



**Local & Regional
Europe**

CEMR response Open Public Consultation on the European Climate Pact, within the European Green Deal

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**Council of European Municipalities and Regions
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CEMR is the broadest organisation of LRAs in Europe, with over 60 national associations of municipalities and regions from 41 European countries. These represent some 130,000 LRAs. CEMR's objectives are twofold: to influence European legislation on behalf of local and regional governments and to provide a platform for exchange between its member associations and their elected officials and experts. Moreover, CEMR is the European section of United Cities and Local Governments, the worldwide organisation of local government.

INTRODUCTORY REMARKS

Climate change is already affecting cities and regions worldwide through increased heatwaves, floods, droughts, forest fires and migration. In 2050, the world population is expected to reach nearly 10 billion. This will have an even greater impact on the environment and the urgency to adapt to climate change. Local and regional authorities are suffering the consequences and impacts of climate change. But they can also provide the solutions. It is for this reason that CEMR welcomes the opportunity to contribute to the climate debate at EU level, as in this occasion of this open consultation.

On 4th March 2020, the Commission has launched an Open Public Consultation until the 27th May on the “European Climate Pact” which will be officially presented in the third quarter this year. The Climate Pact is part of the European Green Deal launched last December.

CEMR's wants to express the following key messages to contribute to the open consultation to shape the Climate Pact which has to be ambitious, transparent, inclusive and participatory:

1. We need to tackle the climate challenge through **ambitious local leadership and action, and effective communication with citizens**
2. We need to further **use and strengthen existing channels and platforms** and if needed, **base any new ones on existing ones** at local, regional national and international levels
3. We need supporting **regulation and financing** for local and regional government to take on the necessary dialogues, in line with the ambition of the pact
4. We recognise **public procurement as a tool for sustainability**, with due regard to the autonomous decisions of LRAs
5. We need to trigger action with **concrete pledges and initiatives**
6. We welcome the idea of **Climate Pact ambassadors**

1. **We need to tackle the climate challenge through ambitious local leadership and action, and effective communication with citizens**

The role of LRAs in communicating and mobilizing citizens is indisputable. And we are clearly seeing this now, in this particular moment we are experiencing the corona-crisis. Our national associations representing towns and regions have been particularly active in responding to this escalating situation: by providing information to their members on the latest developments, best practices and guidelines and working with the national government to ensure the coordinated action of all levels of government, including the need for appropriate changes in legislation to deal with the situation. Our members have brought local challenges to their national government's attention, have communicated rapidly-changing government ordinances to towns and regions, and have collaborated with national governments to make sure these ordinances respect local needs.

On the same way to the health crisis, the level of change required to mitigate emissions and to adapt to climate change can only be achieved by strong political commitment and leadership, at all levels of government and in partnership and dialogue with all stakeholders, citizens, business, industry and the private sector. The local and regional levels are playing a key role in achieving the goal of carbon neutrality by 2050 and has to be a key partner in the future Climate Pact. In many Member States, the local level is at the forefront, working with ambitious climate targets and local and regional solutions – including various initiatives, partnerships and tools such as sustainable climate and energy action plans (SECAPs) and climate budgets. This is why the local level needs a special consideration and place in the Pact.

We need to localise and decentralise the dialogue to achieve the urban and global agendas. CEMR supports the global climate agendas and the achievement of their objectives through [the localisation of](#)

[the SDGs](#) and in dialogue with the local level. The outcomes of COP22 in Marrakech in 2016 were closely linked to the implementation of the SDGs and the Urban Agenda of Habitat III. The localisation process of the 2030 Agenda should therefore come with a real commitment to strengthening multi-level and multi-sectorial alliances, respecting the principle of diversity and different local and regional solutions.

