



*Employers entrusted to deliver
Sustainability Growth Innovation*

Position Paper

Response to the Call for Evidence on the Omnibus II Proposal – InvestEU

18 July 2025

SGI Europe welcomes the European Commission's proposal to **amend the InvestEU Regulation and related instruments through the Omnibus II package**. As the representative voice of enterprises providing Services of General Interest (SGIs), we support the objective of **enhancing the efficiency of the EU guarantee and simplifying access to EU-level investment support**. We also welcome the proposal's continuity with past instruments such as the Juncker Plan (EFSI), whose architecture SGI Europe actively supported.

General principles

SGI Europe has long advocated for **EU-level investment instruments to help close structural investment gaps**, particularly in social and public infrastructure. In 2015, we strongly supported the creation of the European Fund for Strategic Investments (EFSI), calling for it to evolve into a lasting pillar of the European economic instruments.

InvestEU, as the successor to EFSI, represents this evolution. The Omnibus II proposal further **consolidates its role by expanding capacity and simplifying implementation**. These improvements align with SGI Europe's longstanding priorities:

- **Ensuring access to long-term finance** for SGI providers;
- **Enhancing the role of local and regional actors** in investment planning and implementation;
- **Supporting strategic sectors** such as energy, housing, mobility, education, healthcare, and social services;
- **Promoting efficient coordination** between EU institutions, implementing partners, and national promotional banks.

Support for the proposed improvements

SGI Europe broadly supports the Commission's proposal and highlights the following positive elements:

- **Increased investment capacity:** The EUR 2.5 billion increase in the EU guarantee, expected to mobilise an additional EUR 25 billion in investment, is a welcome step toward addressing persistent market failures.
- **Better use of existing instruments:** The proposed blending of legacy instruments (EFSI, CEF, InnovFin) with InvestEU enhances efficiency and helps avoid "stop-and-go" dynamics.
- **Simplification of procedures:** The effort to reduce administrative burdens by 25% for all enterprises and 35% for SMEs will support broader access, especially for smaller SGI providers.
- **Flexibility for Member States:** Allowing Member States to contribute to InvestEU and better mobilise investment not only through guarantees but also via financial instruments is an important innovation.

Recommendations and outstanding concerns

While supporting the direction of travel, SGI Europe urges attention to the following points:

Prioritise investment in SGIs and social infrastructure

InvestEU should continue to prioritise investments that generate long-term public value. We call for:

- **Recognition of services of general interest** as key areas under the sustainable infrastructure and social investment windows;
- **Proportionate procedures for projects led by local authorities**, non-profit associations, and social enterprises (e.g. cost-covering housing providers);
- **Specific earmarking or incentives to address investment gaps in sparsely populated and underserved areas.**

Ensure fair access for public and municipal SGI providers

Current definitions of SMEs under InvestEU can exclude public or municipally-owned enterprises that meet all quantitative criteria. SGI Europe supports the amendment to remove Article 3(4) of Commission Recommendation 2003/361/EC from the SME definition, **ensuring ownership-neutral access to the instruments, including for enterprises with public participation and non-profits providing SGIs.**

Raise the threshold for simplified reporting

SGI Europe supports **raising the simplified reporting threshold from EUR 100,000 to EUR 200,000.** This would facilitate the inclusion of smaller-scale yet socially impactful projects, often led by local actors.

Improve coordination and accessibility

We support calls for **better coordination among implementing partners and for a more user-friendly interface for beneficiaries.** A one-stop-shop model would help local SGI providers navigate access to financing more efficiently.

Address the housing crisis through InvestEU

Europe faces a deepening housing crisis, particularly in terms of affordability and energy efficiency. SGI Europe supports the proposal to give affordable housing projects **simplified access to InvestEU instruments.** Housing is a cornerstone of social cohesion, and its strategic importance must be reflected in EU investment policy.

Conclusion

SGI Europe **welcomes the Omnibus II proposal as a step in the right direction to strengthen InvestEU** as a long-term, strategic instrument for delivering EU policy objectives. We emphasise the need to:

- **Safeguard the specific role of public and social investment** and better leverage private investment;
- **Prioritise funding access for SGI providers;**
- Maintain the **public value orientation of InvestEU**, even as its scope expands.

We stand ready to contribute further to the legislative debate and to work with the Commission, the Parliament and Member States to ensure that InvestEU continues to deliver tangible results for citizens, enterprises and communities across Europe.