



## CPMR ISLANDS COMMISSION CONTRIBUTION TO THE EC CALL FOR EVIDENCE ON THE FUTURE EU ISLANDS STRATEGY

*This contribution has been developed in close cooperation with the CPMR Island Commission's member regions and brings together both political priorities and concrete evidence originating from island territories themselves, reflecting their lived realities, structural challenges and development potential.*

*This contribution is complementary to and fully aligned with the CPMR'S contribution to the parallel Call for Evidence on the EU Strategy for Coastal Communities. It reflects the specific perspective of the CPMR Islands Commission and benefits from the political support of the CPMR Political Bureau.*

### SECTION 1 - BUILDING THE CASE FOR AN EU ISLAND-PROOFING

The geographical discontinuity of insular territories results in structural constraints, which are further exacerbated in the case of archipelagos. These challenges are not temporary, but permanent features of insularity, which require sustained, place-based and tailored public intervention.

The specific situation of islands has long been recognised at EU level, notably through the need to guarantee a homogeneous development within the EU since the Maastricht Treaty (1992) and the explicit reference to the “handicaps” of islands in the Amsterdam Treaty (1997). This recognition is clearly anchored in Article 174 of the TFEU. However, despite this legal basis, EU legislation and funding frameworks still insufficiently reflect the structural realities of insularity. As a result, EU policymaking continues to fall short in systematically addressing island-specific challenges, limiting the development potential of island territories and, ultimately, the full exercise of EU citizenship rights.

These shortcomings are particularly evident across several EU policy areas. To better illustrate this, the Islands Commission of the CPMR has carried out, together with its members, a mapping of existing EU policies and instruments that have a differentiated impact on island territories. The overview presented in the [Annex](#) highlights a wide range of relevant policy areas where insularity is insufficiently taken into account. While not exhaustive, this mapping provides a robust evidence base demonstrating the need for a more systematic and adapted approach to islands' specificities in future EU policymaking, while avoiding a 'one-size-fits-all' approach.

Against this background and based on the evidence gathered through the mapping exercise, the Islands Commission urges the future EU Strategy for Islands to explicitly acknowledge islands as frontline territories. This recognition should be translated into **an EU island-proofing approach** across all EU policies with a significant territorial impact, including Cohesion Policy, Common Agricultural Policy, fisheries, transport, energy and state aid, among others.

To operationalise such an island-proofing approach<sup>1</sup> through the future Strategy and in line with its past policy positions, the Islands Commission puts forward the following proposals:

- **Conduct a comprehensive cross-sectoral analysis of EU policies impacting islands**

As a first step, the future Strategy should involve a more in-depth and cross-sectoral analysis of how EU policies affect island territories. This analysis should be carried out with the active involvement of island authorities and serve to identify concrete needs for policy adjustment, adaptation and reform, thereby informing future legislative and non-legislative initiatives for islands.

- **Systematically integrate the territorial impact assessment of EU legislation on islands into the policymaking process**

The future Strategy should promote the systematic consideration of the territorial impacts of EU legislation on island territories throughout the entire policy cycle. This approach should be aligned with recent calls<sup>2</sup> for more regular and even compulsory territorial impact assessments of EU policies on different types of territories, including islands (in line with the current ongoing process to revise the “EU better regulation” initiative). To this end, the Strategy could set out concrete operational guidelines to mainstream an island-sensitive approach in EU policymaking, including through improved territorial analysis for islands and the systematic use of existing impact assessment tools since the design phase of EU policies.

- **Consider the introduction of an “insularity clause” in relevant EU legislation**

The future Strategy could initiate the process to develop and test the introduction of an “insularity clause” in EU sectoral legislation with a significant predicted impact on island territories, such as transport, energy, Common Agricultural Policy or Cohesion Policy. Such a clause could establish a clear obligation to consult relevant island authorities at key stages of the policy-making process, ensuring that island-specific realities are duly considered from the earliest phases of legislative design. This would also facilitate a consistent consideration of island-specific realities across all Member States when implementing EU legislation, including those where insularity is not explicitly recognised in the national legal or policy framework (e.g., France or Sweden).

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<sup>1</sup> Existing island-proofing experience that can also inspire a future EU island-proofing mechanism are found in the [Scottish Islands Communities Impact Assessments tool](#), as well as the [Toolkit to island-proof Swedish legislation](#) developed by the OECD in the framework of a multicounty project in cooperation with DG REFORM (2023-2025).

<sup>2</sup> For instance, the [Joint Declaration of Ministers responsible for Cohesion and Territorial Policy](#) in May 2025

Beyond the above-mentioned concrete proposals, it is worth stressing that the effective implementation of a future EU Strategy for Islands cannot be carried out in a meaningful and proportionate way without reliable, sufficiently disaggregated and comparable data that adequately reflects the structural realities of insularity. Indeed, a **persistent lack of island-specific data** (particularly at sub-regional or individual island level) continues to constrain the ability of EU policymakers to properly assess how legislation and sectoral policies affect island territories.