We need to **target the discussions to be held with different groups of actors**. The Commission should consider that different target groups (governments, scientists, business, universities, schools, civil society organisations, youth organisations, women and marginalised communities) need to focus on different content and specific terminology. The local, regional and national levels are well placed to address topics around regulatory frameworks, financial and technical resources for local action implementation. CEMR considers that it is necessary to increase the involvement of social partners at European, national and local level, and to take measures to strengthen the social dialogue. We also need to pay a larger attention to the education aspects of the different sectors.

And in order to combat the climate crisis, CEMR also considers that **growing economic inequalities, poverty, promotion of gender balance and avoiding social division should be regarded as a priority** within the European Union. Gender equality, work-life balance and flexible working patterns, digitalisation, and the integration of unemployed persons and migrants into the labour market are of crucial relevant. Other relevant aspects of the European labour market that must be improved are the transition from school to work, lifelong learning, vocational training and skills mismatch. This would generate a more equal generational balance and, at national level, more balanced reforms which can contribute enormously in the field of climate change and green growth creation and promotion of a circular economy (and not linear) society. Meeting these objectives and tackling these issues as well as many of the principles proposed by the Commission will require access to quality and affordable public services and suitable investment, especially at the local and regional level.

Examples and experience from CEMR: CEMR has collected some initial information and examples of climate laws and/ or climate pacts from CEMR members: 1) Belgium; 2) Denmark; 3) Estonia; 4) Finland; 5) Germany; 6) Iceland; 7) Latvia; 8) Luxembourg; 9) Norway; 10) Scotland; 11) Slovenia; 12) Sweden; 13) The Netherlands. The document can be found [here](#). Check as well [publication](#) By Platforma - CEMR on "Sustainable Development Goals: how Europe's towns and regions are taking the lead".

2. We need to further use and strengthen existing channels and platforms and if needed, base any new ones on existing ones at local, regional national and international levels

Existing platforms, tools and plans at national, regional or local level can already offer the relevant foundation and channels to realize the ambitions of this Climate Pact in many areas. Varying initiatives already exist in different MS. These include cooperation both between LRA, with MS, with business and industry, with civil society, academy etc. They should have the opportunity to connect to the EU Climate Pact for greater visibility and sharing knowledge and best practice.

Efforts must be put specially where the greatest positive effects can be expected and by doing this, the scope of the Climate Pact can be broader. We need to avoid replication of platforms which are already in place. And when we talk to the local and regional levels, we need to use channels/tools such as: websites, social media (twitter, Youtube), international/EU/regional/local events, conversations with citizens on specific policy topics (citizens' dialogues, assemblies,...), local helpdesks for consultancy and capacity building (like the ones used in the [European Covenant of Mayors](#) or the [Covenant of Mayors in Sub Saharan Africa](#)). Further promotion and support of all these initiatives would be welcomed, eg. material support on financing and capacity building, greater visibility, more connections with specific policy areas (to give space for more consultation and deliberation like in the context of the Research Missions or the PPP under Horizon Europe R+I programme).

This Climate Pact will only be successful if it complements and/or scales up existing initiatives.

Examples and experience from CEMR members:

Dutch Climate deal: The Climate Agreement is part of the Dutch climate policy. It is an agreement between many organisations, municipalities, civil society and companies in the Netherlands to combat climate change. The government's central goal with the National Climate Agreement is to reduce greenhouse gas emissions in the Netherlands by 49% by 2030 compared to 1990 levels. <https://www.government.nl/documents/reports/2019/06/28/climate-agreement>

The **Fossil Free Sweden initiative** has encouraged more than 20 industries and business sectors to draw up their own roadmaps as to how they will be fossil free while also increasing their competitiveness. The initiative is initiated by the government and based on the decision by the parliament to make Sweden climate neutral by 2045. The roadmaps contain commitments for the stakeholders, describe when and how to become fossil free, including the need for investments, new technological solutions, political solutions and obstacles to be removed. Sectors and industries include construction, cement, concrete, steel, mining & minerals, forestry, agriculture, groceries, heating, electricity, recycling, aviation, maritime, heavy hauling and digitalization consultancy. Some municipalities and regions are part of the wider initiative, some are parties of individual roadmaps and some are participating in challenges for transport, company cars and solar panels. The Swedish Association of Local Authorities and Regions, SALAR has signed and is participating in the roadmaps for the heating and construction sectors. Link: <http://fossilfritt-sverige.se/in-english/>

