



Nature Conservation in EU Funds 2014-2020



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List of abbreviations used in the document:

NGOs - Environmental Non-Governmental Organizations

ROP - Regional Operational Programme

RES - renewable energy sources

RFEP&WM - Regional Fund for Environmental Protection and Water Management

NFEP&WM - National Fund for Environmental Protection and Water Management

SMEs - small and medium-sized enterprises

DDP – Detailed Description of Priorities

ERDF – European Regional Development Fund

ESF – European Social Fund

Introduction

ENGOS, participating in drafting of the ROPs for 2014-2020, express their views on the framework conditions that should be created for the implementation of the ERDF and ESF in the new financial perspective. Fulfillment of the conditions set forth in this document will ensure efficient use of EU funds for sustainable development, guaranteeing that the projects supported from ROPs will meet global, regional and local environmental challenges, improving the environmental quality of the region, and thus the quality of life in general. Implementation of the recommendations set forth by ENGOS will also help to increase transparency and efficiency of public spending, including its environmental dimension.

In formulating our position we take into account current needs and challenges associated with the effective use of natural resources, prevention of biodiversity loss, climate change and adaptation to this change.

Our position is formed as demands on environmentally significant issues that we believe should be reflected in both ROPs and the subsequently prepared DDP or in the project selection criteria.

Positions included in this document have been developed basing on recommendations made during the workshops on the inclusion of ENGOS in the programming of EU funds at the regional level. In developing positions used were also the results of analyzes of the Regional Operational Programmes for 2007-2013 in the context of sustainable development and included in the recommendations for the next period. Positions are addressed to Marshal's Offices responsible for the preparation of ROPs and other partners involved in the programming process. Coordinated by the Alliance of Associations Polish Green Network, process of integrating environmental organizations in the ROP programme was implemented in 2012-2014 in all 16 provinces within the project „European Funds for sustainable development - public participation in the planning of future budget period beyond 2013” with the support of Switzerland within the Swiss cooperation programme with the new EU member states. Individual positions were developed at different times and not necessarily refer to the version of the ROP submitted on May 10, 2014 to the European Commission. However, in the following document, we tried to include any updates resulting from the publication of the version submitted to the European Commission. We hope that these recommendations will be taken into account when drafting the final version of the ROPs.

Chapter 1 addresses issues relevant to all Regional Operational Programmes, and the subsequent chapters refer to individual provinces, arranged in an alphabetical order. Detailed positions related to particular ROPs 2014-2020 can be found at www.ekoprojekty.pl.



Wolin - Zielonka Hills - fot. Fridolin freudenfett (Peter Kuley)

1. General and horizontal issues

1.1. Sustainable development

Ensuring sustainable development in ROPs requires:

- introduction of formal criteria regarding efficient use of natural resources and energy efficiency in particular,
- introduction of a criterion of non-degradation of environment and natural habitats in infrastructure projects,
- planning adequate to the environmental challenges allocation in the axes, activities, types of projects and categories of intervention of EU funds,
- designing of product and result indicators, including strategic outcome, which measure the actual implementation of the principle of sustainable development in all priority axes, measures and individual projects,
- balancing the ROP and the axes so that they are at least neutral for the climate and biodiversity,
- introduction to all Priority Axes certain types of projects, i.e. containing solutions to prevent the loss of biodiversity and tackle climate change, adaptation to climate change and other pro-environmental, eco-innovative solutions, incorporating elements of environmental education,
- introduction of sustainability criteria, the criteria for promoting pro-environmental solutions and criteria for social responsibility as criteria for selection of projects in all priority axes and actions,
- support for prosumer renewable energy, based on the initial stage of initiating investment in micro-installations and start the process of marketization and reduced costs - in this context it is essential to lift administrative barriers and create an appropriate support system and the implementation of pilot and bridge subsidy programmes for renewable energy and micro-installations for micro-grids and energy storage systems,
- co-financing of projects in the field of flood protection and adaptation to climate change should be allowed only when they offer comprehensive solutions in the catchment scale, as well as adaptation measures based on ecosystem services in areas at risk, taking into account the suitability of the applied solutions in times of drought; for projects in the field of small retention preference should be given to projects that have a positive impact on the protection of biodiversity, including projects related to the restoration of rivers, floodplains and protection of wetlands,
- taking into account in the selection criteria all infrastructure investments, including transport, the question of their resilience to climate change and guarantee that they do not increase the risk of loss,
- the creation of a chance to benefit from bottom-up partnership approach, which is Community-Led Local Development (CLLD), recommended by the EU for the new financial perspective (2014-2020).

1.2. Implementation of Programmes

To ensure the efficient selection of projects it is necessary to:

- include in the evaluation criteria of all projects sustainable development solutions and pro-environmental solutions. Preference should be given to measures preventing pollution at the source and projects implementing standards of “green public procurement”,
- restrict the list of key projects (selected outside competitions as a result of political decisions) in terms of their number and size of allocation and set up clear rules for their choice, taking into account aspects of sustainable development and real regional impact (it would be advisable also to include environmental projects, also nature conservation ones, into the list of key projects),
- increase the objectivity of the projects assessment, provide opportunities for better scalability of evaluation and reduction of its subjectivity,
- link projects’ assessment criteria with the objectives of particular activities and priorities, as well as indicators of results,
- adopt the objectives of “environmental” indicators to measure actual results, not just actions (also relevant for nature conservation and educational activities),
- include environmental organizations and institutions responsible for environmental issues in the process of monitoring the implementation of the Programme, including ensuring the participation of their representatives in the Monitoring Committee,
- ensure the preservation of “environmental consultations” mechanism that limits environmental conflicts, with the participation of environmental organizations and institutions responsible for nature protection - ensuring proper feedback to partners participating in the consultations and introducing a mechanism verifying information provided by the beneficiary for the purpose of assessing applications for funding,

- introduce formal criteria associated with the effective use of natural resources, including energy efficiency criteria, to all types of projects,
- plan allocations adequate to the environmental challenges, in all priority axes, activities, types of projects and categories of intervention, the stability of the allocation must be guaranteed (changes should be made only in exceptional cases),
- ensure that the whole Programme and its individual priority axes are balanced, so that they are at least climate and biodiversity neutral. ROPs must meet not only the environmental global climate change challenge, but also the problem of biodiversity loss, to the extent far greater than in the previous financial perspective,
- incorporate a non-competitive mode of project selection, which should be applied only in the case of a strategic public investments, meaningful to the entire region, meeting all the eligibility criteria including - as noted above - the sustainable development criteria, promoting environmental solutions and corporate social responsibility. Limitation of non-competitive mode of project selection to a strategic minimum (independent from political interests) is particularly important for the transparency of the selection of beneficiaries that exclude risk of corruption. The programme should identify strategic projects which should be subject to public consultation as well as the environmental impact assessment of individual projects identified for support from the ERDF and the ESF in 2014-2020. Evaluation of proposals should be objectified through the removal of expert judgment and should link points awarded within each criterion with appropriate indicators,
- ensure that projects fit in the sustainable development of the region; that rule should be treated as a conditionality, while in all the activities, criteria for promoting environmental solutions, including (if appropriate) among others, energy efficiency, renewable energy, efficient use of resources, mitigation of and adaptation to climate change, should be applied,
- eliminate, through proper ROP's architecture, that the projects of very different types compete with each other,
- introduce a mechanism verifying the information provided by the beneficiary during the assessment of grant applications,
- create and implement a mechanism for spending, that is consistent with the assumptions (number of competitions, the time span from application to signing a contract, etc.) for all the activities in all the priority axes that is reliable, objectified and open to external participants (experts, social partners, etc.) Analysis of the causes of too slow an implementation or lack of implementation of projects/activities in the context of individual priority axis and intervention categories of EU funds must be the basis for institutional interventions, including, inter alia, changing the selection criteria for projects and/or groups of beneficiaries, funding rules and eligibility of expenditure, additional promotion competitions, training for beneficiaries. Cancellation of certain types of projects or changes in planned allocations of EU funds should be treated as an emergency solution,
- ensure that at the level of the project evaluation criteria, points should be attributed to complying with environmental/sustainable development horizontal policy. It should be much higher than in the case of ROPs 2007-13 - in ENGOs' opinion, the total score for the horizontal policies should have a point value comparable to the scores available in the strategic evaluation,
- introduce to the horizontal evaluation criteria points for commitment to comply with optional standards, such as, for example "green public procurement" (preferences in shopping for organic products and Fair Trade Certified, local or/and recycled products, returnable packaging), or the use of offsetting.

1.3. Monitoring, evaluation and changes in the ROP and the accompanying documents

It is essential that the partnership principle is implemented not only at the stage of designing the Regional Operational Programme, but also during its refinement (DDP) and implementation. Especially significant is that the complete and legible information about the ROP and its implementation is made public – also through the website. Information should be published regularly and take into account, inter alia, subsequent versions or clarifications of the Programme, announced competitions, criteria for evaluation of projects (with the changes in the criteria and their justifications), the list of beneficiaries selected in various competitions along with a brief description of the projects, changes in allocations (with justification) and evaluation reports. Non-governmental organizations hold the opinion that the information submitted to the Monitoring Committee should be publicly available, and the process of monitoring and evaluation should be realistically open to the voice of the society. Participation of social partners, as members of the Monitoring Committee, should be strengthened within the framework of technical assistance through the necessary organizational support (taking into account the travel costs to meetings) and substantive (in terms of necessary cost of opinion-seeking from external experts). Possible changes in the Regional Operational Programme (including its details) should be accompanied by the analysis of social and environmental impact, and changes undertaken as a result of the mid-term review should undergo strategic environmental impact assessment. These changes should also be discussed with the social partners.

1.4. Availability of funds for environmental organizations

To ensure the actual availability of the ROP funds for environmental organizations and their equality with other actors, it is necessary to:

- create a systemic mechanisms enabling NGOs to supplement their financial contribution from regional sources (e.g. RFEP&WM),
- reduce the need for costly preparation of feasibility studies (especially in projects related to biodiversity conservation and environmental education),
- take into account the cost of adequate coordination to ensure the effective supervision over the execution of project tasks and achievement of quality objectives (among others, percentage of the maximum level of management costs should be determined by the size of the project),
- provide real opportunities for advance funding without too sophisticated security system,
- enable the implementation of environmental projects in the field of interregional and international cooperation,
- create opportunities, in the case of projects submitted by NGOs, for full project pre-financing,
- ensure that the staff`s costs related to the subject of the project, not directly related to its management, were not included in the limited management costs,
- in the case of both the management and substantial costs, limits should allow to cover full employment costs, beneficiaries should have the opportunity to comply with all the rules and regulations (including costs of social security),
- create a mechanism of technical support for the organizations preparing the application (e.g. within the framework of Technical Assistance) in the form of consultations, training or information point.