**Addressing this data gap should therefore be considered a priority and a policy enabler, rather than an isolated statistical exercise** (e.g., territorial impact assessments of EU policies on islands rely on quantitative, territorially disaggregated data). The future Strategy should thus promote improved availability, coherence and interoperability of island-relevant data, ensuring that such evidence systematically informs impact assessments and supports the adaptation of EU policies with significant territorial effects.

In this context, it is worth quoting the recent OECD report “[Island Economies: Building Resilient, Innovative and Connected Island Regions](#)” (November 2025), carried out in the framework of the multicountry project “Improve the quality of multi-level governance and strengthening the resilience of island economies of Croatia, Greece and Sweden” (TSI - MCP/23EL34), implemented with DG REFORM. The study highlights persistent data gaps and limitations in the availability, comparability and territorial granularity of island-relevant data at EU level, and underlines their implications for evidence-based policymaking. It also puts forward concrete proposals to improve the EU data and knowledge framework on islands (page 17), which could provide valuable input for the implementation of a future EU Strategy for Islands.

Likewise, when it comes to better understanding islands’ realities through better data, the European Commission is encouraged to build on valuable existing tools, such as the [Habitability Index approach](#) that allows to define, measure and develop the attractiveness of an island with accurate and tailored indicators.

## SECTION 2 – THE SCOPE OF THE FUTURE STRATEGY: KEY AREAS THAT DESERVE ATTENTION IN THE STRATEGY

Islands place sustainability at the heart of their development, as they are facing more than ever before, global challenges and transitions, while dealing with continuous structural geographical constraints linked to insularity, remoteness and limited resources. In line with both the EU Green Deal and UN 2030 Agenda goals and the European Union’s broader goals – including cohesion, climate neutrality, competitiveness and social inclusion - the future EU Strategy for islands should encompass a holistic and place-based framework, tackling the three interconnected pillars of sustainability – economic, environmental and social - and supporting insular growth, attractiveness and resilience.

As the CPMR Islands Commission members underlined in its unanimously approved [2023 Palma Final Declaration](#) “the future EU Islands Agenda should focus on a **preliminary limited set of major economic, social and environmental issues that have strong territorial impacts on islands, in**

coherence with the EU objectives.” Sustainable development must therefore be addressed in all its dimensions through integrated, tailored and territory-sensitive solutions.

Building on this, economic, environmental and social sustainability dimensions are considered essential for an effective and well-adapted EU Islands Strategy. For each dimension, a number of related key priorities and actions have been outlined, including concrete examples (see [Annex](#), to consult all evidence collected), as follows.

#### a. Economic sustainability

Island economies face permanent structural constraints linked to insularity, including additional operating costs, small and fragmented markets, limited competition and strong dependence on a limited number of economic sectors. These additional costs of insularity are well documented in EU and academic studies<sup>3</sup>. Recent global crises and the challenges linked to green transition have further amplified these vulnerabilities.

##### **Adapting state aid frameworks to insular realities**

The permanent additional costs of insularity result in structural market failures that limit private investment in island territories. In this context, **state aid is a cornerstone of economic sustainability for islands**. The EU Islands Strategy should therefore:

- **Formally acknowledge that permanent insularity-related costs and structural market constraints justify a differentiated approach to state aid for island territories**, as supported by legal analyses on the application of EU state aid rules to island territories. This recognition should be reflected across all relevant existing state aid frameworks (e.g. regional aid, de minimis rules, General Block Exemption Regulation).
- **Encourage insularity-sensitive interpretation and guidance** in the application of existing state aid frameworks and ensure that the specific situation of islands is systematically considered in future evaluations and revisions, notably for state aid rules affecting infrastructure, connectivity and productive investment.

*In this context, a concrete example of the current shortcomings is provided by the application of the EU de minimis Regulation, which does not take into account the permanent additional logistics and transport costs faced by island-based companies. Evidence from the Balearic Islands (see [case 26 of the Annex](#)), shows that firms exhaust the de minimis ceiling more rapidly than their mainland counterparts merely to offset structural insularity-related costs, leaving limited room to support investment, innovation or competitiveness.*

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<sup>3</sup> See, for instance, [An estimation of Insularity Cost in Sicily \(2020\)](#), [Impact de l'insularité en Corse sur la performance économique des entreprises \(2019\)](#), [Los costes de la insularidad de las Islas Baleares: evaluación de políticas actuales y propuestas de futuro \(2016\)](#)

### Supporting economic diversification, innovation and the blue economy

Economic diversification is essential to reduce islands' vulnerability to external shocks and strengthen long-term resilience. Given structural market constraints, diversification in island territories requires targeted incentives and adapted competition frameworks to ensure territorial equity with other EU regions. The EU Islands Strategy should therefore:

- Support economic diversification in island territories with a particular focus on the **development of sustainable blue economy** as a key driver of growth, employment and innovation for these territories.
- **Promote investment in research, innovation and digitalisation adapted to insular contexts**, notably through the effective use of Smart Specialisation Strategies (S3) and the Interregional Innovation Investments (I3), while encouraging incentives and competition frameworks that place island regions on a more equal footing with other EU territories.