13 sectorial climate partnerships in Denmark have been established by the Danish Government and the private business sector. The business sector has an important role to play in achieving the Danish government's greenhouse gas reduction target and ensuring that the green transition becomes a green business adventure. The partnerships collaborate on measures that reduce business greenhouse gas emissions and strengthen the companies' green competitiveness. At the same time, the Green Business Forum has been established. The partnerships are: Energy and supply sector-Waste and water, circular economy-Energy intensive industry-Manufacturing-Life Science and biotech-Food and agriculture-Land transport-Aviation-The Blue Denmark (the blue economy)-Construction-Trade-Service, IT and consulting-Financial sector. Each partnership work on recommendations on how the specific sector can contribute. Link to partnerships and recommendations: <https://em.dk/ministeriet/arbejdsomraader/erhvervsregulering-og-internationale-forhold/klimapartnerskaber/>. Local Government Denmark have represented the Danish local authorities in the three partnership for waste and water, circular economy. Link to their recommendations: [here](#).

The Danish Council on Climate Change is established in connection to the Danish Climate Law as an independent expert body that advises on the transition to a climate-neutral society. LGDK represents the Danish municipalities in a **climate dialogue forum** commenting on the Climate Council's recommendations to the government. LGDK would like to be further involved in a more formalized climate cooperation with the Danish government.

In the DK2020 initiative 20 Danish municipalities will develop top ambitious climate plans with inspiration from the world's leading cities in the area, to boost the implementation of the goals of the Paris Agreement. Behind the initiative are the association Realdania, the international urban network C40 and the green think tank CONCITO. <https://www.realdania.org/whatwedo/grants-and-projects/dk2020>

Energy Efficiency Agreements in Finland are an important part of Finland's energy and climate strategy and a primary tool to improve the efficient use of energy and industrial/municipal associations, without resorting to legislation or other coercive measures. The cooperation with the Government comprise both industry, the energy, service property and building sectors, municipalities, and oil-heated real estates (See more under section 5).

AICCRE: The Integrated Regional Air Plan (PAIR 2020) of Emilia-Romagna was approved with resolution of the Legislative Assembly in April 2017. The PAIR2020 expects to achieve by 2020 important reduction targets for the main pollutants compared to 2010. The key word of PAIR 2020 is "integration", in the belief that to meet air quality standards it is necessary to act on all sectors that contribute to air pollution as well as to climate change and to develop coordinated policies and measures at various levels government (local, regional, national) and the Po Valley.

Examples and experience from CEMR:

CEMR is involved in various initiatives and can share the experiences in this aspect: [The Global Covenant of Mayors](#), (including its Regions Portal for regional covenants to share and exchange information), the [European Covenant of Mayors](#), [the Reference Framework for Sustainable Cities](#), [PLATFORMA](#) strategic partnership for development and decentralised cooperation, the National Climate and Energy Action Plans or the Local Authorities Platform of the Covenant of Mayors for Sub Saharan Africa (a knowledge-sharing platform, have long-term experience in interacting with different partners worldwide). The European Energy Award is also another example in many European cities.

CEMR, through PLATFORMA (the pan-European coalition of towns and regions – and their national, European and global associations – active in city-to-city and region-to-region, cooperation), is working with peers to implement climate projects in developing countries and on south-south, north-south and north-north decentralised cooperation also. As a hub of expertise on European local and regional governments' international action, PLATFORMA aims at boosting European local and regional governments' contribution to EU development cooperation policies and international frameworks, especially on [climate issues](#).

