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Recovery and Resilience Plan of Slovakia

Call for an addition of measures related to adaptation to climate change, support for biodiversity, and improvement of conditions for sustainable energy and non-motorized transport to the „Green Slovakia“ priority area.

The Ministry of Finance has, just before Christmas, sent to the European Commission the first [complex proposal of the Recovery and Resilience Plan](#). One of the priorities should be green economy which will, according to the proposed document, „*support environmental sustainability, the quality of life and will contribute to the development of green innovation as one of the sources of economic growth*“¹.

As part of the „Green Slovakia“ priority the budget of 1900 mil. € should finance the following four components: 1) renewables and energy networks; 2) green renovation of buildings; 3) modernization of railways; 4) decarbonisation of industry and alternative fuels.

We appreciate the effort of the Ministry of Finance and other state institutions in preparing, during these challenging times and in a relatively short time a document that should be „*the answer to the immediate consequences of the crisis and the systemic shortcomings of the Slovak economy*“¹. Nevertheless, we would like to express our concern about public involvement, including the non-governmental sector and municipalities, in the preparation of the document. The process lacked the procedures required and recommended by the Aarhus Convention², the European Code of Conduct for Partnership³ and the Initiative for open governance³⁴. It is most likely that the minimal professional public debate surrounding the preparation of the Recovery and Resilience Plan led to the creation of a document which, in our opinion, does not contain sufficient most effective measures in a number of important areas.

We are of the opinion that a recovery plan should not only „*pay for buildings, networks and cables*“¹ but should also support an increased resilience towards the negative effects of climate change, conservation of biodiversity and creation of conditions for sustainable mobility. These transformation and investment measures have an irreversible long-term positive impact and together with those already proposed under the Green Slovakia priority will bring „*significant and sustainable improvement in key areas affecting the quality of life in Slovakia*“¹ as set out in the Recovery and Resilience Plan in its introductory parts.

Therefore, we ask the Ministry of Finance of the Slovak Republic and the relevant ministries to carry out an actual consultation with the professional public in the remaining time and to add the following thematic areas to the Recovery and Resilience Plan of Slovakia within the "Green Slovakia" priority:

¹ Recovery and Resilience Plan SR: Simplified summary, December 2020: <https://www.mfsr.sk/sk/media/tlacove-spravy/predstavujeme-dalsie-detaily-planu-obnovy.html>

² <https://unece.org/environment-policy/public-participation/aarhus-convention/text>

³ <https://op.europa.eu/en/publication-detail/-/publication/93c4192d-aa07-43f6-b78e-f1d236b54cb8>

⁴ https://www.minv.sk/?ros_ogp

1. thematic area: "**Resilient and green landscape**" with the objective to increase resilience, reduce vulnerability and support the adaptation of urban, forest and agricultural land to climate change. The component will complementarily support the preservation and increase of biodiversity.

These shall include investments in comprehensive planning and implementation of land re-parcelling, water retention measures on forest and agricultural land, restoration of natural forests, restoration of habitats and habitats of species in unfavourable condition, planting of greenery, creation of clusters of protective tree and shrub vegetation in the an open land, infiltration belts, multifunctional field edges, alleys, restoration of floodplains, including wetlands, river branches and other water-related ecosystems, in the urbanized landscape to support a wide range of measures for slowing down runoff and increasing water reuse. The component will be tied to the reforms in the management of protected areas.

The need for an addition of this component stems from the fact that even if we use the strictest mitigation measures to reduce greenhouse gas emissions in Slovakia or to absorb them at all levels, we can no longer avoid the adverse effects of climate change⁵. These are a threat especially in the cumulative effect with another global problem - the loss of biodiversity. The protection and restoration of natural habitats as a source of necessary environmental goods and services is essential within protected and natural communities as well as in urbanized landscapes and forest and agricultural land. The European Commission itself explicitly mentions the protection of biodiversity as part of the European Recovery Plan⁶.

2. thematic area: „**Development of a cycling transport**“ with the objective to increase the share of bicycle traffic in the total transport network in cities and suburban areas of Slovakia.

Reinforcing the importance of short-distance cycling transport will reduce the negative impacts of transport on the environment (clean air, climate change) and enhance its positive social impacts. The development of cycling transport will also help to prepare our society for the digital and green transformation (reduction of walking distances and frequency of commuting to work, reinforcing public passenger transport, etc.).

In addition to own investments into the construction of cycling paths and modification of other roads and public spaces, easing of transportation, establishing safe parking for bicycles, supporting bikesharing etc., the supported activities will also include systematic data collection, creation of principles according to which public funds will be allocated for the development of cycling transport; modifications of conceptual and spatial-planning documentation at the regional and city level (inclusion of non-motorized transport), elaboration of methodologies and procedures, education of professional public on sustainable transport from various points of view, introduction of sustainable transportation as a topic in higher education. To increase synergies, the investments into infrastructure development can be focused on interconnecting cycling and rail transportation (enlargement of the collection area of railway stations, support of intermodality, etc.).

3. into the existing component „**Renewable sources and energy networks**“ we propose to add an activity aimed at preparing conditions for the creation of regional sustainable energy centres. Without a stable and quality system of coordination and planning of sustainable energy (in a broader sense including e.g. transport) in subregions / urban development areas it is not possible to accomplish Slovakia's demanding international commitment to reach carbon neutrality by 2050 and make optimal use of public funding. The approved National Energy and Climate Plan of the Slovak Republic 2021-2030 (NECP)¹⁷ contains a special

⁵ <http://www.kri.sk/sk/publikacie/adaptacia-na-zmenu-klimy-naliehava-uloha-miest/>

⁶ https://ec.europa.eu/info/strategy/recovery-plan-europe_sk#hlavn-prvky-dohody

⁷ National energy and climate plan (NECP) – Slovakia: https://ec.europa.eu/energy/topics/energy-strategy/national-energy-climate-plans_en

measure for the creation of regional sustainable energy centres (RCUE) as the basis for this system. NECP foresees the financing of RCUE from European Structural and Investment Funds and the national budget, however, in the decade 2020/30 it anticipates creating only 16 regional sustainable energy centres. In order for the system to fulfil its objective from the beginning, it is necessary for it to cover the entire territory of the Slovak Republic. At the same time, it is necessary from the onset of regional sustainable energy centres in 2024 to create and approve an optimal organisation model and standardized methodological procedures for their operation as well as a system of continuous professional education of regional sustainable energy centres' staff (currently such conditions for an effective functioning of the regional sustainable energy centres are not ensured).

The implementation of these investments linked to structural reforms will have a multiplication and long-term effect from the economic perspective as well as on the overall well-being of the population and quality of the environment. Their omission from the forthcoming Recovery and Resilience Plan of Slovakia would mean a wasted opportunity for our county, nature and people.

We would therefore like to ask you to revise the Green Slovakia priority. At the same time we would kindly like to ask you to appeal from your level to all relevant bodies and institutions for the mentioned thematic areas to become a part of the Recovery and Resilience Plan of Slovakia and be supported by an adequate financial amount from the Recovery Fund.

We offer our capacity and expertise for possible amendment or adjustment of the components.

Yours sincerely

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