*For instance, evidence from Corsica (see case 28 of the Annex) highlights that in relation to the participation in EU research and innovation programmes, higher travel costs, longer travel times and limited accessibility hinder the ability of island-based universities, research centres and SMEs to build and sustain European consortia, ultimately limiting islands' capacity to fully benefit from innovation-driven diversification opportunities.*

### Fostering sustainable tourism adapted to island economies

Tourism is a central pillar of economic development for many European islands, but it also amplifies structural vulnerabilities linked to limited territory, environmental sensitivity, seasonality and dependence on external resources. Islands that are major tourist destinations are particularly exposed to imbalances generated by tourism pressure, making them more vulnerable than continental areas. In this sense, the future EU Islands Strategy should:

- Ensure that EU approaches to sustainable tourism explicitly recognise islands as territories requiring specific attention, tailored solutions and priority consideration. Concretely, **valorise and dedicate attention to islands in the future EU Strategy for Sustainable Tourism**.
- Encourage the **development of innovative and adaptive tourism models in island territories**, in line with recent calls at EU level<sup>4</sup>, by promoting dedicated funding, technical support and appropriate regulatory flexibility for islands facing strong tourism pressure, recognising their ecological limits, extenuated pressures on local, regional and national infrastructure, reliance on external resources and structural vulnerabilities.

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<sup>4</sup> [\*Committee of the Regions \(CoR\) Opinion "Towards sustainable and resilient tourism in the European Union: Strategy for balanced and adaptive management"\*, CDR-1378-2025, adopted in December 2025 \(rapporteur: Balearic Islands\).](#)

## Improving connectivity and mobility

Territorial discontinuity makes island territories highly dependent on air and maritime transport for the movement of people and goods, as well as for access to essential services and economic competitiveness. In addition, for island Member States as well as islands within Member States, transport connectivity is not merely an economic enabler but a prerequisite for territorial cohesion and social inclusion. At the same time, decarbonisation measures under the EU Green Deal risk generating disproportionate costs for island businesses and citizens.

Beyond passenger mobility, island connectivity is equally critical for the functioning of freight and supply chains. In ferry-dependent systems, disruptions in maritime transport often translate into binary outcomes for time-sensitive goods: either delivery occurs as scheduled or commercial value is entirely lost. For island-based producers – particularly in the agri-food sector – just-in-time logistics models and centralised mainland distribution systems leave little room for delay or adjustment. This structural mismatch between island transport conditions and internal market requirements creates a competitive disadvantage that goes beyond transport costs, affecting reliability, market access and the effective integration of island companies into the EU internal market.

The EU Islands Strategy should therefore:

- Ensure affordable, reliable and sustainable air and maritime connectivity for island territories and island Member States, recognising the crucial social and economic role of regional and national airports and ports (with especial attention to archipelagos) for mobility, public service obligations and competitiveness. This should include **tailored support for key transport infrastructures, taking into account their low profitability and strong seasonality.**
- Support a fair green transition of island connectivity, **by accompanying the decarbonisation of air and maritime transport with adequate transitional and compensatory measures**, while promoting the deployment of sustainable fuels, electric aviation and clean maritime transport solutions adapted to insular contexts. This includes **allowing regulatory and State Aid flexibility** where the application and timing of EU transport and decarbonisation measures generate asymmetric impact on islands, including adjusted implementation timelines, transitional arrangements and compensatory funding, in order to ensure a fair and proportionate pathway towards decarbonisation.
- **Strengthen the resilience and redundancy of island transport systems** acknowledging the heightened exposure of islands to extreme weather events, infrastructure disruptions and supply chain shocks.
- **Recognising inter-island mobility, where applicable, and internal mobility within islands as an integral component of island connectivity**, including ferry services and public transport systems linking ports and airports to population centres and urban nodes. Particular attention should be given to archipelagos and multi-island regions, where scale

limitations and geographical constraints restrict the commercial provision of transport services.

- **Recognise and address the structural vulnerability of island freight systems, particularly for time-sensitive goods**, by ensuring that EU transport, internal market and competition frameworks take into account the specific constraints of ferry-dependent supply chains, and by supporting coordinated logistics solutions that enhance reliability and market integration for island-based companies.

