



TOWARDS A CLIMATE NEUTRAL EU:
EFFICIENT ALLOCATION OF EU FUNDS

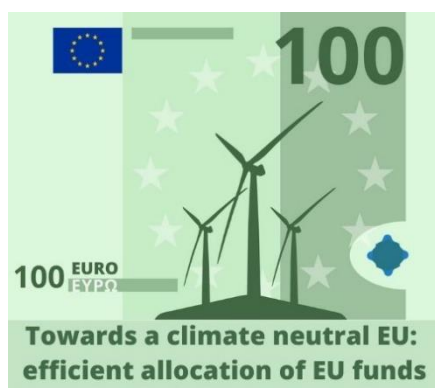
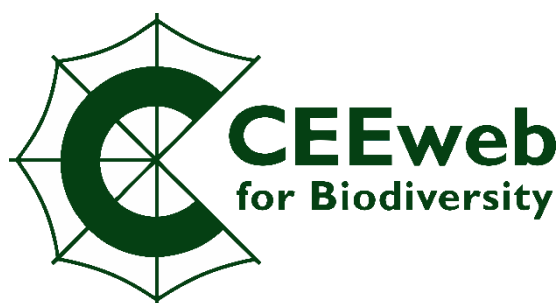
Evaluating EU funding mechanisms 2021-2027: Poland

An assessment of Regional Programmes for
EU funding, Poland 2021-2027

SEPTEMBER 2022

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Acknowledgements

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Disclaimer

The project “Towards a climate neutral EU: efficient allocation of EU funds” is part of the European Climate Initiative (EUKI). EUKI is a project financing instrument by the German Federal Ministry for Economic Affairs and Climate Action (BMWK). The EUKI competition for project ideas is implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH. It is the overarching goal of the EUKI to foster climate cooperation within the European Union (EU) in order to mitigate greenhouse gas emissions.

The opinions put forward in this document are the sole responsibility of the project partners and do not necessarily reflect the views of BMWK.

1. Comments on draft Regional Programme for Mazowze, 2021-2027

A. Specific points of address

Programme strategy: key development challenges and policy actions

Priority I - A more competitive and intelligent Mazovia

Specific objective 1(i) Developing and strengthening research and innovation capacities and the use of advanced technologies

Specific objective 1(ii) reaping the benefits of digitisation for citizens, businesses, research organisations and public institutions

Specific objective 1(iii) to enhance the sustainable growth and competitiveness of SMEs and to create jobs in SMEs, including through productive investment

Specific objective 1(iv) Developing skills for smart specialisation, industrial transformation and entrepreneurship

Specific objective 1(v) enhancing digital connectivity

Priority II - Greener Mazovia

Specific objective 2(i) to promote energy efficiency and greenhouse gas emission reductions

Specific objective 2(ii) to promote renewable energy in accordance with Directive (EU) 2018/200, including the sustainability criteria set out therein

Specific objective 2(iv) to support climate change adaptation and disaster risk prevention and resilience, taking into account ecosystem-based approaches

Specific objective 2(v) promote access to water and sustainable water management

Specific objective 2(vi) fostering the transition towards a circular and resource-efficient economy

Specific objective 2(vii) to enhance the protection and conservation of nature, biodiversity and green infrastructure, including in urban areas, and to reduce all types of pollution

Specific objective 2(viii) supporting sustainable multi-modal urban mobility as part of the transition towards a zero-emission economy

Priority III - Better connected Mazovia

Specific objective 3(ii) to develop and enhance sustainable, climate resilient, smart and intermodal mobility at national, regional and local level, including improved access to TEN-T and cross-border mobility

Priority IV - Improving the quality of life in Mazovia

Specific objective 4(ii) to improve equitable access to high quality and inclusive education, training and lifelong learning services through the development of accessible infrastructures, including by supporting resilience in distance and online education and training

Specific objective 4(iii) to promote the socio-economic inclusion of marginalised communities, low-income households and disadvantaged groups , including people with special needs, through integrated actions covering housing and social services

Specific objective 4(v) Ensure equitable access to health care and promote the resilience of health systems, including primary health care, and support the transition from institutional to family and community-based care

Specific objective 4(vi) Strengthen the role of culture and sustainable tourism in economic development, social inclusion and social innovation