2. Regional Operational Programmes for 2014-2020

2.1. Lower Silesia Regional Operational Programme

Energy efficiency and renewable energy

In the priority related to the production and distribution of energy from renewable sources, it is valuable to draw attention to the need to support distributed energy and broaden the types of supported sources. The controversial provision is, however, preference given to hydropower. Environmental organizations also welcome the recognition of the relationship between investments in renewable energy and energy security of the region and the creation of green jobs associated with the production, maintenance and servicing of equipment and systems for the production of energy from renewable sources. We appreciate also declared preference for complex projects in the form of programmes covering the prosumer-type activities.

We urge decision makers to extract in the ROP, for example in the form of a special competition, support associated with the financing of the purchase and installation of renewable energy micro-installations by communities, housing cooperatives and SMEs. In the case of such assistance in assessing the preference should be given to projects for the economic effects of the integration of micro-installations of energy storage systems (without “mechanical” rewarding, for example, increased number of RES technologies or partners). Investments in upgrading the network infrastructure - solely in order to connect to the RES, including prosumers, should also be particularly supported. The creation of a new group of small producers (prosumers) will reduce network losses, especially in the medium and low voltage sections of the network. This action, however, requires the construction of infrastructure for “plugging” in a network of micro and small dispersed sources.

The priorities for energy efficiency and use of RES in enterprises and the public sector has an integrated approach, taking into account the need to perform audits, support systems, intelligent energy management and preference for projects involving renewable energy and energy-related deep modernization, which is worth to appreciate. It is particularly important that all the buildings are built or renovated in order to obtain the best possible energy standard, as close to the zero energy standard as possible. It is important that these preferences are clearly reflected in DDP of the ROP and the project evaluation criteria.

We draw attention to the need to add non-governmental organizations to the potential beneficiaries of energy efficiency in public buildings projects, as they utilize such buildings.

The priority on the implementation of low-carbon strategies should be evaluated positively, especially the development of harmless, environmentally friendly, sustainable transport, which takes into account the complementarity of public transport, walking and cycling and promotes the construction of highly energy efficient infrastructure. It should however be noted that the adopted wording for passive construction should be clarified so as to take into account in assessing the effectiveness not only the demand for usable energy, but also auxiliary energy, needed for the functioning of the system.

Waste management, adaptation to climate change

ENGOS positively assess planned actions supporting the field of waste management in the waste management priority axis. Enabling support for environmental education, promoting proper waste handling is also valuable. However, the need to take into account the preferences of waste treatment projects using low-energy technologies and in accordance with the waste treatment hierarchy should be taken into consideration.

In the water and wastewater treatment priority axis, ENGOS draw attention to the necessity of linking construction and modernization of water supply systems projects to the construction and expansion of sewerage and sewage treatment plants. The record about supporting the waterworks “provided that sewage would be taken away” is definitely insufficient. Water systems construction should be supported only provided that connecting customers to the sewage system and wastewater treatment plants takes place as well, as only such a solution provides real environmental effects.

Protection of biodiversity

ENGOS appreciate the separation in ROP of a unique priority axis dedicated to the protection of and access to natural resources. Regarding ROP records, we see the need for making them more detailed. The record about support for “centres of biodiversity conservation based on native species” should refer to nature conservation activities in the biodiversity-rich areas, of regional or local importance. Similarly, support for “contributing to the active nature conservation” should not only be directed at the “equipment of parks and nature reserves”, but also other areas characterized by high biodiversity. Similarly, further specifying the record about support directions of “the necessary infrastructure related to the protection of natural habitats and species”, it should refer to the infrastructure in broader sense, including “green infrastructure”.

Environmental Education

ENGOS are positive about the support in priority axis *Protection and access to natural resources* for projects related to environmental information and educational campaigns, as well as development of environmental education centres (and in the case of environmental education centres, among the most crucial assessment criteria, their curriculum should be taken into consideration). We appreciate the inclusion in the waste management priority axis activities promoting proper waste management. We see a clear need to take into account similar educational and promotional activities in other priority axes focused on environmental issues, low-carbon strategies priority in particular.

Sustainable Transport

It is important for rail projects to integrate the development of the rail transport system with cycling solutions. Therefore, we propose to include in the assessment criteria preference for projects that increase the availability of interchanges by bikes (including the possibility of safe bike storage), limiting rail barriers for cycling traffic and projects related to purchase and adjustment of the rolling stock to carry bikes and disabled people. ENGOS claim that within the priority on road transport accessibility, in the assessment criteria system, projects positively influencing pedestrian and cycling traffic and caring for such user needs are preferred.



Szczeliniec Wielki, North view from stoliwa cliff - viewpoint "The Sky" (pl: Niebo) - fot. Bjoern.Hoernitz

2.2. Kuyavia-Pomerania Regional Operational Programme

Energy efficiency and renewable energy

It is postulated to be a priority course of action to adopt energy efficiency improvements - develop and implement energy efficiency and sustainable “green” buildings regional programme. Focus should be put on the development and implementation of spatial assumptions for renewable energy development (“Space for RES”) as a basis for the protection of the region and to support the development of RES adapted to regional environmental assets. Renewable energy production based on agricultural products should also be an important element.

The region’s spatial management requires definite improvement in order to limit all kinds of investments on the nature-rich areas, including housing – it is essential to develop and implement regional standards regarding spatial order. ENGOs active in this field should play an important role – they should verify range and rules of protected areas functioning and develop a regional portal on spatial information. Implementation of RES solutions in transport, especially public transport, promoting dispersed, integrated energy sources should be considered, as well as developing and implementing the “Kuyavia-Pomerania RES Cluster” programme.

Biodiversity and environmental education

In the ROP, priority should be given to the protection of habitats and species, which should be combined with the awareness raising on the importance of biodiversity, since the adoption of the menial role of natural resources carries a potential threat to the conservation of habitats and species. The document should include a space for difficult environmental projects, related to the conservation of natural resources and improvement of endangered habitats and species conditions - implementing authority should undertake actions to promote and support subjects undertaking activities in this sphere. Strengthening the position of regional products, especially local native varieties of plants (such as gene bank in Pokrzywdowo), should also not be forgotten. Projects must be inevitably accompanied by environmental education (e.g. green schools, thematic regional fairs), especially those related to sustainable development.

Wastewater and Waste Management

The new programme should first of all assume guaranteeing access to the basic public services, taking into consideration individual needs of particular beneficiaries, and rules of rational environmental use and sustainable development. It should also support proper changes of waste management policy and further improvement of access to basic public services. Waste segregation at its source combined with proper forms of education as the most effective waste recycling should be stressed.

Sustainable transport (urban, rail, cycling)

ENGOs request to definitely increase the role of railway in the region, preferably through revitalization of railways, purchase of new rolling stock, restoration of cancelled routes and increasing the role of rail cargo transportation. It is essential to underline the need to build bike parking lots in the close proximity to railway stations, in order to create an alternative for road transport. Further building of cycle lanes is also needed, especially in the directions touristically attractive as well as creating integrated city bike transport system through substantial financial support for enlarging bike-hire points, connecting routes etc. We propose also to increase the share of RES in public transport.

Adaptation to climate change

ROP, according to ENGOs, should prioritize actions related to modernization and repair of drainage systems, which years ago were defectively assembled and served only the purpose of land draining. Action on this matter should be based on a set of real and measurable criteria, unchangeable during the implementation of the ROP. However, any interventions in existing ecosystems should be taken with great care and in accordance with EC directives.

2.3. Lubelskie Regional Operational Programme

Energy efficiency and renewable energy

Regarding the category of projects related to the production of energy from biomass and biogas, ENGOs propose that the support could be obtained primarily with installations which use biomass of domestic origin, and more importantly – obtained locally, ideally in close proximity to the installation itself.

ROP should also, independently from legal bindings, exclude from financing all undertakings which assume co-combustion of biomass and coal. The programme should especially promote projects, where biomass will be sourced from nature conservation activities. Favoured should be undertakings assuming energy use from agricultural and forest waste as well as agricultural activity rather than crops cultivated specifically for biomass.

When assessing the economical effectiveness, the more proper criteria than used in the ROP 2007-2013 assessing the proportion of power installed to its costs, would be measuring proportion of total foreseen produced energy to its costs – such approach, taking into consideration the durability, would promote high-quality installations, durable and effective in a longer time-span. It is necessary to include support for prosumer energy, but also to adjust the electricity grid to intake energy from such sources. In the projects related to increasing energy efficiency of buildings, the required standard should be so called deep energy performance modernization financed from ROP sources, both in public buildings and commercial investments.

Biodiversity and environmental education

We propose to expand the catalogue of support areas into projects related to restore passability of ecological corridors, combating invasive plants etc. We propose also to include in the catalogue of project types the educational undertakings, such as social campaigns, educational programmes, non-formal education and others. The particular attention should be given to develop criteria of project assessment – for example criteria related to biodiversity should be defined in such a way, that financed projects indeed focus on protection of endangered species and habitats and continuity of corridors, not on e.g. standard forest management or hunting. It would be advisable to define (with assistance of experts and nature conservation specialists), the set of the most important needs regarding nature conservation in the region – it would serve as a starting point for assessing the priority of submitted project proposals. Projects in this category, because of the potential beneficiaries profile, should be subject to full pre-financing and the feasibility study in the case of projects not including investment elements should not be required. In addition, it is proposed to incorporate activities related to non-material cultural heritage.

Wastewater and waste management

An important task for the Lubelskie region in the field of water and wastewater management is to eliminate the disproportion between the number of households provided with water supply and households with access to sewage system. The evaluation criteria and the adopted indicators level in the ROP 2007-13 meant that as a result of the previous programme, the number of people having water supply and not having a sewage system increased even more. There should be an assumption made, that none of the projects financed from ROP can increase this disproportion.

Sustainable Transport

The proportion between allocation for road transport and railways, city and bike transport should be at least reversed comparing to the previous programming period. This tendency is strengthened by omission, among types of activities, of the cycling infrastructure (Activity 1 of axis 4, priority 4.5). Infrastructure of city bike transport should be allowed as a stand-alone undertaking, not only as an element accompanying road or tourist investments.

Flood protection and adaptation to climate change

Among exemplary activities/types of projects, we propose activities such as: maintenance and development of natural retention (wetlands, forests, micro-basins and increasing the share of biologically active areas on urban land) and adjusting land use forms to existing threats: floodplains atlases, tools of spatial management policy – excluding land at risk from investments and housing (including buyout of land and moving the infrastructure elsewhere in justified cases). The assessment of submitted project proposals related to flood prevention should always include the proportion of protected wealth to water infrastructure costs and its alternative.

