MFF 2014-2020: Implementing climate commitment and tracking climate spending[1]

July 2012

CONTENT

[1] This briefing is largely based on the following research: Medarova-Bergstrom, K. and Volkery, A. (2012) Walking the talk - practical options for making the 2014-2020 EU MFF deliver on climate change. Final report for the Dutch Ministry of Infrastructure and the Environment. Institute for European Environmental Policy (IEEP), Brussels

SUMMARY

To reach the EU agreed climate and energy targets by 2020, the European Commission states that at least 20% of the future Multiannual Financial Framework (MFF) 2014-2020 should support climate action[2]. Our environmental NGOs strongly support this initiative and ask to increase it to 25% of the next MFF. In order to have a proper legal basis, this commitment should be included in the Negotiating Box (in its Article 9) and in the Inter-Institutional Agreement. In addition, a robust implementation of the "climate mainstreaming" in several steps is required to ensure all relevant EU funds maximize their climate benefits.

Based on the current legislative proposals for EU funds and several assumptions, **we calculate that only 10,1% of the next MFF will support climate action: there is still a huge gap of €154 billion between current proposals and 25% climate spending in the next MFF**. Only 3 funds representing 12% of the total MFF reach the target: LIFE (55% for climate action), Horizon 2020 (35%) and Connecting Europe Facility (33%). All others are far from the target: external action is at 14,3%, Cohesion Policy (even with a broad approach) only reaches 11,3%.

With only 3,7% for climate action, CAP is by far the most worrying EU fund in terms of climate mainstreaming and tracking:

- Within rural development, the share for climate and environment spending is small (25%) and legally weak;
- Within direct payments, Council and Parliament could weaken the Commission's proposals for the three measures of the greening component. It will be needed to examine how far the results of the compromises in Council and Parliament are stringent enough to be considered as 'significantly climate-related', as required by the European Commission's methodology to be counted as 40% climate-related.

We therefore recommend to increase Rural Development support to climate change and to strengthen the three measures of the greening component (direct payments).

We support the approach of climate tracking and have developed ten principles to define a robust and stringent climate tracking methodology. On this basis, we propose specific percentages for climate tracking for each relevant EU fund. We have high concerns related to the climate trackers related to following specific fields:

- **Biomass and land use** in Rural Development (forestry investments), Cohesion Policy (biomass-based renewable energy) and potentially Horizon 2020 (food security, agriculture, bio-economy and energy from biomass/biofuels): The European Commission is not yet able to provide a clear methodology to assess the full climate impact of biomass projects – notably biofuels. Therefore biomass projects can't get generous default percentages for climate tracking as long as sustainability guidelines are not finalised;
- **Risk prevention** in Cohesion Policy (natural risk prevention and disaster management infrastructures): risk prevention is not automatically climate adaptation neither climate friendly;

[2] European Commission (2011) A budget for Europe 2020 – Part II: Policy Fiches, COM(2011)500, 29.6.2011: "Already today, a proportion of the EU budget is related to climate mainstreaming and thus contributes to Europe's transition to a low carbon and climate resilient society. The Commission intends to increase the proportion to at least 20%, with contribution from different policies, subject to impact assessment evidence."

- **In these cases, default percentages can't work and a careful case by case approach is required based on additional project information, to only count what can truly benefit climate change and contribute to the EU 2020 climate target.**

1. SECURE A 25% CLIMATE SPENDING REQUIREMENT IN THE NEXT MFF

1.1. Raise the climate commitment from 20% to 25% of MFF

In the current MFF 2007-2013, only a meager 5% or approximately €50 billion[3] delivers climate benefits: this is fully inadequate to match the EU climate commitments and targets. In June 2011, the European Commission published its Communication on the future Multiannual Financial Framework (MFF) 2014-2020 [4]. The achievement of the Europe 2020 Strategy targets is considered as the main priority – including the "20/20/20" climate and energy targets. **To reach the climate and energy targets, the Commission states that at least 20% of the future MFF should support climate action[5].**

We strongly support this initiative and ask to increase it to 25% of the next MFF. Notably, the EU is currently not on track to achieve the 2020 energy efficiency target and special emphasis and resources are required for energy saving investments in the next MFF.

The Commission's approach for ensuring 20% climate action in the future MFF is **climate mainstreaming**: it has been translated into the major sectoral proposals on CAP, Cohesion Policy, Horizon 2020, CEF and external action.

1.2. Include the 25% commitment in the Negotiating Box or in the IIA

It is essential to safeguard the overall objective of 25% climate mainstreaming in the next MFF, while ensuring specific EU funds' implementation. It should therefore be added to the Negotiating Box as prepared by the Presidency for negotiation in the Council. We recommend the following addition:

"8. The optimal achievement of objectives in some policy areas depends on the mainstreaming of priorities into a range of instruments in other policy areas. Climate action and environment objectives will therefore be reflected in the appropriate instruments to ensure that they contribute to strengthen energy security, building a low-carbon, resource efficient and climate resilient economy that will enhance Europe's competitiveness and

[3] Medarova-Bergstrom, K., Volkery, A. Baldock, D. and Withana, S. (2011) When Financial Needs Meet Political Realities: Implications for Climate Change in the Post-2013 EU budget. DEEP 3, June 2011, IEEP
[4] European Commission (2011) A budget for Europe 2020, Commission Communication, COM(2011)500, 29.6.2011, Brussels
[5] European Commission (2011) A budget for Europe 2020 – Part II: Policy Fiches, COM(2011)500, 29.6.2011: "Already today, a proportion of the EU budget is related to climate mainstreaming and thus contributes to Europe's transition to a low carbon and climate resilient society. The Commission intends to increase the proportion to at least 20%, with contribution from different policies, subject to impact assessment evidence."

create more and greener jobs. ***At least 25% of the MFF will be climate related expenditure***."

In addition, a similar paragraph should be added in the future Inter-institutional Agreement (IIA)[6]:

"8a (new). Climate mainstreaming will be reflected in the appropriate instruments to ensure that they contribute to strengthen energy security, building a low-carbon, resource efficient and climate resilient economy that will enhance Europe's competitiveness and create more and greener jobs. At least 25% of the MFF will be climate related expenditure."

1.3. Ensure a robust implementation of climate mainstreaming

To ensure the climate mainstreaming in the different EU funds, a solid implementation is required. The Commission states in its MFF communication: "The framework should be simple and pragmatic and be built on two strands: 1) common tracking procedures for climate related expenditure; and 2) target setting in all relevant policies and the monitoring of results".

