

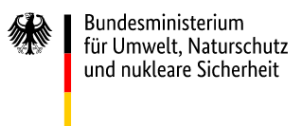
**Proposals and comments to NRRP,
published on 7 April 2021,
by the Ministry of Investments and European Funds.**

**These proposals and comments were prepared by environmental NGOs:
Focus Eco Center,
Partnership Foundation,
Terra Millennium III and
WWF Romania**

The mentioned NGOs elaborated detailed proposals concerning the elaboration of the National Recovery and Resilience Plan (NRRP) which was sent to the Ministry of EU Funds. The principles and proposals from that document are sustained in continuation by us, this document being a reaction to the NRRP version published on 7th of April 2021.

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Disclaimer: The opinions put forward in this document are the sole responsibility of Focus Eco Center and do not necessarily reflect the views of BMU or the project partners.



	Proposal in NRRP	Comments and proposals of NGOs	Claims
1)	Development of the water and wastewater sector: Start of the program "first connection to water and sewage"	It is necessary to clarify what is meant by this program which must comply with the European Directives. Connecting to water and sewage cannot be done individually, and in areas where there are sewage and water systems in many cases the inhabitants do not connect because they have no money to pay for these services even if they are connected, so this aspect has to be taken in consideration. Ensuring the flow and quality of water supply in rural areas.	

		<p>It is necessary to use nature-based solutions in localities considering storm water management under climate scenarios for integrated management.</p> <p>Urban Water Treatment Directive: https://ec.europa.eu/environment/water/water-urbanwaste/index_en.html</p> <p>Drinking Water Directive: https://ec.europa.eu/environment/water/water-drink/legislation_en.html</p>	
2)	<p>Development of the water and wastewater sector:</p> <p>Collection and treatment of urban wastewater in TAUs (territorial administrative units) of less than 2,000 inhabitants using community waste pits.</p>	<p>In TAUs (territorial administrative units) of less than 2,000 inhabitants, water supply systems must be decentralized. Projects like these falls within the limit in the PNRR according to the criteria of the European Commission. In order to have a real chance of being eligible such projects should use environmentally friendly and innovative methods. Wastewater treatment should be solved locally with wastewater treatment systems using environmentally friendly methods. Such a system has already been successfully implemented in Romania in the village of Viscri and is a worthy model for all communities under 2000 inhabitants. In addition, the costs are lower than those of conventional wastewater treatment systems.</p> <p>http://www.mihaieminescutrust.ro/wp-content/uploads/2020/01/Prima-sta%C5%A3ie-de-purification-ecological%C4%83-from-Rom%C3%A2nia_Mihai-Eminescu-Trust.pdf</p> <p>By using Community septic tanks, wastewater is likely to be transported to a treatment plant, the transport resulting in carbon dioxide emissions. There are models of environmentally sound wastewater treatment systems, the legislation should be adapted to make it possible to easily authorize these treatment plants (which are used very often in rural areas in Europe), and to offer some standard models.</p> <p>https://www.buildinggreen.com/feature/ecological-wastewater-treatment</p> <p>https://www.mdpi.com/2073-4441/12/2/412</p>	
3)	<p>Increasing the adaptation of infrastructure in the field of land improvements and the field of active interventions in the atmosphere to climate change in order to prevent and manage climate-related risks, as well as increase the capacity to respond to conditions of efficient use and protection of water sources:</p> <p>Modernization of drainage systems to prevent and reduce flood risk and mitigation.</p>	<p>Romania is already experiencing extreme water phenomena and it is well known that wetlands, swamps have a buffering effect. Under no circumstances should drainage and drainage work be carried out but works on wetland rehabilitation and the correlation of rehabilitated areas with agricultural and recreational activities.</p> <p>All work must be in line with the Water Framework Directive and the Basin Management Plan</p>	

		<p>https://ec.europa.eu/environment/water/water-framework/index_en.html</p> <p>https://ec.europa.eu/environment/water/participation/map_mc/countries/romania_en.htm</p> <p>Romania's land improvement infrastructure was designed and built for more than 60 years ago when the effects and severity of climate change were not known. Thus, any investment in infrastructure (including adaptation to new climate conditions) must be designed on the basis of future scenarios to identify those solutions that help to adapt the economic sector in the long term, develop local communities and restore degraded natural ecosystems. Under no circumstances shall adaptation investments in a sector be vulnerable to other sectors or adversely impact natural ecosystems.</p> <p>Wetlands also play an important role in reducing pollution caused by different types of fertilizers, and thus reducing nitrate groundwater pollution</p> <p><i>Soil health policies for CAP and Agri-environment Directives:</i> https://www.soilcare-project.eu/</p>	
4)	<p>Ensuring integrated river basin management and strengthening policy to improve and protect water resources and biodiversity:</p> <p>Institutional reform for good water governance and improvement of the economic mechanism for self-financing of the Romanian National Water Agency;</p>	<p>By improving the economic mechanism of self-financing of the Romanian National Water Agency there is a risk that the activities that bring profit at the expense of the activities of supporting the ecological system, as far in the country there are precedencies. This conflict of interest exists in the current structure, and if a mechanism will be set up to be implement the WFD, a reform should be promoted which – among other things – also solves this problem. Reform should be promoted that strengthens the involvement of local communities in water management issues, for example by strengthening the role of River Basin Committees, which at present, instead of being a forum for debate, in the river basin has a more formal role.</p> <p>In the implementation of the RBMP (River Basin Management Plan) should also be effectively involved the local communities</p> <p>https://ec.europa.eu/environment/water/participation/map_mc/countries/romania_en.htm</p> <p>Such examples exist in Europe:</p> <p>https://www.eau-rhin-meuse.fr/comite-bassin-role</p>	

