Cohesion Policy 2014-2020: 
NGO priority recommendations for triadogue

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Environmental NGOs would like to highlight the opportunity for decision makers to support and improve key aspects of the European Commission’s proposals and oppose detrimental changes during triadogues. This will maximise the benefits that can be delivered to European regions by the future Cohesion Policy and other Common Strategic Framework funds.

These improvements to the Commission’s proposals will ensure that these EU funds contribute to reach the EU 2020 environmental targets, create regional green jobs, enhance economic opportunities and address environmental challenges of climate change, biodiversity loss and resource inefficiency.

This briefing focuses on priority issues of the Common Provisions Regulation, the European Regional Development Fund’s Regulation and the Cohesion Fund’s Regulation.

Priorities for the Common Provisions Regulation
- Support the European Parliament’s proposal for a stronger language on Sustainable development including explicitly biodiversity and ecosystem protection (Art 8).
- Oppose the European Parliament’s proposal to include transport under the low carbon thematic objective or at least limit it to ‘sustainable urban mobility’ to ensure consistency with ERDF regulation (Art 9-4).
- Support the European Parliament’s proposals to assess climate impacts of programmes complementing the Strategic Environmental Assessment (Art 48) and biodiversity impacts of major projects (Art 91).
- Oppose the Council’s proposal to weaken ex-ante conditions and instead support the improvement of result orientation of the Cohesion Policy through ex-ante conditions and an adequate performance framework based on targets and indicators (Art 17, Annex I). Furthermore, the European Commission should adopt the entire Partnership Contract proposed by the Member States (Art 14).
- Support the European Parliament’s proposal for a strong partnership through multi-level governance and the European Code of Conduct, ensuring the equal engagement of environmental and socio-economic partners. This needs to be reflected in the monitoring committees but also during the preparation of partnership contracts and Operational Programmes, with technical assistance available for partners (Art 5-3, 13, 14, 23, 24, 42, 43, 48, 52, 87-1).

Priorities for the European Regional Development Fund’s Regulation
- Support a compromise in modifying the European Commission’s proposal regarding basic services projects in developed regions. Some projects, including in the areas of ICT, innovative solutions and cross-border cooperation under the European territorial cooperation goal still lack
sufficient support in developed regions. There should still be financial support to these areas in developed regions. (Art 3-1 d).

- Support a compromise in expanding the thematic concentration of ERDF to include ICT and Environment thematic objectives as means of expanding the flexibility of the concentration.

- Support a compromise for higher thematic concentration for the low carbon objective to contribute to the Europe 2020 Strategy and 2020 targets on renewable energy, energy efficiency and climate change. We recommend a minimum of 22% in developed regions and 12% in less developed regions as proposed by the European Parliament (15% if the Cohesion Fund is accounted) (Art 4 a ii and b ii).

- Ensure that investment priorities in the ERDF will not be further diluted and will deliver on the Europe 2020 Strategy targets including:
  a) Supporting the European Parliament’s proposal for SME support to explicitly include eco-innovation and resource efficiency areas (Art 5-3);
  b) Supporting the European Parliament’s proposal of ‘ecosystem-based’ climate adaptation and risk prevention (Art 5-5 a and b);
  c) Supporting a compromise to limit the scope of cogeneration and district heating and cooling support to high efficiency distribution networks as means of avoiding subsidising fossil fuel (Art 5-4);
  d) Supporting the Council’s proposal in expanding the low carbon objective to specifically mention sustainable multi-modal urban mobility and land based measures delivering both on climate mitigation and adaptation (Art 5-4);
  e) Supporting the Council and European Parliament’s proposal explicitly mentioning the ‘restoration’ of biodiversity under the environment investment priority (Art 5-6 d);
  f) Opposing the Council’s proposal in introducing the support for the development of gas and power distribution, storage and transmission systems under the transport investment priority (Art 5-7);

Priorities for the Cohesion Fund’s Regulation

- Ensure that investment priorities in the Cohesion Fund will not be further diluted and will deliver on European 2020 targets and the Europe 2020 strategy. This includes:
  a) Opposing the European Parliament’s proposal on expanding the scope of cogeneration and district heating and cooling as means of avoiding subsidising fossil fuel and ensuring consistency with ERDF regulation: only support high efficiency distribution networks (Art 2 b);
  b) Supporting a compromise for expanding the low carbon objective to specifically include sustainable, smart and integrated energy action plans and land based measures delivering both on climate mitigation and adaptation (Art 3 a);
  c) Supporting the European Parliament’s proposal of ‘ecosystem-based’ climate adaptation and risk prevention (Art 3 b);
  d) Supporting the European Parliament’s proposal to explicitly mention Natura 2000 under the environment investment priority (Art 3 c).

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