Our environmental NGOs support the multi-step approach of the European Commission and recommend the following steps:

1. **Define ex ante the spending target for climate action that each EU fund should reach**
   See chapter 2.
   The Commission states that "All relevant instruments will include a specific objective related to climate, accompanied by a result indicator"[7]. Where relevant, specific targets should indeed be defined for each Member State, each programme, etc. This notably includes the Partnership Contracts and Programmes of the Common Strategic Framework funds. Altogether, the targets should reach at least 25% of the future MFF.

2. **Define ex ante climate targets and indicators in programmes of relevant EU funds**
   Partnership Contracts and programmes of Cohesion Policy, rural development and the maritime and fisheries fund should include ambitious measurable targets in term of climate change, energy efficiency and renewable energies, and specific performance indicators to monitor annual progress.
   This should also apply to funds centrally managed by the Commission: Horizon 2020, Connecting Europe Facility and external action.
   The targets should be consistent with the EU 2020 climate and energy targets.

3. **Ensure that effective tools are in place in relevant EU funds' regulations**
   The Commission has put forward an integrated set of tools that we strongly support:
   - thematic ex-ante conditionalities for Common Strategic Framework's funds;
   - Strategic Environmental Assessments of programmes including climate change;

[6] Draft inter-institutional Agreement, between the Parliament, the Council and the Commission on cooperation in budgetary matters and on sound financial management, COM(2011) 403 final

[7] European Commission (2011) A budget for Europe 2020, Commission Communication, COM(2011)500, 29.6.2011, Brussels

- carbon footprint assessment for relevant programmes and projects;
- climate thematic concentration in the European Regional Development Fund, part of Cohesion Policy.

4. **Reward best climate performance with financial incentive**
   Ensure that provisions in relevant EU funds allow and incentivize an increased co-financing rate or a financial bonus for the best delivering projects, notably in Cohesion Policy, rural development and Connecting Europe Facility.

5. **Ensure climate chance is a selection criteria in the programming cycle**
   Calls for proposals, questions to applicants, assessment and scoring of projects should all include climate change impact as clear criteria in all programmes and projects relevant to or impacting climate change.

6. **Track the climate spending in each EU fund with an appropriate methodology**
   See chapters 3 (principles) and 4 (implementation fund by fund).

2. CLOSE THE GAP BETWEEN CURRENT PROPOSALS AND 25% OF MFF FOR CLIMATE ACTION

The European Commission does not specify how and to what extent each EU fund will contribute to the minimum 20% funding for climate action in the overall MFF. Therefore, based on the legislative proposals from the Commission and several assumptions, we have calculated estimates of how much spending will support climate action:

EU funding instrument	Total allocation (€ billion)	Spending for climate action (€ billion)	Assumption for climate spending	% of EU fund for climate action
Heading 1 Smart and inclusive growth	**494,8**	**78,9**		**15,9%**
Horizon 2020	80	28	35% of Horizon 2020 spending is 100% climate-related Commission's figure (Recital, COM(2011)809 final)	35,0%
Connecting Europe Facility	40	13	In pre-identified priorities, renewable-related grids are 100% climate-related, railways are 40% climate-related	32,5%
Cohesion Policy	336	37,9		11,3%
ERDF low carbon thematic concentration	*ERDF 183,1*	*25,4*	22% in developed and transition regions, 12% in less developed regions (Parliament's figures, REGI committee vote, 11 July 2012)	
Railway	*23,9 today*	*9,56*	Not in low carbon concentration. Same investment in railways as in the current MFF, 40% climate-related	
Climate adaptation	*5,9 today*	*2,95*	Not in low carbon concentration. Same investment in risk prevention as today, half of which is 100% climate-related	
Other Heading 1	34	0	No information available	0%

Heading 2 Sustainable growth	**386,5**	**15,6**		**4,0%**
CAP	375	13,8		3,7%
Direct payments	*283*	*0*	30% for greening component (Commission's figure, art 33, COM(2011)625 final): no information available; unlikely that measures will have a 'significant' climate impact (for being 40% climate-related) – *see Chapter 4.5*	0%
Rural development	*92*	*13,8*	25% of EAFRD for climate and environment (COM figure, Recital 28, COM(2011)627final): assumption that half is 100% climate-related and a quarter is 40% climate-related	15,0%
EMFF	6,9	0	No information available	0%
LIFE	3,2	1,8		55,0%
LIFE Climate	*0,8*	*0,8*	All is 100% climate-related	100%
LIFE Environment	*2,4*	*0,96*	All is 40% climate-related	40%
Heading 3 Security and citizenship	**18,5**	**0**	No information available	**0%**
Heading 4 Global Europe	**70**	**10,0**		**14,3%**
Global Public Goods programme (DCI)	6,3	*2,2*	50% is environment or climate-related (Commission's figure, Annex VII, COM(2011)840final): assumption that half of it is 100% climate related and half of it is 40% climate-related	35,0%
Dvpt Cooperation Instrument (DCI)	14,3	*2,9*	20% is climate-related	20%
Rest	49,4	*4,94*	10% is climate-related	10%
Heading 5 Administration	**62,6**	**0**	No information available	**0%**
Total MFF contribution	**1033,5**	**104,5**		**10,1%**
Climate spending needed in MFF		**258,4**	25% climate spending	**25%**
Gap to close		**153,9**		**14,9%**

Source: NGO coalition based on updated Commission's figures, July 2012

Key concerns

- **The result is that only around 10% of the next MFF supports climate action: there is still a huge €154 billion gap between current proposals and 25% climate spending in the next MFF**. Only 3 funds reach the target: LIFE (55%), Horizon 2020 (35%) and CEF (33%). All others are far from achieving the target:
    - External dimension is at 14,3%;
    - Cohesion Policy, even with a broader approach than only the ERDF low carbon thematic concentration, reaches only 11,3%;
    - Even more worryingly CAP is at only 3,7%.

- Given that a lot of information is still not available, some climate spending will be likely added on top on these figures. **Nonetheless CAP will likely remain much below the target: additional efforts are therefore required** (*see Chapter 4.5*).

- CAP is by far the most worrying part of the EU budget in term of climate mainstreaming:
    - Only a small part of rural development is devoted to environment and climate change (25% in a Commission's recital, with a very weak legal force). According to the Rio markers methodology, **it is clear that not 100% of this**

share can be counted as 100% climate-related and will be at best 40% climate-related. In addition, several measures of rural development proposed by the Commission could be counter-productive for climate action (*see Chapter 4.5*).