The criteria for evaluation of projects should take into account and reward actual non-technical methods, holistic catchment approach, retention in the catchment area, including natural one – restoration and protection of wetlands and habitats with high retention capacity, restoration of small streams, slowing down the flood wave cumulation.

2.4. Lubuskie Regional Operational Programme

Energy efficiency and renewable energy

When it comes to the current draft ROP for 2014-2020, it does not take into account any direct relationship between investing in energy efficiency and RES and creating new, so called green work places. It should also be mentioned that in the Lubuskie region one of the biggest lignite plant in Europe is planned, which is hard to combine with promotion of a sustainable development policy.

Therefore, ENGOs postulate that special support (e.g. regarding developing strategies) should be designated for communes wanting to invest in RES, support group or individual RES and energy efficiency projects. Support for RES should depend on the analysis of potential, local conditions etc. It is also important to plan a long-term support for prosumer energy.

Protection of biodiversity

According to ENGOs, in the future ROP it would be essential to extract as a separate activity on protection of biodiversity and inclusion in the activity types the restoration of habitats and protection of species types of projects, which are already run by ENGOs in the Lubuskie region.

According to ENGOs, nature conservation should be an equivalent activity within the new ROP and its implementation should be protected by providing access of different beneficiaries and re-defining types of activities. We postulate also to run a prior identification of needs and conditions in the region in this regard.

Water, sewage and waste management

The current draft ROP for 2014-2020 assumes that one of the key investments will be connecting into the sewage system households that remained so far outside the access to the city sewage network – ENGOs point out that other options should be analyzed, especially those that could be less costly or allow for reclamation of part of the waste (e.g. investments into household water treatment plants). Solutions for sewage and wastewater treatment in sparsely populated areas or in Natura 2000 areas should be diversified, adapted to modern standards and they should take into account environmental aspects.

Sustainable Transport

ENGOs request that the ROP for 2014-2020 includes maintaining a high allocation for the modernization of railway transport, but at the same time investment needs should be analyzed. We believe that well-functioning railway connections in the region will allow for the transformation into the so-called low-carbon economy, and also increase the mobility of people and their access to education.

In the road investments the safe pedestrian-bike passages should be extracted, especially in the regions of cities. Also the analyses of support for water infrastructure and potential of development of water tourism should be performed. ENGOs and business entities should be allowed as beneficiaries in transport activities.

Environmental Education

Elements of environmental education should be cross-cuttingly included in both the priority axes directly concerning environmental issues (adaptation to climate change, environmental protection, efficient use of natural resources) and the priorities related to social competences, such as the development of education, social inclusion, and finally life-long learning.

ENGOs notice, that without systematic educational activities it is difficult to implement sustainable development rules locally, such as responsible waste management or using more effective energy sources. Such activities should relate to both broader global challenges, such as climate change, but also to the regional ones.

2.5. Lodzkie Regional Operational Programme

Energy efficiency and renewable energy

ENGOS are hopeful about records of the ROP within its 3rd priority axis: *Low-carbon economy and environmental protection*. Nonetheless, we postulate to include and give proper meaning in the ROP, also in DDP and criteria of project selection, to deep energy modernization of buildings and phased modernization leading to deep energy modernization, limiting energy poverty, introducing energy management systems (including smart metering) and low-emission strategies, including (apart from pro-environmental city transport) and limiting the household-derived pollution, financing (and not only promotion) energy-saving, passive, zero-energy and plus-energy buildings, especially ecological and autonomous ones.

Protection of biodiversity

ENGOS postulate to secure the implementation of the ROP in 2014-2020 in the nature conservation area, carefully designing conditions for the implementation based on recognition of needs and organizational conditions of potential beneficiaries.

Water and wastewater management

We recognize the need to build a network of storm water drainage and rain sewage treatment plant, especially in urban areas. We also propose to allow for support from the ROP also for the expansion and modernization of rainwater drainage (adequately to the frequency of torrential rains, the current trends in the characteristics of rainfall), the expansion and modernization of the sewage treatment plant designed to take rain water, construction of open and closed reservoirs storing rainwater (possible to use to a certain extent during the drought), measures to reduce impervious surfaces. These activities, feasible thanks to EU funds available in the ROP, will not only be an important component of wastewater management, but also of adaptation to climate change.

Waste management

The ROP does not allow to clearly assess the planned support for projects in the field of waste management in the financial perspective 2014-2020. The draft document speaks of "specific actions to protect the environment and carry out key investments under the Waste Framework Directive and the Landfill Directive, with particular emphasis put on the installation for biodegradable waste and hazardous waste disposal". We postulate to include also into the list of project types the implementation of new technologies for recovery, recycling and reducing the amount of waste (including energy recovery), the closure and reclamation of landfills that do not meet environmental requirements, as well as disposal of sewage sludge.

Sustainable transport (urban, rail, cycling)

ENGOS approve planned expenditures for, among others, investments in the rolling stock and railway infrastructure, the creation of an efficient and safe public transport system, competing with private transport, and the integration of public transport within cities and their functional areas, including the lines / communication networks, functioning within the country and regional passenger transport.

Notwithstanding the foregoing, we conclude that the ROP clearly states that part of any road investment (construction, modernization, reconstruction) must include a separation / construction of safe pedestrian and bicycle routes, as long as such do not exist. We propose also that the project selection criteria eliminate solutions harmful to the environment and those not taking into account the necessary adaptive solutions to climate change and also prefer projects whose element is to provide and / or improve the coherence of protected areas and ecological corridors (green infrastructure). We call for a reduction of the construction of local roads to a minimum and their actual linking - through appropriate project selection criteria - with broader concepts related to sustainable urban mobility.

Environmental Education

We propose to allocate a significant part of the support on environmental education, understood not only as the promotion of content, teaching, but also as the acquisition of competences, including vocational ones. All priority axes should allow and promote projects that contain widely understood environmental education. At the same time, we expect that such education, focused on the acquisition of competencies, training of personnel and / or the promotion of green jobs, will be reflected in all the priority axes of the ROP.

Educational and promotional activities proposed in the ROP in no way meet specific and horizontal implementation of the principle of sustainable development by raising environmental awareness, including beneficiaries and target groups of individual actions.

Adaptation to climate change and horizontal implementation of the principle of sustainable development

One of the specific objectives of the priority axis 3: *Low-carbon economy and protection of the environment* is to improve the ability to adapt to climate change. It should be emphasized that the assignment of this topic to a certain segment of one of the many priority axes does not respond adequately to the challenge of a complex adaptation to climate change.

Support should be provided for the restoration of water courses, restoration and protection of floodplains and wetlands, increasing the spacing of the shafts, the construction of polders or dry tanks. Flood risk management (and mitigation of drought) must also take into account rainwater management in populated areas.



Grand Fir (*Abies grandis*) in Rogów Arboretum - fot. Crutier

2.6. Lesser Poland Regional Operational Programme

Energy efficiency and renewable energy

In order to maximize the energy savings potential in the residential sector and public buildings, it is necessary that preference is given to projects leading to a deep modernization of the energy performance of buildings. It is assumed that a deep modernization of the energy performance of buildings leads to energy savings of 60 - 90%, while standard modernization of energy performance leads to savings of not more than 30%. We propose that energy savings amounting to 30% are the absolute minimum for projects funded from the ROP and projects exceeding this size are promoted. The key is to include in Priority 4, that in the area of the distribution infrastructure only operations in the field of development and modernization of infrastructure for energy distribution system to connect new RES installations will be implemented. We propose the introduction of mechanisms ensuring coordination of projects of heat exchange for more efficient and environmentally friendly ones with those focused on development / modernization of the district heating network modernization projects in the field of energy performance of buildings, which will reduce their demand for heat.

Environmental Education

Environmental education should stand for appropriate complementary actions under the ESF, i.e. promote emerging environmental investments, encourage the use of implemented solutions, changing attitudes into pro-environmental ones etc. On the one hand the principle that environmental education is a part of any project must be established, on the other - implementation of "cross-cutting" educational projects unrelated to the specific individual investments should be enabled – coherent with objectives and tasks of each aforementioned axes of the programme and the wider sustainable development.

Wastewater and waste management

Among the projects funded from the ROP, investments and activities in line with waste disposal hierarchy should be promoted in the first place, i.e., waste prevention and limiting their number and the negative impact on the environment, consistent with the principles of environmental protection, preparation for reuse, recovery and recycling. Construction of plant for thermal treatment of waste should be placed in the last place and be used only for waste that is not recyclable.

The main objectives of the interventions implemented under the priority investment are in line with waste hierarchy in the EU, i.e.: waste prevention, preparation for re-use and intensification of recovery and thereby reduction of its amount in landfills. However, there is no reflection of these goals in the indicators. The indicator "share of municipal waste that is not subject to the landfilling in the bulk storage of municipal waste" does not show how or whether waste production was prevented or whether an adequate level of waste recovery and recycling was ensured.

The intervention does not provide measures for waste prevention which, in accordance with the recommendations of the EC should be given the highest priority. In this respect, it is desirable to include the potential of non-governmental organizations. When it comes to improving air quality, outcome indicators should take into account, in addition to lowering greenhouse gas emissions and PM10, also other parameters, i.e. reduction of pollution levels exceeding regulatory levels (according to the diagnosis and the data available from the Lesser Poland air monitoring:, PM2.5, Penzo(a)pyrene, sulphur dioxide, nitrogen oxides).

Sustainable Transport

We believe that the allocation for development of railway transport should be as high as the one for the development of road transport. To ensure efficient use of resources and achievement of the low emissivity, the purchase of new rolling stock should not serve only the purpose to increase its quantity, but above all, to increase the number of passengers using it, which actually contributes to the reduction of emissions. If the number of built P + R parking lots does not affect the amount of users, it will not have a direct impact on lower emissivity of transport.

2.7. Mazovia Regional Operational Programme

Energy efficiency and renewable energy

Non-governmental organizations hopefully accept changes of entries in the ROP regarding energy efficiency and renewable energy and the specific objectives of the Programme in this area comparing to the ROP 2007-2013. In particular we support, awaiting transferring of assumptions into DDP (including the criteria for selection of projects, not only in the priority axis III: *The transition to a low carbon economy*) and give proper meaning to low-carbon strategies, a deep modernization of energy performance of buildings as well as modernization and the introduction of phased energy management systems (including smart metering). Energy modernization projects should lead to the so-called deep modernization of the energy performance (deep retrofiting), related to the use of heat recovery technology and high performance thermal insulation that goes beyond cost efficiency.