*A concrete example of failed tailored support to ensure continued connectivity in island territories while accompanying their decarbonisation is illustrated by the implementation of the ReFuelEU Aviation. Obligations for airports and airlines to supply and blend sustainable aviation fuels in order to comply with decarbonisation targets generate additional logistical and cost burdens for other island airports and airlines. Evidence from Balearic Islands indicate (see case 3 of the Annex) that the lack of tailored and/or compensatory measures for islands in this context risks translating climate obligations into higher ticket prices and reduced connectivity for these territories which remain very dependent on air transport.*

*Similar concerns arise in relation to the application of the EU Emissions Trading System (ETS) to maritime transport, which affects freight and combined freight and passenger shipping services falling within the scope of the ETS. Island Member States such as Malta are highly dependent on these services for access to the European internal market and for essential passenger connectivity, with no viable land-based alternatives. The pass-through of ETS compliance costs risks disproportionately increasing transport and logistics costs for island economies, with knock-on effects on the cost of living, competitiveness and supply chain resilience. This highlights the need for island-specific transitional measures and the targeted reinvestment of ETS revenues to safeguard essential maritime connectivity while supporting decarbonisation objectives.*

### **Facilitating island participation in EU Territorial Cooperation programmes**

EU Territorial Cooperation (ETC) programmes have proven to be effective tools for fostering economic development, innovation and integration between territories. For island regions, participation in ETC is particularly important to overcome structural constraints linked to insularity, limited market size and geographic isolation. In other words, it is key for their economic sustainability.

Islands constitute a specific category of territory, surrounded by water and characterised by maritime borders. Their functional, economic and environmental linkages are therefore primarily organised at maritime basin level, rather than along land borders or strictly distance-based criteria. However, existing eligibility rules and programme architectures often limit the ability of islands to cooperate with relevant partners across the same maritime basin, reducing their effective access to ETC opportunities and undermining their economic potential. Against this background, the EU Islands Strategy should:



- Provide **a clear policy impetus for EU Territorial Cooperation programmes to better take into account the specific situation of island territories**, including through tailored proportionate and flexible eligibility rules and implementation arrangements that facilitate island participation, while avoiding unnecessary administrative complexity.
- Promote **cooperation between island regions located within the same maritime basin**, alongside rigid distance-based criteria, where strong functional, economic or environmental linkages exist.
- Encourage **the progressive adaptation of Interreg programme design and implementation rules**, so as to better reflect maritime realities and remove structural barriers to island participation in territorial cooperation.

*A concrete illustration of the barriers faced by island regions in accessing EU Territorial Cooperation is provided by the case of the Balearic Islands (see case 25 of the Annex). Despite sharing the same maritime basin and strong functional, socio-economic and governance linkages with Catalonia and Occitania, the Balearic Islands are excluded from the coastal strand of the Interreg POCTEFA programme solely due to the 150 km maritime distance threshold set out in Article 4(1) of Regulation (EU) 2021/1059. This strictly geometric criterion limits islands' ability to participate in cross-border cooperation on maritime, climate, biodiversity and blue economy projects and results in a tangible loss of access to EU funding, despite comparable institutional capacity and thematic relevance vis-à-vis eligible continental regions.*

## **b. Environmental sustainability**

On the frontline of the climate and environmental crisis, islands need to hold strong to develop their potential towards green and climate neutral transition. An EU Islands Strategy should therefore embed a dedicated environmental sustainability pillar that addresses islands' structural and geographical specificities, natural limitations, ecological values, and support their capacity for innovation in their transition to climate neutrality.

### **Supporting climate action, adaptation and transition**

Largely exposed to the impacts of climate change — including sea level rise, coastal erosion, heatwaves, drought, water scarcity, biodiversity loss and increasingly frequent extreme weather catastrophes - islands face pressures that generate significantly higher adaptation costs compared to mainland territories. The EU Islands Strategy should therefore:

- **Integrate environmental sustainability and climate resilience across all relevant EU policies** affecting islands, considering the need for an urgent transformative change in developing mitigation and adaptation efforts to respond to devastating impacts of climate change and extreme weather events.



- Consider linkages with the **EU Cohesion Policy and future EU climate instruments** to increase compensation for higher adaptation and mitigation costs in insular territories. Further consideration should be given to the social impact of energy transition on islands.
- Provide guidance for a **clear decarbonisation pathway for islands** within the framework of **the European Climate Law** which acknowledges their different starting points, while also recognising the role of insular territories as laboratories for energy transition and emissions reduction. The insular context should be further addressed in the Emissions Trading Systems (ETS and ETS2) - notably regarding maritime, air transport and mobility - and the Social Climate Fund to support vulnerable households and micro-enterprises in islands.
- Support the development and implementation of **tailored climate-resilient plans** and measures at local, regional and national levels, grounded in multi-level governance and strong citizen engagement.