- **Direct payments are even more preoccupying**: we consider that the three measures proposed by the Commission are a basic minimum for having a significant climate impact. Indeed, a study from the Netherlands Environmental Assessment Agency[8] finds that "The positive impacts of the proposals for the Common Agricultural Policy for greening Pillar I on farmland biodiversity and reducing greenhouse gas emissions will probably be small."

  In addition, there are huge concerns that Council and Parliament could weaken the Commission's proposal. It will be needed to examine in details how far the results of the compromises in Agriculture Council and Parliament's AGRI Committee will be stringent enough to be considered as 'significantly climate-related', as required by the European Commission's methodology to be counted as 40% climate-related. It might be relevant to create a new specific category of 20% climate tracking.

  The "menu" proposal for greening measures instead of the proposed package of three measures would likely make it a huge administrative nightmare – and thus impossible - to assess climate impacts if 13 million European farms build their own specific greening.

  We make clear recommendations to improve the greening component of direct payments and ensure a 40% climate tracking (*see Chapter 4.5*).

3. DEFINE A CLEAR AND STRINGENT CLIMATE TRACKING METHODOLOGY

3.1. Improve the basis of the Rio markers methodology[9]

In its 2014-2020 MFF communication, the European Commission states that the MFF climate tracking will be based on the Rio markers methodology: "All expenditures will be marked in one of three categories: climate related only (100%); significantly climate related (40%); and not climate related (0%). This is based on an established OECD methodology ("Rio markers"), but does not exclude the use of more precise methodologies in policy areas where these are available."

[8] PBL - Netherlands Environmental Assessment Agency, Greening the CAP - An analysis of the effects of the European Commission's proposals for the Common Agricultural Policy 2014-2020, February 2012

[9] For more information on the Rio markers, see Medarova-Bergstrom, K. and Volkery, A. (2012) Walking the talk - practical options for making the 2014-2020 EU MFF deliver on climate change. Final report for the Dutch Ministry of Infrastructure and the Environment. IEEP, Brussels

The positive elements of the Rio markers methodology are that it is applied since 1998 in the international context[10], the EU and Member States are already using it for development funds (it is compulsory since 2008 in the area of development cooperation[11]) and it includes climate change adaptation in addition to mitigation since 2009.

But several shortcomings of the Rio markers methodology should be remedied:

- It is based on planned expenditure against tracking of funds actually disbursed – while tracking on disbursement levels is more accurate (although more difficult to implement in practice) [12];
- Previous evaluations have found that it provides significant room for interpretation and incorrect policy signals[13]. This can affect the comparability and aggregation of results[14]. Broad interpretation can lead to very different estimates, depending on the subjective assessment of the person carrying out the tracking exercise[15];
- Tracking climate adaptation expenditure is particularly difficult. The OECD-DAC definition is too broad to be helpful in such case. Analysis has shown that activities that support adaptation in one context may be maladaptive in another, depending on climatic, environmental, socio-economic, cultural and institutional factors;
- Some activities can be marked as both mitigation and adaptation, which can lead to double counting;
- It only counts positive spending for climate. If a fund is 20% climate friendly, 40% climate neutral and 40% counterproductive for climate, the overall impact of the spending is <u>negative</u>. But this is not visible with the Rio markers methodology.

The World Bank, the European Investment Bank and the French Development Agency AFD have developed (or are developing for the EIB) alternative methodologies. The World Bank has no fixed adjustment factor: the approach for assigning percentage scores is more flexible and is applied on a project by project basis; the tracking of the mitigation benefits is considered an interim solution and is followed by an ex-post greenhouse gas analysis when the project is approved[16].

To remedy several shortcomings of the Rio markers methodology and ensure an appropriate implementation for EU funds, we have developed the following ten principles.

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[10] OECD (2009), Measuring aid targeting the objectives of the Rio Conventions, May 2009, OECD-DAC

[11] European Council 10.2009, Presidency Conclusions: "[a] comprehensive set of statistics for climate financing and support …*to be established, preferably by building on existing reporting mechanisms such as the OECD-DAC system for monitoring financial flows to developing countries, including ODA, based on proper engagement of developing countries. "

[12] http://www.unep.org/pdf/dtie/BilateralFinanceInstitutionsCC.pdf

[13] Michaelowa, A. and Michaelowa, K. (2010), Coding error or statistical embellishment: the political economy of reporting climate aid, CIS Working Paper No.56, Centre for Comparative and international Studies, ETH Zurich and University of Zurich

[14] Hervé-Mignucci, M. (2012) Pros and cons of the Rio Markers. Presentation at the workshop 'Practical options for climate mainstreaming in the 2014-2020 EU MFF', 1 February 2012, Brussels

[15] Buchner, B. et al (2011) Monitoring and tracking long-term finance to support climate action. OECD and IEA, May 2011

[16] For more information on these alternative methodologies, see Medarova-Bergstrom, K. and Volkery, A. (2012) Walking the talk - practical options for making the 2014-2020 EU MFF deliver on climate change. Final report for the Dutch Ministry of Infrastructure and the Environment. IEEP, Brussels

3.2. Follow ten principles to properly implement the Rio markers methodology to the MFF

We propose the following set of integrated principles to ensure a transparent, clear, precise, stringent and robust climate tracking methodology:

1. **Develop an EU wide methodology to avoid differences in specific Member States**
The Commission should ensure that there is one common methodology at EU level – not 27 ones in 27 Member States, that would entirely jeopardize the comparability and aggregation of results[17]. It would avoid contradicting classifications of expenditure under the different EU funding instruments and make it easier for MS to track the climate spending.

2. **Ensure a conservative and robust methodology**
The European investment Bank rightly proposes a conservative approach as one of the main principles of its methodology on carbon footprint assessment: use conservative assumptions, values and procedures – those that are more likely to underestimate positive impacts and overestimate negative impacts. For application with the MFF, it should mean that when it is uncertain that some categories of spending deliver climate benefits, they should be accounted as 0%.

3. **Only count climate-specific spending, not all environmental-friendly spending**
Climate tracking is more focused and specific than environment tracking. Therefore EU spending benefitting the environment in a broad sense (e.g. resources like water, waste, air pollution, etc.) should not be counted as climate change related expenditure. According to the established Rio markers methodology, counting can only happen when the spending is climate related only (100%) or significantly climate related (40%).