Priority V - Vocationally active Mazovia

Specific objective 4(a) improve access to employment and activation measures for all job seekers, in particular young people, notably through the implementation of the Youth Guarantee, the long-term unemployed and disadvantaged groups in the labour market as well as the economically inactive, and through promoting self-employment and the social economy

Specific objective 4(b) Modernise labour market institutions and services to assess and anticipate skill needs and provide timely and well-targeted

assistance and support for the matching of skills and qualifications with labour market needs and for labour market flows and mobility

Specific objective 4(d) to support the adaptation of workers, enterprises and entrepreneurs to change, to promote active and healthy ageing and a healthy and well-adapted working environment which takes account of health risks

Priority VI - Modern and accessible education in Mazovia

Specific objective 4(f) to promote equitable access to and completion of good quality, inclusive education and training, especially for disadvantaged groups, from early childhood education and care through general and vocational education and training to higher education, and adult education and learning, including facilitating learning mobility for all and accessibility for people with disabilities

Specific objective 4(g) Promoting lifelong learning, in particular flexible up-skilling and re-skilling for all, including entrepreneurial skills and digital competences, better anticipation of change and demand for new skills based on labour market needs, facilitating career transitions and supporting occupational mobility

Priority VII - Active integration and development of social and health services in Mazovia

Specific objective 4(h) Support active social inclusion to promote equal opportunities, non-discrimination and active participation, and to enhance employability, in particular of disadvantaged groups

Specific objective 4(k) Increase equitable and timely access to good quality, sustainable and affordable services, including services that support access to housing and person-centred care, including health care; modernise social protection systems, including supporting access to social protection, with a particular focus on children and disadvantaged groups; improve accessibility, including for people with disabilities, efficiency and resilience of health systems and long-term care services

Specific objective 4(l) to promote the social inclusion of people at risk of poverty or social exclusion, including the most deprived and children

Priority VIII - Mazovia closer to citizens

Specific objective 5(ii) to promote integrated and inclusive social, economic and environmental development at local level, culture, natural heritage, sustainable tourism and security in non-urban areas

Priorities for technical assistance

Priority IX - Technical assistance (ERDF)

Priority X - Technical assistance (ESF+)

Financial plan

Basic conditions *(To be completed at a later stage)*

Programme institutions *(To be completed at a later stage)*

Partnership

Communication and visibility

Application of unit rates, lump sums, flat rates and non-cost-related financing
(To be completed at a later stage)

B. Table of comments and amendments (overleaf)

Priority/area of the document	Specific objective or other chapter of the document	Page No.	Entry in the draft Regional Programme: European Funds for Mazovia 2021-2027 to which comments are made	Suggested change (concrete proposal for a new wording of the entry)	Reason for the comment
2.1.2.2	2.1.2.2.1	80	<p>"Aimed in particular at projects in line with the region's potential, i.e. solar energy, small-scale wind energy and biomass and biogas."</p>	<p>"Aimed in particular at projects in line with the region's potential, i.e. solar energy, small-scale wind energy, geothermal energy and biomass and biogas."</p>	<p>Geothermal potential is also available in Mazovia, particularly in its north-western part, an example of which is the geothermal heat plant in Mszczonów. It is worth recalling that heat pumps are also an exploitation of geothermal potential.</p>
2.1.2.3	2.1.2.3.1	85	<p>In addition demand is for light rescue equipment such as: rescue boats with special trailers, outboard motors, sand packers,</p>	<p>Add after the mentioned sentence. Preference will be given to the purchase of vehicles and equipment powered by low-carbon (mainly for vehicles) and zero-carbon (mainly for</p>	<p>The description of the intervention lists the equipment to be purchased for TSOs. Due to one of the main objectives of spending EU funds in the period 2021-</p>

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			<p>contaminated water pumps,</p> <p>rescue saws, circular saws, power generators, portable water tanks, AC detectors</p> <p>AC detectors, and for measuring concentrations.</p>	mobile equipment) energy sources.	<p>2027, it is necessary to give these purchases some environmental criteria, which the suggested provision introduces. Trustworthy electric saws, cutters and other rescue equipment are available on the market. It is also possible to purchase - instead of generators - portable electricity storage units, e.g. trailers with storage units, to power this type of equipment with electricity rather than internal combustion</p>