CEMR has advocated for the role of subnational governments in mitigation and adaptation at COP meetings and at the UN climate summit (eg. as the one held last September) to boost climate ambition, to assist its members in their dialogue with their central governments in the production of Nationally Determined Contributions and to support local and regional governments in their path towards creating resilient societies and territories. These practices can be shared in the Climate Pact in terms of a multi-level dialogue among different levels of governance.

Examples and experience from CEMR:

Since the COP in Paris in 2015, local and regional authorities have increasingly been welcomed as important partners for the international agreements. CEMR is working at this level especially through the Global Task Force of Local and Regional Governments, coordinated by UCLG and through Local Government and Municipal Authorities constituency of UNFCCC. This international level of the local level also needs to be part of the European Climate Pact (CEMR can voice the echo of UCLG formally as its European branch).

3. We need supporting regulation and financing for local and regional government to take on the necessary dialogues, in line with the ambition of the pact

National, EU and international regulation must respect the diversity of regional and local conditions, be gender sensitive not be unnecessarily detailed, allowing for different local and regional solutions on how to achieve commonly agreed targets. Policy should be technology neutral. There is no single solution, since climate, resources, capacities and socio-economic factors vary across nations. National governments and the EU should recognise an active role for local and regional authorities in the design of climate mitigation and adaptation policies and regulations, including in the Nationally Determined Contributions and the EU National Energy and Climate Plans. The instrument of delegated acts must

be used carefully, not to apply to detailed regulation that is not sensitive to national and local conditions, on which there are several examples.

Local and regional governments require broad legal and financial competence in order to take action and work together with citizens and the private sector. There is also a need for national and EU financial instruments for awareness-raising, capacity-building and investment to implement policy. Increased and adequate pricing of CO₂ and reduced subsidies on fossil energy (and eventually abolish them) are important potential sources for financing action. The new EU multiannual financial framework needs to recognise that more EU funding and investments are needed for local actors to implement actions and develop projects.

The European Green Deal proposed by the new EU Commission should be an opportunity to achieve this. At the same time a just transition needs to fully recognise and accommodate the social effects through designated support and funding which is also gender-responsive. The social dimension is also a fundamental element that needs to be considered while talking about climate change dialogue: evidence shows that the most vulnerable are suffering more than any other of the impact of climate change on the European economy and way of life. Last but not least, the European Commission should make its future “pandemic recovery plan” linked to the current health crisis conditional on commitments to the green transition.

Examples:

Thinking on UK government strategy ([Paper from ARUP](#) on climate emergency) with useful references.

Lielupe ECO training helps prepare and prevent ecological disasters. Interreg (Lithuania, Latvia). An ERDF-funded project has set up a joint rescue team and early warning system, improving the response rate to ecological disasters around the Lielupe Basin.

4. We recognise public procurement as a tool for sustainability, with due regard to the autonomous decisions of LRAs

The public sector generates a substantial part of the annual national gross domestic product. With its purchasing power the public sector can provide an impetus for the development of more sustainable products and services and their market penetration. Therefore we recognise that public procurement is a tool for sustainability, contributing to many environmental, economic and societal goals.

However, decisions on what issues are supported by which public contracts, and whether and how strategic sustainable public procurement is being used locally must be made according to the principle of local self-government and democratic decision-making by each local and regional authority (respecting Art 4 of the TEU). CEMR is therefore concerned by the inappropriate and increasing use of public procurement rules by the EU institutions as a mandatory policy instrument.

Also the EU cannot in general be expected to lead the development of advanced procurement criteria, since these depend on the development on many different markets through close contact between producers and users such as LRA:s. Even so the EU has important roles to facilitate procurement by relevant regulation, setting minimum product criteria and expanding guidance and tools such as standards, eco-design demands, environmental product declarations (EPD:s) etc. In this context CEMR urges the Commission to launch a process for reliable and transparent EU-wide certificates and labelling schemes, particularly in the field of environmental sustainability, in order to create legal certainty and reduce burdens for LRA's.

