Wien, 10. März 2016
Zweiter Entwurf (EU Draft Version 2.0 / 2-3-2016) der geplanten Ministererklärung (Pact of Amsterdam) betreffend eine gemeinsame Urban Agenda für die EU - Stellungnahme

Sehr geehrte Damen und Herren!

Der Österreichische Städtebund bedankt sich für die Übermittlung des ersten Entwurfs (EU Draft Version 2.0 / 2-3-2016) der geplanten Ministererklärung (Pact of Amsterdam) betreffend eine gemeinsame Urban Agenda für die EU und die Gelegenheit zur Stellungnahme.

The Austrian Association of Cities and Towns (AACT) welcomes the initiative of bringing the EU Urban Agenda to life. To integrate cities and urban areas of all sizes into the policy and decision making process of the EU when it comes to the urban dimension is long due. To ensure better coordination among the existing EU policies and structures in acknowledgment of the conflicting impacts on cities of the EU legislation regarding the growing complexity of urban themes is the only way to meet the big challenges that urban areas are facing.
Therefore, the AACT regrets, that the drafted „Pact of Amsterdam“ contains a great amount of determinations about what it NOT should be (like e.g. „no new structures / programmes“). Again, we would recommend to discard these restricting parameters or to substitute them with more open ones. Sometimes, REstructuring or even REthinking existing legislation or financing might be necessary.

What should be for sure is a transparent, participative and binding working process between EU-authorities and urban representatives.

**Comments on specific points**

**Preamble**

Unfortunately, the preamble has been changed a lot. We are very much missing the former paragraph including the reasonable question for „better coordination of EU policies is the main rationale for an EU Urban Agenda“.

Especially a strong and equal dialogue with the European Commission was an important element of the EUUA, that seems to have been eliminated from the draft.

While the EUUA was ought to start a process of a better cooperation between local/regional, national and EU-level when it comes to urban interests, the new draft seems to lose its focus, eg, in the following text from the Preamble.

*In order to address the increasingly complex challenges in Urban Areas, it is important that Urban authorities cooperate with civil society and business, since they are the main drivers in shaping the future economic, social, cultural and environmental quality of Urban Areas. EU and national policies should set the necessary framework within which citizens, business and urban authorities can tackle their most pressing challenges.*

That text passage should be scratched to keep the focus on the other aspects.

We appreciate the explicit addressing of urban areas but are wondering, why the well established term „functional urban areas“ (FUA) is non-existent in the draft.
I Objectives and scope of the EU Urban Agenda

**Ad 4.1.** – The former clear demand for an “urban impact assessments“ is missing in that text passage. The AACT insists on the need for an “urban impact assessment“ in an EU Urban Agenda.

**Ad 4.2** - „user-friendly“ sources
In the new 2.0 version of the draft (Pact of Amsterdam) the „urban dimension“ is missing. In our opinion, the „urban dimension“ in terms of the "Acquis Urban" has to stay a permanent feature of the EU regional policy, because it ideally interprets the "integrated approach for city development".


EU support-measures and Regional Policy as a whole should be garantueed and accessible for cities of all sizes, for bigger metropolitan areas like Vienna as well as for small and medium sized cities and towns and their surroundings. And thus even in better developed regions like Austria, where the need for EU-financing is still existent, e.g. when it comes to Smart City-measures EU-funds are an important addition to national funds and the only way to guarantee successful, lighthouse Smart City-projects in the sense of EU-goals. We therefore also hope, that the efforts for simplification will be intensified during the next years. We would appreciate it, if in the future special guidelines for the funding of integrated urban development projects would be re-established. Public administration with its non-profit approach cannot work under the same funding regimes as private beneficiaries.

The EUUA goals and measures should not only be related to the EU-definition of „integrated sustainable urban development“ according to Art. 7 ERDF Regulation, especially when it comes to other measures like eg. Urban Development Network (Art. 9 ERDF-Regulation). Outstanding intergrated urban development happens in many other cities, and are obligatory related to Art. 7.

