



Bund für
Umwelt und
Naturschutz
Deutschland



To:

Frans Timmermans, Executive Vice-President of the European Commission,

Valdis Dombrovskis, Executive Vice-President of the European Commission,

Virginijus Sinkevičius, EU Commissioner for Environment, Oceans and Fisheries

Berlin, 15 April 2021

Dear Executive Vice-Presidents,

Dear Commissioner,

Subject: Open letter on the German Recovery and Resilience Plan

The corona pandemic is an enormous challenge for our society. Therefore, we have welcomed the political agreement of the EU legislators on the “Next Generation EU” package, including the Recovery and Resilience Facility (RRF). Now, this joint European effort must live up to its name and serve the well-being of both, the present and the future generations. Investments under the RRF therefore must be in line with the European Green Deal and its targets on climate and biodiversity, while respecting the “do-no-significant-harm” principle.

The German government has presented its draft for the national Recovery and Resilience Plan (RRP) in December 2020 and is now in dialogue with the Recovery Task Force within the Secretary General of the European Commission to finalize the plan by the end of April. In our opinion, the draft is not in line with the European legislative framework and we have not received any indications from the responsible authorities that they are considering a revision of critical points. We therefore urge you to uphold the green elements during the ongoing structured dialogue and the review process of the final RRP.

Critical dimensions:

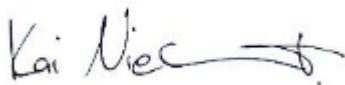
- The content of the RRP must be adapted to the EU requirements on biodiversity. Investing in the restoration of ecosystems creates jobs as well as long-term value in the form of ecosystem services. The resulting long-term benefits exceed the initial costs by far. We therefore strongly welcome the political decision by the EU legislators to strengthen the role of biodiversity within the RRF regulation. Yet contrary to the European requirements, the German draft plan unfortunately does not mention biodiversity even once. This is particularly egregious since a new ecosystem restoration fund was proposed by the Environment Ministry during the development of the RRP draft, but shot down by the Finance Ministry.
- The [Green Recovery Tracker](#) by the Wuppertal Institute and E3G shows that the draft RRP is unlikely to meet the climate quota of 37 percent. We also deeply regret that the draft did not

explicitly exclude the promotion of fossil fuels. Funding for plug-in hybrid vehicles cannot be considered a climate protection measure, because these vehicles cause many times the CO2 emissions specified by the manufacturers under actual road conditions. It is essential for the credibility of the plan that the European Commission does not approve any investments in fossil fuels, including fossil gas. Climate-damaging measures must not be classified as climate protection.

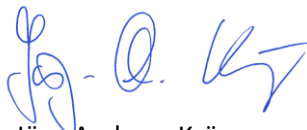
- The draft RRP is primarily based on the national economic stimulus package, which was agreed in June 2020 and is now set to be refinanced with EU funds. This is not in line with the principle of additionality for EU funding. Instead, European money should be used for additional investment in the future and it is important not to set a bad precedent for the rest of the EU. If other Member States follow the same approach, it would severely weaken the green growth impulse the RRF is supposed to provide.
- During the whole process of drawing up the German RRP, there has been no involvement of civil society including environmental NGOs. Due to the strong environmental requirements (including the compliance with the DNSH principle) of the RRF regulation, we believe that the extensive participation of environmental organisations is essential. In addition to a higher quality of the measures, the respect of the partnership principle strengthens the democratic legitimation of the RRP and its societal acceptance. The EU regulation on the RRF states that the member states must give account of the conducted public participation. In addition, the Aarhus Convention requires environmental associations to be involved, as the RRP is clearly an environmental plan.

The undersigned environmental associations urge you to use the structured dialogue with the German government as an opportunity to bring up the issues named above and to demand concrete steps for improvement. We also stand ready for a personal exchange with you at your earliest convenience.

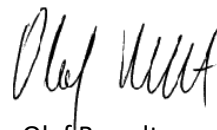
Yours sincerely,



Prof. Dr. Kai Niebert
President
DNR



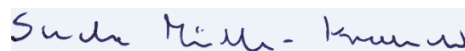
Jörg-Andreas Krüger
President
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Olaf Brandt
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Head of Nature Conservation
WWF Germany



Sascha Müller-Kraenner
CEO
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