CEMR also advocates simplification in public procurement rules and the option to specify a degree of local employment or use of local suppliers in public contracts ('buy local'), providing a number of bidders can still compete. This would help contracting authorities to promote local SMEs and the proximity

principle for environmental and climate reasons, increase local employment or boost local skills as part of their overall local growth objectives.

CEMR supports its members to make use of innovative procurement strategies to pursue environmental, climate and societal objectives, respecting that priorities remain a voluntary decision by the individual authority.

Many LRAs and their organisations for joint procurement already contribute to sustainability, within the existing legal framework, by placing advanced demands and buying more sustainable products and services for transport, vehicles, construction, energy supply, energy efficient appliances, bio-based and/or recyclable products etc.

Examples and experience from CEMR:

ÖkoKauf Wien: Following up on the environmental sustainability and climate change strategy of the City of Vienna, “ÖkoKauf Wien” was established as early as 1998 as a competence network of representatives of different departments of the city administration and is one of the earliest initiatives for the promotion of sustainable public procurement worldwide. The programme, which was awarded the European Public Sector Award (EPSA) in 2011, has been an integral part of Vienna’s Environmental Protection Department (MA 22) since 2012.

Objectives: The programme regularly prepares and updates criteria lists and additional findings for the environmental compatibility of procurement groups, that are binding for the persons in charge of procurement at the City of Vienna when establishing ecological requirements. It is also a consulting and awareness-raising programme, addressing its target groups by publishing information and positions on various topics of sustainable procurement. The city endeavours to be a role model and a pioneer in environmental protection and sustainable development. The € 5 billion worth of products and services bought each year provides the city with a market power to influence suppliers and producers. In 2008 the first internal evaluation of the programme showed savings in both CO2-emissions and costs.

Selected impacts of the programme: saving costs of approx. 1.5 million € yearly by using modern building technology and energy efficient appliances; saving approx. 15,000 t of CO2 yearly; protecting employers and reducing damage to human health by environmentally friendly disinfection and cleaning agents; reducing the amount of cleaning agents by 40% while achieving the same cleaning effect; avoiding more than 4 tons of harmful solvents yearly by environmentally friendly building products; reducing air pollutants and particulate matter by low-emission municipal vehicles.
www.oekokauf.wien.at.

KEINO competence centre for public procurement in Finland: KEINO is formed by a strategic partnership between six organisations working as a network towards joint objectives, such as increasing the number of strategic, sustainable and innovative procurements. These organisations are Motiva Ltd, the Association of Finnish Local and Regional Authorities, VTT Technical Research Centre of Finland Ltd, The Finnish Funding Agency for Innovation, Business Finland, the Finnish Environment Institute SYKE and Hansel Ltd (a central purchasing body for central and local governments). The centre is funded by the Ministry of Employment and Economy, and jointly steered by a conclave of six ministries. KEINO supports and helps Finnish public contracting authorities with the development of sustainable and innovative procurement. KEINO seeks to increase contracting entities' awareness of strategic procurement management and impact thinking. The centre assists contracting entities in developing tools for managing and measuring sustainable public procurement. Furthermore, ambitious ‘buyers’ groups’ for co-creation of strategic procurement practices are set in key fields such as, construction and the built environment, mobility and logistics, bio and circular economy. KEINO change agents act as the local focal point for the competence centre, bringing KEINO's activities and support closer to public procurers locally. KEINO Academy enables participating organizations to accelerate their own transformation process. <https://www.hankintakeino.fi/en>

SKL Kommentus is a procurement agency owned by Sweden’s municipalities and regions. Its purchasing center administers a broad selection of about 140 framework agreements for products and

services that can be used by all customers (covering roughly 5-10% of LRA procurement). Generally and when relevant these include environmental and social criteria and demands to drive the market. Product categories include energy efficient residential and preschool buildings, PV-cells, light sources, vehicles, fuels, ICT-equipment, single-use articles, play material etc. An important part of the work is to follow up on social and environmental demands on producers globally, and increasingly on chemical content by testing products in cooperation with other public procurers. A starting point for both SKL Kommentus and individual municipalities and regions is usually the sustainability criteria available in more than 50 product groups from the [National Agency for Public Procurement](#)

Danish SKI is a procurement agency established 1994 by the Danish municipalities and the Danish Government. As a not-for-profit company any profits are invested in developing more and better framework agreements. The SKI's aim is to ensure that each assignment goes to the supplier with the most competitive offer - in terms of both quality and price. More information [here](#).

