

Überarbeitung des Aufbau- und Resilienzplans 2020-2026

REPowerEU-Kapitel und Aktualisierung bestehender Maßnahmen

Anhang zum österreichischen Aufbau- und Resilienzplan



Anhang zum österreichischen Aufbau- und Resilienzplan

TEIL 1: EINFÜHRUNG IN DEN ANHANG.....	3
1. Allgemeines Ziel	3
2. Begründung für die Überarbeitung	4
TEIL 2: BESCHREIBUNG ZUSÄTZLICHER UND GEÄNDERTER REFORMEN UND INVESTITIONEN	5
TEIL 2.1: REPowerEU Kapitel	5
1. Allgemeines Ziel des Kapitels.....	5
2. Beschreibung der Reformen und Investitionen im Kapitel	5
3. Vorfinanzierungsantrag	40
TEIL 2.2: GEÄNDERTE KOMPONENTEN	41
TEIL 3: KOMPLEMENTARITÄT UND UMSETZUNG DES PLANS	157
1. Kohärenz mit anderen Initiativen	157
2. Komplementarität der Finanzierung	157
3. Wirksame Umsetzung.....	157
4. Konsultationsprozess der Stakeholder	157
5. Kontrolle und Audit.....	157
6. Kommunikation.....	157
TEIL 4: GESAMTKOHÄRENZ UND AUSWIRKUNGEN DES PLANS	158
1. Kohärenz	158
2. Gleichstellung der Geschlechter und gleiche Chancen für alle	158
3. Stärkung der wirtschaftlichen, sozialen und institutionellen Resilienz.....	158
4. Vergleich mit der Investitionsgrundlage.....	158

TEIL 1: EINFÜHRUNG IN DEN ANHANG

1. Allgemeines Ziel

In diesem Kapitel werden die wichtigsten wirtschaftlichen Entwicklungen seit der Verabschiedung des österreichischen Aufbau- und Resilienzplans (AT ARP) dargelegt und ein aktueller Ausblick gegeben.

Der AT ARP besteht aus:

- Den Durchführungsbeschlüssen des Rates 10159/21 und 10159/21 ADD 1
- Der operativen Vereinbarung C(2022) 8401 vom 17. November 2022

die vom Ministerrat am 10. September 2021 und am 23. November 2022 zur Kenntnis genommen wurden.

Wirtschaftliche Entwicklungen und Erwartungen seit 2021

Der AT ARP wurde vor dem Hintergrund einer verzögerten Erholung aufgrund der anhaltenden Auswirkungen der COVID-19-Pandemie erstellt. Die strategische Ausrichtung bestand jedoch darin, die damals umgesetzten Konjunkturpakete zu stärken und gleichzeitig mit wirtschaftlichen, ökologischen und sozialen Schwachstellen in Österreich umzugehen und das Zukunftspotenzial zu erhöhen. Ein besonderer Schwerpunkt lag - wie bei den nationalen Konjunkturprogrammen - im Klimaschutz und in der Digitalisierung. Österreich schlug Investitionen in Bildung, Forschung, Wirtschaft und Nachhaltigkeit vor und stärkte damit Regionen und Gemeinden. Darüber hinaus unterstützen Reformen in den vier Schwerpunktbereichen (Komponenten: 1. Nachhaltiger, 2. Digitaler, 3. Wissensbasierter und 4. Gerechter Aufbau) die jeweiligen Investitionen.

Die strategische Ausrichtung erwies sich als richtig, da die wirtschaftliche Erholung bereits 2021 stark einsetzte. Alle wichtigen Wirtschaftsindikatoren (siehe Tabelle 1 unten) entwickelten sich besser als erwartet. Die Verbraucherpreise stiegen jedoch um 1 Prozentpunkt stärker als erwartet. Trotz des wirtschaftlichen Gegenwinds, der nicht zuletzt durch die russische Aggression gegen die Ukraine ausgelöst wurde, entwickelte sich die österreichische Wirtschaft im Jahr 2022 weiterhin besser als erwartet. Die hohe und steigende Inflation veranlasste die Regierung zu einer Reihe kompensierender Einkommensstützungsmaßnahmen, die auch in den Jahren 2023 und 2024 Wirkung zeigen werden. Während für 2023 ein gedämpftes BIP-Wachstum erwartet wird, ist klar, dass sich Österreich - mit Ausnahme der Inflation - auf einem besseren Wirtschaftspfad befindet als 2021 angenommen. Der Fokus der Novelle sollte daher auf der Erreichung der Ziele von REPowerEU liegen und gleichzeitig jene Maßnahmen des bestehenden Plans anpassen, die

aufgrund objektiver Umstände nicht mehr umsetzbar sind.

Table 1: Economic developments growth and comparison to expectations in the Austrian RRP of 2021

	2021	2022	2023	2024	2025	2026
Outcome 2021-2022 and New Baseline Scenario						
GDP, nominal, rate of change in %	6,6	10,2	7,4	6,1	5,2	4,7
GDP, volume, rate of change in %	4,6	5,0	0,3	1,8	2,1	2,0
Dependent employment (in 1,000)	3734,4	3.844,6	3.874,6	3.924,6	3.975,1	4.017,4
Unemployed (in 1,000)	331,7	263,1	269,1	259,1	241,3	230,8
Inflation (CPI, rate of change in %)	2,8	8,6	7,1	3,8	3,0	2,5
Private final consumption expenditure, real, rate of change in %	3,6	4,1	1,3	2,0	2,4	2,2
Net lending/borrowing of general government in % of GDP	-5,8	-3,2	-3,2	-1,6	-1,4	-1,3
Gross debt in % of GDP	82,3	78,4	77,0	75,1	73,3	71,4
Expectations in 2021						
GDP, nominal, rate of change in %	2,7	6,5	3,2	3,5		
GDP, volume, rate of change in %	1,5	4,7	1,6	1,8		
Dependent employment (in 1,000)	3677,9	3761,9	3803,5	3843,1		
Unemployed (in 1,000)	384,6	355,6	342,2	329,2		
Inflation (CPI, rate of change in %)	1,8	1,8	1,7	1,7		
Private final consumption expenditure, real, rate of change in %	1,1	4,6	2,7	2,0		
Net lending/borrowing of general government in % of GDP	-8,4	-4,3	-3,0	-2,5		
Gross debt in % of GDP	89,6	88,1	88,1	87,6		

Sources: BMF - Austrian Stability Programme 2022-2026, STAT, WIFO

2. Begründung für die Überarbeitung

Im Einklang mit der ARF-Verordnung schlägt Österreich auf der Grundlage der folgenden Artikel Änderungen am zuvor angenommenen AT ARP vor:

- *Artikel 21a im Zusammenhang mit dem Kapitel REPowerEU*

Gemäß Artikel 21a soll Österreich 210 304 520 EUR an nicht rückzahlbarer Unterstützung für sein REPowerEU-Kapitel erhalten, das aus zwei Reformen und zwei Investitionen bestehen soll.

- *Artikel 21: eine Änderung oder Vorlage eines neuen Plans, weil der Aufbau- und Resilienzplan einschließlich der relevanten Etappenziele und Zielwerte von dem betreffenden Mitgliedstaat aufgrund objektiver Umstände teilweise oder vollständig nicht mehr durchzuführen ist.*

Auf der Grundlage von Artikel 21 beantragt Österreich die Änderung einiger Maßnahmen des ursprünglichen Plans aufgrund objektiver Umstände.

TEIL 2: BESCHREIBUNG ZUSÄTZLICHER UND GEÄNDERTER REFORMEN UND INVESTITIONEN

TEIL 2.1: REPowerEU Kapitel

Dieses REPowerEU-Kapitel beschreibt den Beitrag Österreichs zur Erreichung der REPowerEU-Ziele und den Einsatz der Aufbau- und Resilienzfazilität (ARF) für diesen Zweck.

