

Public participation in the planning of the RRP's and the Programming of Cohesion Policy

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Bankwatch's study on the RRF plans

Bankwatch have conducted a study looking at the current status of the RRF Plans in 8 CEE countries. Thanks to our Member Groups on the ground, we assessed how strong these plans are based on two criteria:

- 1. To what extent are these plans open to public participation?**
- 2. To what extent are these plans aligned with the EU 2030 targets?**

Public Participation

“the involvement and commitment of the public and of all stakeholders is crucial to the success of the European Green Deal”

EC Communication on the Green Deal, December 2019

- Even though the Commission clearly states the importance of public participation, we have found that this is not the case for the Recovery and Resilience Plans so far.
- The RRP of eight Central and Eastern European countries (BG, CZ, EE, HU, LV, PL, RO, SK) show that citizens and local stakeholders are in most cases not associated with the drafting of these plans.

Overall, it's not good news....

Czechia – Submitting the plans without formal approval

- Czechia submitted its draft RRP in October, without formal Government approval and with no public consultation.

Poland – Reluctant to involve the public at every stage

- The Ministry for Regional Funds has held no public consultations or any other kind of dialogue on the priorities of the recovery plan or the underlying reform agenda.
- The government will argue that no strategic environmental assessment (SEA) is needed because the projects have already been assessed under other procedures.

With some improvements...

Slovakia – involving citizens from August

- The Ministry of Finance invited dozens of experts in the middle of August 2020 to participate in drafting the Recovery and Resilience Plan.
- They organised a series of webinars for experts from ministries, industries and CSOs in the week of 17 August.

Hungary – recently opening consultations

- The draft RRP was published on 2 December for public consultation on the Government EU funds website (palyazat.gov.hu).
- No deadline but probably a long consultation period.

Romania

- The draft RRP was officially published on 26 November. A public consultation procedure was opened online, with a table to fill and no clear deadline for the process.
- The responsible Ministry claims that consultations will follow after publishing the draft plan, but offers no information on a specific timeline for this, nor on conducting SEA.
- Romania foresees the expansion of its gas network through the RRF and plans a very low financial allocation for renewables, energy efficiency, digitalization, or research and innovation (for which only 225 mil. is allocated).

Alignment with the EU 2030 targets

The EC recently released an assessment on each of the Member State's national energy and climate plan (NECP), providing an estimate of the stated ambition and guidance on what measures need to be supported to reach the 2030 targets.

Most NECPs in CEE countries are filled with plans to expand **waste incineration, gas pipelines and unsustainable biomass**. They also have far too low ambition on the various climate and energy indicators.

NECPs are not on track to reach the 2030 targets, **so it's up to the RRF** to support more ambitious investments in energy efficiency, renewable energy and stop supporting harmful projects.

Summary of the findings

TABLE OF KEY FINDINGS

AMOUNT RECEIVED UNDER
RRF 2018 PRICES **

LEVEL OF TRANSPARENCY AND
PUBLIC PARTICIPATION

ALIGNMENT WITH 2030 ENERGY
AND CLIMATE TARGETS

BULGARIA 

**EUR 6.0
BILLION**

ALTHOUGH THERE HAVE BEEN CONSULTATIONS ON THE RRF, THEY ARE PERCEIVED BY THE PUBLIC AS FORMAL AND NOT RELEVANT, SINCE THERE HAS BEEN NO RESPONSE TO PUBLIC INPUT SO FAR.

INFORMATION ABOUT THE PLAN IS VAGUE AND LACKING ANY DETAIL ON KEY REFORMS NEEDED IN ENERGY, TRANSPORT AND WASTE MANAGEMENT SECTORS, AS WELL AS ON ALIGNMENT WITH OTHER SOURCES OF EU FUNDS. IT IS LIKELY TO BE USED FOR INCREASING FUNDING FOR FOSSIL FUELS AND BUSINESS-AS-USUAL, LOW AMBITION MEASURES, AND THE COUNTRY MAY CONSEQUENTLY MISS 2030 CLIMATE TARGETS.

CZECHIA 

**EUR 6.7
BILLION**

THE RRF DOCUMENT IS STILL NOT OFFICIALLY AVAILABLE. THE DRAFT PLAN HAS ALREADY BEEN SUBMITTED TO THE EUROPEAN COMMISSION WITHOUT ANY MEANINGFUL PRIOR CONSULTATION.

THERE IS NO PLANNED FOSSIL FUEL PHASE-OUT AND NO STRATEGIC PLANNING WHICH WOULD HELP THE COUNTRY TO REACH THE 2030 TARGETS.

ESTONIA 

**EUR 1
BILLION**

THERE IS A COMPLETE ABSENCE OF PUBLIC PARTICIPATION. 70% OF THE RRF HAS ALREADY BEEN ALLOCATED WITHOUT PRIOR CONSULTATION.

COMPARATIVELY, THERE ARE SOME GOOD MEASURES OUTLINED IN THE PLAN. THE OVERALL LEVEL OF AMBITION COULD BE SUBSTANTIALLY IMPROVED IF PUBLIC PARTICIPATION WAS INCREASED.