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					<p>engines. Many fire stations are powered by PV cells, for example, and the purchase of electrical equipment will make it possible to make better use of the electricity produced at these sites from RES, while the purchase of portable energy storage units will make the availability of electricity more reliable for TSOs. All of this will contribute to not increasing greenhouse gas emissions.</p>

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					Without such an addition, there is a danger that cities and municipalities will submit projects that only consist of drainage and rainwater harvesting and not water retention. This effect should be avoided, hence the proposal to add such a comment.
2.1.2.5	2.1.2.4	99-100	Addresses gaps in output and result indicators	Output indicators lack indicators for the reuse of things, e.g. number of new repair shops for used things, replacement points for unused things The output indicators lack indicators on the reuse of things,	In the description of the intervention, attention was - rightly - drawn to the need to develop offers for the re-use of things and their exchange. It

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				<p>e.g. the amount (weight, volume) of things that have been diverted for reuse and have not become waste.</p> <p>It is also worth noting that both types of indicators lack separate consideration of recovery - only recycling is mentioned.</p>	<p>also mentions the types of activities that can be developed within the scope of such an offer and therefore also be funded. However, the monitoring of this type of project was completely ignored in the indicators, hence the proposal of indicators on this issue.</p>
2.1.27	2.1.2.7.1	112	Reducing emissions from transport through the purchase of street cleaning machines	Reducing air pollution from transport through the purchase of street cleaning machines/equipment;	Often, taking transit traffic out of the city leaves it with the problem of oversized carriageways, unsuitable for reduced traffic, which

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			<p>and equipment;</p> <p>Construction of bypasses to relieve the city of traffic, particularly transit traffic</p>	<p>Construction of bypasses to relieve the city of traffic, particularly transit traffic, together with the adaptation of existing roads used by transit traffic to local traffic conditions;</p>	<p>are dangerous for other traffic users and unsightly, so we suggest favouring this type of comprehensive project.</p>
2.1.3	2.1.3.1	120	<p>TEN-T and national roads, taking into account the hierarchy of the road network, the risk of induced demand and the functions of the different road categories, so as to counteract excessive traffic growth</p>	None	<p>We very much welcome the inclusion of the issue signalled in the aforementioned sentence in the criteria for selecting projects for implementation. However, we would like to point out that there is a need to verify the indicative list from this</p>

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			road traffic and the transfer of travel from, for example, rail to road." and indicative list of road projects		point of view - the list includes investments which will move road traffic towards Warsaw and may cause induced traffic in this direction - including traffic taken over from rail transport, e.g. Paszkowianka, voivodship roads extended in Józefów or Pruszków.
2.1.3	2.1.3.1.2	126	Result indicators	Suggested new indicator: number of road accidents per inhabitant (of the province). Suggested new indicator: indicator for reduction of	The description of the lines of action suggests that actions will be implemented in the area of traffic safety (e.g. ring roads), so this

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				<p>transport exclusion, e.g. reduction of travel time to the provincial capital by rail/bus transport.</p> <p>New indicator: Greenhouse gas emissions from the transport system of the Lower Silesian Voivodship</p> <p>New indicator: Breakdown of transport tasks at voivodship level</p>	<p>type of indicator should appear.</p> <p>The description of the lines of action suggests that actions will be implemented to reduce traffic exclusion, so this type of indicator should appear.</p> <p>Measuring greenhouse gas emissions should become a standard in assessing the effectiveness of investments, as one of the main objectives of</p>

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					<p>the implementation of investments in the financial perspective 2021-2027 is to reduce emissions.</p> <p>Calculating emissions for a transport system does not need to be a complicated task and is feasible both before and after the investment.</p> <p>Measuring the distribution of traffic tasks in a situation where investments in traffic reduction and increasing the attractiveness of public</p>

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					transport are declared should be the standard for measuring the effect of the measures.