1. Allgemeines Ziel des Kapitels

Die in diesem Kapitel enthaltenen Maßnahmen zielen auf die Bewältigung der an Österreich gerichteten Herausforderungen in den länderspezifischen Empfehlungen für 2022 und 2023 im Bereich der REPowerEU-Ziele ab, in denen der Rat empfiehlt, dass Österreich:

“ die Abhängigkeit von fossilen Brennstoffen insgesamt verringert und die Einfuhren fossiler Brennstoffe diversifiziert, indem es den Einsatz erneuerbarer Energien und den Ausbau der erforderlichen Infrastruktur beschleunigt, insbesondere durch vereinfachte Planungs- und weiter gestraffte Genehmigungsverfahren, die Energieeffizienz steigert, insbesondere in der Industrie und im Gebäudesektor, und die Energieversorgung diversifiziert sowie die Flexibilität und die Kapazitäten von Verbindungsleitungen für den Umkehrfluss erhöht. ”

Die Zuweisung der beantragten 210,3 Mio. EUR konzentriert sich auf die Verringerung der Abhängigkeit von fossilen Brennstoffen, den Ausbau erneuerbarer Energien und der erforderlichen Infrastruktur, die Dekarbonisierung des Verkehrs- und Gebäudesektors sowie die Vereinfachung und Vereinheitlichung von Planungs- und Genehmigungsverfahren.

2. Beschreibung der Reformen und Investitionen im Kapitel

a) Übersichtsbox

Neue Maßnahmen/aufgestockt durch zusätzliche Zuschüsse (Artikel 21a)

Name der Maßnahme	Sofern relevant: vorhandene CID- Referenznummer	Geschätzte Kosten (in EUR)
5.A.1. Beschleunigung der Genehmigungsverfahren für erneuerbare Energien		0
5.A.2. Wasserstoff als Schlüsseltechnologie zur Klimaneutralität		0
5.B.1. Photovoltaikanlagen und Stromspeicher		140 304 520
5.B.2. Förderung von emissionsfreien Nutzfahrzeugen und Infrastruktur	1.B.4 Emissionsfreie Nutzfahrzeuge	70 000 000

b) REPowerEU-Ziele

Die russische Invasion in die Ukraine im Februar 2022, der Krieg und seine Auswirkungen, auch auf die Energieversorgung, verleihen der energiepolitischen Transformation eine neue Dringlichkeit. Österreich hat die ökologische Transformation bereits im österreichischen Aufbau- und Resilienzplan (ARP) priorisiert, und 59% der Mittel werden für grüne Maßnahmen ausgegeben. Maßnahmen aus allen vier bisherigen Komponenten des ARP tragen zur Verwirklichung der Gesamtziele von REPowerEU bei:

1 - Nachhaltiger Aufbau - 1.A.1 Erneuerbare Wärmeesetz
1 - Nachhaltiger Aufbau - 1.A.2 Förderung des Austauschs von Öl- und Gasheizungen
1 - Nachhaltiger Aufbau - 1.A.3 Bekämpfung von Energiearmut
1 - Nachhaltiger Aufbau - 1.B.1 Mobilitätsmasterplan 2030
1 - Nachhaltiger Aufbau - 1.B.2 Einführung des 123-Klimatickets
1 - Nachhaltiger Aufbau - 1.B.3 Emissionsfreie Busse
1 - Nachhaltiger Aufbau - 1.B.4 Emissionsfreie Nutzfahrzeuge

1 - Nachhaltiger Aufbau - 1.B.5 Errichtung neuer Bahnstrecken und Elektrifizierung von Regionalbahnen
1 - Nachhaltiger Aufbau - 1.D.1 Erneuerbaren Ausbaugesetz
1 - Nachhaltiger Aufbau - 1.D.2 Transformation der Industrie zur Klimaneutralität
2 - Digitaler Aufbau - 2.D.3 Ökologische Investitionen in Unternehmen
3 - Wissensbasierter Aufbau - 3.B.2 Finanzierung von Umschulungs- und Weiterbildungsmaßnahmen
3 - Wissensbasierter Aufbau - 3.D.1 IPCEI Mikroelektronik und Konnektivität
3 - Wissensbasierter Aufbau - 3.D.2 IPCEI Wasserstoff
4 - Gerechter Aufbau - 4.B.3 Klimafitte Ortskerne
4 - Gerechter Aufbau - 4.C.5 Investitionsfonds „Klimafitte Kulturbetriebe“
4 - Gerechter Aufbau - 4.D.1 Spending Review mit Fokus „Grüner“ und „Digitaler“ Wandel
4 - Gerechter Aufbau - 4.D.4 Gesetzliche Grundlagen und Governance im Bereich Klimaschutz
4 - Gerechter Aufbau - 4.D.5 Ökosoziale Steuerreform
4 - Gerechter Aufbau - 4.D.6 Green Finance (Agenda)

Weitere Maßnahmen, die nicht im ARP enthalten sind, konzentrieren sich ebenfalls auf die Sicherung der Energieversorgung und den Übergang zu erneuerbaren Energien. Neben den gesetzlichen Umsetzungsmaßnahmen zur Beschleunigung des ökologischen Wandels strebt Österreich die Initiierung ganzheitlicher, abgestimmter Konzepte und Prozesse, insbesondere im Bereich der Förderung erneuerbarer Energien, sowohl auf Bundes- als auch auf Landesebene an. Auf diese Weise werden die spezifischen Kompetenzbereiche zwischen den Regionen und Behörden auf verschiedenen Ebenen berücksichtigt und eine nachhaltige nationale Umsetzung der REPowerEU-Ziele angestrebt.

Die folgenden Maßnahmen, die zu den REPowerEU-Zielen beitragen und aus anderen Quellen als der Aufbau- und Resilienzfazilität finanziert werden, können als Beispiele genannt werden:

Programmname	Budgetvolumen (in Mio. EUR)	Zeitplan	Kommentar
Strategische Gasreserve	4 046,5	2022-2025	Staatlich kontrollierte Speicherung von Erdgas in Gasspeicheranlagen

Programmname	Budgetvolumen (in Mio. EUR)	Zeitplan	Kommentar
Gasdiversifizierung	400,0	2022-2025	Teilweise Unterstützung für die zusätzlichen Kosten, die den Unternehmen durch die Lieferung von Erdgas aus nicht-russischen Quellen entstehen.
Ausbau der Fernwärme	371,9	2023-2026	Förderung des Ausbaus und der Dekarbonisierung von Fernwärme- und Fernkältesystemen.
Photovoltaik-Ausbau Privathaushalte	568,5	2023-2026	Förderung privater Photovoltaikanlagen
Erneuerbarer Ausbau	1 286,8	2020-2022	Finanzierung außerbudgetär über Stromkostenzuschlag
Verpflichtung zur Energieeffizienz einsparung	760,0	2023-2026	Förderinstrument für "zusätzliche" Maßnahmen zur Erreichung der EU-Energieeffizienzziele 2030
Transformation der Industrie	1 375,0	2023-2026	Sektorspezifische Förderung von Klimaschutzmaßnahmen im Bereich der Prozessenergie, die sowohl Investitionsmaßnahmen als auch Maßnahmen im Bereich der Betriebskosten umfasst.
Umweltförderung im Inland (UFI)	621,2	2023-2026	Investitionshilfen, insbesondere für Unternehmen, um die Umstellung auf erneuerbare Energien und Energieeffizienzprojekte zu fördern.
Sanierungs offensive	1 935,0	2023-2026	Thermische Sanierung und Kesselaustausch; davon 158,92 Mio. EUR durch ARF finanziert.
Kommunales Investitionsprogramm	500,0	2023-2025	Unterstützung von Gemeinden bei Energieeffizienzprojekten und der Umstellung auf erneuerbare Energien
Unterstützung für einkommensschwache Haushalte	570,0	2023-2026	Schwerpunkt auf der thermischen Sanierung und dem Austausch von Heizkesseln für einkommensschwache Haushalte