AICCRE: Ministry of the environment, Italy. Green Public Procurement: a strategic tool for relaunching a sustainable economy, mandatory since 2016: https://www.minambiente.it/sites/default/files/archivio/allegati/GPP/Gpp_opuscolo.pdf.

5. We need to trigger action with concrete pledges and initiatives

CEMR supports the promotion of pledges (public commitments on climate that go beyond legislation goals) encouraged by the Commission and supports relevant initiatives worldwide. The main advantages of a pledge are the motivation to take action, accountability for actions, recognition for such actions, lead by example and motivate and inspire others. Local and regional action on own initiative also has the advantage of building on and being sensitive to local conditions.

Examples and experiences from CEMR:

CEMR as an umbrella organisation, has, on a voluntary basis and with the support of its members, adopted a "[Sustainability checklist](#)" to apply within the organisation, for events, services, transport, awareness-raising etc. And our individual associations are also committing this one or similar guides/actions.

Additional actions from UK Councils: Ashden and Friends of the Earth have put together an evidence-based list of the most effective [actions councils can take on climate](#).

CEMR is active in and can contribute the three areas which will be initially covered in this Climate Pact,: :

- 1) energy efficiency in buildings
- 2) low-carbon mobility in cities
- 3) planting trees/green urban areas (CEMR is less active in this area).

We are willing to explore further how we can get involved in pledges in areas 1 and 2 mainly.

Reflections on area 1) energy efficiency in buildings:

The requirements defined by the existing (only recently revised) energy laws (esp. EPBD & EED) are minimum requirements. Many municipalities are already setting stricter efficiency requirements for construction methods and building technology for their own existing buildings and for new quarters as part of urban planning. This is worthwhile both from a climate policy perspective and in terms of the entire life cycle of a building from an economic perspective - and also for renovation.

This does not mean that LRA in general would be in favor of stricter laws, since these would not be sensitive to local and regional conditions. Mandatory energy-efficient renovation requirements would also risk overburdening LRA budgets. Stricter laws would set standards which in some MS would lead to most energy-efficiency projects not being eligible for public funding anymore. In many MS the most successful examples on energy efficiency are almost exclusively based on funding from the federal or state level.

For the local level the most important success factor in the building sector is cost-effectiveness and amortisation of planned measures. The most common obstacles for project implementations are the high investment costs and the lack of financial and human resources.

Mostly cities and municipalities state that they need support in form of training courses for their own employees and an overview of funding in order to promote climate protection activities in the building sector. Besides advice, information materials for the implementation of measures and support for data collection and data analysis is required. Energy consumption data of buildings are an important basis for setting climate-relevant targets and measures in the sense of a climate and energy strategy.

A valuable next step to address the energy efficiency in buildings is to identify the bottlenecks on financial, technical, legal and practical level. The exchange of information and best practices on local level is very necessary. Many initiatives on local, regional and national level work on this and on EU level there will be the renovation wave.

CEMR has also welcomed the announcement of the future initiative on the “Renovation wave in buildings” (of the Green Deal) due next September. CEMR already sent input, which can be found in box below, to the Commission last March on questions on barriers and market-pull to scaling up the renovation of the building stock, specificities of segments of the building stock, and needs for the Open Platform and making such a platform sustainable over time.