**Ad 9** - “The EU Urban Agenda should be implemented in full transparency”
The information policy of the European Commission in particular is in need of improvement. On the one hand, when one is questioned, there are often short deadlines to be claimed, on the other hand many things are handled in a small,
exclusive circle of just a hand full of players like Eurocities, where many cities have no (regular) access. We therefore would immensely appreciate an immediate implementation of a web-based platform, where relevant information and documents concerning the EUUA are made accessible for each and every stakeholder.

II Priority Themes of the EU Urban Agenda

Ad 10 – Important urban cross-cutting issues are still missing, e.g. demographic change, age-appropriate living etc.

Ad 13 – the list of Priority Themes should also be open for being revised and augmented by local and regional authorities. Guaranteeing transparency through public consultation is fundamental.

III The operational framework of the EU Urban Agenda:

Ad 15b – thematic partnerships
The final composition of the first partnerships is inadequate from our point of view. Too many actors, that already have a good impact on EU-authorities dominate the partnerships, that were ment to be focused on urban needs.

The AACT is starting to think, that maybe existing bodies might be a better opportunity to develop the EU Urban Agenda. The Urban-Intergroup for example could overtake some of these tasks – but would therefore have to extend their clientele.

Ad 15b – knowledge
„Knowledge“ through monitoring is important but should not make the benefits of „knowledge exchange“ forgotten. For the cities themselves, the knowledge exchange is one of the most important tools, the EU grants.

IV Partnerships

Two very important points have also been erased from this chapter: The involvement of Council Working Groups as well as the demand for the consideration of the urban agenda within future EU multi-annual frameworks were fundamental elements of the first draft and should be re-established.
Ad 21: Before partnerships do so, a transparent discussion process of their suggestions should be initiated – we recommend to integrate the official representative organisations of urban interests like the AACT in Austria to guarantee transparency.

Ad 30: The optional character of revolving financial instruments as well as the Juncker-Fund should not change but be kept in the way it is.

V Member States

The demand for a close involvement of urban areas or their representatives into the european and the national policy making process is very welcomed. This spirited goal should not be restricted by immediate references on existing boundaries but strengthened by an open-ending approach.

VI Urban Areas

Ad 31 - 35 – Eurocities and CEMR are indeed important players – but the text should clearly show the openness for other representatives of urban interests, too.

Ad 38 – To ensure an open, transparent and broad access of interested urban areas to the information, an official web-site is strongly recommended, that contains all important information and documents. Not every city or urban area has access to organisations like Europcities.

VII European Commission

Ad 49 – Representatives of the European Parliament should absolutely be members of the Urban Agenda Steering Committee, as stated in the first Draft.

The list of stakeholders is insufficient and should be revised.
Finally, the AACT strongly supports the Viennese statement:

“A growing number of urban challenges have very local symptoms, but require a wider territorial solution. On the other hand, urban solutions have the potential to lead to wider territorial benefits. Therefore the approach of „functional urban areas“(FUAs), including urban-rural cooperation, agglomerations of smaller and medium-sized cities, as well as metropolitan areas should be a cross sectoral task of all themes of the EU Urban Agenda.

In order for the EU Urban Agenda to become a relevant, effective and liable framework for European policies, regulations and instruments that will serve our citizens’ needs and concerns, we urge the European Commission in particular to adopt the EU Urban Agenda as one of its priorities during its mandate and include it in its annual work programmes. The European Commission should be coordinating the EU Urban Agenda and thus ensure the coherent and integrated policy-solutions that our cities need at European level. The Commission should, in this respect, consider to expand the instrument of impact assessments to include the urban dimension.“

We strongly insist on a transparent process – eg. Concerning partnerships and their work and politically relevant recommendations - as well as the integration of the official representative organisations of urban interests like the AACT in Austria.

The Austrian Association of Cities and Towns thanks for the consideration of its requests.

Mit freundlichen Grüßen

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