



NGO Comments on the Position Paper of the Commission on the development of Partnership Agreement and programmes in Germany for the period 2014-2020

The German NGO network welcomes the Commissions Position Paper as an informal basis for further discussions on the German Partnership Agreement.

The three most pressing challenges identified in the Commission`s paper are the focal points for achieving sustainable development in Germany in line with the Europe 2020 strategy. However, the EU's Biodiversity 2020 Strategy, the Climate Change Roadmap, the Energy Roadmap and the Resource Efficiency Roadmap are fundamental components of the Efficiency Flagship Initiative under the Europe 2020 strategy and we consider the recommendations in this paper to be non-ambitious in meeting Germany's main environmental challenges and set targets. While the Position Paper focuses on three main challenges and investment priorities for a smart, sustainable and inclusive growth in Germany, we regret that it is not offering the full potential given by the legislative proposals and does not take into account all relevant challenges for a transition towards a sustainable development that addresses climate change and natural resources in Germany. Following the structure of the Commission`s position paper, we add the following comments to the challenges and investment priorities identified by the Commission:

Reducing regional disparities in competitiveness taking account of demographic change

- Meeting the demographic change challenge from the environmental perspective

Demographic change in Germany needs to be addressed including the protection of the environment through integrated environmental planning. Restructuring infrastructure will play an important role especially in the eastern regions. These developments will gain new open spaces that need to be managed in a sustainable manner.

Enhance labour market potential, social inclusion and raise educational achievement

- Address shortages of skilled workers in green jobs more efficiently

From the transformation of the energy system and the shift to a green economy a request of skilled workers in the field of renewable energies, energy and resource efficiency will arise. The CSF should support education programmes for green jobs and awareness raising programmes for the exposure to new green technologies and standards. This should also include the funding of green jobs in the field of nature conservation e.g. conservation areas.

Transformation of the energy system and strengthening sustainable use of natural resources

- Protecting the environment in urban areas delivers multifunctional benefits:**

Not only rural areas are facing environmental challenges. Cities and urban areas have the highest population density and are vulnerable to effects of climate change, i.e. heat waves, floods or heavy storms. Therefore we see an urgent need to highlight the role of CSF funding for environmental measures in urban areas. Green Infrastructure is such an innovative approach which needs to be adequately adopted within the future programming in Germany, ranging from green bridges to measures for ecological wetland restoration. Especially in cities green walls and roofs as well as green spaces with cooling effects need to be considered in terms of climate change.

- Taking into account the main drivers for biodiversity loss:**

In the position paper the loss of biodiversity is very much based on agricultural land use, while one of the biggest drivers for the loss of biodiversity has not been mentioned yet. The ongoing construction of transport infrastructure and increasing land sealing are causing fragmentation effects and are decreasing the connectivity of Germany's ecosystem, and thereby their provision of ecosystem services. The Roadmap for a Resource Efficient Europe (COM (2011) 571 final) which is part of the Europe 2020 Strategy says, "*Member States, with the Commission, will: Work towards the objectives of the Biodiversity Strategy by integrating the value of ecosystem services into policymaking (continuous).*" This milestone highlights the importance of intelligent funding that delivers the highest impact for multifunctional benefits.

- Ensuring the contribution of CSF to the financing of Natura 2000 network:**

The Natura 2000 network is the most promising pillar for achieving the targets set in the ambitious European and German biodiversity strategy. Through the introduction of the PAF (Prioritized Action Frameworks) the Commission aimed at ensuring the integrated funding for Natura 2000 including CSF in all member states. Therefore the "Priorities for Funding" need a clear commitment to the financing of Natura 2000 measures through all CSF funds. The partnership agreement should include a strategic approach to ensure the coordination between the funds for Natura 2000 financing.

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