Examples and experience from CEMR members:

Energy Efficiency Agreements in Finland are an important part of Finland’s energy and climate strategy and a primary tool to improve the efficient use of energy. Voluntary agreements are a tool to fulfil the EU energy efficiency obligations set for Finland without resorting to legislation or other coercive measures. The aim of these agreements is to improve the efficient use of energy within industry, the energy sector, service sector, property and building sector, municipalities, and oil-heated real estates. The Energy Efficiency Agreement for Municipal Sector is an agreement between the Ministry of Employment and the Economy, the Energy Authority and the Association of Finnish Local and Regional Authorities on improving the efficient use of energy in the municipal sector. Municipalities, cities and joint municipalities sign their own Energy Efficiency Agreement, in which they commit themselves to the actions and targets specified in the Energy Efficiency Agreement for Municipal Sector. In accordance with the agreement, the participant’s rental housing properties are joined primarily into the Rental Housing Property Action Plan under the Energy Efficiency Agreement for the Property Sector. For several years, companies and municipalities have taken voluntary measures to improve their use of energy. Since the 1990s, Energy Efficiency Agreements have been the primary tool in Finland for improving energy efficiency and meeting the strict EU obligations on improved efficiency in energy use. <https://energiatehokkuussopimukset2017-2025.fi/en/agreements/>

A big success factor in Germany are the easily accessible funding programmes, which are non-credit based, direct payments. Moreover, funding programmes to cover the personal costs of "Klimaschutzmanager" (Climate protection managers) which are directly adjacent to the municipalities' administration have also been a great way for municipalities to develop strategies as well as offering consultancy services for both the public administration, companies and citizens to find the right energy-efficient solution for their buildings.

The German County of Schmalkalden-Meiningen: Photovoltaic systems and many other measures for renewable energy and energy efficiency: Climate protection has long been a top priority in the Thuringian county of Schmalkalden-Meiningen. The county has lead by example in the fields of solar energy, geothermal energy, bio-energy, combined heat and power generation, electromobility, the energetic recycling of household, bulky and commercial waste as well as the implementation of sustainable energy efficiency measures in the electricity, heating and transport sectors. In addition, the county administration offers both services and subsidies. The county ENERGIE working group has since 2001 given advise to the county and its municipalities, as well as to entrepreneurs and citizens. It publishes an energy saving guide for construction and renovation with energy saving. A county energy conference is organized biannually, to present trends, best practice and funding opportunities, also including an energy savings prize. From 2020 public events are arranged in cooperation with the academy, on tax law problems for renewable energy generation. The county administration has checked all its roof area for solar suitability and since 2004 rented roofs or installed PV systems itself. The output of all current 31 systems is 1,310 kilowatts peak (kWp). The PV-systems on educational institutions and sports halls give a practical demonstration of climate protection for children and young people. Total CO₂ reduction is almost 1,000 tons per year, and will generate a substantial financial surplus during its operation. All measures and activities on energy efficiency and renewable energy also minimize energy dependency and increase regional added value and employment. Other successful examples from German regions include: work with bio-energy, building automation and control systems, LED-lighting, subsidized energy counselling etc.

CEMR's responses on the future proposal on the "Renovation wave in building" came from these countries: 1) Austria; 2) Finland; 3) Germany; 4) Slovenia; 5) Sweden; 6) Scotland; 7) England; 8) The Netherlands. The full responses can be found [here](#).

Reflections on area 2) Mobility:

Addressing low-carbon mobility is key to achieve both the targets of the Paris agreement and sustainable local development. Local authorities dedicate a large part of their resources to planning local mobility plans and improve their urban transport infrastructure according to their local priorities and conditions.

CEMR and its member associations support the ambition of the Climate Pact to accompany local authorities in their action towards mobility by sharing knowledge, raising awareness, and possibly targeted financial support for sustainable urban mobility plans.

We recall the primary role and competence of local authorities in planning local mobility strategies. With respect of the subsidiarity principle, any European measure that would introduce mandatory local transport rules in the future will not be supported by local authorities, as well as attempts by the EU to impose common criteria, standards or harmonisation of urban transport policies.