4. **Use data of actual funds disbursed and not only planned expenditure, as much as possible**
Tracking on disbursement levels is more accurate than on planned expenditures. The usual delay of several years between the planning and the actual disbursement often lead to changes that reduce the accuracy of the tracking.

5. **Ensure that there is no double counting for climate mitigation and adaptation**
If an activity is marked as both mitigation and adaptation, it can lead to double counting jeopardizing the aggregation of results. Therefore the methodology should clearly state that one project can be tracked as benefitting climate mitigation OR climate adaptation, never both. This is the only secure way to avoid double counting.

[17] With the potential exception of some climate adaptation measures which may make sense in the context of a Member State and not in another – see below

In addition the coding for adaptation should be simple and restricted to certain activities[18]. It has also been suggested to count activities as climate adaptation only if they are based on national/regional climate vulnerability assessments, strategic planning documents or climate risk screening studies[19].

6. **Shift to a project based approach for large scale projects**

   Big projects, particularly in infrastructures, are required to provide more data than small ones given their potential impacts and benefits. In many cases these data sets include greenhouse gas impacts assessments. It therefore becomes possible in these cases to improve the basic 0%/40%/100% classification of projects by moving to a more precise approach, measuring the real CO2 emissions: it improves the accuracy of the methodology, which is important in such cases of large scale projects than can cost up to several billions each.

7. **Develop and apply simultaneously carbon footprint assessment and climate and energy-related result indicators**

   As stated above, tracking climate expenditure is only the first step of ensuring climate mainstreaming of the future MFF: the data of actual climate emissions from EU funded projects is as important as the data of MFF euros spent for climate. Therefore setting climate and energy related performance indicators in all relevant EU funds is necessary, as is requiring carbon footprint assessment. While it is neither possible nor relevant to assess the climate impact of every small project, this should be clearly obligatory for programmes and for large scale projects:

   - In France the NECATER software is already in use for years to provide the net carbon impact (in CO2 tons equivalent) of a Cohesion Policy funded Operational Programme[20]. The Strategic Environment Assessment should include it;

   - For large projects, our environmental NGOs have proposed a methodology to assess the exhaustive climate impacts of EU funded transport projects (**see Annex 1**). The Cost Benefit Analysis should include it.

8. **Provide training and clear guidance**

   The European Commission should provide very clear guidance for practitioners by publishing instructional booklets and build institutional capacity. It should work with recipient countries, raise awareness, develop appropriate skills of managing authorities, conduct training workshops and answer questions – to build trust and ensure the best and quickest possible results. Already in the next coming years (2012-2013), training and guidance should be stepped up so as to ensure that the implementation process can

[18] Hervé-Mignucci, M. (2012) Pros and cons of the Rio Markers. Presentation at the workshop 'Practical options for climate mainstreaming in the 2014-2020 EU MFF', 1 February 2012, Brussels

[19] Tirpak, D. et al (2010) Guidelines for reporting information on climate finance. WRI Working Paper. World Resource Institute, Washington DC

[20] See the presentation by the French government, http://www.rdbrmc-travaux.com/spge/site_v2/IMG/Necater_presentation.pdf

kickstart as early as 2013. It should also put some efforts into automatizing the methodology to ease its implementation.

9. **Monitor the results annually with corrections when needed**
   In the first years, it will be important to check that the classification done by practitioners is appropriate, in order to ensure comparability and robustness of the results. Indeed the European Commissions states in its MFF package: "Monitoring of delivery of results will ensure the effectiveness of the mainstreaming effort during the next budgetary cycle. This will also help to identify the effectiveness of different spending programmes and the conditionalities attached to them. (…) It is proposed to establish clear benchmarks, monitoring and reporting rules for all relevant EU policy instruments".

10. **Develop the methodology to count negative climate spending**
    Climate change mainstreaming is a holistic approach, requiring a holistic tracking in the MFF. Counting only the positive efforts to fight climate change and keep silent on the negative spending, increasing emissions or undermining climate resilience, is partial and inconsistent: it does not give a fair and holistic view of the climate impact of the MFF. Important climate harmful subsidies will remain in the next MFF (e.g. Cohesion Policy subsidies for high carbon transport like road and aviation). Therefore the climate tracking methodology should be developed to account negative climate spending.

It is important to note that one common methodology implementing these principles will simplify the work of each Member State to track climate spending and instead of being an administrative burden, it is a tool to improve the performance of EU spending (in line with the Europe 2020 Strategy) and to increase efficiency in the mid-term.

4. IMPLEMENT THE CLIMATE TRACKING METHODOLOGY FUND BY FUND

Based on the ten principles above, it becomes possible to design an appropriate climate tracking methodology based on the Rio markers for the MFF and for each relevant EU fund. Climate tracking is already effective for development aid in Heading 4 (Global Europe) therefore it is not addressed here. In addition, it has been considered that the climate tracking is not relevant for Heading 3 Security and Ctizenship, and for Heading 5 Administration[21]. All other Headings are detailed below.

4.1. Heading 1 (except Horizon 2020, CEF and Cohesion Policy)

Items of Heading 1-Smart and Inclusive Growth proposed by the European Commission in its MFF communication are listed below. We add percentages by default for the climate tracking.

Heading 1. Smart and Inclusive Growth	
Items of heading 1	**% climate tracking**
Galileo	0
Nuclear safety + decommissioning	0
CSF research and innovation (Horizon 2020)	See below
New Competitiveness/SME	0
Single Education, Training, Youth and Sport	0
Social development agenda	0
Customs-Fiscalis-Anti Fraud	0
Agencies	0
Other	0
Margin	0
Connecting Europe Facility	See below
Cohesion Policy	See below

Specific issue:

- *Nuclear safety + decommissioning*: This expenditure is exclusively about closing old power plants (not related to electricity production) and about ensuring no contamination and damage of current plants - not bringing any low carbon added value. Therefore the climate impact should be 0%.

[21] With possible exception of staff working entirely on climate change in Commission and other EU institutions (EEA, JRC) – if they are able to provide this level of detailed information

4.2. Heading 1: Horizon 2020

Below are listed the items proposed by the Commission for the new EU research fund. We add percentages by default for the climate tracking.