2. Comments on draft Regional Programme for Małopolska, 2021-2027

No.	Submitter	Part of the document to which the remark refers (e.g. title of chapter, subchapter/ priority/ specific objective)	Page no. in document	Content of remark (proposed amendments)	Reason for remark
1.	Foundation Institute for Sustainable Development	2(viii) supporting sustainable multimodal urban mobility as an part of the shift towards a zero-carbon economy	115	<p>"No financial instruments are planned to be used under the specific objective.</p> <p>The projects planned to be implemented under the specific objective will be carried out by public institutions and, as a rule, will not generate revenues/savings". The point should be reworded to introduce the possibility of using financial instruments and</p>	<p>The scope of support proposed in the programme allows for the subsidisation of investments that can generate income or savings - including can be implemented by private entities, these are in particular:</p> <ul style="list-style-type: none"> - energy-efficient street and road lighting (can be implemented by energy companies); - developing systems for the coordination/integration of different modes of transport (including the 'mobility-as-a-service' concept

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				<p>to ensure that the statements in the programme do not diverge from the reality - see the explanatory memorandum for details.</p>	<p>(can be implemented by private service providers)</p> <p>- charging stations of electric vehicles, refuelling stations for alternative fuels (can be used to generate additional income outside the transport business).</p> <p>Therefore, either financial instruments should be introduced for selected types of investments, e.g. ESCO for retrofitting of lighting, or provisions should be introduced in the programme to block the receipt of subsidies by investments of this type that generate revenue or savings. We rather suggest the former solution, i.e. the use of financial instruments</p>

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					(after appropriate analyses of their scope and formula).
2.	Foundation Institute for Sustainable Development	2(viii) supporting sustainable multimodal urban mobility as an part of the shift towards a zero-carbon economy	115	Product indicators. We postulate the addition of indicators from the CRL: Number of "Bike&Ride" facilities built, infrastructure for alternative fuels (charging stations).	The proposals are a consequence of the proposed programme provisions, which currently allow investment in Park&Ride car parks and alternative fuel infrastructure.
3.	Foundation Institute for Sustainable Development	2(viii) supporting sustainable multimodal urban mobility as an part of the shift towards a zero-carbon economy	116	Result indicators. We propose to add result indicators: 1. distribution of passenger transport tasks in the largest cities of the region (Kraków, Tarnów, Nowy Sącz etc.). 2. reduction of greenhouse gas	The description of the specific objective includes the activities that will achieve the objectives measured by the proposed indicators. In particular, the following provisions should be pointed out: - Reducing individual motorised traffic in city centres,

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				<p>emissions from passenger transport. (summary value for completed projects).</p> <p>3. road traffic safety indicator, e.g. number of road accident victims per 1,000 inhabitants of the region or selected largest cities in the region.</p>	<p>in particular "The aim of support in this area is to further develop modern, zero- and zero- and low-emission urban transport encouraging the abandonment of the use of passenger cars". - the indicators currently written into the programme do not measure this objective!</p> <p>- acquisition of new zero- or low-emission bus fleets and other investments contributing to emission reductions</p> <p>- equipping roads and streets equipped with the necessary facilities and road equipment for the safe of traffic of public transport vehicles</p>

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4.	Foundation Institute for Sustainable Development	2(viii) supporting sustainable multimodal urban mobility as an part of the shift towards a zero-carbon economy	116	We do not know why the programme does not specify the groups of beneficiaries who can apply for funding - in other regional FE such provisions are used. Even if such provisions will not be inserted in the programme (but e.g. in more detailed documents), we postulate in the scope of this objective to indicate, among others, NGOs as beneficiaries.	Non-governmental organisations may, in particular, carry out projects in the field of: information, promotion and education activities promoting public or individual non-motorised and traffic safety in public transport. This implementation can be independent or as a partner in a project, so NGOs could be beneficiaries of EU FE funds.
5.	Foundation Institute for Sustainable Development	3(ii) developing and enhancing sustainable, climate resilient,	118	"Construction and reconstruction of provincial roads, including bypasses" - we suggest adding a condition	Often the construction of a city bypass leaves it with the problem of oversized carriageways, unsuitable for reduced traffic,