*As an example, Gotland is the region in Sweden with the highest CO2 emission per capita and remains among the most fossil-fuel-dependent territories in the world. Initiatives such as the Clean Energy for EU Islands Initiative, which provides long-term support for renewable transitions through technical assistance, capacity building and financing, are important enablers. Yet the initiative is primarily focused on energy transition goals without sufficiently linking broader climate adaptation needs (e.g., water scarcity, coastal erosion, heat stress on infrastructure) into EU climate and cohesion frameworks. Without huge investments in infrastructures (port, cables, electricity grid, greening of the aviation, green Investments in CAP, circular Economy) Gotland will remain the region with the highest CO2 emission per capita ([see case 16 of the Annex](#)).*

### **Disaster risk management and climate preparedness**

While the Islands Commission acknowledges that the RESTORE package offers some flexibility for post-disaster reconstruction, a more structural approach is needed. The EU Islands Strategy should therefore:

- Strengthen EU support for **climate risk prevention, preparedness and adaptation** in insular territories, including the outermost regions, which face significant risks from heat, drought, and sea level rise. This implies further considering the island-impact of risk and prevention legislations.
- Support particularly **preparedness in critical sectors** such as **food production and supply systems** (including strategic food and water reserve), **the health sector** (medical evacuation, medication stocks and distribution) and energy security, ensuring continuity of essential services in islands in case of emergencies (e.g. floods, fires, extreme weather events). This should be complemented by reinforced **civil protection and defence cooperation**, and the **development of dedicated emergency protocols for islands**, in

consideration of their territorial discontinuity, limited infrastructure, and dependence on external supply chains.

- Clarify risk ownership and ensure **equitable access to financial resources** for prevention, response and reconstruction to ensure regional level responsiveness to urgent climate threat.
- **Promote the exchange of best practices**, collection and use of data and knowledge sharing to enhance regional and local responsiveness to climate threats.

*Evidence from island regions shows that risk and prevention legislation does not always adequately account for insular specificities. As an example, the implementation of Directive 2007/60/EC (Floods Directive) reveals disproportionate impacts compared with mainland regions especially in archipelagos, as experienced by the Azores, translating into higher financial and organizational burden, where measures must be shaped to island vulnerabilities and constraints to ensure effectiveness and equity (see case 19 of the Annex).*

### **Tackling energy security and poverty towards the Green Transition**

Many islands, facing structural limitations, remain heavily dependent on imported fossil fuels, endure high energy costs, and experience structural energy poverty. However, they have promising role in pioneering the green transition, possessing strong potential for renewable energy deployment and system innovation.

The EU Islands Strategy should address islands' energy security, affordability and poverty while enabling them to contribute to EU decarbonisation and green transition, and notably:

- Open reflections on how to provide further support in the deployment of **locally produced renewable energy**, storage solutions, smart grids, recognizing that islands are **pioneer territories for developing integrated, decentralised and resilient energy systems**, but also struggling with grid isolation and no or limited of interconnection to the mainland, small market size and infrastructure constraints. This should lead to an EU framework that explicitly **recognises isolated and weakly interconnected island** energy systems and provides adapted market rules, dispatch mechanisms and support tools to ensure affordability, security of supply and effective decarbonisation.
- Tackle energy poverty through targeted social and infrastructural measures and support the **development of energy communities** in islands.
- Ensure access to financial instruments such as the **Just Transition Fund (JTF)**, alongside other EU funding streams supporting decarbonisation, energy efficiency, and social mitigation measures, and leverage the **Clean Energy for EU Islands Initiative**, which provides long-term support for renewable transitions through technical assistance, capacity building and financing. Effective and equitable implementation of EU energy and climate legislation in island contexts requires targeted technical assistance mechanisms,

provided both at EU level and through responsible national authorities, in consideration of the structural administrative constraints faced by insular territories.

*For instance, while the Climate Social Fund from the Fit for 55 package aims to mitigate the social impacts of the green transition by addressing energy and mobility poverty, in island regions - such as the Azores - higher structural energy and transport costs mean that prices of heating, fuels and mobility can disproportionately increase. Without explicit recognition of island conditions, the measure risks deepening social vulnerability. National Social Climate Plans should therefore prioritise vulnerable groups in islands to ensure a just and non-regressive energy transition (see case 21 of the Annex).*

### **Biodiversity protection and ecosystem restoration**

The preservation and restoration of islands' rich biodiversity and unique ecosystems – including vulnerable and endemic species - should be at the core of the environmental sustainability pillar of the EU Islands strategy which should therefore:

- Provide targeted support to islands undergoing environmental degradation, invasive species, land-use pressure, climate change impacts and tourism intensity, and prioritizing the preservation and restoration of island biodiversity and ecosystems within **EU biodiversity objectives**. Those thematics should be fully integrated in post-2027 EU programmes with dedicated calls addressing insular challenges, notably in the framework of interregional cooperation and Interreg programmes. Biodiversity regulation should also be adapted to allow emergency management and active climate adaptation.
- Ensure that the implementation of the **Nature Restoration Law** and related EU legislation fully reflects insular realities and the key role of regional and local authorities as well as recognizes the higher cost of meeting restoration targets.
- Support **island-specific ecosystem restoration actions** and the development of **Nature-based Solutions** (NbS), targeting coastal and marine ecosystems, forests, wetlands and agricultural landscapes, as they are essential tools for both biodiversity recovery and climate adaptation.
- Align ecosystems preservation and conservation goals with local economy and insular communities' realities and understand the need for **more geographically fine-tuned ecosystems management measures** that links biodiversity protection with the viability of traditional low-impact island fisheries and agricultural practices.

