

EU budget 2014-2020: NGO priority recommendations for the Common Strategic Framework¹

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Environmental NGOs strongly welcome the Common Strategic Framework (CSF) as an Annex of the Common Provisions' Regulation. It is a needed tool to ensure a proper implementation of fundamental principles and approaches of the Common Provisions' Regulation, in order to ensure that the future programmes will better contribute to reach the Europe 2020 targets, create regional green jobs, enhance economic opportunities and address environmental challenges.

This briefing focuses on the parts of the CSF which we support the most, and underlines as well several opportunities for improvements.

Priority recommendations:

1. Amend the misleading paragraph 4.5 (3) in order to ensure a legally correct reference to the plans, programmes or strategies, and a clear coherence with the title of the chapter:
"The relevant sectoral plans, programmes or strategies serving the environmental acquis (...) as referred to in the LIFE Regulation (...)"
2. Support Chapter 4.5. LIFE and the environmental acquis (with amendments proposed), Chapter 4.8. on the selection of transport projects, Chapter 6.2. Sustainable development (with amendment proposed), Chapter 6.6. Climate change mitigation and adaptation.
3. Support Chapter 6.1. Partnership and multi-level governance.
4. Amend Chapter 4.4. New Entrants Reserve 300 demonstration funding, to ensure that sustainability criteria are included to select demonstration projects.

Recommendations for the Common Strategic Framework

- **Amend the Chapter 4.4 New Entrants Reserve (NER) 300 demonstration funding:**
"Member States shall ensure, where appropriate, that financing from the CSF Funds is coordinated with support from the NER 300 Programme, which uses the revenues from auctioning 300 million allowances reserved under the new entrants reserve of the European Emissions Trading Scheme to co-finance a wide range of ~~large-scale demonstration projects of carbon capture and storage (CCS) as well as of innovative sustainable~~ renewables technologies across the EU
Justification: it is important to ensure that only sustainable energy sources receive EU support.

¹ Referring to the "ANNEX I - Common Strategic Framework elements related to the coherence and consistency with the economic policies of Member States and the Union, coordination mechanisms among the CSF Funds and with other relevant Union policies and instruments, horizontal principles and cross-cutting policy objectives and arrangements to address territorial challenges"

- **Support the chapter 4.5. LIFE and the environmental acquis, and improve it with the 3 following amendments:**

1. Amendment to the paragraph 4.5 (1): "Member States shall, ~~where possible~~, seek to exploit synergies with Union policy instruments (both funding and non-funding) serving climate change mitigation and adaptation, environmental protection and resource efficiency."

Justification: There is no reason that the coordination and synergies on environmental matters should be reduced compared to other (non-environmental) sectors.

2. Amendment to the paragraph 4.5 (2): "Member States shall, ~~where appropriate~~, ensure complementarity and coordination with LIFE, (...).

Justification: LIFE should be treated the same way as other EU funds and programmes. There is no reason to reduce coordination and synergies with LIFE.

3. Amendment to the paragraph 4.5 (3): "The relevant sectoral plans, programmes or strategies serving the environmental acquis (including the Prioritised Action Framework, the River Basin Management Plan, the Waste Management Plan, the national mitigation plan or adaptation strategy), ~~as referred to in the LIFE Regulation~~, shall serve as the coordination framework for support from the different Funds.

Justification: As the title of the chapter rightly says, the environmental acquis is supported by LIFE so it should be clarified in this paragraph to ensure coherence.

The exclusive reference to the LIFE regulation should be deleted as it is misleading: the plans mentioned above are parts of several other existing regulations (Birds and Habitats Directives, Water Framework Directive, Waste Framework Directive); the LIFE regulation is not the general regulation for the environmental acquis, it is only a specific regulation for the EU funding programme for the environment.

- **Support the chapter 4.8 Connecting Europe Facility (CEF) on the selection of transport projects, and notably the paragraph 4.8 (4) related to the Commission's White Paper on Transport, highlighting the need for a significant long term reduction in greenhouse gases in the transport sector.**

- **Support the chapter 6.1. Partnership and multi-level governance**, as a crucial way to improve the ownership, quality and delivery of programmes.

- **Support the chapter 6.2. Sustainable development, and improve it by adding a new paragraph 6.2 (5):**

"6.2.5. Member States shall set out how to achieve and finance climate change objectives and biodiversity objectives including Natura 2000, as part of Prioritized Action Frameworks at the regional or Member State level".

Justification: it is important to mention in the Prioritized Action Frameworks how to achieve and finance environmental objectives, in order to make the best strategic use of the Prioritized Action Frameworks.

- **Support the chapter 6.6. Climate change mitigation and adaptation**, as a fundamental requirement to mainstream climate mitigation and adaptation.

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