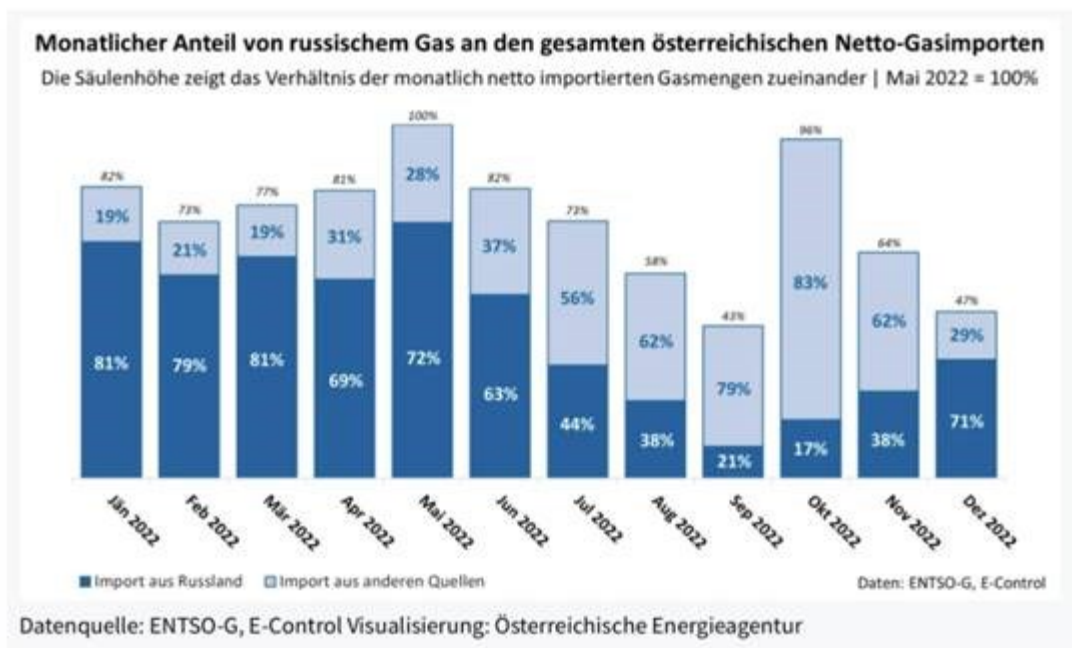
Programmname	Budgetvolumen (in Mio. EUR)	Zeitplan	Kommentar
Umweltstiftung	17,5	2022-2025	Schaffung von bis zu 1.000 Ausbildungsplätzen im Bereich Green Jobs

Österreich verbrauchte in den Jahren 2018 bis 2022 im Jahresdurchschnitt 96 Terawattstunden (TWh) Erdgas. Etwa neun Prozent dieses Volumens wird durch die heimische Produktion abgedeckt. Der Rest wird importiert. Ein großer Teil der Importe kam bis vor kurzem aus Russland. Österreich arbeitet jedoch auf allen Ebenen am Ausstieg.

Während der Anteil des russischen Gases im Januar 2022 noch bei 81% lag, lag er im Dezember 2022 bei 71%.

In absoluten Zahlen haben sich die russischen Importe im Dezember 2022 im Vergleich zum Januar 2022 jedoch fast halbiert:

Abbildung 1: Monatlicher Anteil von russischem Gas an den gesamten österreichischen Netto-Gasimporten



Quelle: ENTSO-G, e-control Visualisierung: Österreichische Energieagentur

Basierend auf einer Studie der Österreichischen Energieagentur¹ beträgt der erwartete Rückgang der Erdgasimporte aus Russland im Jahr 2027 im Vergleich zu 2019 rund 3,7 Mrd. m³² unter der Annahme

- dass alle möglichen Maßnahmen zur Verringerung des Gasverbrauchs und zur Steigerung der heimischen Produktion von erneuerbarem Gas umgesetzt werden
- und dass diese umgesetzten Maßnahmen auch die beabsichtigten Wirkungen in größtmöglichem Umfang erzielen.

Die Maßnahmen des REPowerEU-Kapitels können zu den Bemühungen bis 2027 wie folgt beitragen:

- Reformmaßnahme 5.A.1 (Umweltverträglichkeitsprüfungsgesetz 2023) enthält zahlreiche Maßnahmen zur Steigerung der Verfahrenseffizienz im Allgemeinen, aber auch speziell für Energiewendeprojekte (Erzeugung erneuerbarer Energie, Speicherung, Übertragung). Dies wird den Ausbau der Wind- und Wasserkraft sowie der biogenen Energie beschleunigen. Der durch diese Maßnahme beschleunigte Ausbau der Windkraft trägt einerseits dazu bei, die Umwandlung von Gas in Strom zu reduzieren (als Teil des indikativen Reduktionsbedarfs von 22 TWh) und andererseits kann die zusätzliche Energie für die Produktion von klimaneutralem³ Wasserstoff genutzt werden (als Teil des indikativen Produktionsbedarfs von 1 TWh).

Die Reformmaßnahme adressiert das REPowerEU-Ziel Artikel 21c 3 (b) [...] *Beschleunigter Ausbau der Nutzung von erneuerbaren Energien* durch die Vereinfachung und Beschleunigung der Genehmigungen für erneuerbare Projekte.

- Reformmaßnahme 5.A.2 (Wasserstoff als Schlüsseltechnologie für Klimaneutralität) unterstützt auch den Ausbau der Wasserstoffproduktion in Österreich, trägt zum Aufbau einer Wasserstoffinfrastruktur in Österreich bei und unterstützt die Entwicklung zukünftiger Importe von klimaneutralem Wasserstoff.

Die Reformmaßnahme adressiert das REPowerEU-Ziel Artikel 21c 3 (b) [...] *Steigerung der Erzeugung und Nutzung von nachhaltigem Biomethan und*

¹ <https://www.bmk.gv.at/dam/jcr:13567ab2-19e1-4a76-9794-b8fd3c9533c2/Unabhaengigkeit-von-Gas-aus-Russland-Analyse-AEA-26-04-2022-final-Grafik.pdf>

² Auf Seite vier der genannten Studie wird der Rückgang der Nachfrage nach importiertem Gas von 79 TWh auf 36 TWh beschrieben. Dies entspricht einer Reduktion von 43 TWh Gas. Die 3,7 Mrd. m³ ergeben sich aus der Umrechnung von 43 TWh (= 43 Mrd. kWh) mit dem aktuellen Heizwert von 11,54 kWh/m³.

³ wie definiert in: „Wasserstoffstrategie für Österreich“ (<https://www.bmk.gv.at/dam/jcr:0eb2f307-1e4d-41b1-bfd8-22918816eb1b/BMK-Wasserstoffstrategie-DE-UA-final.pdf>)

erneuerbarem oder nicht fossilem Wasserstoff [...] durch die Förderung des Einsatzes von nachhaltigem Wasserstoff, der durch verschiedene Technologien und Anwendungsmöglichkeiten die Klimaneutralität in schwer zu dekarbonisierenden Sektoren fördern und den Übergang zu einem erneuerbaren Energiesystem maßgeblich unterstützen kann.