	<p>Studies on the ex-ante assessment of institutional capacity to respond and adapt to crisis situations with a view to identifying measures to strengthen and accelerate institutional resilience;</p>	<p>Only carrying out capacity assessment studies is not sufficient. Measures are also needed to improve the existing situation, such as: Central and local government training program on risk situations and resilience in such situations.</p> <p>Inventory, renovation and construction of new civil protection shelters for emergencies.</p> <p>Awareness and training of citizens on civil protection.</p>	
5)	<p>Ensuring integrated river basin management and strengthening policy to improve and protect water resources and biodiversity:</p> <p>Adapting to climate change by modernizing complex dams, increasing storage capacity and adapting exploitation to ensure ecological conditions;</p>	<p>Dams existing in many cases are a problem for the ecological system, and it needs to be clarified what is meant by their modernization, and this modernization as it contributes to integrated management. Investment alternatives should be assessed on certain dams, including the consideration of their elimination as adaptation to climate change conditions and the provision of multiple benefits to local communities and the restoration of degraded ecosystems.</p> <p>Generally, if fish ladders are made at dams, this can provide longitudinal connectivity, but the biggest problem (created by the regularization works), lateral connectivity is not solved.</p> <p>A formula should be found whereby large dams are not financed and funding is provided for as many wetland rehabilitations in the river basin as possible, which are accessible to local communities.</p> <p>Nature-based solutions for urban water management: IWA Publishing (2020) Blue – Green Systems: A review of nature-based solutions for urban water management in European cities: a critical assessment based on case studies and literature https://iwaponline.com/bgs/article/2/1/112/71868/A-review-of-nature-based-solutions-for-urban-water</p> <p>FAO UN Nature-based solutions for agricultural water management and food security https://www.preventionweb.net/publications/view/62867</p>	

Pillar I Green Transition

I.2 We afforest Romania and protect biodiversity

	Proposal in NRRP	Comments and proposals of NGOs	
6)	<p>Limitation of illegal logging through sustainable and transparent forest management and</p>	<p>First-place monitoring and control are inherent in the reform that is required to combat illegal logging.</p>	<p>Also imposed by</p>

	<p>administrative reform of ROMSILVA, including through: Digital means of surveillance and control of illegal activities in forests, in particular logging illegal trees</p>	<p>Digital means of surveillance and control (ineffective if not located outside the forest) are a punitive component with low potential in terms of effectiveness, in the absence of measures to prevent the phenomenon that must be combated in the first place (in addition to being "limited"). In this respect, the following two interventions are essential:</p> <p>(1) the establishment of the Single Forest Register – in the form of a¹ GIS database embedded in the SUMAL IT platform, providing basic information on the provenance of wood – because, unless there is a clear record of forest areas, a relevant and coherent legislative framework cannot be developed, investments cannot be absorbed to support sustainable forest management or plan effective control;</p> <p>(2) digital measurement and the establishment of the fingerprint of wood volumes harvested from forests – solutions developed using artificial intelligence – will thus generate an electronic seal of timber transport, established for the traceability of wood and for the prevention of multiple transport or 'overload', enabling the production of an expeditious technical cube, which removes the subjectivity of the human factor, which will at the same time support the increase of the competitiveness of operators in the forestry sector (without these modern technical solutions, the control of the movement of wood will be limited as before, to the verification of the traceability of documents and less of the quantities of wood).</p>	<p>Article 2 of Law No. 57/2020 on sustainable forest management of Romania</p>
7)	<p>Increase the accessibility of the national forest fund through the construction of new forest roads and the rehabilitation and modernization of existing ones.</p>	<p>Must be established very clear what the forests where these investments will be implemented – for example in forests with a production role to support the application of environmentally friendly treatments.</p>	
8)	<p>Forestry of Romania by planting new forests and forest and agro-forest curtains</p>	<p>About 500 thousand ha of forests are located outside the national forest fund, as is apparent by comparing the data of the National Forest Inventory with those of the National Statistical Institute, which are areas where the forestry regime does not apply. Forest vegetation outside the national forest fund is not subject to sustainable cutting management, and there is a risk of significant reduction, with negative effects on the environment. Financial and administrative measures should therefore be applied in order to maintain these areas already naturally forested.</p>	

