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Stellungnahme

Wien, 13. Jänner 2016
**Erster Entwurfs (EU Draft Version
1/17.2-2015) 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 1/17.2-2015) 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 into the policy and decision making process of the EU when it comes to the urban dimension is long due. And to ensure better coordination among the existing EU structures in acknowledgment of the conflicting impacts on cities of the EU legislation (p. 3) regarding the growing complexity of urban themes is the only way to meet the big challenges that urban areas are facing.

On the one hand, cities are the nodes of European society and therefore must be the forerunners addressing new challenges through innovative solutions. On the other hand, they must organise on a European scale to collaborate finding and implementing these solutions and to build a strong system of cities that can be the backbone of Europe.

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“). We would recommend to discard these restricting parameters or to substitute them with more open ones. Sometimes, REstructuring or even REthinking financing might be necessary.

For example, the funding of the partnerships or for evaluation stays an open question (e.g. We are not yet informed, how the 50,000 Euros will be used, that are said to be the „budget“ of each of the partnerships).

Comments on specific points

I Objectives of the EU Urban Agenda

Ad 2. - We welcome the focus on urban areas as a whole. But throughout the document it remains unclear, who will be addressed (cities, urban areas) at which state or action and who will decide about this. We therefore recommend to define all the partners that might speak on behalf of cities and urban areas. From our point of view, these are at least the following:

- city-representatives,
- representatives for the urban areas as a whole,
- national City Associations (CA)

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ad 3. - The three focus points of the Urban Agenda mentioned under 3.1. to 3.3. point into the right direction, but unfortunately on a closer look, their specific contents appear to be a rather weak approach in comparison to the above mentioned requirements.

3.1. – better regulation

We agree to points 3-1-1 – 3.1.3. and especially welcome the urban impact assessment mentioned under 3.1.2.

Point 3.1.4. should be more clearly formulated, esp. the terms “actors involved / relevant stakeholders”. As mentioned above, the AACT would recommend a structured “information system” that includes all national city associations. At the other side, we worry about the long term commitment for the Urban Agenda and its goals, if there is no representative at the commission-level that functions as a reference person for the EU Urban Agenda as a whole. We doubt that “multi-level-governance” as stand-alone-solution will ensure the fulfilling of the aims of the EUUA, that the AACT hopes for (e.g. making sure, that the urban dimension and the involvement of city representatives in policy making processes will be enduring for the future years, supervision of the process, etc)

So the AACT strongly recommends

- a representative for the EUUA within the EC (in German: “Kümmerer”)
- the inclusion of the EUUA topics within the working programme of the EC
- to guarantee for the involvement of city representatives into decision making
- the installation of an “Urban Impact Assessment”.¹

3.2. – better funding

The involvement of the local level is inevitably important and therefore very welcome.

3.2.1 - *“To exchange knowledge on ways to improve coordination ...”*

It is clear, that there will be discussion . But the clear aim is to improve the coordination - not the knowledge exchange.

3.2.3. *“... to involve authorities responsible for urban areas ... “*

As not in every member state (MS) the system and governance of urban areas are that advanced, a better formulation might be:

“...to involve cities, authorities or institutions responsible for urban areas or City Associations (CA), who support this topic on behalf of their members....“

¹ Ideally, the EUUA should function as an „Early Warning System“ for new or changing policies at EU level with an urban dimension, so that cities, city associations and urban stakeholders can be involved into a - then broader- discussion early.

3.3. – better regulation

As knowledge exchange between cities and urban areas is of great importance, we recommend to add the following point:

3.3.3. „To improve and further ensure possibilities for knowledge exchange between cities and urban areas. Cities and urban areas need support when it comes to the further development of their actions. The European and foreign exchange of knowledge is essential to learn from each other and to pass innovations on between them, will accelerate the solution expertise of European urban areas.“

As mentioned above, the AACT would recommend changes concerning points 4 – 8 as we find them to be much too restrictive for the one time occasion of an EU Urban Agenda, that sustainably will ensure the innovative power, life quality and economic stability of cities, towns and urban areas all over Europe. This Agenda, its contents, aims and its purpose therefore cannot be compared to e.g. the Macroregion-approach. The EUUA has to be open to future necessities, when it comes to the above defined goals 3.1 – 3.3., so we suggest as follows:

Ad 4. – „The EU Urban Agenda ~~does not aim to create new EU funding sources~~ and does not aim to transfer competences to the European level.“

Ad 5. - It does not seem to be possible to ensure to fulfill the aims of the EUUA without defining and untangling responsibilities. Within the existing structure, there should e.g. be room for the possibility to install a contact person responsible for urban issues that arise from the EUUA („Kümmerer“).

Ad 7. – „The EU Urban Agenda will guide the informal dialogue on urban development between Member States, representatives of urban areas, **City Associations** and the European Commission. **The EU Urban Agenda supports the creation of representatives of Urban Areas.**“

Ad 8. - This point is repetitive (point 4) and should therefore be dropped.