Heading 1: Horizon 2020	% climate tracking
I Excellent science	
1. The European Research Council	0
2. Future and Emerging Technologies	0
3. Marie Curie actions on skills, training and career development	0
4. European research infrastructures (including e-Infrastructures)	0
II Industrial leadership	
1. Leadership in enabling and industrial technologies:	
Information and Communication Technologies	0
Nanotechnologies, advanced materials and advanced manufacturing and processing	0
Biotechnology	0
Space	0
2. Access to risk finance	0
3. Innovation in SMEs	0
III Societal challenges	
1. Health, demographic change and wellbeing	0
2. Food security, sustainable agriculture, marine and maritime research and the bio- economy	0 (exception 40)
3. Secure, clean and efficient energy	40 (exception 100)
4. Smart, green and integrated transport	40
5. Climate action, resource efficiency and raw materials	Climate action 100 / Resources 0 (exception 40)
6. Inclusive, innovative and secure societies	0
European Institute of Innovation and Technology (EIT):	
Climate kick	100
Renewable energy kick	100
ICT kick	0
Food kick (tbc)	0
Sustainable urban transport kick (tbc)	40
Non-nuclear direct actions of the Joint Research Centre	0

Key concerns

- ***III. 2. Food security, sustainable agriculture, marine and maritime research and the bio- economy***: in general, are not specifically related to climate change (0%). Some specific projects could be accounted more if climate change is clearly shown as being a "significant objective" of the project research, the requirement of Commission's methodology of Rio markers (possibly 40%).
  Dealing with lands (agriculture, bio-economy) has complex impacts on climate change; indirect land use changes can be disastrous for climate change and the Commission is not yet able to provide a clear methodology to assess the full climate impact of biomass/biofuels projects. Therefore, a very conservative, careful and selective approach based on precise project information is required to only count what can truly benefit climate change.
- ***III. 3. Secure, clean and efficient energy***: energy security as such is not related to climate change, therefore climate change is not the "principal objective" here (40%). Only the renewable energy and energy saving/energy efficiency projects can be account for 100% if they can be isolated in the financial reporting.
  In addition, biomass/biofuels projects have complex climate impacts (see above). For this sector, default percentages for the climate tracking would be dubious. A conservative, careful and selective approach based on precise project information is required to only count what can truly benefit climate change.

Other specific issues

- *I.1. The European Research Council*: related to "Frontier research by the best individual teams" according to the Commission, not specifically related to climate change (0%);
- *I.2. Future and Emerging Technologies*: "Collaborative research to open new fields of innovation" according to the Commission, not specifically related to climate change (0%);
- *I.3. Marie Curie actions on skills, training and career development*: "Opportunities for training and career development" according to the Commission, not specifically related to climate change (0%);
- *I.4. European research infrastructures (including e-Infrastructures):* "Ensuring access to world-class facilities" according to the Commission, not specifically related to climate change (0%);
- *II.3. Innovation in SMEs*: "Fostering all forms of innovation in all types of SMEs" according to the Commission, not specifically related to climate change (0%);
- *III. 3. Secure, clean and efficient energy*: energy security as such is not specifically related to climate change, therefore climate change is not the "principal objective" here (40%). Only the renewable energy and energy saving/energy efficiency projects can be accounted 100% if they can be isolated in the financial reporting;
- *III.4. Smart, green and integrated transport*: the principal objective of transport is mobility not climate change, which therefore can only be a "significant objective". It is already commonly accepted that transport should account for 40% maximum for climate tracking;
- *III.5. Climate action, resource efficiency and raw materials*: It is a broad scope that does not focus on climate change only and requires to isolate specific projects: climate projects should account 100%; in general resource and raw material projects should be accounted 0%, except if they can clearly show that climate change is a "significant objective" of the project research (40%).

4.3. Heading 1: Connecting Europe Facility

Below are listed the items proposed by the Commission for the new Connecting Europe Facility fund for EU-wide transport, energy and telecommunication infrastructures. We add percentages by default for the climate tracking.

Heading 1: Connecting Europe Facility	**% climate tracking**
Lists of pre-identified priorities	
TRANSPORT	
a) Horizontal priorities	
Single European Sky	0
Traffic management systems for roads, rail, etc.	0 (except project based approach)
Core network ports and airports	0
b) Core network Corridors and c) and other sections	
Rail	40 (except project based approach)
Port	0
Inland waterways (IWW)	0 (except project based approach)
Multimodal	0 (except project based approach)
ENERGY	
a) Priority corridors	
Northern Seas offshore grid (RES)	100
North-south electricity interconnections in South-Western Europe (RES)	100
North-south electricity interconnections in Central Eastern and South Eastern Europe (RES)	100
North-west gas interconnections in Western Europe	0
North-west gas interconnections Central Eastern and South Eastern Europe	0
Baltic energy market interconnection plan in electricity	0 (except project based approach)
Baltic energy market interconnection plan in gas	0
Southern gas corridor	0
b) Priority areas	
Smart grids deployment	0 (except project based approach)
Electricity highways	0 (except project based approach)
Cross-border carbon dioxide networks (CCS)	0
TELECOMMUNICATIONS	
a) Horizontal priorities	0
Innovation management, mapping and services	0
Support actions and other technical support measures	0
b) Broadband networks	0
Investment to achieve the Digital Agenda 2020	0

Deployment of passive physical, combined passive and active physical, and ancillary infrastructures	0
Associated facilities and services	0
Exploitation of potential synergies between the roll-out broadband networks and other utilities (e.g. energy transport, water and sewage) in particular those related to smart electricity distribution	40
c) Digital service infrastructure	
Trans-European high-speed backbone connections for public administrations	0
Cross-border delivery of e-Government services	0
Enabling access to public information and multilingual services	0
Safety and security	0
Deployment of ICT technology solutions for intelligent energy networks and for the provision of smart energy services	100

Key concerns

- ***Energy b) Priority areas - Cross-border carbon dioxide networks (CCS)*****:** there is not yet any conclusive evidence of research projects on CCS. The large scale development of translational CCS networks seems therefore totally inappropriate. The principle of conservativeness requires to allocate 0% for climate tracking.

Other specific issues

- **Given that this fund will focus on transnational large scale infrastructures, it is very relevant to adopt an approach at the project level as much as possible**, to provide much more accurate data on climate spending. At project level, it becomes possible and relevant to develop a more precise approach (e.g. 0% / 20% / 40% / 60% / 80% / 100%). Therefore, the values below should be considered only as default values;
- *Energy a) Priority corridors - Baltic energy market interconnection plan in electricity*: The Commission did not mention any objective related to climate change (0%);
- *Energy b) Priority areas - Smart grids deployment* and *Electricity highways*: The Commission did not mention any objective related to climate change (0%);

4.4. Heading 1: Cohesion Policy

The Commission has proposed a new set of "categories of intervention" to replace the existing categories of expenditures[22]. They are listed in **Annex 2** [23]. We add percentages by default for the climate tracking.