Local authorities of all sizes have already set up ambitious voluntary mobility strategies and solutions – this issue does not only concern major cities. We call on the EU to supporting the existing structures and service. For CEMR, it also clearly makes sense that the issue of mobility should not be limited to urban areas but has to be extended to functional areas and include rural and peri-urban areas. This is important for the development of integrated mobility solutions, comprising intercity transport for instance.

Public transport is a key element of a climate-friendly, sustainable future. Many LRA:s have ambitious plans for modal shifts. The Covid-crisis has led to a drastic fall in public transport, with a need to be compensated for the fare losses during. This can also be in a longer timeframe since regaining lost clients is a question of behaviour that can take time to change back. Therefore, public transport needs to be included in rescue packages. Additionally, financial support for negative impacts (like it is the case for natural disasters) needs to be exempted from EU state aid law. The sector needs to be further supported after the crisis in general.

Examples:

CEMR is involved in the [Mobility partnership of the Urban Agenda](#) which has proposed solutions to improve the framework conditions for urban mobility for cities across the EU. This covers issues relevant to technological advancements, encouraging the use of active modes of transport, improving public transport and promoting multi-level governance measures.

Germany and Sweden both have plans to double public transport in a short period of time. In Sweden regional and local public transport has in a 10-year period increased the share of renewable fuels from 42 to 90 per cent, contributing to climate mitigation.

Reflections on area 3) planting trees/green urban areas:

To reduce the urban heat island effect local authorities mostly create additional green and open spaces in the public area. Façade and roof greening are also implemented. Besides shading the outdoor space through trees, canopies, etc improve the microclimate. The natural design of gardens, courtyards and the approval of spontaneous green on less used areas are also measures set by cities.

The area of tree planting is of great importance since it has the potential for awareness raising at a lower cost. Many cities already do these projects already and are willing to do get involved if there were more financial means. We could suggest to have more simple programme guidelines and language translation in some countries so more citizens can also feel more engaged and implement actions with the LRAs (and before starting to plan big campaigns, we need to assess who is the target audience in case there is a need to overcome the language barrier), it is a win-win situation. There are already some small-scale project schemes of INTERREG and Europe for Citizens and they are funded on a very small scale basis there (5.000€-30.000€) to help with cultural exchanges between citizen from different Member States for example. This does not represent a very large expenditure at EU level but it has an enormous effect on the Europeanisation of the participating citizens and municipalities. Something similar could be assessed for the implementation of the EU Green Deal with LRAs and their citizens.

Examples: On regeneration of natural areas, rather than crowded plastic forests:
<https://www.rewildingeurope.com/wp-content/uploads/publications/boosting-ecological-restoration-for-a-wilder-Europe/index.html>

CEMR also supports a monitoring, reporting and evaluation system on the implementation of pledges collected to encourage transparency, accountability, learning experiences. But this process should be done in an easy and flexible way and not adding administrative burden on the local level (so using existing monitoring and reporting systems (eg, the one used in the Covenant of Mayors or by self or community monitoring by participants).

The other options proposed in the consultation are: adaptation of reporting requirements, light reporting and verification methods for all, a deep reporting, sample verification methods. We believe that adopting these, this would occur into an additional burden for local authorities and the fact that they would also imply the accomplishment by an independent body adds complexity to the initiative.

6. We welcome the idea of Climate Pact ambassador

CEMR would like to propose to become “ambassador” of the Climate Pact at the local level to represent the voice of the LRAs towards the institutions of the European Union and relevant stakeholders. Our spokespersons on climate and energy - who are politicians – can hold such a role. The Ambassadors could increase the effectiveness and success of the Pact as they would be the visible face while transmitting transport local and regional messages, experiences, best practices, etc.

Examples and experience from CEMR: *We already can share the experience we have as we have proposed Ambassadors at the Committee of the Regions within the context of the European Covenant of Mayors, we have set up a group of Ambassadors within the Covenant of Mayors in Sub Saharan Africa and we also follow the work of the Ambassadors figure within the context of the Global Covenant of Mayors.*

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