The authorities should also, considering the prospect of a seven-year implementation of the ROP, plan support for prosumer renewable energy. In the initial period, to initiate the investment in micro-installations and begin the process of marketization and costs decrease, it is essential to lift administrative barriers and create an appropriate support system as well as the implementation of pilot and bridge subsidy programs for micro-installations renewable energy and for micro-grids and energy storage systems.

Protection of biodiversity

ENGOS appeal to secure the implementation of the ROP in the 2014-2020 period in the area of nature protection, carefully designing the conditions of implementation based on the identification of needs and organizational determinants of potential beneficiaries. We appreciate the support planned for the protection of parks, nature reserves, protected landscape areas and for the implementation of the landscape protection policy. We propose to program activities focused on so called green infrastructure, improving the consistency of a network of protected areas of the region, including the continuity of ecological corridors of regional and local importance.

Water and wastewater management

ENGOS draw attention to the need of linking projects focused on construction, expansion and modernization of water supply systems with the construction and expansion of sewerage and sewage treatment plants. Admission to the implementation of projects limited to the construction or upgrading of water networks and water treatment devices will be counter-productive in relation to environmental challenges in the field of waste management. We propose to extend the activities associated with sewerage and wastewater treatment to activities putting forward the problem of rainwater management on urban areas, densely populated or/and with a substantial amount of impervious surface.

Waste management

ENGOS are positive about the continuation, in the 2014-2020 financial perspective, the support of EU funds activities in the waste management sector. It should be noted, however, that the architecture of evaluation and selection of projects in this area will be essential to ensure building an economy in line with the waste hierarchy.

Sustainable Transport

We propose that activities supporting the development of cycling in cities be extended to the modernization of communication routes, including pedestrians, for the separation of bicycle routes, which significantly improve the situation in this area and further enhance traffic safety. Notwithstanding the foregoing, we are of the opinion that the development of public transport and cycling cannot be the exclusive domain of cities. To ensure economic and social cohesion of the region, including improving the quality of life of its inhabitants and the development of tourism public transport must develop, including rail and linear communication infrastructure - road or rail – and be accompanied by cycling infrastructure (bike communication routes and parking lots).

Environmental Education

ENGOS are hopeful about the information that within the ROP not only the ERDF fund will be implemented but the ESF fund as well. With the support of the latter, non-technical, non-infrastructure activities can be implemented. We propose to allocate a significant part of the support for environmental education, understood not only as the promotion of content, teaching, but as the acquisition of competencies, including vocational ones, which could support the development of the labor market, including green jobs.

Adaptation to climate change and horizontal implementation of the principle of sustainable development

One of the specific objectives of the priority axis IV: *Environment, climate change and resource efficiency* of the Mazovian ROP 2014-2020 is the prevention of natural disasters and mitigating their consequences. The programme in its current version is limited only to support the integrated rescue system, modernization and equipping of emergency services and to imprecise records such as: support for agricultural land reclamation, development of complex systems of small retention in accordance with the Small Retention Programme for Mazovia Region and restoration of watercourses.

It should be noted that the Small Retention Programme is not an adaptation strategy, it was also not verified against Directive 2000/60/EC and 2007/60/EC. Also the programme cited, in support of flood safety, developed for the area of the Vistula River Central. These programmes may not be accepted a priori as a reference point for, as stated in the ROP, designation of the most important measures of flood prevention in a ROP scale. We propose to, within the framework of projects of flood protection, climate change adaptation and mitigation, limit the support according to measurable and verifiable criteria for effective flood risk management and reduction, with an emphasis on complex solutions in a catchment scale, as well as adaptation measures based on ecosystem services in areas at risk, taking into account the suitability of solutions used during the drought.

Restoration of watercourses must be extended to the restoration and protection of floodplains and wetlands, increasing the spacing of the shafts, construction of polders or dry tanks. Flood risk management must take into account also, as stated previously, stormwater management in populated areas. Protection of wetlands, the base of functioning of aquatic and water-dependent ecosystems, as water storage, precludes the use of drainage. They are indeed counterproductive in terms of retention (storage) of water in the basin, necessary in reducing the risk of floods and droughts. Only upgrading existing systems of drainage should be made, so that they can perform the functions of irrigation - use the stored water during the drought. In order to combat drought, building underground reservoirs, resistant to evaporation should be considered.

Non-governmental organizations also urge that all infrastructure investments within the ROP, including transport, were resistant to climate change, especially in the context of floods and phenomena associated with torrential rains and did not generate the risk of flooding and high water.



Area adjoining the conservation area - fot. Rafklim

2.8. Opolskie Regional Operational Programme

Energy efficiency and renewable energy

Emphasizing the need for action planning based on energy audits and ensuring the implementation of comprehensive (and not superficial) modernization of the energy performance of buildings, should be assessed positively. It is worth noting that EU funds should support projects of deep modernization of buildings (deep retrofit), which brings much greater effects in terms of energy savings than many of the previously implemented modernization projects. The possibility of using EU funds by the housing communities or households in order to carry out the energy modernization of residential buildings should be strongly supported. Among the beneficiaries of the system, the entities implementing energy services (ESCO) should be included. In addition, attractive rules for the financing of projects in the field of energy efficiency in residential buildings should be provided, not excluding in advance the use of grants. Particular emphasis should be placed on supporting small installations (up to 200 kW). Small systems can play a very important role in the construction of distributed energy, provided that improvement in regional and local energy security should be supported by European funds in the first place.

Protection of biodiversity, environmental education

Importance of biodiversity for development of the region and the need for its protection have been recognized in the diagnostic part of the ROP 2014-2020, according to which “the most important environmental conditions for regional development should include, inter alia, significant biodiversity assets and diversity of nature and landscape. The most valuable areas of natural and cultural landscapes are not only an important part of the national system of environmental protection, but thanks to the existing natural and cultural potential, they are a serious asset for economic development of the region. However, despite the legal protection that covers approx. 30% of the region, a continuous decline in the biodiversity of the region has been recorded, exhibiting a high proportion of vascular plants, plant communities and fauna threatened with extinction”. This accurate diagnosis was unfortunately not reflected in the allocation of EU funds for investment priority 6.4 *Protecting and restoring biodiversity, protection and remediation of soil and supporting ecosystem services, including Natura 2000 programme and green infrastructure*. Certainly this amount will not be sufficient for satisfactory support of all types of projects listed in the draft ROP.

Water and wastewater management, waste management

When it comes to the criteria for selection of projects, it is worth to award additional points to projects implemented in particularly environmentally sensitive areas, such as Natura 2000 sites. In the field of waste management, as indicated in the EU and national documents, when using EU funds the hierarchy of waste should be observed - waste prevention, reuse and preparation for recycling. The current draft of ROP 2014-2020 seems to meet those rules, emphasizing the primary importance of selective collection of waste and the need to build a “recycling society”. The waste hierarchy must, however, be reflected not only in the text of the ROP, but also at the stage of implementation of the Programme and individual projects.

Sustainable Transport

Just as in the period 2007-2013, the design of the new ROP focuses on the support of road transport infrastructure, with the marginal treatment of other modes of transportation. This will lead to a deepening dominance of cars as means of transportation of both passengers and goods, with all its consequences for the environment and communities of the region (air pollution, noise, congestion, road accidents, faster degradation of existing roads). The ROP 2014-2020 should put more emphasis on the need to build a sustainable transportation system in the Opole region and reverse the current trend, which is weakening the position of public transport. Nevertheless, recommendation to include in the ROP not only purchase of new rail rolling stock, but also investment into reconstruction and upgrading of railways of local importance deserves approval.

As the experience of regions that have opted for this type of projects already in the period 2007-2013 (including the region: Greater Poland, Pomerania) shows, such investments allow for a significant improvement in the offer for the passengers with relatively little effort. Proposals included in the ROP on supporting urban transport and sustainable urban mobility deserve recognition as well.

At the same time, those activities should not be made at the expense of other key areas related to the construction of low-carbon economy, such as renewable energy sources and improving energy efficiency.

2.9. Podkarpackie Regional Operational Programme

Energy efficiency and renewable energy

EU funds should support the projects of deep modernization of buildings (deep retrofit), which brings much greater effects in terms of energy savings than many of the previously implemented modernization projects.

Protection of biodiversity, environmental education

The elementary principle of sustainable development aspect of the ROP 2014-2020 should be to ensure that the projects harmful for the environment, which have not been duly subject to an environmental impact assessment, including impact assessment on Natura 2000 sites will not be implemented. Notwithstanding the protection of biodiversity (without competition for joint allocation of resources), an area, that should be strongly supported in the framework of the ROP 2014-2020 is environmental education. In addition to activities associated to undertakings in the field of environmental protection and nature conservation, it is necessary to enable the realization of the separate educational campaigns to increase public environmental awareness, implemented by ENGOs. This is crucial, because without appropriate attitudes and behaviors of people, the very realization of investment projects will not guarantee a satisfactory level of environmental protection. Principles of financing projects in the field of environmental education should take into account the specificities of non-governmental organizations as the most effective executors of this type of action. Organized with the support of the ROP 2007-2013 environmental education centers should, in the next programming period, serve as a base to carry out specific learning activities. Environmental education should be an independent action, also financed by the ESF, of which substantial part will be managed by regional authorities under the ROPs.

Water and wastewater management, waste management

Support for water and wastewater management within the ROP 2014-2020 should take into account the most economically and environmentally efficient solutions tailored to the specifics of the area. In terms of waste management, the EU waste hierarchy should be respected, where the waste prevention is a priority, followed by reuse and preparation for recycling in accordance with the principle of 3Rs - reduce, reuse, recycle. This hierarchy must be reflected not only in the text of the ROP 2014-2020, but also in the allocation of funds for different types of projects. It is also impossible not to mention here the crucial role of environmental education, because without providing appropriate social habits there is no chance of reducing the amount of waste or significantly increase recycling.

Sustainable Transport

The ROP 2014-2020 should provide funding for the revitalization and modernization of the region's most important railway lines, which will not be covered by the support from the national level. Particular attention should be paid to railways that serves as commuting line to major cities as well as in areas attractive to tourists. Ensuring the conditions for the operation of rail freight services is equally important. Bearing in mind the high external costs of automotive freight transport (road surface destruction, air pollution, noise, congestion, accidents), it should be a priority on the national level, but also, in a complementary manner, the action supported by the ROP 2014-2020.