Key concerns

- ***Field 056 Renewable energy: biomass****:* For this sector, default percentages for the climate tracking would be dubious, as the Commission is not yet able to provide a clear methodology to assess the full climate impact of biomass (notably biofuels) projects. Current science suggests that many biomass projects have no short term climate benefits; indirect effects can even turn them into climate unfriendly projects. Biomass projects can't get generous default percentages for climate tracking as long as sustainability guidelines are not finalised. Spending should count as climate-related only if climate benefits are proved (real emission savings by 2020), on the basis of precise and clear project information.
- ***Field 065 Adaptation to climate change and natural risk prevention:*** Climate adaptation should be counted 100%. But natural risk prevention is not necessarily linked to climate change: it could be counted 40% or 100% only on the basis of precise project information; by default, the climate tracker for natural risk prevention should be 0% or at best 40%.
- ***Field 067 Civil protection and disaster management systems and infrastructures***: This field will likely include many heavy engineering projects that cause massive greenhouse gas emissions. It should not count as climate spending (0% by default).

Other specific issues

- **The Cohesion Policy funds partly focus on large scale infrastructures (especially transport): for the "major projects"[24], it is therefore very relevant to adopt an approach at the project level as much as possible**, to provide much more accurate data on climate spending. At project level, it becomes possible and relevant to develop a more precise approach (e.g. 0% / 20% / 40% / 60% / 80% / 100%). Therefore, in the case of major projects the values provided in the Annex should be considered only as default values;
- ***Field 043 - Support to environmentally-friendly production processes and resource efficiency in SMEs***: This intervention field should not be counted as climate relevant (0%) since there is a more appropriate category for this (060 - Energy Efficiency in SME). But it should be accounted for spending on resource efficiency in relation to the requirements for tracking environmental expenditure that is also mainstreamed;
- ***Field 064 - Protection and enhancement biodiversity, nature protection (including Natura 2000) and green infrastructure***: A 40% climate tracking is

[22] European Commission, Draft Working Paper, Categories of intervention, Fiche No 6, Brussels, 14 November 2011
[23] WWF considers that the new categories require some improvements and will provide recommendations simultaneously
[24] Projects above €50 million

proposed given that investments in ecosystems and biodiversity build climate change resilience, contributing to climate change adaptation;

- ***Fields of the European Social Fund (categories 81-98):*** the Commission provides a secondary theme under the ESF in 7 themes, including one on "02 Supporting the shift to low carbon, resource efficient economy". While it is an interesting approach, it is still too broad and not specifically climate-focused to account it for the climate tracking.

4.5. Heading 2 - Sustainable Growth: natural resources

Items of Heading 2 Sustainable Growth: natural resources proposed by the Commission in its MFF communication are listed below. We add percentages by default for the climate tracking.

Heading 2 Sustainable Growth: natural resources	% climate tracking
Subceiling CAP (direct payments + market expenditures)	
Basic Payment Scheme	0
Green Payment Scheme:	
7% Ecological Focus Areas	0 – improvement proposed
Permanent pastures	0 – improvement proposed
Crop diversification	0 – improvement proposed
Young Farmer Scheme	0
Small Farmer Scheme	0
Coupled Support	0
Natural Constraint Support	0
Rural Development	See below
EMFF (incl. market measures) + FPA's + RFMO's	0
Environment and climate action (Life+):	
LIFE Environment	40
LIFE Climate	100
Agencies	0
Margin	0

Key concerns

- **The need to enhance the greening measures of CAP direct payments to ensure their climate relevance**
  The three measures proposed by the Commission for the “greening” of direct payments of the Common Agricultural Policy (CAP) are a difficult issue. On the one hand they have been designed by the Commission to bring benefits on both climate mitigation (e.g. increase soil organic matter, reduce emissions from the use

of fertilizer and manure) and adaptation (e.g. increasing resilience against pests, coping with lower water availability).

On the other hand, it remains to be proven that they are robust and stringent enough to account for 40% climate tracking as having a “significant” climate objective – as required in the Commission methodology for Rio markers. A recent study from the Netherlands Environmental Assessment Agency[25] finds that “The positive impacts of the proposals for the Common Agricultural Policy for greening Pillar I on farmland biodiversity and reducing greenhouse gas emissions will probably be small (…). The ecological focus area requirement is potentially the most effective measure.” If this assessment is confirmed, the climate marker can only be 0.

To ensure that the three greening measures have a “significant” climate objective, our environmental NGOs are proposing to strengthen them in such a way:

- Real protection of permanent grasslands, by changing the definition (including no change of land use for 7 years minimum); removing the 5% conversion of permanent grasslands; setting 2011 as the earliest cut-off date for defining permanent grasslands;
- Strengthening of Ecological Focus Areas (EFA): 10% of EFA designated at farm level; EFA should not only be landscape features (such as hedges and trees), but also elements such as fallows, buffer strips, headlands, semi-natural farmland habitats etc; criteria for defining the types of crops allowed under EFA; no trading of EFA between farmers; no acceptance of low-level agri-environmental measures as EFA;
- Genuine crop rotation instead of crop diversification, based on 3 crops including one legume; no crop representing more than 50% of the farmland. Benefits of crop rotation, including soil carbon storage, are well established.

Our environmental NGOs believe that such improved greening measures would qualify for a 40% climate tracking.

- **The need to increase rural development support to climate change**
  Rural development is structurally much better suited than direct payments to deliver climate benefits: it is based on specific programmes and projects, has a multiannual approach and can therefore develop much more targeted and effective approaches. **Therefore, we demand that half of the CAP amount is allocated to rural development, and that 50% of the rural development fund is earmarked for environment and climate purposes.** This would ensure a much bigger delivery for climate change mitigation and adaptation – along with many other benefits (rural jobs, local community support, biodiversity protection, etc).

Other specific issues

- LIFE Environment: A 40% climate tracking is proposed given that investments in ecosystems and biodiversity build climate change resilience, contributing to climate change adaptation.

[25] PBL - Netherlands Environmental Assessment Agency, Greening the CAP - An analysis of the effects of the European Commission’s proposals for the Common Agricultural Policy 2014-2020, February 2012

4.6. Heading 2: Rural Development

Measures of Rural Development, second Pillar of the CAP, proposed by the European Commission are listed below. We add percentages by default for the climate tracking.