- Investitionsmaßnahme 5.B.1 (Ausbau von Photovoltaik- und Stromspeicheranlagen) trägt zur Erreichung von Klima- und Umweltschutzziele sowie zur Förderung der Energieunabhängigkeit bei.
Die Investitionsmaßnahme adressiert das REPowerEU-Ziel Artikel 21c 3 (b) [...] *Erhöhung des Anteils an und beschleunigter Ausbau der Nutzung von erneuerbaren Energien* durch die Förderung des Einsatzes von Photovoltaik (PV) und Stromspeichersystemen.
- Investitionsmaßnahme 5.B.2 (Förderung emissionsfreier Nutzfahrzeuge und Infrastruktur) unterstützt die Dekarbonisierung des Straßenverkehrssektors.
Die Investitionsmaßnahme adressiert das REPowerEU-Ziel Artikel 21c 3 (e) [...] *Förderung der Emissionsfreiheit des Verkehrs und der Verkehrsinfrastrukturen, einschließlich Schienenwegen*, durch Verringerung der Abhängigkeit von fossilen Brennstoffen durch den Kauf oder die Nachrüstung von mindestens 167 Nutzfahrzeugen der Fahrzeugklassen N2 und N3 (einschließlich Sattelzugmaschinen und Sonderfahrzeuge).

Maßnahmen, die bereits im ursprünglichen ARP enthalten sind, werden in den kommenden Jahren zusätzlich ihre Wirkung zeigen:

- Verbot des Einbaus von Gasheizkesseln in neuen Gebäuden (Reform 1.A.1)
- Senkung des Gasbedarfs durch Förderung des Austauschs von Gaskesseln (Investition 1.A.2)
- Gesetzlicher Rahmen zur Förderung von Biogas durch das Erneuerbaren Ausbaugesetz (Reform 1.D.1)
- Rechtlicher Rahmen für die Förderung des Baus von Elektrolysekapazitäten durch das Erneuerbaren Ausbaugesetz (Reform 1.D.1)
- Investition 1.D.2 Transformation der Industrie zur Klimaneutralität
- Investition 3.D.2 IPCEI Wasserstoff
 - IPCEI Wasserstoff trägt zur Entwicklung von Ressourcenkapazitäten bei, um die Importabhängigkeit in strategischen Sektoren in Österreich und Europa zu verringern.
 - Entwicklung eines 60-MW-Elektrolyseurs für die Herstellung von grünem Wasserstoff und zur Versorgung der industriellen Produktion von Ammoniak.
 - Entwicklung hocheffizienter Hochtemperatur-Elektrolyseure zur emissionsfreien Produktion und Anwendung von H₂ in der Industrie.

- Im Zusammenhang mit IPCEI Wasserstoff stärken die von IPCEI geförderten Unternehmen ihre Widerstandsfähigkeit oder strategische Autonomie.

c) Beschreibung der Reformen und Investitionen

Der bestehende österreichische Aufbau- und Resilienzplan (ARP) sieht Reformen und Investitionen in vier Kapiteln ("Komponenten") vor, deren Umsetzung an der Erreichung von insgesamt 171 Meilensteinen und Zielen (im Folgenden "Meilensteine") gemessen wird, für deren Erreichung Österreich insgesamt 3,75 Mrd. EUR aus der Aufbau- und Resilienzfazilität erhält. Im Hinblick auf die Verhältnismäßigkeit wird das vorliegende zusätzliche REPowerEU-Kapitel, das mit zusätzlichen 210,3 Mio. EUR finanziert wird, weitere 10 Meilensteine enthalten, die zwei neuen Reformen sowie einer neuen und einer aufgestockten Investition zugeordnet sind.

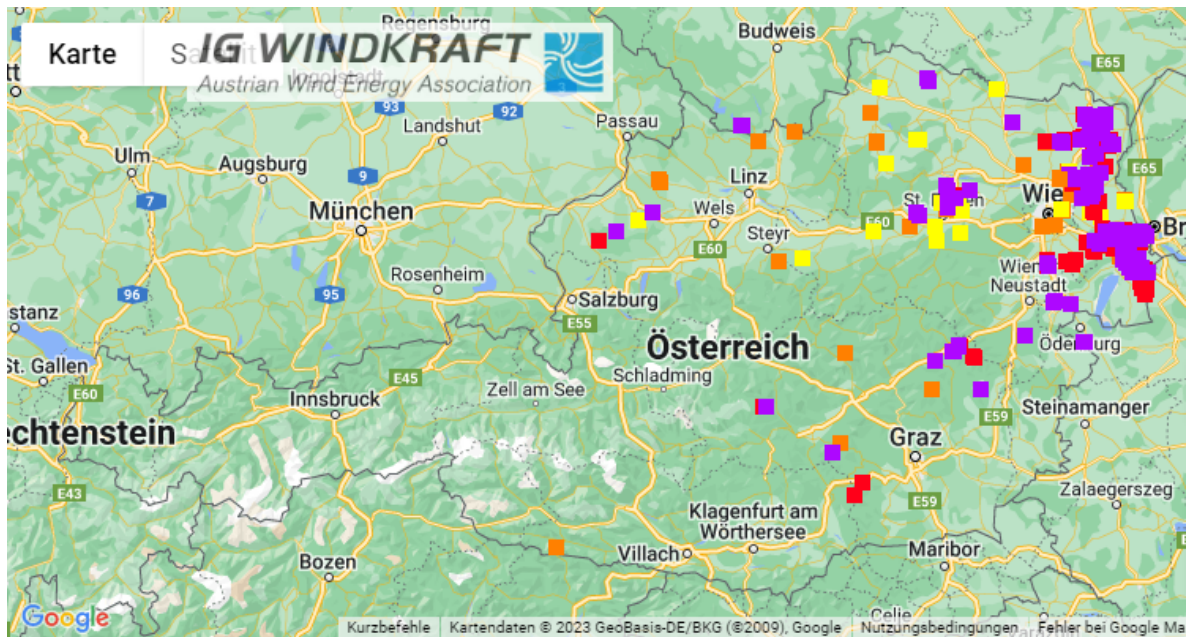
Sub-Komponente 5.A - REPowerEU Reformen

Die beiden Reformen dieser Sub-Komponente zielen darauf ab, Genehmigungsverfahren im Bereich von Energiewendeprojekten zu beschleunigen und andererseits Wasserstoff als Schlüsseltechnologie für die Dekarbonisierung zu etablieren.

5.A.1. Beschleunigung der Genehmigungsverfahren für erneuerbare Energien

Die größten Herausforderungen:

In Österreich fällt die Raumplanung in die Zuständigkeit der Länder, während die konkrete Flächenwidmung in die Zuständigkeit der Gemeinden fällt. Dies hat dazu geführt, dass der Ausbau der Windenergie aufgrund fehlender oder unzureichender Energieplanung und -Ausweisung bisher hauptsächlich im Osten Österreichs stattgefunden hat und es in einigen Bundesländern nur langsame oder gar keine Fortschritte gab. Insbesondere die Bundesländer im Westen Österreichs sind durch den Ausbau der Windenergie wenig erschlossen, vor allem in den alpinen Regionen gab es bisher fast keinen Ausbau der Windenergie; siehe die nachstehende Karte der bestehenden Windkraftprojekte in Österreich:



Quelle: IG Windkraft – Windradlandkarte (13.04.2023); verfügbar unter [IG Windkraft - - Windrad-Landkarte](#)

Umweltverträglichkeitsprüfungsverfahren (UVP) sind in Österreich konzentrierte Genehmigungsverfahren ("one-stop-shop"), bei denen alle erforderlichen Genehmigungen für ein konkretes Projekt in einem Verfahren von einer Behörde erteilt werden. Diese Verfahren sind daher für Großprojekte, die oft mit weitreichenden Umweltauswirkungen verbunden sind, komplex und sind – in Übereinstimmung mit der EU-UVP-Richtlinie – mit Öffentlichkeitsbeteiligung und Rechtsmitteln für Umweltorganisationen und die betroffene Öffentlichkeit durchzuführen.