9)	Protecting biodiversity, maintaining and increasing the favorable conservation status of species and habitats by: Updating Management Plans for Protected Areas;	It is also necessary to promote interventions on <i>the elaboration and implementation of management plans for protected natural areas.</i> This need also results from the presentation of context contained in the PNRR, where the following aspects are captured: " <i>only 300 management plans for Natura 2000 sites (for 215 SCI and 85 SPA) are approved, out of the 606 required to cover the entire network, which means that 49.50% of Natura 2000 sites have management plans. Therefore, the process of drawing up management plans, revising them for the inclusion of specific conservation objectives and their implementation requires further support. This is all the more important in the context of promoting investments that must respect the principle of do not significant harm, since the existence of an adequate level of knowledge of Natura 2000 sites is essential in carrying out an appropriate analysis of the impact on biodiversity.</i>	
10)	Development of ecological channels, ecological habitat reconstructions and species conservation	Has to be clarified the use of the terminology of ecological channels. If the document refers to ecological corridors (in this case we completely agree with this proposal) or if reference is made to https://aquastiri.ro/2019/08/23/reziliencia-urbana-canalele-de-desecare-potentiale-coridoare-ecologice/ drains, and then a clear and precise wording must be made.	

Pillar I Green Transition

I.3 Waste management, selective collection and circular economy

	Proposal in NRRP	Comments and proposals of NGOs	
11)	Developing efficient waste management Development, modernization and completion of integrated municipal waste management systems (for SMIDs and non-associated localities); The inclusion in the economic circuit of secondary raw materials from materials recovered from the population in the form of waste.	Organic waste accounts for more than 50% of the amount of waste generated. That is why it is essential that organic matter is transformed into compost. We propose to prove the standard of the compost in Romania, in order to market it. The lack of standard limits the marketing of compost or requires laboratory analysis in other European countries. A proposal for a standard for compost was submitted to the Ministry of Environment in 2019 by the organization of TERRA Millennium III and is found at this link: https://terramileniultrei.ro/2018/09/politici-publice-integrate-de-gestionare-eficienta-si-transparenta-a-deseurilor-municipale-si-a-datelor-trades-2/ The European standard on compost may also be adopted. https://ec.europa.eu/environment/pdf/waste/compost/hm_annex2.pdf	

		Developing social enterprises and supporting existing ones for the circular economy. e.g. repair shops, refurbishments, specialized shops, etc.	
12)	Development and adoption of the National Climate Law following the revision of Romania's medium- and long-term strategy on reducing greenhouse gas emissions and the adoption of the Action Plan to reduce greenhouse gas emissions in the period 2021-2030.	<p>Monitoring the implementation of the strategy in order to achieve the objectives and achievement of the indicators.</p> <p>Development of a software to simulate the impact of policies adopted according to the model https://www.climateinteractive.org/tools/c-roads/</p> <p>Training for public administration on climate change, mitigation and adaptation measures to propose appropriate projects.</p> <p>Introducing climate change education in the education system in line with the 2012Doha commitment and the National Climate Change Strategy 2016-2020.</p>	

Pillar I Green Transition
I.4 Rail transport and urban mobility

	Proposal in NRRP	Comments and proposals of NGOs	
13)	Optimizing the running of passenger trains on the national rail network	Although mentioned as a problem, the solutions are not mentioned. We propose to come with concrete proposals in traffic digitization measures, interventions for repairs, e-ticketing.	
14)	Increasing the efficiency of green urban mobility	Modernization of electric urban public transport (trams and trolleybuses, buses) and the related electricity network. With the development of new renewable energy generation capacities, urban public transport based on green electricity leading to reductions in greenhouse gas emissions will be required. Has to be included in proposal complex measures linked to micromobility, shared transport, infrastructure for bikers, etc.	

