

*Mr. Walter Deffaa  
Director General for Regional Policy  
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*Cc Mr. Karl Falkenberg, Director General for Environment  
Cc Mr. Jos Delbeke, Director General for Climate Change*

*Brussels, 11<sup>th</sup> of December 2013*

**Ref: 13/144**

**Subject: Concerns over the lack of uptake of environmental priorities in the Partnership Agreements (PAs) and the Operational Programmes (OPs)**

Dear Mr. Deffaa,

We would like to present you our recent analyses and thoughts concerning the preparations of Partnership Agreements and Operational Programmes. This letter gives a brief overview of our major concerns and most problematic cases. We also attach<sup>1</sup> the statement from the second European NGO Forum on Cohesion Policy Reform 2014-2020 held in Wandlitz, where you kindly contributed with a motivating video message.

We fully understand the pressure to start the preparations for the next funding period, however the informal negotiations and agreements should not come at the expense of transparency and the partnership principle. Our main concerns are that environmental priorities in the Partnership Agreements and the Operational Programmes are not being properly addressed. This is partly due to poor implementation of the Partnership Principle by Member States, which does not only concern environmental NGOs but also environmental authorities. We received worrying reports from several countries that DG REGIO does not want to consider spending of EU funds on the environment as a thematic priority. Another concern is the lack of support from DG REGIO for land based climate change mitigation.

#### Lack of integration of environmental partners

Several of our local partners in different Member States have sent in disturbing information that suggests that environmental partners are not being consulted on the drafting of the PAs and OPs. This includes cases where environmental partners are not being consulted at all, Member States are not delivering a transparent progress report, and/or not giving sufficient opportunities for partners to input when public consultations are held. For example, we are extremely worried about the drafting process in Portugal where there has been no consultation with environmental partners, and where the information about the status of this drafting process is not publicly available. In the case of Portugal, we have already made our points to the implementation unit within DG REGIO, who have suggested that since economic and social partners have been contacted, this is sufficient for proceeding with the drafting process. We consider that this response is totally inadequate, since, as you are aware, the environment is not only a fundamental basis for ensuring proper planning of any programme and project, but it is also a key area to finance to decrease Europe's unemployment rate, sustainably increasing Europe's economic potential, and for increasing the quality of life for European citizens.

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<sup>1</sup> Statement from the second European NGO Forum on Cohesion Policy Reform 2014-2020

### Lack of support for environmental thematic priorities

We have concerns that, although environment thematic priorities are part of each European Commission's position paper on the Partnership Agreements, DG REGIO is not ensuring that these get translated in the final documents, especially within the Operational Programmes. One major specific concern regarding this is that we have received public information that suggests that DG REGIO is denying Member States the possibility of establishing environment thematic programmes. This is the case for the French Partnership Agreement and Operational Programmes, where the environmental thematic priority has been completely removed by the European Commission despite protests of the French Environment minister and the DATAR. As these are being put forward by the governments, we are surprised DG REGIO would block such priorities.

### Lack of support for environmental integration in other priorities

We are also highly concerned that the current informal discussions have been exclusively about the concentration of thematic objectives and investment priorities. Therefore, the ambition set out by the European Commission to integrate environment across all objectives will be severely undermined.<sup>2</sup> This would risk losing the potential for creating synergies between funds and providing innovative solutions to local problems while integrating measures that can create multi benefits for cohesion. One concrete example where we see a risk is the mitigation relevant adaptation measures<sup>3</sup>, where for example, two German regions<sup>4</sup> included peatland restoration measures as part of their strategy to reduce CO<sub>2</sub> emission and to account for the 20% climate earmarking obligation. Nevertheless, the European Commission rejected in the first run their peatland projects because they were concerned that the plans would have higher land purchase than the maximum 10%, that there was unclear intervention logic and added value of such projects within the program, and such small scale projects should be rather designed as pilot schemes. We are highly concerned that feedback from the European Commission to the Member States is often being misinterpreted, and having negative consequences on Member States proposals by not adding mitigation relevant adaptation or other environmental mainstreaming measures to their Operational Programmes.

We would like to meet you in the coming weeks to discuss these concerns in more detail.

Yours sincerely,



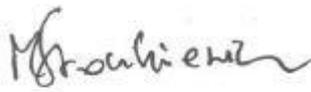
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WWF European Policy Office



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<sup>2</sup> Article 8 of the Common Provisions Regulation defines the need for environmental integration

<sup>3</sup> As proposed under Article 5.4.e of the European Regional Development Fund Regulation

<sup>4</sup> Which hold more than 50% of Germany's peatlands