Ziele der UVP-Gesetzesnovelle 2023:

- Durchführung von UVP-Genehmigungsverfahren für Windkraftanlagen auch bei fehlender Energieraumplanung durch die Länder und/oder Ausweisung durch die Gemeinden. In Fällen, in denen eine überörtliche Energieraumplanung vorliegt aber keine Widmung auf örtlicher Ebene, können unter bestimmten Voraussetzungen UVP-Verfahren auch ohne Widmung durch die Gemeinde durchgeführt werden. Fehlt beides, benötigt der Projektträger die Zustimmung der Gemeinde.
- Bei Projekten der Energiewende (Erzeugung erneuerbarer Energien, Stromleitungen und Pipelines, Tiefenbohrungen für Geothermie etc.) besteht ein besonders hohes öffentliches Interesse. Bei Standorten, die einer strategischen Umweltprüfung (SUP) unterzogen wurden, darf eine Ablehnung des Vorhabens nicht allein wegen der Auswirkungen auf das Landschaftsbild erfolgen, und die Berufung hat bei (unzureichend begründeten) pauschalen Beschwerden keine aufschiebende Wirkung.

- Bessere Verfahrensstrukturierung durch konkrete Einspruchsfristen zu Beginn des Verfahrens und festgelegte Fristen der Behörden und des Bundesverwaltungsgerichts für weitere Eingaben im Verfahren - für alle UVP-Verfahren. Dadurch werden Verfahrensverzögerungen durch bewusst verspätete Einreichungen von Projektgegnern verhindert.
- Verstärkte Nutzung der Digitalisierung durch mehr Möglichkeiten für Behörden elektronische Verfahren und Online- oder Hybrid-Verhandlungen (insbesondere für die Hinzuziehung von Sachverständigen, bei der derzeit aufgrund mangelnder Verfügbarkeit Engpässe gibt, die zu Verzögerungen führen) zu nutzen - für alle UVP-Verfahren.
- Bessere Koordinierung zwischen Projektantragstellenden und Behörden in Bezug auf die einzureichenden Unterlagen über prioritäre/nicht prioritäre Umweltauswirkungen und stärkere Berücksichtigung der Ergebnisse von SUPs - für alle UVP-Verfahren.
- Erleichterung von Genehmigungsänderungen bei technologischer Weiterentwicklung (z.B. von Energieeffizienz- oder Leistungssteigerungsmaßnahmen) oder bei immissionsneutralen oder geringfügigen Änderungen durch Mitteilung an die Behörde anstelle von Änderungsverfahren - für alle UVP-Verfahren.

Erwartete Auswirkungen:

Das Bündel zahlreicher Maßnahmen in der UVP-Novelle zur Vereinheitlichung und Vereinfachung der UVP-Verfahren wird voraussichtlich zu einer Beschleunigung der Genehmigungsverfahren führen. Es wird erwartet, dass alle Sektoren, nicht nur Energiewendeprojekte, von der Reform profitieren werden.

Einwände sind bei allen UVP-Genehmigungsverfahren innerhalb der Frist für die Öffentlichkeitsbeteiligung (also mit der Veröffentlichung der Projektunterlagen wie etwa der Umweltverträglichkeitserklärung) zu erheben. Wer also nicht fristgerecht Einwände erhebt, hat im weiteren Verfahren keine Parteistellung. Damit wird verhindert, dass Eingaben und Stellungnahmen erst sehr spät im Verfahren eingereicht werden und dadurch Verzögerungen entstehen.

Beschleunigung der Beschwerdeverfahren vor dem Bundesverwaltungsgericht: Verfahrensverzögerungen durch missbräuchliche Vorbringen erst im Beschwerdeverfahren sind nicht mehr zulässig. Damit werden auch die Verfahren vor den Gerichten deutlich verkürzt.

Wenn die Auswirkungen eines EE-Projekts auf die Landschaft auf Planungsebene durch eine SUP vorbewertet wurden, können diese Auswirkungen nicht zu einer Ablehnung der Genehmigung führen. Dies wird insbesondere die Genehmigung von Windparks erleichtern. Laut dem 8. UVP-Bericht an das Parlament (2021) betrug die durchschnittliche Dauer der zwischen 2009 und 2020 abgeschlossenen UVP-Verfahren 15,2 Monate von Antrag bis zur

Genehmigung und 7,2 Monate ab Vollständigkeit der Projektunterlagen bis zur Genehmigung. Die Dauer variiert zwischen den einzelnen Projekttypen aufgrund mehrerer Faktoren, wie der Qualität der Projektunterlagen, der Sensibilität und Auswirkungen auf die Umwelt, der Verfügbarkeit von Experten sowie der Beteiligung der Öffentlichkeit. Mit den in der UVP-Novelle vorgesehenen und oben erwähnten Maßnahmen wird erwartet, dass sich die Dauer der UVP-Verfahren verkürzt. Bewertungen der Auswirkungen werden im 9. UVP-Bericht (2024, für den Zeitraum 2021 bis 2023) und im 10. UVP-Bericht (2027, für den Zeitraum 2024 bis 2026) vorgelegt.

Die betroffenen Wirtschaftszweige (insbesondere die Energiewirtschaft) sowie die UVP-Behörden (der Länder) waren an der Vorbereitung der Novelle beteiligt und wurden daher bereits darüber informiert. An die Vollzugsbehörden wurde mit Inkrafttreten der Novelle ein Informationsschreiben versandt.

Zeitraumen:

Meilenstein 1 – Q1/2023: Die Novelle des UVP-Gesetzes wurde am 22. März 2023 im Bundesgesetzblatt veröffentlicht und trat am 23. März 2023 in Kraft.

Meilenstein 2 – Q3/2024: 9. UVP-Bericht an den Nationalrat mit Informationen zur Dauer der UVP-Verfahren, einschließlich Empfehlungen über die notwendigen Maßnahmen, um die EE-Genehmigung in Österreich weiter zu beschleunigen.

EU-Beihilfenrecht:

Die EU-Beihilfenrecht ist nicht unmittelbar relevant.

5.A.2. Wasserstoff als Schlüsseltechnologie zur Klimaneutralität

Die größten Herausforderungen:

Klimaneutraler Wasserstoff ist ein wichtiger Wegbereiter für das österreichische Ziel der Klimaneutralität bis 2040. Er kann dazu beitragen, die Klimaneutralität in schwer dekarbonisierbaren Sektoren - wie etwa der energieintensiven Industrie - sicherzustellen und den Weg zu einem klimaneutralen Energiesystem unterstützen. Gleichzeitig kann Wasserstoff eine wichtige, nachhaltige Option für die sichere Energieversorgung Österreichs in der Zukunft sein. Er kann zu einer mittel- bis langfristigen Abkehr von fossilem Gas beitragen und damit die Abhängigkeit von fossilen Energieimporten deutlich verringern. Wichtig ist, dass klimaneutraler Wasserstoff in Zukunft in ausreichender Menge und zu möglichst günstigen Bedingungen für Österreich zur Verfügung stehen muss. Dies erfordert wiederum eine funktionierende, effiziente und zukunftssichere Wasserstoffinfrastruktur in Österreich.

Zielsetzungen:

Die strategischen Eckpfeiler zur Unterstützung des Aufbaus eines österreichischen Wasserstoffmarktes werden im Rahmen der österreichischen Wasserstoffstrategie festgelegt. Die Strategie skizziert ambitionierte Ziele und konkrete Maßnahmen entlang der gesamten Wasserstoff-Wertschöpfungskette und unterstützt damit einen gezielten und effizienten Ausbau von klimaneutralem Wasserstoff. Investitionen in die klimaneutrale Wasserstoffproduktion werden vorangetrieben und Anreize für marktbasierende Geschäftsmodelle geschaffen. Zur Wasserstoffstrategie gehört ein eigener Aktionsplan, der in sieben übergreifende Handlungsfelder unterteilt ist und die Maßnahmen zur Umsetzung der Strategie bis 2030 enthält.