The operational framework of the EU Urban Agenda

Ad 9. - The "coherent set of actions" mentioned under 9. is indeterminate. We strongly encourage the document to explicitly state what the desired results ("deliverables") of the actions listed in section 10 of the document are supposed to be and how they contribute to the objectives.

In any case, we recommend to add national organisations, that represent urban interests, like the Austrian Association of Cities and towns and other City Associations (CA): „*The EU Urban Agenda ... European Commission, cities, **City Associations** and relevant stakeholders ...*“

Ad 10 / 10.1. - Partnerships: Member states, **cities**, urban areas **or their representatives**, the Commission, and relevant stakeholders **including City Associations ...**

The selection process for the participants of the partnerships have to be transparent and open for all who would like to contribute to ensure a balance of interests.

All elaborated results of these partnerships should be able to revise after discussing it in an open consulting mechanism.

We appreciate the determined schedule (10.8) as well as the better conjunction of existing processes and initiatives as stated in points 10.2 to 10.11., but would very much like the latter to be of a broader and less restrictive approach.

10.10. – The alignment of the work of the UDN-network is of course very useful. But the UDN-expertise must not be the only benchmark, as there are innovative Austrian cities with a lot of EU-expertise, that are not included into this special network, as e.g. the City of Graz, a frontrunner when it comes to integrated planning or Smart City projects.

Thus not only cities who have currently the opportunity to implement ERDF-measures within the ERDF-Operational Programmes should be able to contribute to the Urban Agenda-setting.

Ad 11. – „The coherent set of actions of the EU Urban Agenda will be jointly coordinated by the Member States, the Commission, the European Parliament, cities, **City Associations**, ... „

Ad 11. & 13. - The AACT welcomes the idea of a „Steering Committee“ as well as for the planned Evaluation, and hope for more details to be acknowledged, soon.

II Partnerships

Ad 19. - Each Partnership is made up of Member States, the European Commission, cities, **City Associations**, ...

Ad 26. - As the recommendations of the partnerships appear to be the most significant result of the Urban Agenda process, this section of the document should be formulated more strongly. The recommendations are the result of engaged work and should therefore be treated with due attention, as otherwise a sufficient involvement of partners might be lacking.

III These of the EU Urban Agenda

Ad 27 – The AACT recommends to add the following Themes 13, 14 and 15:

13 Delivering high quality services of general interest / public services

14 Governance – Development of functional urban areas

15 Sustainable finances of urban areas

The aspect of territorial integration in the **functional urban area** clearly is lacking. This topic was mentioned in Riga by many member states and is unquestionably a core issue for the development and strengthening of urban areas. It could be mentioned as an extra theme, e.g. ”Territorial transition“ or seen as a principle that sits above all sectoral themes. This is mentioned in Annex A, but should be moved to the actual text of the pact.

Therefore we appreciate the given possibility of point 29 to add to and to revise the initial list of Themes (point 27). ²

² Auf keinen Fall sollte der integrierte Ansatz der Leipzig Charta, der thematisch grundsätzlich offen angelegt ist, durch eine Begrenzung auf wenige Themenfelder eingengt werden. Wichtig ist dabei auch der zweite Ansatz der Leipzig Charta, der auf die sozialräumlichen

IV European Commission

The here mentioned only supporting role of the EC is too vague. The ambitious aims of the EU Urban Agenda will need strong management capabilities, and someone will need to provide this "secretariat" function.

Ad 37. - "to take into consideration" is a rather weak expression when it comes to take into account the efforts and the meaning of the results of the working stages of the EUUA. As mentioned before, the AACT strongly recommends the implementation of a contact person / representative for the EUUA within the EC.

V Cities and City Association

The involvement of the cities is the very important step and therefore a meaningful part of the EUUA, that the AACT strongly agrees to. As the EUUA is dedicated to cities and urban areas of all sizes throughout the member states we recommend into account, that many of the smaller cities and towns rely on their representation, that is executed by City Associations like the AACT.

We therefore recommend to add City Associations to this section of the document, to ensure the information and involvement of cities and towns of all sizes, by adding "City Associations" in **points 39³ to 41.**

Ad 42. - „To involve cities ... where necessary.“

This formulation shows a lack of commitment. The AACT recommends a stronger formulation like **“...whenever it comes to topics of urban dimension, cities, towns, urban areas and City Associations have to be involved”** .

Ad 43. - „To encourage **and further support** knowledge exchange...how to make optimal use of EU-funds **and how to reduce administrative burdens to cities using EU-funds.**“

³ Das „Committee of Regions“ sollte als vertraglich determinierte Institution der EU eigentlich gar nicht erwähnt werden müssen...

**Der Österreichische Städtebund ersucht um Berücksichtigung seiner
Stellungnahme.**

Mit freundlichen Grüßen



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