

## Good governance of the EU's national recovery and resilience plans

The EU's Recovery and Resilience Fund is a historic opportunity for Europe to start building a robust environmental governance system that can guarantee policy coherence, true progress towards sustainability and health, and meaningful public engagement.

As the majority of national recovery and resilience plans are currently in the approval stage by the European Commission and the Council, there are serious concerns regarding both the transparency of the process so far and the transparency throughout the upcoming implementation of the plans. Crucially, the system of governance of NRRPs implementation after their approval is far from clear.

We are concerned that in the absence of clear and strict rules of good governance and accountable systems of monitoring against sustainability objectives, additionality in relation to existing green policies (such as respective national energy and climate plans), and "do no significant harm" criteria, reforms, investments and projects may be wrongly labelled green or harm EU environmental targets.

We stress the need for strong monitoring of the plans' compliance with the DNSH principle not only during the ex ante assessment of NRRPs by the Commission's services, but also at member states level throughout the implementation period, and by the European Commission when looking at the achievement of relevant milestones and targets. The implementation of the NRRPs cannot lead to roll back on environmental protections, policies and laws, as underscored by the non-regression principle of EU treaties. Europe's recovery strategies need to safeguard and enhance the implementation of the environmental acquis, and the Aarhus Convention, and open faster pathways towards climate neutrality and environmental integrity.

Although we acknowledge that the governance models of NRRPs are strongly dependent on national governments, the European Commission needs to ensure that those are fit to ensure compliance of the NRRPs with the EU's environmental acquis, the good governance principle and contribute to the achievement of the Green Deal objectives. There is, in other terms, a shared responsibility in this respect.

The aim of our proposals is to ensure that the national recovery plans are implemented in a participatory way, underpinned with accountable and transparent processes.

### Proposals

We call upon the Commission to assess the NRRPs and monitor their progress in accordance with investment needs to achieve 2030 climate and environmental objectives set out by the EU green deal, and international climate and biodiversity agreements.

We further call upon the Commission to ensure that the NRRPs are fully aligned with the 1.5°C target of the Paris Agreement, while also strengthening environmental democracy.

Below, we articulate specific proposals addressed to the European Commission and the member states.

## 1. Good monitoring system

- i. **Open database:** The disclosure of the fiches of all projects funded under the NRRPs in accessible-to-all national portals is imperative. It is also important that these information systems will invite the submission by the public of material and data on the sustainability and DNSH profile of each investment. In the recent years progress has been made toward reporting of the beneficiaries of the EU funds (CAP and Cohesion funds) in national web portals and also in integrated databases on EU level that should be further advanced as suggested by the recent report published by the EP<sup>1</sup>.
- ii. **Scoreboard:** The scoreboard (RRF regulation art. 30) needs to provide meaningful indicators which incorporate the contribution of NRRPs to the achievement of meaningful output and outcome indicators. More concretely the scoreboard should include at minimum:
  - Indicators related to civic participation in the implementation of the national Plans. For example, the number of meetings with stakeholders, the role of social partners, the various bodies/institutions consulted on the Plan's implementation, or the establishment of a dedicated institution to steer or monitor the implementation of the Plan.
  - The relative (%) contribution of respective NRRPs to the achievement of EU 2030 climate, energy and biodiversity targets
  - The contribution of respective NRRPs to EU SDG targets, based on the existing detailed indicators of the later, and the contribution to the EU targets of the Action Plan on the European Pillar of Social Rights
  - Dedicated indicators able to track the contribution of the RRP to gender equality
  - Dedicated indicator related to the systems in place to ensure full respect of the DNSH principle, including the avenues available for citizens to raise concerns regarding a specific investment.
  - The proportion of respective NRRPs spending that is taxonomy-aligned as per regulation EU/2020/852 and the associated delegated act C/2021/2800 final
- iv. **Monitoring committees:** The model of setting up monitoring committees at the member state level, and applying the European Code of Conduct on Partnership as in Cohesion Policy, offer a solid platform for social engagement. Although they often lack meaningful engagement with, and participation, of stakeholders comprising their membership, these monitoring committees operate on the basis of specific and transparent indicators. We consequently propose the setting up of similar bodies to ensure the participation of a broad range of social and economic stakeholders and civil society organisations in reviewing the progress in the implementation of the NRRPs. These bodies could also play an advisory role, or suggest consulting existing relevant institutions therefore. Several Member States are planning to put in place a dedicated monitoring committee for the NRRP: this kind of initiative should be promoted and strengthened to fully involve stakeholders and make sure civil society can have a say throughout the implementation of the reforms and investments.

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[https://www.europarl.europa.eu/meetdocs/2014\\_2019/plmrep/COMMITTEES/CONT/DV/2021/0125/Study\\_Largest50Beneficiaries\\_EN.pdf](https://www.europarl.europa.eu/meetdocs/2014_2019/plmrep/COMMITTEES/CONT/DV/2021/0125/Study_Largest50Beneficiaries_EN.pdf)

It will be important to make sure such inclusive platforms/committees have a web portal, clear contact details and a well-resourced secretariat, in order to allow people to channel issues or remarks they may have on specific investments

## 2. Access to information

Although the European Commission has published its assessments of NRRPs, many NRRPs have not yet been fully disclosed to the public in a number of Member States. As such, we call the Commission to request the disclosure of full NRRPs without undue delay. We also call the Commission to ensure that the reports which will be submitted by Member States twice a year on the progress made in the achievement of their recovery and resilience plans are fully disclosed, in a spirit of transparency.

## 3. Civic participation

As pointed out recently by the European Economic and Social Committee, the involvement of organised civil society has been far from satisfactory in the majority of EU countries so far. Although meaningful public participation is an end in itself, it is key to ensure everyone contributes to make the Plan a success. Civil society organisations and other stakeholders also have a role to play to ensure effective monitoring of the implementation of policies and laws, particularly when relating to common goods, such as the natural environment and the climate.

We consequently call upon the European Commission to systematically include milestones and targets related to civic participation in the implementation of the national Plans, and to include related indicators in the upcoming Scoreboard used to monitor the Plans' implementation.

We would also like to emphasise the need for a Structured Dialogue with civil society at an EU level to guarantee the promotion of the best practices and identifying the need for action to address systemic issues and lack of coherence with EU law and Green Deal objectives.

On behalf of:



and  
**EURONATUR** STIFTUNG