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		<p>smart and intermodal mobility at national, regional and local level, including improved access to TEN-T and cross-border mobility.</p> <p>including improved access to TEN-T and cross-border mobility</p>		<p>concerning bypasses: Bypasses can only be financed together with adapting existing roads used by transit traffic to local traffic conditions.</p>	<p>which are dangerous for other traffic users and unsightly, so we suggest favouring this type of comprehensive project.</p>
6.	Foundation Institute for Sustainable Development	3(ii) developing and enhancing sustainable, climate resilient, smart and intermodal mobility at national,	119	<p>Support for investment in the infrastructure of existing aeroclub airports in order to adapt them to business traffic.</p> <p>– We request the deletion of</p>	<p>Air transport received a lot of financial support in the period 2007-2013 and today is left with many orphaned assets (regional airports). Investment in local airports to accommodate</p>

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		<p>regional and local level, including improved access to TEN-T and cross-border mobility.</p> <p>including improved access to TEN-T and cross-border mobility</p>		support for this type of project.	<p>business traffic does not meet the criteria of sustainable mobility (it subsidises the least environmentally friendly means of passenger transport - aviation) and favours richer social groups (business) over poorer groups. Moreover, the investment so described is likely to be feasible without public support, as it is by definition for wealthy customers who can afford this type of luxury service.</p>
7.	Foundation Institute for Sustainable Development	<p>3(ii) developing and enhancing sustainable, climate resilient, smart and intermodal mobility at national,</p>	119	<p>Regional rail transport and non-urban public transport. We request the following to be added: construction of railway lines for regional</p>	<p>We do not know whether this was inadvertently or deliberately omitted from the programme, but the financial plan allocates EUR mln to the implementation of investment code 095, i.e. 'Newly</p>

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		<p>regional and local level, including improved access to TEN-T and cross-border mobility.</p> <p>including improved access to TEN-T and cross-border mobility.</p>		passenger transport	<p>constructed or extended railway lines - TEN-T core network'. Regardless of this, the draft programme contains the relatively highest rate of road funding, relative to rail, among other FEs. A positive example in this respect is the Lower Silesian Voivodship, where numerous revitalisations of railway lines for regional transport purposes are planned in the FE. In the Małopolska voivodship, there are also lines which are worthy of such revitalisation and integration with other modes of transport, such as Rabka-Zdrój-Limanowa-Nowy Sącz or Muszyna-Leluchów. We call for them to be</p>

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					reconsidered in the programme.
8.	Foundation Institute for Sustainable Development	3(ii) developing and enhancing sustainable, climate resilient, smart and intermodal mobility at national, regional and local level, including improved access to TEN-T and cross-border mobility. including improved access to TEN-T and cross-border mobility	121	Product indicators: Addition of a new indicator: Number of supported integrated interchanges	The programme contains a large amount of funds allocated to expenditure code 107, viz: "multimodal transport (TEN-T)", which probably means spending on the creation or expansion of solutions that integrate transport services in the region of the various modes or branches of public transport, in essence integrated interchanges. It will therefore be reasonable to use the proposed output indicator, which, in addition, is listed in the CRL.
9.	Foundation Institute for	3(ii) developin	121	Result indicators:	The description of the specific objective

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	Sustainable Development	g and enhancing sustainable, climate resilient, smart and intermodal mobility at national, regional and local level, including improved access to TEN-T and cross-border mobility. including improved access to TEN-T and cross-border mobility		<p>Addition of result indicators:</p> <ol style="list-style-type: none"> 1. number of people using the purchased or modernised rail passenger rolling stock per year (is on the CRL) 2. time saved through new or upgraded road infrastructure (included in the CRL) 3. reduction of greenhouse gas emissions from passenger transport. (aggregated value for completed projects) 4. road safety indicator, e.g. number of road accident victims per 1,000 inhabitants of the region. 	<p>shall include the activities that will achieve the objectives measured by the proposed indicators. In particular, provisions should be made for:</p> <ol style="list-style-type: none"> 1. purchase of railway passenger rolling stock 2. the realisation of investments in new and modernised road infrastructure 3. purchase of rolling stock with reduced exhaust emissions 4. construction of road traffic safety devices. <p>In addition, the objective currently contains only one result indicator relating solely to road investments, which does not provide any</p>

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					<p>opportunity to assess whether the investments made have resulted in an improvement in sustainable transport, but only measures the increase in transport. And yet the aim of these investments is "[...]to develop transport infrastructure [...] while contributing to a reduction in the negative impact on the environment". - currently this aspect is not measured in the programme.</p>
10.	Foundation Institute for Sustainable Development	3(ii) developing and enhancing sustainable, climate resilient, smart and intermodal mobility at national, regional	121	Under the specific objective, the use of financial instruments is not planned. financial instruments. The projects planned to be implemented under the	Acquisition of environmentally friendly rolling stock for out-of-town public transport can also be carried out by private transport companies, e.g. transport subcontractors or simply private service providers.