*As an example, the Regulation (EU) 2019/1022 on demersal fisheries in the western Mediterranean, while contributing to stock recovery, applies uniform effort limits and spatial measures that do not differentiate island ecosystems. In the Balearic Islands, where fishing is predominantly small-scale and closely tied to fragile coastal ecosystems, uniform restrictions can have disproportionate socio-economic effects without necessarily delivering equivalent ecological benefits (see case 15 of the Annex).*

## **Sustainable use and management of natural resources, support to circular economy**

Limited natural resources in islands - in particular, land, water and raw materials - as well as high dependency on imports and complex waste management conditions, imply the necessity for insular territories to further develop circular economy and reach more resilient and sustainable models, to become less dependent on the mainland and external suppliers. The EU Islands Strategy therefore should:

- Support the **sustainable use and management** of land, water and raw materials, preventing overexploitation, land sealing and reducing reliance on the mainland supply chains and external sources, thereby strengthening resilience.
- Encourage **circular economy approaches** adapted to small and remote markets, including waste reduction, reuse, local valorisation of resources, increased access to secondary raw materials and sustainable bio-based solutions, by encouraging networking, best practices sharing, cooperation and communities' empowerment.
- Highlight the need for EU rules especially on **waste management and the upcoming Circular Economy Act**, to consider adaptive rules, flexibility and support mechanisms specifically for island territories which are facing more costly and administratively complex processes, operational constraints, and compliance risks without additional environmental benefits than on the mainland.
- Give **greater attention to adapting water related legislation** to insular realities, in particular within the **European Water Resilience Strategy**, regarding water scarcity, pollution control, efficiency, and sanitation. In some islands, with desalination rates above 90% and major network losses, compliance risks to push the water prices beyond socially and economically sustainable levels. Without legislative flexibility, targeted funding, and recognition of insular specificities, EU water resilience objectives may prove disproportionately burdensome for islands.
- Consider the **EU Bioeconomy Strategy** to further support more sustainable and circular production and use of biological resources in insular territories.
- **Invest in digitalisation and innovation** across the water cycle with dedicated funding for water resilience in islands in the next Multiannual Financial Framework.

*In relation to this issue, by way of example it is worth considering the Waste Framework Directive (2008/98/EC) & Regulation (EU) 2024/1157. Limited treatment capacity, land scarcity, territorial fragmentation, and structural reliance on maritime transport for hazardous or non-recoverable waste create systemic constraints. In particular, Article 36 treats intra-state waste shipments as standard market flows, disregarding that transport for islands is a structural necessity (see case 13 of the Annex).*

## C. Social sustainability

Beyond environmental and economic challenges, islands face persistent structural constraints that affect their social dimension and demographic balance, including access to social and public services, labour markets as well as heritage and cultural identity. An EU Islands Strategy should therefore include a dedicated pillar aimed at strengthening an inclusive social cohesion, preserving island communities and their well-being.

### Social cohesion, demographic challenges and preserving “the right to stay”

Operating with limited capacity, insular authorities must strengthen their governance and local community resilience and services, to ensure equal opportunities and quality of life for island residents, who are confronted among other challenges with ageing, youth outmigration, brain drain and labour shortages and market vulnerabilities. The EU Islands Strategy should therefore:

- Reinforce **multi-level governance** and strengthen the role of regional and local authorities in the design and implementation of EU policies affecting social dimension in islands, while supporting **place-based approaches** that take into account islands’ small population size, remoteness and the higher costs of service provision.
- Promote further insular **social cohesion and community well-being** by addressing administration and public service accessibility and territorial disparities. Access to **public services of general interest**, including education, social services and digital services should be considered, acknowledging the higher costs and logistical complexity of provision in insular areas.
- Support measures that allow island residents to maintain an effective “**right to stay**” by enabling communities to build their future in their home territories, through employment, education and social policies adapted with demographic realities, considering ageing populations and youth retention.
- Consider the specific needs of islands into the **EU Union of Skills**, with targeted actions to reduce skills gaps and labour shortages and promote more **accessible and inclusive labour markets**, by including further support for quality jobs and worker protection and increase lifelong learning opportunities.
- Address in particular **youth outmigration** and **brain drain from islands**, through a specific **talent retention approach**, including targeted measures to make education, training and mobility opportunities more accessible. This would require more adapted and flexible rules for **Erasmus+ for young people from islands**, taking into account their transport constraints, higher mobility costs, and limited local education offer.
- Improve access to **healthcare**, including primary care, specialised services and emergency response capacity, which are critical for community wellbeing and demographic stability.