2.10. Podlaskie Regional Operational Programme

Energy efficiency and renewable energy

Investments Conducted over the past years did not emphasize importance of energy saving in the operation phase, which is best seen when looking at equipment bought from EU funds (e.g. color laser printers for current needs), unjustified from the point of view of the goal they were to serve. During the evaluation of projects special attention should be paid to the justification of the purchase of equipment for its energy efficiency (in all priority axes). Symptomatic is the lack of energy saving in government and local government institutions (opening windows during the heating season, unreasonable use of air conditioning, long-term light use in unused or rarely used rooms) - it would be appropriate to promote methods of reducing energy consumption during the operation of the premises, for example by using appropriate automation, or energy management systems. This problem stems from the lack of energy saving habits, which must be altered by providing information and education campaigns. It is necessary to campaign on energy saving, renewable energy and environmental effects of energy production from various sources, as well as on the effectiveness and environmental impact of devices powered by different types of energy.

In projects related to energy, the use of naturally occurring plants used for energy production, for example willow or reed should be promoted; it is preferable to source energy from conservation activities on protected areas, for example removing shrubs in wetlands (see the Biebrza National Park).

Legal and technical measures aiming at using for energy purposes native plants with high biomass increase potential, e.g. hemp (use of western solutions) should be promoted. Creating, in appropriate locations, composting plants containing gas and heat recovery, especially in rural areas, where large amounts of biomass are created, should be supported, as well as acquisition of heat from local renewable sources and limiting of co-combustion.

Thermomodernization investments should be led with preference to use natural materials (hay, hemp, clay etc.), which would have an additional educational factor and would influence promotion of natural building material as well as modern architectural solutions.

RES should not be treated uncritically, we postulate exclusion from financing from the ROP building of wind farms or singular wind turbines, if the investment is performed on Natura 2000 site or in its buffer zone.

For real implementation in policies the increase of energy efficiency, appropriate indicators of achievement must be determined, which include reduction of average energy demand by at least 30% in modernized buildings, based on monitoring of energy saved as an outcome of performed projects, using energy audit before and after the investment as an obligatory procedure included in eligible costs of the project.

Eligible costs of thermomodernization projects should include also informational and educational activities, aimed at both users of buildings, external surrounding and local community.

Looking prospectively on the whole 2020 programming period, the ROP should include support for prosumer RES. It is essential to lift administrative barriers and create appropriate support system as well as to implement pilot and bridge subsidy programmes for RES micro-installations, micro-grids and energy storage systems. It could be implemented through a separate thematic activity in the ROP, related to financing of purchase and installing RES micro-installations by communities and housing cooperatives, SMEs and though defining subcategory of complex projects, assessed higher in the system of projects assessment for economic effects of integration of micro-installations with the energy storage systems (without "mechanical" rewarding of e.g. higher amount of RES technologies or greater number of partners).

Investments in modernization of network infrastructure should be particularly supported – solely in order to connect it to the RES, especially prosumer ones. Creating new groups of small producers (prosumers) will allow to reduce network losses, especially in medium and low voltage sections of the network. This action, however, requires the construction of infrastructure for "plugging" in a network of micro and small dispersed sources.

Nature conservation, biodiversity and environmental education

In the period 2014-2020, the ROP should involve first of all leading effective activities aimed at environmental awareness raising of local communities, such as, e.g. the campaign for valuing natural assets of the region as the potential for local sustainable development led by local communities. When it comes to formal issues, ENGOs request that the Programme contains a provision for measures supporting experts financed from Technical Assistance.

This would help to significantly improve the quality of submissions concerning biodiversity. In our opinion, it is necessary to significantly increase the level of sewage, wastewater treatment and waste management, the modernization of drainage, which should be carried out only for water retention needs. Reconstruction of drainage should not, however, be included in the ROP – it

consists usually of reconstruction of old, unjustified solutions. Support is also required for retention and treatment of rainwater, its use and construction of small retention reservoirs of anti-erosion functions and increasing biodiversity, as well as carrying out restoration of floodplains. Additional measures are also necessary to provide information about reducing emissions and its prevention. For their implementation adequate preparation of local development plans will be required - because the emission points should be placed in appropriate locations.

In the axis concerning measures to protect nature, in our opinion the forefront is enhancing biodiversity, and active environmental education, whose main purpose is environmental awareness of the public on the benefits of ecosystem and all the profits that local community may derive from the environment. No less important from the point of view of the environmentalists is also supporting efforts to preserve and improve ecosystem services, including education and information and social mobilization for the protection of the nearest environment.

Water and sewage and waste management

The period 2014-2020 should first consider changing the methods of projects evaluation regarding wastewater, that would enable the construction of sewers in areas of high natural value, in spite of a small amount of connections to households.

In order to achieve this goal, a significant increase in funding for sewage and wastewater treatment will be needed. Only those projects which assume the construction of water network along with the sewers should be supported. In our opinion, withdrawing from the construction of paved surfaces, e.g. concrete or paved parking lots, especially in urban areas should be encouraged. Supporting constructing permeable surfaces in terms of rainwater management will also contribute to the programme of adaptation to climate change.

We believe that the allocation to support waste management, which will take into account the most environmentally friendly methods and overall financial costs, social and environmental, should be increased. This means therefore, that projects selected for co-financing should be the most efficient regarding recycled materials use and showing the greatest energy efficiency and cost efficiency, that have undergone public consultation. The only projects that should be accepted are those compliant with waste hierarchy. According to ENGOS, there is also need to conduct monitoring of illegal dumps and waste from agriculture for composting (organic waste, silage, hay, etc.).

Sustainable Transport

To provide transport solutions in line with the principle of sustainable development, ENGOs request that more attention is paid to support the construction of bicycle paths in cities and connecting tourist locations. Creation of bicycle hire spots, bicycle paths and systems park'n'ride, bike'n'ride should also be supported.

In our opinion, it is necessary to provide also real support for revitalization, modernization and reconstruction of railway lines, as well as support the construction of cargo hubs. In the planning of rail traffic (timetables, transport bicycles), the characteristics of tourist traffic should also be taken into account.

Another priority should be to support efforts to eliminate solutions and mitigate the negative impact of transport infrastructure on the environment, such as elimination of traffic from natural areas, limiting the use of roads in valuable areas only for the needs of local communities and tourists. For overloaded and damaged Podlasie region transit routes, the only solution is the effective implementation of the "Trucks on tracks" campaign.

2.11. Pomerania Regional Operational Programme

Energy efficiency and renewable energy

Non-governmental organizations hopefully accept changing of entries in the ROP regarding energy efficiency and renewable energy and the specific objectives of the Programme in this area in relation to the ROP 2007-2013. However, to implement the assumptions about energy efficiency and renewable energy to be effective, we postulate to take into account the issues of energy efficiency and renewable energy in all ROP priority axes, including those related to employment, by putting special emphasis on the creation of green jobs related to the production, handling and servicing of equipment and systems for the production of energy from renewable sources. Emphasis should also be put on introducing energy management systems (including smart metering) and a deep modernization of the energy performance of buildings and phased modernization. For projects in the field of energy modernization, eligible costs should also include information / education addressed to users and buildings' visitors. Among the projects in the field of renewable energy, projects using biomass from the active nature conservation should be given preference.

Protection of biodiversity

The ROP includes priority 6.4 *Protecting and restoring biodiversity, protection and remediation of soil and supporting ecosystem services also through the Natura 2000 and green infrastructure* and its planned scope of support is to be directed at the active nature conservation, in particular landscape parks and nature reserves. However, both indicators of outcome and product refer only to the green areas in the cities, the number of established parks protection plans and length of hiking trails created - none of them relates directly to the objectives set out in the priority title. There is the risk that, despite the declared capabilities to support projects actually restoring biodiversity, projects that will contribute to the implementation of indicators, will not pursue this goal.

Water and wastewater management

The criteria for selection of projects should award additional points to projects on particularly environmentally sensitive areas, such as Natura 2000 sites. Funding of the construction of domestic sewage treatment plants (e.g. through projects submitted by municipalities) should be established.

Waste management

The main objectives of the interventions implemented under investment priority 6.1 *Investing in the waste management sector in order to fulfill the obligations laid down in the acquis of the Union in the field of the environment and meeting those commitments going beyond the investment needs identified by Member States* are in line with the waste hierarchy in the EU, i.e.: prevention, preparation for re-use and intensification of recovery and thereby reducing the amount of waste in landfills. There is, however, lack of reflection of these goals in the indicators. The indicator "share of weight of biodegradable municipal waste transferred to landfills compared to the weight of the waste produced in 1995" does not show how, if at all, waste was prevented, or whether an adequate recovery and recycling level was ensured.

Sustainable Transport

In Pomerania region, there are numerous roadside plantings, often formed by old trees of high conservation, cultural and landscape value. They are a habitat for many protected species and ecological corridors for many species of animals, fungi and plants, including those protected by national and European law, for example *Osmoderma eremita*. They serve as "green infrastructure" that provides many ecosystem services. Road investments and other works executed in road lanes (e.g. laying optic fibers or sewerage) are a threat to trees growing by the road or in its vicinity.

It is proposed to introduce a strategic criterion given higher value when assessing the project: the creation of an alley and providing care for it for at least 10 years for newly built routes and existing roads, at which there are no tree lanes; access criterion: a description of the impact of the investment on roadside trees. For investments where there is a need for cutting down roadside trees, re-planting an alley should be planned. Investments should include monitoring and maintenance of new plantings.

Environmental Education

The means to take action to increase the environmental awareness of the inhabitants of Pomerania in the fields of: practical knowledge about sustainable development, climate change, loss of biodiversity, nature protection, including the network "Natura 2000", renewable energy, waste management and transport - aimed at changing attitudes, efficient use of resources should be planned. Without raising the environmental awareness of the inhabitants of Pomerania, who will be the recipients of ecological solutions implemented under the programme, achieving some indicators scheduled in the ROP may be at risk.

2.12. Świętokrzyskie Regional Operational Programme

Energy efficiency and renewable energy

Non-governmental organizations hopefully look at the ROP records related to energy efficiency and renewable energy under Priority Axis 3 *Efficient and green energy*. We support, awaiting transferring assumptions into DDP (including the criteria for selection of projects, not only in the priority axis 3), planning grants for activities such as the comprehensive modernization of energy public buildings and residential buildings, installations of RES in the energy retrofitted buildings, support for low-carbon plans (including information and promotion activities, campaigns to promote construction of zero-emission and investments in passive construction and modernization of urban lighting), support for environmentally friendly public transport, support for the creation of green jobs through the construction of installations for the production of biofuels and bio-components and construction / modernization of plants for the production of renewable energy equipment.