Heading 2: Rural development (CAP)	% climate tracking
Knowledge transfer and information actions	0
Advisory services, farm management and farm relief services	0
Quality schemes or agricultural products and foodstuffs	0
Investments in physical assets	0
Restoring agricultural production potential damaged from natural disasters and catastrophic events and the introduction of appropriate prevention actions	0
Farm and business development	0
Basic services and village renewal in rural areas	0
Investments in forest area development and improvement of the viability of forests	0 – 40
Afforestation and creation of woodland	0 – 40
Establishment of agro-forestry systems	40
Prevention and restoration of damage to forests from forest fires and natural disasters and catastrophic events	0 – 40
Investments improving the resilience and environmental value of forest ecosystems	40
Investments in new forestry technologies and in processing and marketing of forest products	0
Setting up of producer groups	0
Agri-environment- climate	40 – 100
Organic farming	40
Natura 2000 and Water framework directive payments	40
Payments to areas facing natural or other specific constraints	0
Animal welfare	0
Forest-environmental and climate services and forest conservation	40
Co-operation	0
Risk management	0
Mutual funds for animal and plant diseases and environmental incidents	0
Income stabilisation tool	0
Technical assistance	Does not apply

Key concerns

- ***Investments in forest area development and improvement in the viability of forests***: Some investments in forest "viability" could be about increased logging and reduction in forest carbon stock, with no short term climate benefits by 2020 (0%). It might be required to finalise sustainability guidelines on biomass before being able to provide default percentages. Therefore, a very conservative, careful and selective approach based on precise project information is required to only count what can truly benefit climate change (40%).
- ***Afforestation and creation of woodland***: precise project information is needed to ensure the positive climate impacts of these measures, as it depends on the type of lands that will be reforested. Indeed, some extensive grasslands contain very high level of carbon stored in the soil and afforestation may not necessarily bring climate benefits.
- ***Prevention and restoration of damage to forests from forest fires and natural disasters and catastrophic events***: with this measure climate benefits will not be automatic. Removing trees damaged by fire or pest reduces the carbon stock at least on the short term, while not necessarily speed up forest recovery in carbon stock terms. Precise project information is required to count 40%.
- ***Investments in new forestry technologies and in processing and marketing of forest products***: This measure will likely result in increased logging thus reducing the forest carbon stock, with no short term climate benefits by 2020 (0%).

Other specific issues:

- *Agri-environment- climate*: A distinction is needed between agri-environmental schemes (40%) and climate schemes (100%).

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ANNEX 1
Climate rating of EU transport spending[26]

To help ensure that transport infrastructure spending contributes to overall transport emissions reduction targets, the EU should adopt a 'climate rating' methodology that ensures EU funds are used to stimulate clean and efficient infrastructure. Transport & Environment commissioned the consultants CE to develop the basis for a methodology for a climate rating of all transport projects. The full report can be read at http://www.transportenvironment.org/publications/climate-rating-transportinfrastructure-projects [27].

What is climate rating?

The core idea of climate rating is that the proposed projects would have to pass an additional and independent test to evaluate its climate performance (in terms of greenhouse gas emissions). The rating would have to be included in the project proposal, and could be included in EU project appraisal and selection criteria. Such a rating is feasible, without undue administrative burden. The European Investment Bank is for example developing a similar tool to assess the carbon footprint of investments in major projects, including transport[28].

How could a climate rating be made?

According to the CE study, the GHG impacts of new, extended or upgraded transport infrastructure consist of four main elements:

1. Changes in greenhouse gas emissions from traffic, based on traffic forecasts, incl. modal shift and induced demand, emissions factors of different vehicles and energy sources;
2. Changes in greenhouse gas emissions from infrastructure operation, maintenance and management (OMM);
3. Greenhouse gas emissions from infrastructure construction, development and end-of-life processes;
4. Other impacts, such as indirect effects on other sectors.

Many of the data inputs required should already be available and used for the economic assessment (including traffic forecasts) and environmental impact assessment.

The net climate impacts can then be assessed for each project, or for a group of projects, eg in one region or one member state, or for the whole EU transport funding portfolio, to

[26] For more information, see Transport & Environment (2012), Reducing the climate impacts of EU transport spending
[27] CE (2011) Climate rating of transport infrastructure projects, Delft, commissioned by Transport & Environment
[28] EIB (2011) Pilot carbon footprinting exercise: http://www.eib.org/attachments/strategies/footprint_summary_of_the_methodologies_en.pdf

see how transport spending will contribute to achieving emissions targets. The impacts can also be judged relative to economic indicators, including initial investment costs, added value and the cost-benefit analysis.

Are there examples of how such a rating would work?

Yes, CE looked at three different hypothetical transport projects and examined how the four criteria for carbon rating described above would apply. The three projects were: electrification of a rail line, construction of a new road, and introduction of a road pricing system. For all three, it was possible to calculate the expected GHG savings (or increases) based on a number of assumptions. This provides the building blocks for such a methodology, which could be further developed and integrated into EU transport project appraisal procedures.

Recommendations

A climate rating should be required in project proposals and integrated into the selection and appraisal process for EU (and national)-funded transport projects. In order to further develop a suitable methodology, the following key issues deserve further attention:

- Traffic modelling;
- Standardisation of a set of emission factors;
- Precise definitions and default parameters for emissions from infrastructure development, operation, management and maintenance;
- The climate impacts of soot emissions (black carbon).

Could greener projects be awarded a higher rate of EU funding?

T&E recommends using the results of the climate-rating process as a basis of rewarding projects: Those offering the highest climate mitigation (or least damage), whilst achieving other policy objectives such as connectivity and accessibility, should enjoy preferential co-financing rates.

Such a system provides a clear incentive for applicants to choose the most sustainable solutions in order to benefit from a higher co-funding rate. Moreover, it encourages the project managers to propose and implement concrete measures to increase the efficiency of their projects in order to benefit from more attractive EU financial support.