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		<p>and local level, including improved access to TEN-T and cross-border mobility.</p> <p>including improved access to TEN-T and cross-border mobility</p>		<p>specific objective will be implemented by public institutions and, as a rule, will not generate income/savings.</p> <p>We suggest reconsidering the use of financial instruments in the programme, especially as not all proposed investments need to be implemented by public entities - see more in the explanatory memorandum.</p>	<p>Public transport services in the Małopolskie Voivodeship are often provided in a financially viable formula for the carrier and perhaps support instruments should be considered in this respect. In particular, it is worth noting that private carriers often have a less environmentally friendly fleet than public carriers and that replacing the fleet of private carriers could bring greater environmental benefits than continuing to replace the fleet of public carriers only.</p> <p>If you decide to leave investments in air transport in the FE, this type of investment (potentially</p>

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					marketable) should definitely be supported by financial instruments rather than subsidies. In addition, this type of investment will almost certainly be made by private investors.

3. Comments on draft Regional Programme for Wielkopolskie, 2021-2027

**Fragment of the document to which the remarks refer:
Priority II Environment and Energy, Specific Objective 2.1.2.7**

The comments below refer to the following entries from the draft Regional Programme: European Funds for Greater Poland 2021-2027:

"...installations for alternative fuels and for the distribution of energy carriers for zero- and low-emission new-generation transport using environmentally friendly propulsion sources, such as electricity, hydrogen)." Page, 91

"A rational and coherent use of all modes of transport is important, taking into account zero- and low-emission transport including e.g. electric and hydrogen propulsion..." - p. 92

"To achieve clean, safe and integrated mobility, the development of transport infrastructure and synergies between transport and energy systems such as smart charging and refuelling stations (e.g. electric and hydrogen) is assumed." - p. 92

**Suggested amendment (concrete proposal for new wording):
Removal of the word 'hydrogen'**

Justification for this comment:

As predicted by the organisation Transport&Environment (*How to decarbonise European transport by 2050*, Report, November 2018.) in the transport sector, hydrogen will only be of marginal importance to power vehicles, and only in selected industries. This is likely to include only heavy road vehicles and ships and aircraft. In the rest of the transport industries, vehicles will not profitably use hydrogen power, so investing with hydrogen power infrastructure for land transport vehicles should be done carefully so as not to generate stranded assets. There are currently no heavy-duty hydrogen road vehicles, nor ships nor aircraft, and it is likely that only prototypes will appear by 2029, so there will be no need to invest massively in hydrogen vehicle charging infrastructure with FEDW funds.

**Extract from the document to which the comment refers:
Priority II Environment and Energy, Specific objective 2.1.2.7**

Page number of the content to be consulted: 93

Provision in the draft Regional Programme: European Funds for Wielkopolska 2021-2027, to which comments are made:

Planned use of financial instruments: Support will be implemented exclusively in the form of grants. The target group consists of public entities that provide services of general interest and do not

generate income. It is not possible and reasonable to involve private funding or use repayable forms of financing.

Justification for comment:

The argument for such an opening is as follows:

1. The main target groups in this specific objective include, among others, enterprises and public-private partnership entities or cooperatives and housing communities. Some of these types of organisations operate for profit, and it may not be beneficial to the efficiency of EU spending to support them solely through grants.
2. The types of initiatives supported include but are not limited to: vehicle charging or refuelling points, urban cycling systems, use of digital technologies. Currently, many of these types of initiatives are commercial (commercial timetabling platforms, commercial refuelling stations) or semi-commercial (urban cycling) and it would make sense to offer these types of activities repayable forms of support to maintain the commercial nature of their activities. A condition for such commercial types of activities to receive grants should be that the grantee proves that it offers the service at a lower than commercial price or offers at least part of the service free of charge.