Notwithstanding the above, we urge you to include in the ROP and / or give proper meaning to low-carbon strategies, a deep modernization of energy performance of buildings and phased modernization and the introduction of energy management systems (including smart metering).

Considering the prospect of a seven-year implementation of the ROP, support for prosumer renewable energy should be planned. In the initial period, to make the investment in micro-installations possible and begin the process of marketization and decrease in costs, it is essential to lift administrative barriers and create an appropriate support system and the implementation of pilot and bridge subsidy programmes for renewable energy and micro-installations for micro-grids and energy storage systems.

Protection of biodiversity

The ROP for 2007-2013 sees as a barrier to economic development the poor "equipment in tourism infrastructure, which prevents effective use of the rich natural resources (...) existing in the region," not noticing for a moment the need to protect these resources, to prevent biodiversity loss, reducing pressure on the environment through appropriate targeting of development of the various sectors of the economy etc. The ROP must meet, much more than in the current financial perspective, the problem of biodiversity loss - the protection of valuable species and habitats, protecting and restoring the continuity of ecological corridors, minimize and compensate for the effects of infrastructure development and environmental pressures caused by economic development. NGOs appeal to secure in the 2014-2020 period the implementation of the ROP in the area of nature protection, carefully designing the conditions of implementation based on the identification of needs and organizational determinants of potential beneficiaries.

Water and wastewater management

Hoping to create an effective framework for the implementation of the DDP (including appropriate extension of the monitoring indicators), we assess positively planning support for sewage treatment plants in areas where the establishment of sewer networks is not reasonable for economical and / or technical reasons. We call for extending support in this regard for ecological wastewater treatment. We propose an extension of the activities associated with the disposal and wastewater treatment that address the problem of rainwater management in urban areas, densely populated and / or with a substantial amount of impervious surface.

Waste management

ENGOS are positive about the continuation, in the 2014-2020 financial perspective, of the support of EU funds activities in the waste management sector. We postulate to ultimately include in the types of activities also the implementation of new technologies for the recovery, recycling and waste reduction (including energy recovery), the closure and reclamation of landfills that do not meet environmental protection requirements, sludge management and construction, extension and modernization of regional plants waste management.

Sustainable Transport

The ROP rightly notes that the availability of transport is a factor "affecting the multifaceted development (...) of the region" and "the greater availability of transport, the better the potential terms of demographic and economic development." Unfortunately, the description of the priority axis 5 - *Modern communication and transport* references in priority axes 3 - *Efficient and green energy*, and 6 - *The development of towns* testify to the fact that the availability of transport is not understood in the programme in the context of ensuring the region's access, centres of growth, labor markets, education and services, to the people, within a reasonable time. ENGOS call for a modification of the ROP in the field of support of transportation and giving due attention to projects in the field of public transport - available for both urban and rural provinces (through investment in pedestrian and bicycle, public transport fleet).

Environmental Education

We expect that training in this area, but at a more specialized level, focused on the acquisition of competencies, training of personnel and / or the promotion of green jobs will be reflected in all the priority axes of the ROP. The implementation of the principles of sustainable development at all levels of implementation of the programme will not be possible without education and developing competence in environmental terms.

Adapting to climate change and horizontal implementation of the principle of sustainable development

One of the specific objectives of the priority axis 4: *Natural and cultural heritage* is to create systems to counteract the effects of natural disasters and the removal of the consequences of disasters. It should be noted that this target does not fully respond to the challenge of adaptation to climate change. The programme, in its current version, is limited to indicate actions regarding “the forms of small retention infrastructure and support system in emergency situations, outbreaks of natural disturbances”, and the “intervention (...) will focus on the construction or modernization of small retention” and support emergency services will be “complementary to this priority [investment].” The most important types of projects encompass building and modernization of multi-functional small water reservoirs, which suggests that the support will be limited to this type of investment, which in no way contribute to reducing the risk of floods and is not adaptation to climate change. We propose, in the framework of projects in the field of flood protection, climate change adaptation and mitigation, to limit the support based on measurable and verifiable criteria, the actual flood risk management and reduction, with an emphasis put on complex solutions in a catchment scale, as well as adaptation measures based on ecosystem services in areas at risk, taking into account the suitability of solutions used during the drought.

Support should be provided for the restoration of water courses, restoration and protection of floodplains and wetlands, increasing the spacing of the shafts, the construction of polders behind dikes or dry basins. Flood risk management (and mitigation of drought) must also take into account rainwater management in populated areas. It should allow support for the modernization of the systems of drainage, so that they can perform the functions of irrigation - use the stored water during the drought. In order to combat drought building underground reservoirs, non-susceptible to evaporation should be considered.

Non-governmental organizations also urge that all infrastructure investments financed from the ROP, including transport, were resistant to climate change, especially in the context of floods and phenomena associated with torrential rains and did not generate the risk of flooding and high water.



Dużek Lake - fot. S. Czachorowski

2.13. Warmia and Mazury Regional Operational Programme

Energy efficiency and renewable energy

It is necessary to build attractive tools for the support of new RES installations, with a preference given to legal forms, in which local communities would be included (companies, cooperatives, NGOs, etc.). This should be correlated with preferential loans, coming from, for example NFEP&WM, RFEP&WM, Bank of Environmental Protection. It is also important to support the creation of local RES producer groups. During the evaluation of projects special attention should be paid to the justification of the purchase of equipment for energy efficiency (in all priority axes). It is necessary to campaign / educate on energy saving, renewable energy and environmental effects of energy production from various sources, as well as on the effectiveness and environmental impact of devices powered by different types of energy.

Creating in appropriate locations a composting plant with gas and heat recovery, particularly in rural areas, where they create large amounts of waste biomass, should be supported. Support and promotion should be provided for the acquisition of heat from local renewable sources and limiting co-combustion.

Nevertheless, RES should not be approached uncritically, therefore we advocate to exclude from the ROP funding of the construction of wind farms or single wind turbines, if the investment is made in the Natura 2000 site and in its buffer zone. This is particularly important for the Warmia and Mazury region, characterized by unique landscape values.

Eligible costs of thermomodernization projects should also include information and education, addressed both to the users and visitors of objects and the local community.

Looking perspectivevely on the whole programming period 2014-2020, the ROP records should include support for prosumer renewable energy. It is necessary to eliminate administrative barriers and to create an appropriate support system and implement pilot and bridge subsidy programmes for renewable energy and micro-installations for micro-grids and energy storage systems.

Nature conservation, biodiversity and environmental education

For the preservation of biodiversity of the region of Warmia and Mazury a number of actions is recommended, including, among others, proper management of the natural environment with particular emphasis put on natural valuation of the region, preparation of plans for natural areas and monitoring of natural resources, as well as programmes to protect the landscape and biodiversity. We postulate to focus on issues of development of the economic potential based on natural one, taking into account in particular the possibility of development of the pro-natural tourism product and the RES sector as well as the need to protect the natural and landscape values. An action should be taken in the field of active nature conservation, including the restoration and conservation of habitats and species, the reconstruction of forest stands, creating ecological corridors and adaptation to climate change. Equally essential is to build awareness about natural environment, the need for its protection and the possibility of its use with particular emphasis put on the creation of infrastructure for the development of nature tourism and reducing human pressure on natural areas, promotion of types of nature-friendly tourism and building social acceptance for nature conservation through the creation of green jobs and green skills based on using nature assets.

We suggest, furthermore, that thematic objective 6, investment priority 6.3, takes into account the information and education campaigns aimed at protecting the natural heritage, which is the unchanged state of the ecosystems and biodiversity. In the priority axis 5 it is essential to include the financing of "soft" educational activities and information from the ESF and to foresee educational campaigns / information both as separate projects and as components of investment projects.

Water and sewage and waste management

In a region where there are so many rivers and reservoirs, modernization of drainage should be carried out only for water retention, in any case for dredging and removing sludge from rivers, which mostly result in ecological degradation of the river bed. The projects cannot take into account the reconstruction of drainage (which is often reconstructing the old solutions, which are already outdated and groundless), while it is preferable to support retention and treatment of rainwater, rainwater utilization, support of the construction of small retention reservoir increasing biodiversity as well as conducting restoration of floodplains.

Sustainable Transport

Particularly in urban areas, transport causes great inconvenience to the residents, is a source of harmful emissions, and outside residential areas intersects with the migration routes of animals. For both ecological and quality of life reasons, it is preferable to limit the individual transport and replace it with public transport. However, according to local residents, public transport is too expensive and connections are inconvenient. Old rolling stock also does not attract new customers, so more and more people choose their cars. To reverse this trend it is necessary to increase subsidies for public transport, both on urban and regional routes, and above all, for the development of railways.

Efforts to eliminate solutions and mitigating the negative impact of transport infrastructure on the environment (e.g. elimination of traffic in the natural areas, limiting the use of roads in nature rich areas only for local and tourist needs), should be supported.



Area of strict preservation "Zalewy Nadwarciańskie" Greater Poland National Park - fot. Radomil

2.14. Greater Poland Regional Operational Programme

Energy efficiency and renewable energy

The issue, which, in particular, non-governmental organizations pay attention to, is the need to reduce the so-called low emissions. In the current project it is to be achieved by supporting the upgrade of district heating and energy infrastructure. But it is not clear whether local governments, as beneficiaries of this priority, establish support programmes for individual residents, which was and is necessary also in other provinces struggling with this problem. Outdated heating systems in private households whose owners cannot afford to invest in greener and energy-efficient solutions are biggest causes of low emissions. Priority 4.5, directly related to low emissions - *Promoting low-carbon strategies for all types of territories, particularly in urban areas, including the promotion of sustainable multi-modal urban mobility and adaptation measures mitigating the impact of climate change* - implies support primarily in the field of urban transport; vehicle replacement, reconstruction of infrastructure in order to reduce traffic and energy efficient lighting. Non-governmental organizations have criticized the lack of a clear specification of investment in cycling, which should be part of a comprehensive strategy on changing transport systems in cities.

Protection of biodiversity, environmental education

The authors of the ROP rightly diagnose that, although in the region nearly one third of the region are the areas covered by different national forms of protection, there is still no consistent area structure, the pressure of urbanization or unreasonable tourism do not allow for providing adequate protection for biological biodiversity. ENGOs noted, that in this case a holistic approach should be implemented: solid inventory and scientific studies of particular areas should be performed once again and appropriate protection measures and monitoring should be established.