*As an example, In Corsica, Erasmus + participants must rely on ferry and air transport which limits their access to additional financial support available to those using more sustainable travel modes. Such accessibility constraints reduce equal access to education and mobility opportunities, contributing to youth outmigration and brain drain. When pursuing studies or professional pathways requires leaving under more difficult and costly conditions, the capacity of young people to build their future locally — the “right to stay” — is undermined (see case 29 of the Annex).*

## **Housing crisis**

With rising real estate costs notably due to pressure from tourism and second homes, limited land availability and construction constraints, many islands are facing a growing housing crisis, directly affecting permanent residents. The EU Islands Strategy should:

- Ensure that islands’ specific housing challenges are fully considered within the **European Affordable Housing Plan**, including reforms and funding mechanisms to support social and affordable housing for permanent residents.
- Address **structural barriers** linked to land scarcity, high construction costs and seasonal pressures and consider **interactions between EU energy legislation and island housing vulnerability**.

*For instance, the recast Energy Performance of Buildings Directive (EU) 2024/1275) sets ambitious renovation and zero-emission building targets but does not account for structurally higher construction costs in islands. Due to logistical isolation and dependence on imported materials, renovation costs are significantly higher than on the mainland, while local incomes remain lower. Without targeted financial support to offset insularity-related overcosts, this directive implementation risks slowing renovation rates or worsening housing poverty among permanent residents, rather than contributing to a just green transition. As an example, In the Canary Islands, over a third of households show housing deficiencies, construction material costs have risen by around 25% in recent years, and average wages are insufficient to absorb the additional costs of energy-efficiency upgrades (see case 24 of the Annex).*

## **Cultural heritage and identity**

Islands are characterised by their unique and diverse traditional and linguistic heritage, shaping strong identities. These cultural assets are central to social cohesion and play a key role in sustainable local development. The EU Islands Strategy should:

- Support the **protection and promotion of islands’ cultural and linguistic heritage** as key and constitutive elements of European diversity and identity, recognising it as a resource for social cohesion, community resilience and local development.

- Encourage cultural and creative sectoral development, through heritage-based initiatives and community-led projects that generate **virtuous economic development** while safeguarding traditions.
- Promote **sustainable cultural heritage tourism** that fosters **local communities**, boosts responsible visitors' behaviours, and strengthens heritage routes between islands. This includes targeted support for *insular cultural routes* — such as maritime heritage connections (e.g. *Tyrrhenian Itinerary linking Corsica, Tuscan islands, Sardinia*) — which are difficult to promote without **adequate and sustainable transport and connectivity solutions** enabling both local access and environmentally compatible visitor flows.

### Migration management

Some islands - particularly those located on the EU's external maritime borders - often act as first points of irregular migration flows arrival, dealing with reception and integration, including for vulnerable groups such as unaccompanied minors. These responsibilities place significant pressure on local administration systems with limited resources. The EU Islands Strategy should therefore consider the framework of the EU Pact on Migration and Asylum, and:

- Promote a **coordinated and coherent EU migration policy** based on solidarity and shared responsibility among Member States, while ensuring a **multi-level, multi-stakeholder and cross-sectoral approach** to migration management, recognizing the direct operational role of regional and local authorities, especially
- **Adapt migration management legislation** to the realities faced by islands and outermost island regions at the EU's external borders, and provide **adequate direct funding, technical assistance and capacity-building** to those facing disproportionate migratory pressures, to support reception, integration and social inclusion.
- Strengthen the **long-term sustainability of migration-related actions**, moving beyond emergency responses towards structured and durable solutions.

*As an example of concrete challenges faced by islands in relation to this topic, the solidarity mechanism under Regulation (EU) 2024/1351 relies heavily on voluntary contributions, which may not ensure effective relocation from first-entry islands, increasing the risk of prolonged overcrowding of reception systems, as experienced by Canary Islands (see case 34 of the Annex) and the Balearic Islands (see case 36 of the Annex). Screening procedures under Regulation (EU) 2024/1356 can further concentrate administrative and operational burdens in territories with limited infrastructure and public services, unless procedures are redistributed within Member States with EU support.*



## SECTION 3 – GOVERNANCE

The future EU Strategy for Islands should establish a clear and robust governance framework that ensures effective coordination and meaningful participation of EU island authorities and stakeholders throughout the design, implementation and monitoring of the strategy. **A participatory and multi-level governance approach is essential for the success of the EU Islands Strategy.** In this context, the CPMR Islands Commission stresses the need to strengthen consultation and cooperation with EU island authorities at all stages of the process shaping the strategy. This is crucial to foster co-ownership and active involvement of island actors in EU policymaking and constitutes a key precondition for the long-term effectiveness of this initiative.