Diese Maßnahmen, wie zB.

- ein Finanzierungsinstrument für die Transformationsprozesse in der energieintensiven Industrie (einschließlich Wasserstoff),
- Szenarien und Netzmodellierung für die Transformation des Gassektors in Richtung Klimaneutralität 2040 und die Entwicklung eines strategischen integrierten österreichischen Netzinfrastukturplans (NIP) für Strom- und Gas-/Wasserstoffnetze
- oder die Umsetzung einer nationalen Wasserstoffzertifizierung,

werden durch verschiedene regulatorische, rechtliche und finanzielle Instrumente umgesetzt, um die Ziele der Wasserstoffstrategie zu erreichen, und zielen auf die langfristige Entwicklung eines Wasserstoffmarktes in Österreich ab.

Mit spezifischen Umsetzungsmaßnahmen wird der gezielte und effiziente Einsatz von klimaneutralem Wasserstoff in strategischen Verbrauchssektoren, die in das Gesamtsystem eingebettet sind, unterstützt.

Gleichzeitig wird die Entwicklung und Umstellung einer geeigneten Infrastruktur von Erdgas zu Wasserstoff unterstützt und Importe von klimaneutralem Wasserstoff in die Verbrauchszentren in Österreich ermöglicht. Für eine rasche, kosteneffiziente und koordinierte Redimensionierung entlang der Wertschöpfungskette und die Ausweitung von Projekten setzt Österreich koordinierte Maßnahmen von der Produktion über die Infrastruktur bis zur Nutzung von Wasserstoff. Der Aufbau einer eigenen Wasserstoffinfrastruktur, eingebettet in die Gesamtenergiesystemplanung in Österreich, ist ein strategischer Eckpfeiler der Strategie. In diesem Zusammenhang ist eine zentrale Maßnahme der Strategie die Entwicklung eines integrierten österreichischen Netzinfrastukturplans (NIP). Der NIP identifiziert den übergeordneten Netzbedarf im Strom- und Gassektor für eine gesamtwirtschaftliche Energiewende, einschließlich der Umwidmung der bestehenden Gasinfrastruktur in eine Wasserstoffinfrastruktur. Darüber hinaus werden Szenarien und Netzmodellierungen für die Transformation des Gassektors in Richtung Klimaneutralität im Jahr 2040 untersucht, unter anderem durch eine detaillierte Studie über die Entwicklung der Gasinfrastruktur in Österreich.

Um die Umsetzung der Strategie bestmöglich zu überwachen und die Umsetzung der einzelnen Maßnahmen sicherzustellen, wird ein Evaluierungs- und Umsetzungsbericht erstellt. Die Maßnahmen der Wasserstoffstrategie werden hinsichtlich ihres

Umsetzungsstandes und ihrer Wirkung evaluiert, auch im Hinblick auf den Beitrag Österreichs zu den europäischen Energie- und Klimazielen und zu den Zielen des Pariser Klimaabkommens. Der Bericht wird auch eine Bewertung der Fortschritte bei der Erreichung der Ziele der Strategie enthalten.

Um die bestmögliche Einbindung der relevanten Akteure in den Umsetzungsprozess der Wasserstoffstrategie zu gewährleisten und einen regelmäßigen Dialog zwischen den Akteuren sowie Entscheidungsträgerinnen und Entscheidungsträgern sicherzustellen, wird eine nationale Wasserstoffplattform eingerichtet. Diese Plattform wird die Perspektiven und Aktivitäten der Forschung, der Industrie (einschließlich der energieintensiven Industrie wie der Eisen- und Stahlindustrie und der chemischen Industrie), des Energiesektors und der Zivilgesellschaft in einem Dialogprozess bündeln. Die Plattform soll auch die Zusammenarbeit und Synergien zwischen lokalen, regionalen und nationalen Akteuren aus verschiedenen Bereichen stärken, den Informationsaustausch erleichtern, evidenzbasierte Grundlagen für die strategische Umsetzung der Strategie liefern und durch Kommunikation mehr Bewusstsein für klimaneutralen Wasserstoff schaffen.

Zeitraumen:

Meilenstein 1 – Q2/2023: Etablierung einer nationalen Wasserstoffplattform als Maßnahme der Wasserstoffstrategie

Meilenstein 2 – Q1/2024: Veröffentlichung des Evaluierungsberichts über die Umsetzung der Wasserstoffstrategie, einschließlich des aktuellen Stands und einer Bewertung der Fortschritte der in der Wasserstoffstrategie enthaltenen Zielen

Meilenstein 3 – Q1/2026: Veröffentlichung von zwei Schlüsselergebnissen der Wasserstoffstrategie: Der Integrierte österreichische Netzinfrasturkturplan (NIP) sowie Szenarien und Netzmodellierung für die Umstellung des Gassektors Richtung Klimaneutralität im Jahr 2040

EU-Beihilfenrecht:

Das EU-Beihilferecht ist nicht unmittelbar relevant.

Sub-Komponente 5.B - REPowerEU Investitionen

Die beiden Investitionsmaßnahmen zielen auf die weitere Dekarbonisierung des Stromerzeugungssektors sowie des Transportsektors ab. Insbesondere Photovoltaikanlagen können, vor allem, wenn sie mit Stromspeichern kombiniert sind, dazu beitragen, die Zeiten von Stromspitzen zu reduzieren, die normalerweise von Gaskraftwerken abgedeckt werden. Darüber hinaus unterstützt die Förderung emissionsfreier Nutzfahrzeuge der Klassen N2 und N3 die Dekarbonisierung dieser Fahrzeugkategorien, die üblicherweise mit Diesel betrieben werden.

5.B.1. Photovoltaikanlagen und Stromspeicher

Die größten Herausforderungen:

Der russische Angriffskrieg auf die Ukraine und die damit verbundene Gaskrise stellen Europa und Österreich vor enorme Herausforderungen. Ein wichtiger Schritt ist die Erhöhung der Energieunabhängigkeit durch erneuerbare Energien. Die österreichische Bundesregierung hat dazu bereits umfangreiche Maßnahmen ergriffen. Der Photovoltaikausbau in Österreich wird seit 2022 durch das Erneuerbaren-Ausbau-Gesetz vorangetrieben. Die nationalen Ziele werden im österreichischen Aufbau- und Resilienzplan durch die Reform "1.D.1 Erneuerbaren Ausbaugesetz" (EAG) dargelegt. Trotz eines großen Förderbudgets für Photovoltaikanlagen in Höhe von 220 Mio. EUR, das durch das Erneuerbaren-Ausbau-Gesetz im Jahr 2022 zur Verfügung gestellt wurde, ist die Nachfrage nach Unterstützung für den Ausbau, insbesondere im Bereich von Anlagen ≤ 20 kWpeak, weiterhin hoch. Um diese hohe Nachfrage zu bedienen und die Energieunabhängigkeit durch den Ausbau erneuerbarer Energien weiter voranzutreiben, werden nun über REPowerEU zusätzliche Mittel für den Ausbau von Photovoltaikanlagen ≤ 20 kWpeak mit oder ohne Stromspeicher bereitgestellt.