Extract from the document to which the comment refers:

Priority II Environment and Energy, Specific objective 2.1.2.7

Number of the page where the content subject to consultation is located: 94

Entry in the draft Regional Programme: European Funds for Greater Poland 2021-2027 to which the comment relates:

Result indicators - Gaps in indicators

Suggested change (concrete proposal for new wording):

Adding result indicators:

1. Distribution of transport tasks in passenger transport in Wielkopolskie Voivodeship or the largest cities of the region (Poznań, Leszno, Piła, Kalisz, Konin).
2. Reduction of greenhouse gas emissions from passenger transport. (total value for the completed projects).
3. Road traffic safety indicator, e.g. the number of road accident victims per 1,000 inhabitants of the region or the selected largest cities of the region.

Justification for the comment:

The description of the specific objective includes the activities that will achieve the objectives measured by the proposed indicators. In particular, the following provisions should be pointed out:

1. The distribution of transport tasks: "Actions under the specific objective will focus on the idea of a pro-climate transport policy and should be in line with the 'do no significant harm' concept, aiming to reduce the demand for trips made by individual car transport in favour of increasing the share of public transport using public transport modes."
2. Reduce greenhouse gas emissions: "decarbonisation of urban mobility", any mention of purchasing zero- or low-emission rolling stock. It is inconceivable to decarbonise transport and its transformation towards a low-carbon economy without at least trying to measure this

parameter for the projects implemented, especially as the specific objective is under the environment and energy priority.

3. Traffic safety: "Equipping roads and streets with the necessary facilities and road equipment for the safety of the movement of public transport vehicles and other traffic participants", "other initiatives contributing to the improvement of safety" and others introducing a safety element into the implemented objectives of the priority.

Extract from the document to which the comment refers:

Priority II Environment and Energy, Specific objective 2.1.2.7

Number of the page where the content subject to consultation is located: 92

Provision in the draft Regional Programme: European Funds for Wielkopolska for 2021-2027, to which comments are made:

An element complementary to the scope of support (possible and justified for co-financing) within the projects will be measures strengthening adaptation to climate change and fostering climate neutrality, including in the field of green-blue infrastructure, energy efficiency, as well as the use of energy from renewable sources.

Suggested amendment (concrete proposal for new wording of the provision):

We suggest supplementing the provision in the following way: "An element complementary to the scope of support (possible and justified for co-financing) within the projects will be measures strengthening adaptation to climate change and fostering climate neutrality, including green-blue infrastructure, energy efficiency, and the use of energy from renewable sources, as well as education on sustainable mobility and traffic safety."

Justification for the comment:

Nowhere in the description of the specific objective is there any mention of the possibility of including environmental education in projects, while for many it will be an important element in determining the success of the project. This includes encouragement of the use of cycle paths, urban cycling systems, public transport, etc., and also education on the need for investments in e.g. bus lanes or investments in traffic safety, which may be seen as undesirable from the point of view of e.g. drivers who want to achieve the highest possible speeds when travelling on roads.

Extract from the document to which the comment refers:

Priority III Transport (2.1.3)

Page number of the content to be consulted: 97

Provision in the draft Regional Programme: European Funds for Wielkopolska for 2021-2027, to which comments are made:

Priority will be given to projects involving the reconstruction (modernisation) of roads, including roads outside the TEN-T network to connect to the TEN-T network and reducing traffic congestion in cities - construction of ring roads.

Suggested amendment (concrete proposal for new wording of the provision):

It is proposed to add a sentence after the above mentioned: "Investments in bypasses will only be allowed as comprehensive projects, which simultaneously include the adaptation of roads relieved of transit traffic to the parameters of local traffic and increased traffic safety requirements."

Justification for the comment:

As practice shows, cities or municipalities (especially small ones) that have received a bypass are often left alone with the problem of reconstructing and adapting to modern standards and reduced traffic the sections of road previously used by transit traffic. Failure to carry out such reconstruction may result in the renewal of traffic to undesirably high values (induced traffic), as well as a decrease in traffic safety, e.g. due to speeding on road sections not adapted to the new conditions. It is therefore advisable to implement bypasses as part of comprehensive projects.

Extract from the document to which the comment refers:

Priority III Transport (2.1.3)

Page number of the content to be consulted: 98

Provision in the draft Regional Programme: European Funds for Wielkopolska 2021-2027, to which comments are made:

Main target groups

Suggested amendment (concrete proposal for new wording):

We propose to supplement the target groups with at least the following:

- enterprises, including SMEs, "mid-caps", "small mid-caps", large enterprises
- non-governmental organisations, particularly those promoting road safety and sustainable development.