Solutions proposed in the ROP partly respond to those problems: natural inventory of municipalities and development of plans for protected areas. It would be expected that NGOs, environmentalists and naturalists from the region, are included into this activities. It is also necessary to ensure the stability of the allocation of funds for the protection of biodiversity. To utilize the available resources as efficiently as possible, it is necessary to design appropriate conditions for such projects. In particular, appropriate conditions to use these funds by NGOs, which can be an effective beneficiary of EU funds in environmental projects, must be ensured. Within the framework of this priority, environmental education was also pointed out for support. It is a very good step, organizations cooperating under the Alliance of Associations Polish Green Network note however, that the real allocation of funds for environmental education would be ensured only if it is treated as a separate priority. Environmental education should be an independent action, also financed by the ESF, of which substantial part will be managed by regional authorities under the ROPs.

Water and wastewater management, waste management

In terms of waste management, EU waste hierarchy should be respected, where waste prevention should be a priority, followed by reuse and preparation for recycling (3Rs - reduce, reuse, recycle). This hierarchy must be reflected not only in the text of the ROP 2014-2020, but also in the allocation of funds for different types of projects. It is also impossible not to mention here the crucial role of environmental education - without providing appropriate habits there is no chance of reducing the amount of waste or increasing recycling significantly. When it comes to water management, the ROP for the Greater Poland region rightly noted that there is still a huge need for reducing pressure on the environment from the municipal sector. Only a little over 60% of people in the region benefit from sewage treatment plants, while more than 90% of the population uses drinking water network. According to the environmental organizations, the support for water and wastewater management within the ROP should take into account the most economically and environmentally efficient solutions tailored to the specifics of the area. For example, support for the construction of sewage treatment plants may be more profitable than the extension of the sewerage network in sparsely populated areas. Despite the stated benefits of the proposed actions within the ROP, the long-term benefits for both local population and the environment should be taken into account. Dispersed wastewater treatment systems are also a greater guarantee of safety, if case of contamination of groundwater. It should be noted, however, that household sewage treatment cannot be applied in a strip min. 100 m from the shoreline of lakes, due to the potential impact on eutrophication. Local organizations also indicate a degraded wetland habitats in the region and the need for their restoration – this action would be possible also in the priorities of environmental protection. As part of the new ROP, compliance of all investments with the Water Framework Directive must be thoroughly ensured.

2.15. Silesia Regional Operational Programme

Energy efficiency and renewable energy

At the stage of DDP development, more specific provisions enabling communities and housing cooperatives or households to benefit from EU funds in order to carry out the modernization of energy performance of residential buildings should be prepared. Among the beneficiaries of the system, the entities implementing energy services (ESCO) should be included.

As rightly noted in the draft ROP, from the point of view of the need to improve air quality in Silesia, a key challenge is, at the same time, to fight against the so-called low emission of pollutants, including PM10 and PM2.5. It is advisable, in order to reduce emissions of air pollutants, to upgrade heat sources in the public or residential buildings, together with the modernization of energy performance, which will reduce energy consumption and, consequently, the amount of money paid by residents or institutions using the building.

Description of activities dedicated to the production and distribution of renewable energy is, however, very general and requires considerable clarification during the preparation of the DDP. As part of the investment priority 4.1. *Promoting the production and distribution of renewable energy sources*, emphasis should be placed on supporting small installations (up to 200 kW). Small systems, that can play a very important role in the construction of distributed energy, providing improvement in regional and local energy security, should be supported by European funds in the first place.

Protection of biodiversity, environmental education

Unfortunately, the resources allocated in the draft ROP for financial priority 6.4 *Protection and restoration of biodiversity, protection and remediation of soil and the promotion of the protection of ecosystems including Natura 2000, and green infrastructure* represent only 1.1% of the allocation of the entire Programme (€ 38 million), which questions the possibility of implementing courses of action set out in the Conservation Strategy of Silesian Voivodeship. The allocation for the financial priority 6.4 should therefore be increased during the development of the DDP.

The range of possible financing activities related to the protection of biodiversity defined in the ROP, may be a good starting point for further work, but it is certainly not sufficient. It should therefore be extended more precisely in the DDP.

The records put excessive emphasis on infrastructure, while in the framework of ROP, protection of natural habitats and species, not necessarily related to the construction or modernization of any infrastructure should be implemented in the first place. Similar course of action should be taken in the case of environmental education. The ROP should allow not only for the construction and retrofitting of educational centers, but primarily for the implementation of educational and information campaigns for the protection of nature and other topics related to environmental education.

In order to use financial means for the active nature conservation most effectively, it is necessary to finance the preparation of an inventory of natural and protective action plans for individual protected areas, habitats or species in the region. In addition, the area that was not properly recognized in the previous programming period 2007-2013, which should be supported in the new programme, is protection and restoration of ecological corridors.

Water and wastewater management, waste management

In the description of the action on municipal waste management reference to waste prevention, reuse and preparation for recycling is missing. Meanwhile, these are the most important elements of the waste disposal hierarchy, which require compliance with the provisions of both the EU framework directive on waste and the provisions of the Partnership Agreement. The ROP should thus ensure priority to the most desirable way of handling waste.

Effective implementation of the new waste management system in Poland still requires large expenditures on public education, particularly in relation to awareness of the need and the proper way to sort garbage. In the description of waste management activities can be found - the same as for other activities - a standard record indicating the possibility of cross-financing (financing, to the limited extent, the activities typical for the ESF). This opens up the possibility of implementing educational activities as part of a comprehensive waste management projects. These records shall be developed in the DDP - education should be a mandatory part of any project in the field of waste management. In addition, it is also necessary to enable the realization of awareness-raising campaigns on waste management, addressed to the inhabitants of Silesia.

Sustainable Transport

As in the previous programming period 2007-2013, the new ROP focuses on the support of road transport infrastructure. Its development ensured 411 million euros from the European Regional Development Fund, while the railways can only count on less than 93 million euros. This will lead to a deepening dominance of private transport and cars as a mean of transportation of

both passengers and goods, with all its consequences for the environment and communities of the region (air pollution, noise, congestion, road accidents, and faster degradation of existing roads). The ROP should take into account to a greater extent the need to build a sustainable transportation system in Silesia and reverse the current trend, which is an increasingly weaker position of public transport.

Infrastructure activities in the field of sustainable transport should be coordinated with organizational activities that promote sustainable mobility, including the reduction and calming traffic in the city centres. Only in this way will the investment in urban transport help to reduce CO₂ emissions and other air pollutants, while allowing to improve the quality of life in cities and their functional areas.



Dąb Sobieskiego w rezerwacie przyrody Łęczczok, w granicach administracyjnych Raciborza, uznany za pomnik przyrody - fot. Olos88

2.16. West Pomeranian Regional Operational Programme

Energy efficiency and renewable energy

Environmental organizations are very positive about the fact that in the 3rd Priority axis *Support for low-carbon economy* has received 11.84% of allocation which is the third place in terms of size (after the economy and transport). Beneficiaries will be able to apply for a grant from the total amount of 189 376 416.09 euros.

The fact that special emphasis was put on supporting the production and distribution of energy from renewable sources deserves appreciation. In support of this priority, the global nature of climate change is noted, which enforces the coordination of activities in many sectors. Reduction of emissions, including CO₂, is one of the main lines of action identified, that inhibits climate change.

At the same time the increasingly important role for the region a stable energy supply begins to play. This will be done through the development of alternative energy sources based primarily on biomass and biogas, as these sources produce energy regardless of weather conditions. A large share of agricultural production in the region is to ensure a constant supply of raw materials. In addition to these energy sources, solar energy is also listed, acquisition of which will be enabled to be financed from the ROP. The creation of many small investments is planned. Thanks to the large dispersion of renewable energy sources and energy production in small units, investments in costly transmission lines will not be needed. The system will be based on the existing network.

Planned investments will serve as an impulse for the development of bio-economy in the region, where this sector represents regional specialization. In order to achieve stability of the power supply the construction of hybrid models that combine the energy from different sources adequately to local needs is allowed. Installations producing electricity only for their own needs will also be subsidized. During this funding period wind farms are not expected to be financed because their rapid development has encountered problems with reception of power supply as well as environmental problems. Circle of beneficiaries has been very broadly sketched. In fact, only individuals were excluded.

Another priority will be to promote energy efficiency and the use of renewable energy sources in enterprises, and the goal is reducing resources intake in SMEs. Categories of support in this axis will be thermo-industrial buildings, commercial and service companies, technology-efficient consumption of electricity, heat and / or water. The main aim was to also reduce the energy consumption in public buildings and housing.

Protection of biodiversity, environmental education

As part of the investment priority 6.3. *Preservation, protection, promotion and development of natural and cultural heritage*, for which the following objectives were established: to increase tourism and cultural attractiveness of the region and to increase the quality of services provided by key cultural institutions, it is proposed that the protection is extended to traditional forms of landscape, typical to Western Pomerania. They are part of cultural and natural heritage of the region.

Sustainable Transport

It should be emphasized, if it comes to the road investments, at the stage of project evaluation criteria, there is the need to comply with the requirements of the protection of animals, for example protection of amphibians, the construction of "animal crossings" at the intersection of roads with ecological corridors, development of detection and monitoring systems in areas where road system interferes with the network of ecological corridors as well as the introduction of the necessity of a preliminary analysis of the actual need for repair of the road.

In addition, in West Pomerania region, there are numerous roadside plantings, often formed by old trees, of high conservation, cultural and landscape value. They serve as a habitat for many protected species and ecological corridors of many species of animals, fungi, plants, including those protected by national and European law, for example *Osmoderma eremita*. They serve as green infrastructure that provides many ecosystem services. Investments in roads and other works executed within road lanes (e.g. laying optic fibers or sewerage) are a threat to trees growing in the traffic lane or in its vicinity.

It is proposed to introduce a strategic criterion given higher value when assessing the project: the creation of an alley and providing care of it for at least 10 years for newly built routes and existing roads, at which there are no avenues; access criterion: a description of the impact of investment on roadside trees. For investments where there is a need for cutting down roadside trees, re-planting an alley should be planned. Investments should include monitoring and maintenance of new plantings.

Adaptation to climate change

Adaptation to climate change has not been separated in the ROP, it is included in priority Axis 3 *Support for low-carbon economy*. Due to the quite distinct weather phenomena occurring in the region, environmental organizations recommend to focus on developing the interdisciplinary activities, including planning, security systems, education systems, alarm systems, the organization of efficient

evacuation, construction, hydraulic engineering and the restoration of natural retention areas destroyed by land reclamation, embankments and river regulation. Retention activities are only one of several activities that may protect against the effects of flooding. The technical measures should focus on increasing the spacing of the existing embankments, construction of polders in all places where shafts “protect” non-residential or extensively used areas, for example meadows, building dry storage reservoirs, reducing impervious surfaces in urban areas.