Zielsetzungen:

Mit dieser Maßnahme soll mit den zur Verfügung stehenden Mitteln in Höhe von 140,3 Mio. EUR ausschließlich der Einsatz von klimaschonenden und umweltfreundlichen Stromerzeugungsanlagen durch die Neuerrichtung und die Erweiterung von an das öffentliche Netz angeschlossenen Photovoltaikanlagen mit einer Leistung ≤ 20 kWpeak, mit oder ohne Stromspeicher, gefördert werden. Die Meilensteine sind so festgelegt, dass alle Projekte bis zu den Fristen des ARF im Jahr 2026 abgeschlossen sind. Die Förderung soll in Abhängigkeit von der Größe über Pauschalsätze je kWpeak vergeben werden. Die Anlagen sind nach Größe bis 10 kWpeak und Anlagen zwischen 10 und 20 kWpeak unterteilt, die mit unterschiedlichen Pauschalsätzen gefördert werden. Für Stromspeichersysteme bis 50 kWh, die gemeinsam mit der erneuerbaren Energieerzeugungsanlage installiert werden, sind Pauschalen pro kWh zu vergeben. Die Fördervoraussetzungen und die Höhe der Pauschalen in diesem Programm sind im Leitfaden festgelegt und entsprechen den Voraussetzungen der Förderung des Erneuerbaren-Ausbau-Gesetzes, um noch mehr

erneuerbare Anlagen in Österreich zu realisieren und die Energieunabhängigkeit Österreichs zu fördern.

Die Fördermittel im Erneuerbaren-Ausbau-Gesetz werden über den Erneuerbaren - Förderbeitrag und die Erneuerbare-Pauschale aufgebracht; die Möglichkeit der Vergabe zusätzlicher Mittel ist im Erneuerbaren-Ausbau-Gesetz ausgeschlossen und das verfügbare Budget ist begrenzt. Die zusätzlichen Mittel von REPowerEU werden daher durch den Klima- und Energiefonds, ergänzend zur Förderung im Rahmen des Erneuerbaren-Ausbau-Gesetz vergeben. Die nationale Rechtsgrundlage bilden das Klima- und Energiefondsgesetz und die Investitionsförderungsrichtlinie der Umweltförderung im Inland in der jeweils gültigen Fassung.

Zielgruppe sind Privatpersonen und gemeinnützige Vereine, sofern es sich um Verbraucherinnen und Verbraucher im Sinne des § 1 Abs. 1 Z 2 des Konsumentenschutzgesetzes handelt.

Der Klima- und Energiefonds berücksichtigt nur jene Förderanträge, die gemäß dem Erneuerbaren-Ausbau-Gesetz bei der Abwicklungsstelle für Ökostrom (OeMAG) eingereicht wurden, aber von der OeMAG mangels Budget abgelehnt werden müssen. Nach Einwilligung der Antragstellenden zur Weiterleitung ihrer Daten an eine andere Förderstelle (gemäß DSGVO) werden diese Anträge von der OeMAG an die Abwicklungsstelle des Klima- und Energiefonds weitergeleitet und im Zuge eines einstufigen Verfahrens im Förderprogramm des Klima- und Energiefonds registriert. Nach der Umsetzung der registrierten Projekte wird der Antrag von den Antragstellenden im Zuge der Endabrechnung bei der Förderstelle des Klima- und Energiefonds eingereicht, wo die Anträge geprüft werden. Dieser Antrag muss spätestens 24 Monate nach der Registrierung in der Förderstelle des Klima- und Energiefonds gestellt werden. Eine Doppelförderung kann ausgeschlossen werden, da der Erstantrag bei der Abwicklungsstelle des EAG (OeMAG) gestellt werden muss. Es ist nicht möglich, direkt bei der Abwicklungsstelle des Klima- und Energiefonds einen Antrag zu stellen.

Zeitraumen:

Damit alle Projekte im Einklang mit dem Zeitrahmen des ARF abgeschlossen werden können, wurden die Meilensteine wie folgt festgelegt:

Meilenstein 1 – Q4/2023: Richtlinien wurden geändert und veröffentlicht

Ziel 2 – Q4/2024: 17.500 Projekte wurden installiert

Ziel 3 – Q4/2025: 35.300 Projekte wurden installiert

EU-Beihilfenrecht:

Förderberechtigt sind ausschließlich Privatpersonen und gemeinnützige Vereine, sofern sie Verbraucherinnen und Verbraucher im Sinne von § 1 Abs. 1 Z 2 des Konsumentenschutzgesetzes sind. Der Verkauf von Strom aus einer geförderten PV-Anlage kann nach europäischem Recht eine unternehmerische Tätigkeit darstellen, weshalb die Förderung nach der De-minimis-Verordnung abgewickelt wird. Es sind jedoch keine weiteren beihilferechtlichen Prüfungen erforderlich, da die Antragstellenden per se nicht dem Beihilferecht unterliegen.

5.B.2. Förderung von emissionsfreien Nutzfahrzeugen und Infrastruktur

Die größten Herausforderungen:

Die Herausforderungen sind dieselben wie bei der ursprünglichen Investitionsmaßnahme 1.B.4. Aufgrund der aktuelleren Datenlage erfolgt nachfolgend ein Update.

Der Anteil emissionsfreier Fahrzeuge am österreichischen Fahrzeugbestand ist derzeit noch gering. Während der Anteil der Elektroautos an den Neuzulassungen stetig steigt und im Jahr 2022 bereits 15,9% betrug, lag ihr Anteil am gesamten österreichischen Fahrzeugbestand ebenfalls nur bei 2,14%. Im Vergleich dazu war der Anteil elektrischer Nutzfahrzeuge der Klassen N1, N2 und N3 an den Neuzulassungen von Nutzfahrzeugen im Jahr 2022 geringer und lag bei rund 8,4%. Der Anteil elektrischer Nutzfahrzeuge am Bestand erreichte im Jahr 2022 lediglich 1,4%. Lässt man die leichten Nutzfahrzeuge der Klasse N1 außer Acht, beträgt der Anteil der schweren elektrischen Nutzfahrzeuge (N2, N3 und Sattelzugmaschinen) am Bestand nur 0,14%. Dies ist damit zu erklären, dass die Kosten für emissionsfreie Nutzfahrzeuge und die damit verbundene Infrastruktur noch höher sind als die für konventionelle Nutzfahrzeuge, weshalb derzeit, abgesehen von einzelnen Pilotprojekten, kaum größere Flotten auf emissionsfreien Betrieb umgestellt werden, insbesondere bei den schweren Nutzfahrzeugen der Klassen N2 und N3. Um das ehrgeizige EU-Ziel der Klimaneutralität im Jahr 2050 zu erreichen, ist es wichtig, die Umstellung des Güterverkehrs frühzeitig zu beginnen. Dies gilt insbesondere vor dem Hintergrund, dass sich Österreich das Ziel gesetzt hat, bereits 2040 klimaneutral zu sein.

Der Verkehrssektor war im Jahr 2020 für Treibhausgasemissionen in Höhe von rund 21 Millionen Tonnen CO₂-Äquivalenten verantwortlich. Seit 1990 hat der Verkehrssektor (einschließlich des nationalen Flugverkehrs) mit einem Anstieg von 50,7% im Zeitraum 1990-2020 den höchsten Emissionsanstieg aller Sektoren zu verzeichnen. Hauptemittent ist der Straßenverkehr, auf den rund 28% der gesamten nationalen THG-Emissionen (inkl. EH) und rund 99% der THG-Emissionen des gesamten Verkehrssektors entfallen. Der Anteil des Straßenpersonenverkehrs (Autos, Busse, Mopeds, Motorräder) an den gesamten nationalen THG-Emissionen beträgt 16,6%, der des Straßengüterverkehrs (schwere und leichte Nutzfahrzeuge) rund 11%.