Building from the experience and good practices of other EU initiatives (such as the Urban Pact and Rural Pact or the new EU Agenda for Cities), the CPMR Islands Commission suggests the creation of the following governance instruments and bodies:

➤ **A high-level coordination body: the EU Islands Coordination Platform**

This Platform should provide **strategic guidance and political coordination** for the EU Strategy for Islands. It would be key to enabling regular dialogue on the priorities, implementation and monitoring of the strategy. The active involvement of island authorities in this coordination body will be essential to guarantee ownership and relevance.

As a multilevel coordination body, this Platform should bring together regularly the following members:

- EU Local and Regional Island Authorities.
- EU Member States.
- The European Commission.
- The Islands Intergroup of the CoR.
- The Sea, Rivers, Islands and Coastal Areas (SEARICA) Intergroup.

Other key actors may participate as observers (i.e., Partner States, the European Economic and Social Committee (EESC), the European Investment Bank (EIB), the European Observation Network for Territorial Development and Cohesion (ESPON), the Islands Commission of the Conference of Peripheral Maritime Regions (CRPM), the European Small Islands Network (ESIN), and other relevant stakeholders umbrella organizations when deemed relevant).

This body should be jointly coordinated by the European Commission and the EU Member State holding the Council Presidency, provided that the Presidency includes at least one insular territory within its national borders. Where the rotating Council Presidency is held by a Member State without island territories, the coordination of the body could be assumed by another Member State, in accordance with internal arrangements to be defined and agreed with the European Commission.

➤ **A permanent advisory analytical and technical structure: the EU Islands Advisory and Technical Board**

A complementary advisory body should support the high-level EU Islands Coordination Platform by providing technical expertise, analytical capacity, policy input and continuity over time. Composed of island practitioners and experts, key islands stakeholders and relevant EC services, this body would contribute to advancing on insular issues in general at the intergovernmental level and particularly giving technical and evidence-based advice to the EU Islands Coordination Platform about the EU island strategy design, implementation and monitoring.

The EU Islands Advisory and Technical Board would bring together a pool of experts on island-related issues who could be consulted on a regular basis, notably to identify gaps, good practices and opportunities across thematic policy areas. In doing so, the Board would contribute to reducing administrative burdens and support simplification efforts, in line with better regulation principles.

Beyond its advisory role, the Board should also **function as a hub and network facilitator**, enabling the consolidation, exploitation and exchange of analyses and research already carried out by existing academic and research institutions with recognised expertise on island-related issues (such as the University of the Aegean, the University of the Balearic Islands, the University of Cagliari – CreNoS, OTIE, among others). By fostering coordination and synergies among these actors, the Board would help avoid duplication, promote comparability of results and maximise the policy relevance of existing knowledge.

This networking and coordination role could be supported by dedicated funding and tailored programmes, enabling structured cooperation between EU institutions, statistical services and island research centres, and ensuring the long-term impact of analytical work on islands.

To strengthen its analytical capacity, the Board should rely on strategic cooperation with a **dedicated Eurostat statistical unit on islands**, responsible for developing and producing relevant, comparable and high-quality data and analyses addressing the specific socio-economic, demographic and territorial characteristics of EU islands. This would significantly enhance the evidence base for EU policymaking on islands and support better regulation and impact assessment efforts. Close cooperation could also be established between the Board and **ESPON**, who could provide additional territorial intelligence and analytical input via targeted actions and projects involving key stakeholders that could feed into the Board's work and support informed policymaking.

The meetings of the Board could be coordinated by the Member State responsible for the Coordination Platform meetings, and they could be co-chaired with the EC.

➤ **A biannual exchange gathering: the EU Islands Forum**

Similar in spirit to the Cities Forum, as an open and participatory platform for exchange between EU institutions, island authorities, stakeholders and civil society, this forum would facilitate dialogue, peer learning and the sharing of experiences, while reinforcing the visibility of islands within EU policymaking.

It would be key to ensure participation of stakeholders in the EU Island Strategy framework for full ownership and inclusiveness. The forum could gather quadruple helix stakeholders and their networks, promoting exchanges and positive contamination. The Forum could be organized every 2 years at the occasion of the EU Islands Coordination Platform meeting.

➤ **A permanent support structure : the EU Islands Secretariat**

At practical level, the EU Islands Advisory and Technical Board as well as the Coordination Platform could be supported by a dedicated Secretariat. This body should facilitate the EU Strategy's goals, providing administrative, technical and logistical assistance to ensure the effective operations of the whole governance structure, while also supporting the organization of the biannual forum. It should be funded by the EU and serve as a central hub for coordination, communication and facilitation among the various governance bodies.

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**Disclaimer**

*The Islands Commission underlines that the future EU Strategy for Islands should in no way weaken or call into question the existing acquis, legal basis and tailored support mechanisms established for the Outermost Regions under Article 349 of the Treaty on the Functioning of the European Union (TFEU).*