Karwia Struga near Trzebieża, Puszcza Wkłzańska,
(Gmina Police, Western Pomerania), Poland - fot. Mateusz War

List of organizations supporting position papers:

Barwickie Stowarzyszenie Inicjatyw Lokalnych Razem, Barwice; Bractwo Czarnej Wody, Osie; Centrum Ochrony Mokradeł, Warszawa; Centrum Rozwiązań Systemowych, Wrocław; Dolnośląski Klub Ekologiczny, Wrocław; Elckie Stowarzyszenie Ekologiczne, Elk; Federacja Zielonych Gaja, Szczecin; Fundacja „Miłosierdzie i Wiedza”, Szczecinek; Fundacja „Tradycyjna Zagroda”, Kańczuga; Fundacja Aeris Futuro, Kraków; Fundacja Albatros, Dywity; Fundacja Alma, Toruń; Fundacja Biuro Inicjatyw Społecznych, Kraków; Fundacja Client Earth, Warszawa; Fundacja Doliny Baryczy, Milicz; Fundacja Dziedzictwo Przyrodnicze, Bircza; Fundacja Ekologiczna ARKA, Bielsko-Biała; Fundacja Ekologiczna, Legnica; Fundacja Ekologiczny Serwis Prawny, Kraków; Fundacja Ekonomistów Środowiska i Zasobów Naturalnych, Białystok; Fundacja EkoRozwoju, Wrocław; Fundacja Europejskie Centrum Współpracy Młodzieży, Toruń; Fundacja Fundusz Partnerstwa, Kraków; Fundacja Greenmind, Warszawa; Fundacja Greenpeace Polska, Warszawa; Fundacja H2O, Opole; Fundacja Instytut Myśli Obywatelskiej im. Stańczyka, Kraków; Fundacja Instytut na rzecz Ekorozwoju, Warszawa; Fundacja Młodzieżowe Centrum Wiedzy i Innowacji, Toruń; Fundacja na rzecz Efektywnego Wykorzystania Energii, Katowice; Fundacja Nauka dla Środowiska, Koszalin; Fundacja Piaskowy Smok, Katowice; Fundacja Przyrodnicza „Pro Natura”, Trzcинica Wołowska; Fundacja Rozwoju Gmin Polskich, Kraków; Fundacja Strefa Zieleni, Warszawa; Fundacja Towarzystwo Ulepszenia Świata, Białystok; Fundacja Wspierania Inicjatyw Ekologicznych, Kraków; Fundacja WWF Polska, Warszawa; Fundacja Zielone Płuca Polski, Białystok; Fundacji Zdrowie i Życie, Bydgoszcz; Klub Ochrony Środowiska Śląska Opolskiego, Opole; Kobieteria - Stowarzyszenie Inicjatyw Kobięcych, Białystok; Krasnostawski Ruch Ekologiczny „VIDRIS”, Krasnostaw; Lokalna Grupa Działania „Brama na Bagna”, Zambrow; Lokalna Organizacja Turystyczna „Brama na Bagna”, Zawady; Lokalna Organizacja Turystyczna, Toruń; Lubelskie Towarzystwo Ornitologiczne, Lublin; Małopolskie Towarzystwo Ornitologiczne, Kraków; Mazowiecko-Świętokrzyskie Towarzystwo Ornitologiczne, Pionki; Natural Forest Foundation, Giżycko; Ochrony Herpetofauny „Tryton”, Warszawa; Ogólnopolskie Towarzystwo Ochrony Ptaków, Marki; OIKOS Stowarzyszenie Ekologiczne Ziemi Nakielskiej, Nakło nad Notecią; Okręg Warmińsko – Mazurski LOP w Olsztynie; Partnerstwo Borów Niemodlińskich, Niemodlin; Podlaskie Stowarzyszenie Agroturystyczne, Sokółka; Polski Klub Ekologiczny Okręg Mazowiecki, Warszawa; Polski Klub Ekologiczny Okręg Środkowo-Wschodni, Lublin; Polski Klub Ekologiczny okręg Wschodnio-Pomorski, Gdańsk; Polski Klub Ekologiczny, Kraków; Polskie Stowarzyszenie Ochrony Jeży „Nasze Jeże”, Białystok; Polskie Towarzystwo Przyjaciół Przyrody „pro Natura”, Wrocław; Porozumienie Rowerowe, Lublin; Prezydium Rady Organizacji Pozarządowych w Szczecinku; Przyrodników, Świebodzin; PTTK Oddział Lipno; PTTK Oddział Świecie; Społeczny Instytut Ekologiczny, Warszawa; Stowarzyszenie „EcoTerra”, Ruda Śląska; Stowarzyszenie „Eko - Edukacja”, Wrocław; Stowarzyszenie „Okolica”, Białystok; Stowarzyszenie „Zielone Mazowsze”, Warszawa; Stowarzyszenie „Cypel domki”, Nowa Sól; Stowarzyszenie „Ekolubelszczyzna”, Lublin; Stowarzyszenie „Nie Kopalni Odkrywkowej”, Gubin; Stowarzyszenie Alternatywnych Sportów Rekreacji i Turystyki „Integra”, Zawady; Stowarzyszenie Centrum Promocji Ekorozwoju, Poznań; Stowarzyszenie Eko-Inicjatywa, Kwidzyn; Stowarzyszenie Ekologiczne „Etna”, Oława; Stowarzyszenie Ekologiczne „Dla Ziemi”, Kamionka; Stowarzyszenie Ekologiczno-Społeczne „Zielona Swoboda”, Michów; Stowarzyszenie EKOSKOP, Rzeszów; Stowarzyszenie EKO-UNIA, Wrocław; Stowarzyszenie Fabrykancka, Łódź; Stowarzyszenie Forum Chociwelskie, Chociwel; Stowarzyszenie Integracji Społecznej Komunikacji SISKOM, Warszawa; Stowarzyszenie KEKS - „Kozłowska Ekologiczna Kuźnia Smaku”, Turówko 18, Turówko; Stowarzyszenie Kujawsko - Pomorskie Centrum Edukacji Ekologicznej, Bydgoszcz; Stowarzyszenie Kultury Alternatywnej Fala, Elk; Stowarzyszenie Lokalna Grupa Działania „Kraina Łęgów Odrzańskich”, Prochowice; Stowarzyszenie Łódzka Inicjatywa na rzecz Przyjaznego Transportu, Łódź; Stowarzyszenie Miasta Dla Rowerów, Wrocław; Stowarzyszenie Miłośników Czynnego Wypoczynku i Rekreacji „RUSAŁKA”, Weltyń; Stowarzyszenie na rzecz Edukacji Ekologicznej „Dolina Baryczy”, Milicz; Stowarzyszenie na rzecz Ekorozwoju „Agro-group”, Białystok; Stowarzyszenie na Rzecz Rozwoju Społeczności Lokalnej „Serafin”, Lipno; Stowarzyszenie na rzecz Trwałego i Zrównoważonego Rozwoju Zielona Ziemia, Prószków; Stowarzyszenie na rzecz Zrównoważonego Rozwoju, Wrocław; Stowarzyszenie Ośrodek Działań Ekologicznych „Źródła”, Łódź; Stowarzyszenie Poleckie we Włodawie, Włodawa; Stowarzyszenie Pracownia na rzecz Wszystkich Istot, Bystra; Stowarzyszenie Przestrzeni Inicjatyw Twórczych Tektura, Lublin; Stowarzyszenie Przyjaciół Ziemi Gubińskiej, Gubin; Stowarzyszenie Przyjaciół Ziemi Lidzbarskiej, Lidzbark Warmiński; Stowarzyszenie Ptaki Polskie, Goniądz; Stowarzyszenie Rostoczańska Konna Straż Ochrony Przyrody im. 25 Pułku Ułanów Wielkopolskich, Lublin; Stowarzyszenie Społeczno-Kulturalne „Ziemia Kozłowska, Kozłowo; Stowarzyszenie Studentów Nauk Przyrodniczych, Lublin; Stowarzyszenie Tilia, Toruń; Stowarzyszenie Uroczyisko, Supraśl; Stowarzyszenie Węgorapa-Gołdapa, Budry; Stowarzyszenie Zielona Szkoła, Łódź; Stowarzyszenie Zielony Białystok, Białystok; Towarzystwo dla Natury i Człowieka, 20-612 Lublin; Towarzystwo na rzecz Ziemi, Oświęcim; Towarzystwo Przyjaciół Słońska „Unitis Viribus”, Stońsk; Towarzystwo Przyrodnicze „Bocian”, Warszawa; Universal Ecology Specjalistyczna Spółdzielnia Socjalna, Białystok; Wrocławska Inicjatywa Rowerowa, Wrocław; Zakopiańska Fundacja Narodowa SKANSEN, Zakopane; Zamojskie Towarzystwo Przyrodnicze, Zamość; Związek Przyjaciół Pomorza, Gdańsk; Związek Stowarzyszeń „Polska Zielona Sieć”, Kraków.

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Alliance of Associations **Polish Green Network**

is a national alliance of 10 strongest environmental and sustainable development associations and foundations based in the largest cities of Poland. PGN regularly cooperates with about 30 civic society organizations.

The main areas of its activities are advocating for social and environmental justice within sustainable development, establishing social control mechanisms over public funds, increasing consumers impact on multinational corporations, building public support for development and providing development assistance in the Global South countries and Eastern Europe.

Since 2002 PGN has had experience in promotion of responsible consumption, Fair Trade and development education.

PGN is a leading sustainable development network in Poland, making it one of the few NGOs in Poland able to work across all regions of the country.

We act for the sake of nature, people and development.

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Action for Global South www.globalnepoludnie.pl

For the Climate www.dlaklimatu.pl

Funds for Sustainable Development www.ekoprojekty.pl

Green Partnership in Eastern Europe www.zielonasiec.pl

Organizations associated with PGN:

- Federation of the Green „Gaja” / Szczecin
- Foundation Ecological Libraby / Poznań
- Foundation of Ecodevelopment FER / Wrocław
- Centre for Eco-Action „Źródła” / Łódź
- Social Ecological Institute / Warszawa
- Association „Ekoskop” / Rzeszów
- Ecological-Cultural Association Gaja Club / Bielsko-Biała/Wilkowice
- Association for Eco-development „Agro-Group” / Białystok
- Association Eco-Initiative/ Kwidzyn
- Association „Tilia”/ Toruń
- Society for Humans and Nature/ Lublin

Polish Green Network is a member of international NGO networks:

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ANPED and SFTEAM,

as well as national networks:

Polish NGO Federation,
Zagranica Group,
Fair Trade Coalition,
Climate Coalition and Coalition of Polish Environmental NGOs for EU Funds.

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