Put simply, the cleaner a project is, the higher the percentage of EU funding it should receive.

www.transportenvironment.org/infrastructure

ANNEX 2
Climate tracking of Cohesion Policy intervention fields

Heading 1: Cohesion policy	% climate tracking
Intervention field	
I Productive investment:	
01 Generic productive investment in SMEs	0
II Infrastructure providing basic services and related investment:	
Energy infrastructure	
02 Energy infrastructure	0
Environmental infrastructure	
03 Management of household and industrial waste	0
04 Management and distribution of water (drinking water)	0
05 Water treatment (waste water)	0
Transport Infrastructure	
06 Railways (TEN-T Core)	40
07 Railways (TEN-T comprehensive)	40
08 Other Railways	40
09 Mobile rail assets	40
010 TEN-T motorways and roads - Core network	0
011 TEN-T motorways and roads - Comprehensive network	0
012 Secondary road links to TEN-T road network and nodes	0
013 Other national and regional roads	0
014 Local access roads	0
015 Multimodal transport (TEN-T)	0
016 Multimodal transport	0
017 Airports (TEN-T)	0
018 Other airports	0
019 Seaports (TEN-T)	0
020 Other seaports	0
021 Inland waterways and ports (TEN-T)	0
022 Inland waterways and ports (regional and local)	0
Information and Communication Technology Infrastructure	
023 ICT backbone investment (>/= 30 mbps)	0
024 ICT backbone investment (>/= 100 mbps)	0
III social, health and education infrastructure and related investment:	
Investments in social and educational infrastructure	
025 Education infrastructure (tertiary, vocational and adult learning)	0
026 Education infrastructure (primary and secondary)	0
027 Childcare infrastructure (pre-school)	0

028 Health infrastructure	0
029 Housing infrastructure	0
030 Other social infrastructure contributing to regional and local development	0
IV Development of endogenous potential:	
Research and development and innovation	
031 Investment in infrastructure, capacities and equipment in SMEs directly linked to research and innovation activities	0
032 Investment in infrastructure, capacities and equipment in large companies directly linked to research and innovation activities	0
033 Research and innovation infrastructures (public)	0
034 Research and innovation infrastructures (private, including science parks)	0
035 Research and innovation activities in public research centres and centres of competence including networking	0
036 Research and innovation activities in private research centres including networking	0
037 Technology transfer and university-enterprise cooperation primarily benefitting SMEs	0
038 Cluster Support and business networks primarily benefitting SMEs	0
039 Research and innovation processes in SMEs (including voucher schemes, process, design, service and social innovation)	0
040 Research and innovation processes in large enterprises	0
Business development	
041 Advanced support services for SMEs and groups of SMEs (including management, marketing and design services)	0
042 Business development, support to entrepreneurship and incubation (including support to spin offs, spin outs)	0
043 Support to environmentally-friendly production processes and resource efficiency in SMEs	0
044 Business infrastructure (including industrial parks, sites)	0
045 Support to social businesses	0
046 Development and promotion of commercial tourism and culture assets	0
047 Development and promotion of commercial tourism and culture services	0
Information and communication technology and information society	
048 ICT local loop investment (>/= 30 mbps)	0
049 ICT local loop investment (>/= 100 mbps)	0
050 e-Government services and applications, including e-Procurement, access to public information	0
051 Supporting inclusion: e-Inclusion, e-Accessibility, e-Learning and e-Education services	0
052 Addressing Societal Challenges: E-Health, e-Care and scaling up and replication of innovative ICT solutions to health ageing	0
053 Services and applications for SMEs (e-commerce, education and training, networked business processes, etc.) and other measures to improve use of ICT by SMEs	0

Renewable Energy	
054 Renewable energy: wind	100
055 Renewable energy: solar	100
056 Renewable energy: biomass	0 - 100
057 Renewable energy: hydroelectric, geothermal, marine energy and other	100
Energy efficiency	
058 Energy efficiency renovation of public infrastructure	100
059 Energy efficiency renovation of existing housing stock	100
060 Energy efficiency in SMEs	100
061 Intelligent Energy Distribution Systems at low voltage levels (smart grids)	100
062 Co-generation and district heating	100
Environment	
063 Air quality measures	0-40
064 Protection and enhancement biodiversity, nature protection (including Natura 2000) and green infrastructure	40
065 Adaptation to climate change and natural risk prevention	0-40-100
066 Risk prevention linked to human activities	0
067 Civil protection and disaster management systems and infrastructures	0
068 Rehabilitation of industrial sites and contaminated land	0
069 Development and promotion of the tourism potential of natural areas	0
070 Protection, development and promotion of public tourism and cultural heritage assets	0
071 Development and promotion of public tourism and cultural heritage services	0
Sustainable Transport	
072 Clean urban transport infrastructure and promotion	40
073 Intelligent transport systems (including the introduction of demand management or tolling systems)	40
074 Cycle tracks	40
Integrated urban and rural development	
075 Integrated schemes for urban and rural development	0
076 Community led local development initiatives in urban and rural areas	0
Capacity building	
077 Improving the delivery of policies and programmes	0
Compensation for additional costs hampering the Outermost regions	
078 Outermost regions : Compensation of any additional costs due to accessibility deficit and territorial fragmentation	0
079 Outermost regions : Specific action addressed to compensate additional costs due to size market factors	0
080 Outermost regions :Support to compensate additional costs due to climate conditions and relief difficulties	0
V Promoting employment and supporting labour mobility:	

081 Access to employment for job-seekers and inactive people, including local employment initiatives and support for labour mobility	0
082 Sustainable integration of young people not in employment, education or training in the labour market	0
083 Self-employment, entrepreneurship and business creation	0
084 Equality between men and women and reconciliation between work and private life	0
085 Adaptation of workers, enterprises and entrepreneurs to change	0
086 Active and healthy ageing	0
087 Modernization and strengthening of labour market institutions, including actions aimed at enhancing transnational labour mobility	0
VI Investing in education, skills and life-long learning:	
088 Reducing early school leaving and promoting equal access to good quality early childhood, elementary and secondary education	0
089 Improving the quality, efficiency and openness of tertiary and equivalent education with a view to increasing participation and attainment levels	0
090 Enhancing equal access to lifelong learning, upgrading the skills and competences of the workforce and increasing the labour market relevance of education and training systems	0
VII Promoting social inclusion and combating poverty:	
091 Active inclusion;	0
092 Integration of marginalized communities such as the Roma;	0
093 Combating discrimination based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation	0
094 Enhancing access to affordable, sustainable and high quality services, including health care and social services of general interest.	0
095 Promoting social economy and social enterprises	0
096 Community led local development strategies	0
VIII Enhancing institutional capacity and efficient public administration:	0
097 Investment in institutional capacity and in the efficiency of public administrations and public services with a view to reforms, better regulation and good governance	0
098 Capacity building for stakeholders delivering employment, education and social policies and sectoral and territorial pacts to mobilise for reform at national, regional and local level	0
IX Technical assistance:	
099 Preparation, implementation, monitoring and inspection	not applicable
0100 Evaluation and studies	not applicable
100 Information and communication	not applicable