Pillar I Green Transition
I.5 Renovation Wave – Green and Earthquake Rehabilitation Fund

	Proposal in NRRP	Comments and proposals of NGOs	

15)	Establishment of a Renovation Wave fund to adequately finance work to improve the existing built-up fund	Renovation Wave has to be focused on building SMART Buildings or upgrading existing buildings (smart schools, smart government buildings) leading to low energy consumption. Must be fixed in the proposal the number of buildings and the deadlines.	
16)	Establishment of a 'renovation wave' fund to adequately finance work to improve the existing built-up fund	A thermal rehabilitation program for buildings is needed for low-income people who are experiencing energy poverty and who cannot afford to invest in energy efficiency. https://ec.europa.eu/easme/en/news/assist-model-proved-successful-tackling-energy-poverty	
Pillar I Green Transition			
I.6 Renewable Energy and Energy Efficiency			
	Proposal in NRRP	Comments and proposals of NGOs	
17)	Decarbonization of electricity production by restructuring large energy producers using solid fossil fuels (C.E.O./C.E.H.), ensuring the use of RES and transitional natural gas together with other alternative fuels, e.g. hydrogen	Particular emphasis must be placed on electricity transmission networks because, with renewable energy generation, transmission and distribution systems are no longer able to cope. Although there were funds allocated for such projects between 2007 and 2013, they were not used, and in the period 2014 to 2020 only partially, these shortcomings should be corrected by the PNRR. It is important to focus to the production of the hydrogen, but the transmission and distribution has to be taken in consideration. Although we believe that in the very near future Romania, like the other Member States, will have to abandon the use of natural gas in order to achieve climate neutrality, in these circumstances it is necessary to consider adapting the current natural gas networks in order to be used for hydrogen.	
18)	Strengthening the legal framework to facilitate investment to ensure sustainable decarbonization of the energy sector;	The continuation and development of the Prosumer program should be included. Structural reform in the field of energy would also mean a more consistent involvement of small energy producers, facilitating their connection to electricity distribution networks. From the motive of mismanagement of the NEFA (National Environmental Fund Administration) program, the program did not give the expected results, but demonstrated that citizens are eager to become prosumers. The program can also be considered as a partial grant 50%, thus attracting other funds from private sources, provided it is managed by another institution with greater responsibility. Community renewable projects to be included.	

20)	Reform of the industrial sector, small and medium-sized enterprises and/or large enterprises by increasing the energy efficiency indicator.	Supporting the industrial sector for local green energy production. (at the place of consumption)	
21)	Financing of schemes for the installation of E-SRE and decentralized renewable gases	We understand that "renewable gases" refers to those produced from biomass. Given that there is a separate provision in the plan for making investments in the installation of anaerobic digesters (gasification of organic material), and this measure is most likely to support bio methane, it should be clarified whether the proposal relates to waste of agricultural origin or to other situations (waste from sewage treatment plants, etc.).	
22)	Promoting projects that are below the limit of financial profitability	It is necessary to clarify what is meant by this proposal	
23)	Implementation of investments in solar energy, hydrogen use and high-efficiency cogeneration	In the case of cogeneration projects, investments in gas-fired power plants should be excluded	
24)	Investments for the new energy industry in Jiului and Gorj Valley	Jiul Valley benefits from the Just Transition Program. The question that arises in particular regarding the Oltenia Energy Company (CEO) – does it have the capacity to manage so many projects? One solution would be the continuation of the Government Coal Mine Closure Program, already started.	

Pillar IV Social and territorial cohesion

IV.1 Municipality Resilience Fund

	Proposal in NRRP	Comments and proposals of NGOs	
25)	Creating the framework for the green transition of urban areas in Romania.	<p>We propose allocating funds for the implementation of local Climate Change Mitigation and Adaptation Plans or Energy and Climate Action Plans and encouraging the Local Authorities to sign the Mayors' Pact https://www.conventiaprimarilor.eu/</p> <p>Such a program with Norwegian funds has been initiated, but only 8 projects will be financed</p> <p>http://www.mmediu.ro/articol/lansarea-schemei-de-granturi-mici-sgs-1-elaborarea-planurilor-de-atenuare-si-adaptare-la-schimbarile-climatice-in-municipalitati-launch-of-the-small-grants-scheme-sgs-1-development-of-adaptation-and-mitigation-plans-in-municipalities/3925</p>	
26)	Creation of a Resilience Fund for Localities, on four levels: county residence municipalities,	We propose a program to make wood heating installations more efficient, given that more than half of	

	<p>municipalities, cities and municipalities. Within each category, a fixed amount will be allocated to the Local Authorities for the implementation of projects in the PNRR's priority area</p> <ul style="list-style-type: none"> - Projects for communes 	<p>Romania's population lives in the countryside and heating is done with wood in inefficient combustion plants. This program for rural people will also lead to improved air quality.</p>	
<p>Pillar V Health and economic, social and institutional resilience</p> <p>V.2 Resilience in crisis situations</p>			
	Proposal in NRRP	Comments and proposals of NGOs	
27)	<p>Increasing the resilience of institutions and population in crisis situations will ensure the elimination of geographical disparities in the capacity of the authorities to intervene throughout the national territory</p>	<p>Central and local government training program on risk situations and resilience in such situations.</p> <p>Inventory, renovation and construction of new civil protection shelters for emergencies. (These shelters are in a pitiful state).</p> <p>Awareness and training of citizens on civil protection.</p>	