# Cohesion Policy 2014-2020:
# NGO priority recommendations for trialogues

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Environmental NGOs would like to highlight opportunities for decision makers to improve key issues of the Cohesion Policy regulations, in order to maximise the benefits that can be delivered to European regions by the future Cohesion Policy and other Common Strategic Framework funds. In addition, they will ensure that the future Cohesion Policy better contributes to reach the Europe 2020 targets, create regional green jobs, enhance economic opportunities and address environmental challenges.

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

## Priorities for the European Regional Development Fund's Regulation (ERDF)

- **PRIORITY: Thematic concentration (Art 4): Support a compromise in expanding the thematic concentration by including the ICT objective** as means of increasing flexibility for the regions. On the contrary, by adding a non-specific 4th objective, it risks having an incoherent and diluted thematic concentration. The risk is also high that regions will include the transport objective in the thematic concentration, leading to massive investments in high carbon transport infrastructures (roads) – which conflict the EU climate targets. The ICT objective instead is very innovative, has a very high job potential according to the Commission and can include support for smart transport systems – incentivizing more sustainable transport spending.

- **PRIORITY: Thematic concentration (Art 4): Support a 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), because the scope of the low carbon objective has been largely broadened by Council and Parliament (Art 4 a ii and b ii).

- **PRIORITY: Investment priorities (Art 5-7): Reject fossil fuels subsidies** by not introducing the development of gas distribution, storage and transmission systems under the infrastructure objective as proposed by the Council. Fossil fuel subsidies undermine EU credibility on climate change and there are many opportunities of smarter energy investments in Cohesion Policy.

- **Investment priorities (Art 5-4):** Support the Council's proposal in expanding the low carbon objective by **including land based measures** delivering both on climate mitigation and adaptation. This targets peatlands, wetlands or floodplains' restoration. It is a win-win investment for rural regions to achieve the low carbon thematic concentration and also contribute to biodiversity protection.

- **Scope of support (Art 3-2b):** Confirm that ‘investment to achieve the reduction of greenhouse gas emissions from activities falling under annex 1 of Directive 2003/87/EC’ (ETS Directive) remains excluded from the ERDF scope, as proposed by Council, Parliament and Commission. Otherwise it would distort even more the already depressed carbon markets.

## Priorities for the Common Provisions Regulation

- **PRIORITY: Thematic concentration (Art 9-4): Support a compromise to include ‘sustainable urban mobility’ (not ‘sustainable transport’ which is too broad)** under the low carbon thematic objective, in order to ensure consistency with ERDF regulation. On the contrary, including ‘sustainable transport’ would make the low carbon thematic concentration in ERDF useless: the low carbon threshold would be easily achieved with the ample investments on rail without putting any significant efforts on energy efficiency and renewable energies (especially in less developed regions). The urban aspect is crucial to encourage investment in more small scale, local projects of benefit to the highest number of citizens, rather than fewer large-scale projects.

- **Adoption of the Common Strategic Framework (Art 12):** Support the adoption of the Common Strategic Framework as a crucial element to clarify the regulation.

- **Environmental assessment of programmes and projects:** 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).

## Priorities for the Cohesion Fund’s Regulation

- **Scope of support (Art 2-2b):** Confirm that ‘investment to achieve the reduction of greenhouse gas emissions from activities falling under annex 1 of Directive 2003/87/EC’ (ETS Directive) remains excluded from the ERDF scope, as proposed by Council, Parliament and Commission. Otherwise it would distort even more the already depressed carbon markets.

- **Investment priorities (Art 3a):** Support the Council’s proposal in expanding the low carbon objective by **including land based measures** delivering both on climate mitigation and adaptation. This targets peatlands, wetlands or floodplains’ restoration. It is a win-win investment for rural regions to achieve the low carbon thematic concentration and also contribute to biodiversity protection.