

NGO recommendations from April 2020 vs. this week's Green Agenda proposal

What we asked for	EC proposal
Decarbonisation	
Decarbonisation by 2050	<ul style="list-style-type: none"> ✓ "Facilitate swift alignment with the EU Climate Law" ✗ Investment and Economic Plan actively promotes fossil gas; the Green Agenda also to an extent.
2030 climate/energy targets in line with EU ambition	<ul style="list-style-type: none"> ✓ "Facilitate swift alignment with the EU Climate Law" - though EU ambition must be ensured.
Increase action on energy efficiency in buildings and energy poverty	<ul style="list-style-type: none"> ✓ Extend the "EU renovation wave" to the Western Balkans + assist in programmes to tackle energy poverty.
Increased deployment of sustainable renewables and increased caution regarding those with high environmental/social impacts, eg. hydropower.	<ul style="list-style-type: none"> ✗ Investment plan proposes only hydropower projects as flagships with the exception of North Macedonia. The Green Agenda contains no concrete points on this.
Assistance with improved strategic planning of the energy sector.	<ul style="list-style-type: none"> ✓ "Assist partners in the development of National Energy and Climate Plans"
Green Agenda elements to be made legally binding through the Energy and Transport Community Treaties and EU accession process. Robust monitoring and sanction tools needed.	<ul style="list-style-type: none"> ✗ Little use made of the Energy and Transport Community Treaties, only the Climate Law is presented as binding. Importance of environmental enforcement is emphasised but no mechanisms to ensure this, nor strengthening of external monitoring and sanction tools.
Adoption of EU Energy and Environment State Aid Guidelines to improve efficiency of renewables support.	<ul style="list-style-type: none"> ✗ Subsidies are only mentioned in passing under "Mainstreaming environment and climate into relevant policy areas."
Carbon pricing to be introduced/properly implemented.	<ul style="list-style-type: none"> ✓ / ✗ Included but too vague: "Provide technical assistance", "Explore options for early inclusion of the Western Balkans in the EU Emissions Trading Scheme if fully aligned"
Prioritisation of railways and urban mobility, including electrified urban public transport and pedestrian/cycling infrastructure.	<ul style="list-style-type: none"> ✓ Green Agenda mostly supports rail and urban transport ✗ Around half the transport projects in the Investment and Economic Plan are motorways.
Funds needed for just transition of mining regions, based on bottom-up participatory local development plans and application of EU partnership principle. Additional technical assistance needed for project preparation and consultation.	<ul style="list-style-type: none"> ✓ / ✗ Support for just transition included but too vague - lots of "would" and "could".

Exclusion from just transition funds of fossil fuels and other investments not aligned with EU policy objectives. Fair allocation of funds, reflecting magnitude of challenge and climate ambition.	✗ Not mentioned.
Circular Economy	
Adoption/implementation of the EU circular economy package.	✓ / ✗ The need to implement the newest EU waste legislation/targets is mentioned in the text but not in the initiatives. Without any consequences for non-adoption/implementation, it looks unlikely to happen any time soon.
EU financing sources only to be used for circular economy-compatible measures.	✗ Not mentioned.
Take action to enable informal waste pickers to work in healthier, regulated conditions.	✗ Not mentioned.
Depollution	
Increased support for household energy efficiency measures, heat pumps, prosumers, energy communities.	✓ / ✗ Not mentioned apart from the renovation wave above.
Effective, dissuasive and proportional consequences for failure to comply with the Large Combustion Plants Directive, eg. withholding IPA funds.	✗ Not mentioned.
Upgrade official air monitoring systems to measure all regulated pollutants; Set up additional monitoring stations, including for fugitive emissions from mines and ash disposal sites.	✓ Investment plan includes "Support for the establishment of proper air and water monitoring systems and pollution prevention measures."
Air pollution monitoring data to be publicly available in real-time. Alarm signals from institutions with health measures to be improved.	✗ Not mentioned.
Add acquis in the Energy Community Treaty: Water Framework, Air Quality, National Emissions Ceiling Directives and Chapters II and IV of the Industrial Emissions Directive.	✗ Support for Industrial Emissions, Water Framework, Urban Waste Water and Extractive Waste Directives mentioned, but no mechanism to ensure adoption or implementation timetable. In fact DG Environment recently informed Bankwatch that it does not intend to table proposals on the Air Quality or Industrial Emissions Directives under the Energy Community Treaty.
Sustainable food systems	
Strict enforcement of common rules and standards on environment and landscape (eg. reduction of synthetic chemical pesticides, fertilisers, antimicrobials for farmed animals).	✗ "Support alignment of the agri-food and primary production sectors with EU standards" is mentioned, but again no enforcement.
Extension of the area under organic farming management and implementation of voluntary agri-environment programmes/measures for	✓ "Promote environmentally friendly and organic farming and reduction of synthetic chemical products used in food production: pesticides,

provision of environmental public goods and services.	veterinary medicines and fertilisers”
Introduce and promote educational, demonstration and advisory programmes to „green“ human and social capital of farmers and other actors involved in the agro-food chain.	✓ “Support cooperation among scientific and educational bodies and producers and processors in the agri-food sector to facilitate transfer to innovative and environmentally friendly technologies and farming methods”
Biodiversity	
Additional EU support to research and protect high-biodiversity/future Natura 2000 areas.	✗ Not mentioned.
Encourage countries to protect their most valuable rivers.	✗ Not mentioned.
Undertake regional assessment of critical habitats to inform decision-makers on future infrastructure development.	✗ Not mentioned.
Accelerate transposition and implementation of the Water Framework Directive and its “daughter” Directives; Habitats and Birds Directives; and the SEA and EIA Directive (2014 amendments).	✓ / ✗ Mentions the Water Framework Directive under Depollution and environmental legislation generally as needing to be strengthened, but no mechanisms named for doing so. Too much emphasis put on capacity-building rather than oversight by bodies like the Energy Community or Transport Community.
Align National Biodiversity Strategies and Action Plans (NBSAPs) with EU Biodiversity Strategy; Ensure implementation and financing plans are developed.	? Possibly - “Support the region in developing and implementing a Western Balkans 2030 Biodiversity Action Plan”, but no clarity on alignment with EU or implementation/financing plans.