Summary of the findings

LATVIA



EUR 1.9
BILLION

NO PUBLIC CONSULTATIONS HAVE BEEN CONDUCTED YET. A DRAFT PLAN IS EXPECTED TO BE PRESENTED TO THE NATIONAL MONITORING COMMITTEE IN DECEMBER.

STRONG ELEMENTS OF 'GREENING' ARE PRESENT IN THE PLAN. A LIST OF PRIORITY PROJECTS HAS STILL NOT BEEN DECIDED ON BY THE GOVERNMENT.

POLAND



EUR 23.1
BILLION

ALMOST ALL MINISTRIES RESPONSIBLE FOR PROPOSING THE LIST OF PROJECTS SUPPORTED BY THE RRF HAVE NOT MADE ANY INFORMATION AVAILABLE TO THE PUBLIC, NOR HAS THERE BEEN ANY COMMUNICATION ABOUT PROPOSALS FOR THE REFORM AGENDA.

THE RRF IS BEING EXPLOITED AS A WAY TO FINANCE PROJECTS THAT WOULD OTHERWISE NOT BE SUPPORTED BY EU FUNDS. THIS RISKS FAILING TO ACHIEVE THE 2030 TARGETS.

ROMANIA



EUR 13.8
BILLION

DISCUSSIONS HAVE BEEN CONDUCTED BEHIND CLOSED DOORS AND KEPT SECRET FROM PUBLIC VIEW.

THERE IS NO CLEAR PHASE-OUT OF FOSSIL FUELS, AND MEASURES SUPPORTING ENERGY EFFICIENCY ARE SEVERELY NEGLECTED DESPITE THE COUNTRY'S GOOD POTENTIAL IN THIS FIELD.

SLOVAKIA



EUR 5.8
BILLION

STAKEHOLDERS HAVE BEEN INVITED TO PROVIDE INPUT AT EARLY STAGES AND THIS HAS BEEN TAKEN INTO ACCOUNT.

IT REMAINS TO BE SEEN IF THE REAL PLAN WILL BE CONSULTED PROPERLY AND IF ITS CONTENT WILL ENABLE A HIGHER LEVEL OF AMBITION IN SLOVAKIA.

Programming of Cohesion Policy

In parallel to the negotiations on the EU regulations and on the RRF, EU funds under **shared management** have to be planned and discussed between Member States and the European Commission.

2 important documents:

- Each Member State produces a **Partnership Agreement**, which outlines the country's strategy and proposes a list of programmes
- In addition to this Member States also **present Operational Programmes (OP)** which cover entire Member States and or regions.
- OPs contain regional or sectoral objectives, measures and financial allocations. The programmes present the priorities of the country and/or regions or the cooperation area concerned.

The partnership principle

- **Introduced in 1988** as one of four principles of the Cohesion Policy to become a formal arrangement for consultation, coordination and decision making for Structural Funds.
- Substantially strengthened in the last decade with the implementation of the **multi-level governance**; stakeholders, including **regional and local authorities as well as CSOs** are involved in the process, as well as the state authorities.
- In 2014 [the European Code of Conduct on Partnership \(ECCP\)](#) became a legal act that aids Member States in setting up mechanisms for the management of EU funds.

The partnership principle

Member States are required to:

- Ensure that regional, local and urban public authorities, trade union, employers, NGOs and other **civil society bodies are involved in all stages of the process, from planning to evaluation**
- Be **transparent** in the selection of partners
- Provide sufficient **information** to partners and give them sufficient time to make their voice heard in the consultation process
- Support **capacity building** of partners
- Create **platforms** for mutual learning and exchange of good practice

Some examples of CSO's involvement

In Hungary, when **cooperation** with the Regional Development Operational Programme **in assessing environment sustainability of projects.**

In Slovakia, participation in monitoring committee helped developing national **sustainability criteria for Biomass** when using EU funds.

See: <https://bankwatch.org/wp-content/uploads/2018/03/Visegrad-cookbook-web.pdf>



A solid partnership induces structural changes

Involvement of the Civil Society in the partnership



Increased expertise and efficiency of all stakeholders

Changes in the behaviour of the public administration towards public participation

Improved quality and sustainability of the programmes and projects

Strengthened CSO's systems of organisation, networking and representation

Better representation of affected communities

Programming Timeline

The programming process is ongoing in every country.

- In Hungary, the European Commission delegation set up a special page for stakeholders to give their opinion on the draft operational programmes - https://ec.europa.eu/hungary/home_hu
- In Slovakia, Latvia and Estonia, a Strategic Environmental Assessment (SEA) is conducted on the programming (opportunity for input).

State of play on programming

However, here again a number of CEE Member States are still reluctant to open the programming to consultations with the public.

Some countries already consulted the content of their plans but **Bulgaria, Poland continue to be problematic in their involvement of stakeholders.**

There are fears that these Member States **will delay consultations until they can claim that it is too late to change anything to the proposed Partnership Agreements and Operational Programmes.**

This strategy is also mimicking the current preparation of the RRP.

Conclusion and open questions

Coherence between the RRF, the JTF and the ERDF/CF is crucial to deliver the European Green Deal.

Involvement of partners is key to improve coherence and strategic relevance of the plans.

- How can the European Commission help CSOs to get involved in the programming of the Cohesion funds and the RRFs?

- Will the European Commission require an SEA for Recovery and Resilience Plans?

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