific, detailed and probing. Interestingly, the pool of MEPs presenting written questions weakly overlaps with that represented in the RRDs. To put it shortly: written questions and the RRDs seem to serve different purposes.

Enlarging our perspective even more, the EP also prepares 'own-initiative' implementation reports on the RRF. In the second of such reports , the EP several times explicitly refers to the findings of a specific ECA report, and inter alia "urges the Commission to apply the lessons learned and the ECA's observations, and to ensure that future performance-based instruments



are well-targeted, aligned with the aim of financing European public goods and prioritising the addressing of clearly defined strategic challenges, economic sustainability and competitiveness; calls for it to be ensured that all future instruments are designed to measure not only inputs or short-term outputs and progress but also results in terms of long-term impacts backed by outcomes" (European Parliament, 2025). Thus, while such issues were not tackled in the RRDs, they clearly did not go unnoticed by MEPs.

Such broadened perspective should also take into account that there is even one more accountability instrument in place, namely the RRF Working Group. That Working Group was specifically established to prepare for and follow-up on the bi-monthly RRDs. It is composed of 27 MEPs representing all political groups, its exact composition and its agenda are publicly available. During the period of our analysis, there were 35 meetings of that Working Group taking place, next to the 15 RRDs. It is therefore a very active forum that held most of its meetings with the Director-General heading the Commission's Recovery and Resilience Task Force, and sought views from other relevant stakeholders such as the ECA. The reason we had to ignore those activities is that those meetings are not public, they are held in-camera, defying academic analysis. Nonetheless, in order to give a holistic assessment as to whether the EP plays a meaningful watchdog role for the RRF, or by analogy for any other investment programme, one would need to take all related parliamentary activities into account, at the level of the whole parliament ('own-initiative' implementation reports), at committee level (the RRDs), at 'sub-committee level' (the RRF Working Group), and at the level of individual MEPs (written questions). For pundits and scholars of accountability and Europe's Parliament, a lesson that the RRF teaches us is that accountability cannot be assessed solely by looking at a specific instrument in isolation. An assessment of the capacity (or lack thereof) of the EP to hold the Commission accountable on the RRF should be systemic. Paying exclusive attention to individual instruments (however important) can make one lose sight of the overall (and bigger) picture.



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