Justification for the comment:

Within the framework of the description of activities that can be financed under this priority, there are activities that can be effectively implemented by the entities proposed for inclusion in the list of target groups. These include e.g. activities in the field of: education and promotion (p. 97), which can be implemented by NGOs, e.g. as partners of other organisations in infrastructure projects. These include: retrofitting of surveillance and technical rescue services, which can also be implemented by NGOs or companies. These include digital solutions involving increased efficiency, safety and ergonomics in the operation of transport systems, which can be implemented by private companies in particular, including on a commercial basis.

Extract from the document to which the comment refers:

Priority III Transport (2.1.3)

Page number of the content to be consulted: 98

Provision in the draft Regional Programme: European Funds for Wielkopolska 2021-2027, to which comments are made:

Planned use of financial instruments

Suggested amendment (concrete proposal for a new wording of the provision):

We suggest opening the possibility of offering support through repayable financial instruments.

Justification for the comment:

The argument for such an opening is as follows:

1. The main target groups in this specific objective include, inter alia, public enterprises and, in the variant taking into account our previous comment, also commercially operating enterprises.
2. The types of initiatives supported include, among others: digital solutions assuming an increase in the efficiency, safety and ergonomics of the functioning of transport systems - currently, many initiatives of this type are carried out in commercial form (commercial platforms for timetables, logistics, etc.) and it would be reasonable to offer these types of activities repayable forms of support in order to maintain the commercial nature of their activities. A condition for such commercial types of activities to receive grants should be that the grantee proves that it offers the service at a lower price than the commercial one or offers at least part of the service free of charge.

Extract from the document to which the comment refers:

Priority III Transport (2.1.3)

Page number of the content to be consulted: 97

Provision in the draft Regional Programme: European Funds for Wielkopolska for 2021-2027, to which comments are made:

Co-financing will also be provided for projects serving the development of railway lines, including those enabling the connection of linear railway infrastructure to the TEN-T network, improving railway safety; increasing capacity through the construction and extension of linear and point infrastructure elements, modernisation, rehabilitation and revitalisation of railway lines, modernisation of railway sidings.

Suggested change (concrete proposal for new wording of the provision):

We suggest adding at the end of the sentence: "electrification of sections of railway lines".

Justification for the comment:

Electrification is a special type of measure in the financial perspective 2021-2027 as it contributes to the decarbonisation of the transport mode rail. Within the Wielkopolskie Voivodship, there are still some railway lines on which only diesel trains run, e.g. Piła-Krzyż, the Wolsztyn area, and action should be taken to introduce electric railways as well, implying emission-free railways.

Extract from the document to which the comment refers:

Priority III Transport (2.1.3)

Page number of the content to be consulted: 99

Entry in the draft Regional Programme: European Funds for Wielkopolska 2021-2027 to which comments are made:

Result indicators - Gaps in indicators

Suggested change (concrete proposal for new wording):

Adding result indicators:

1. Division of passenger transport tasks in Wielkopolskie Voivodeship between rail and road transport.
2. Reduction of greenhouse gas emissions from passenger transport (total value for the completed projects).
3. Road traffic safety indicator, e.g. number of road accident victims per 1,000 inhabitants of the region.

Justification for the comment:

The description of the specific objective includes the activities that will achieve the objectives measured by the proposed indicators. In particular, the following provisions should be pointed out:

1. Distribution of transport tasks: "support for the development of sustainable mobility" - in this case, the role of railways in the province is expected to increase.
2. Reduction of greenhouse gas emissions: "increasing the dynamics of decarbonisation", any mention of purchasing rolling stock powered by electricity or alternative fuels. We cannot imagine the decarbonisation of transport and its transformation towards a low-carbon economy without at least trying to measure this parameter for ongoing projects for competitions that will offer support for low- or zero-emission rolling stock or others contributing to the promotion of zero-emission transport.
3. Traffic safety: "Consideration shall be given to the implementation of engineering facilities to improve capacity on key road sections, bearing in mind the need to improve the safety of their users and reduce traffic congestion."