40% der Emissionen im Jahr 2020 stammten aus dem Güterverkehr, der schwere und leichte Nutzfahrzeuge umfasst. Im Jahr 2020 wurden rund 74% der Tonnenkilometer auf der Straße zurückgelegt. Die gesamten Treibhausgasemissionen daraus betrugen 8 263 000 Tonnen

CO₂-Äquivalente im Jahr 2020 und sind seit 1990 um rund 100,5% gestiegen, wobei leichte Nutzfahrzeuge einen Anstieg von 36% und schwere Nutzfahrzeuge einen Anstieg von 121,9% verzeichneten. Die Zahl der von Lkw in Österreich zurückgelegten Kilometer (leichte und schwere Nutzfahrzeuge) hat seit 1990 um rund 70% zugenommen, die Transportleistung in Tonnenkilometern um 164%. Das bedeutet, dass die Transportleistung pro Fahrzeugkilometer gesteigert werden konnte. Mit Blick auf das Ziel der Klimaneutralität im Jahr 2040 muss die Dekarbonisierung des Güterverkehrs zügig voranschreiten. [UBA 2022, Klimaschutzbericht 2022]⁴.

Zielsetzungen:

In Österreich sind derzeit 498.325 leichte Nutzfahrzeuge (N1), 9.690 schwere Nutzfahrzeuge der Fahrzeugklasse N2 und 45.234 schwere Nutzfahrzeuge der Fahrzeugklasse N3 sowie 20.247 Sattelzugmaschinen (Stand: Dezember 2022) im Einsatz, die überwiegend mit Dieselmotoren betrieben werden. Lässt man die leichten Nutzfahrzeuge der Klasse N1 unberücksichtigt, beträgt der Anteil der schweren elektrischen Nutzfahrzeuge (N2, N3 und Sattelzugmaschinen) an der Flotte nur 0,14%. Dies macht deutlich, dass gerade in diesen Fahrzeugsegmenten Handlungsbedarf besteht.

Ziel ist es, den Anteil emissionsfreier Nutzfahrzeuge deutlich zu erhöhen. So sollen bis zum zweiten Quartal 2026 mindestens 167 Nutzfahrzeuge der Fahrzeugklassen N2 und N3 (inkl. Sattelzugmaschinen und Sonderfahrzeuge) auf emissionsfreie Modelle umgerüstet und die für ihren Betrieb notwendige Infrastruktur installiert sein. Die Möglichkeit, emissionsfreie Fahrzeuge der Klassen N1, N2 und N3 zu fördern, wurde im Rahmen einer Ausnahmegenehmigung nach Artikel 36a und Artikel 36b der AGVO geschaffen. Die Förderung der Fahrzeugklasse N1 ist in der Maßnahme 1.B 4 beschrieben. Durch die Umstellung von derzeit mit fossilen Brennstoffen betriebenen Nutzfahrzeugen auf emissionsfreie Fahrzeuge bei gleichzeitig ausschließlicher Nutzung erneuerbarer Energien können die Emissionen drastisch reduziert werden.

Umsetzung:

Potenzielle Fördernehmerinnen und Fördernehmer können seit 22. März 2023 bei der Abwicklungsstelle Förderanträge für emissionsfreie Nutzfahrzeuge der Fahrzeugklassen N2, N3, Sattelzugmaschinen und Sonderfahrzeuge und die für deren Betrieb erforderliche Infrastruktur einreichen. Die für den Betrieb der jeweiligen geförderten Fahrzeuge erforderliche Betankungs- und Ladeinfrastruktur kann, sofern die betrieblichen Abläufe dies zulassen, auch von anderen Verkehrsteilnehmern genutzt werden und öffentlich zugänglich sein (siehe BGBl. I Nr. 38/2018 §3 Abs. 2 und 3). Unter der Voraussetzung, dass die in diesem Förderprogramm vorgegebenen Mindestkriterien erfüllt sind, erfolgt eine Reihung der Projekte nach ökonomischen und ökologischen sowie weiteren

⁴ [13. Umweltkontrollbericht \(umweltbundesamt.at\)](https://www.umweltbundesamt.at)

Qualitätsbewertungskriterien. Die Vergabe der Fördermittel erfolgt dann je nach ermittelter Rangfolge und den in der jeweiligen Ausschreibung zur Verfügung stehenden Haushaltsmitteln.

Die letzte Ausschreibung ist für Q4/2024 geplant (bei ausreichender Nachfrage kann der letzte Förderabruf auch früher erfolgen), so dass das Ziel von 167 neuen N2- und N3-Nutzfahrzeugen (inkl. Sattelzugmaschinen und Sonderfahrzeugen) bis zum letzten Zahlungsantrag in Q3/2026 erreicht werden kann.

Die ausschließliche Nutzung erneuerbarer Energien (Strom und Wasserstoff) für den Betrieb der geförderten Fahrzeuge stellt sicher, dass die Investitionen in das effiziente und integrierte Energiesystem passen, das für die Klimaneutralität im Jahr 2040 erforderlich sein wird.

Zielgruppe:

Unternehmen, andere unternehmerisch tätige Organisationen sowie Verbände, religiöse Einrichtungen und öffentliche Gebietskörperschaften.

EU-Beihilfenrecht:

Der Zuschuss stellt eine Beihilfe im Sinne von Artikel 107 Absatz 1 AEUV dar. Grundlage der Beihilfe ist die Ausnahme der betreffenden Beihilferegelung nach Artikel 36a und 36b der AGVO.

Zeitraumen:

Meilenstein 1 – Q1/2023: 1. Der Förderaufruf für Nutzfahrzeuge der Kategorien N2 und N3 "Emissionsfreie Nutzfahrzeuge und Infrastruktur (ENIN)" wurde gestartet

Ziel 2 – Q2/2026: Auf der Grundlage von Zuschussvereinbarungen haben die Empfänger mindestens 167 Nutzfahrzeuge der Fahrzeugklasse N2 oder N3 (inkl. Sattelzugmaschinen und Sonderfahrzeuge) mit emissionsfreier Technologie beschafft und erhalten

d) Projekte mit einer grenzüberschreitenden oder länderübergreifenden Dimension oder Wirkung

Mit drei Maßnahmen des zusätzlichen REPowerEU-Kapitels zum österreichischen Aufbau- und Resilienzplan (alle außer 5.B.2) wird eine grenzüberschreitende bzw. transnationale Wirkung erzielt. Somit tragen 66,71% der Mittel und damit weit mehr als das Mindestziel von 30% zu diesem Wirkungsziel bei.

Spezifisch wird die Investition 5.B.1 Photovoltaikanlagen und Stromspeicher die Abhängigkeit von fossilen Brennstoffen sowie die Energienachfrage verringern und so zur Verbesserung der grenzüberschreitenden Energieflüsse und der Energieversorgungssicherheit der Union beitragen.

e) Konsultation lokaler und regionaler Behörden und anderer relevanter Stakeholder

Wie bereits bei der Vorbereitung des ARP fanden die Konsultationen zum REPowerEU-Kapitel und zur möglichen Anpassung des ARP hauptsächlich im Rahmen des Prozesses zur Vorbereitung des Nationalen Reformprogramms statt. Vom 2. bis 31. März 2023 waren Stakeholder dazu aufgerufen, im Rahmen einer öffentlichen Konsultation Vorschläge an das Bundesministerium für Finanzen als koordinierende Stelle einzureichen. Die Konsultation wurde auf der Website des österreichischen Aufbau- und Resilienzplans öffentlich ausgeschrieben. Darüber hinaus wurden die Sozialpartner, relevante Stakeholder der Zivilgesellschaft, NGOs, Jugendorganisationen sowie Vertreterinnen und Vertreter regionaler und lokaler Behörden schriftlich auf die Konsultation aufmerksam gemacht.

Der Inhalt der Konsultation mit lokalen und regionalen Behörden und anderen relevanten Stakeholdern basierte auf drei Fragen:

- Welche bestehenden Reformen und/oder Investitionen des österreichischen ARP könnten für das "REPowerEU-Kapitel" aufgenommen und in ihrem Ambitionsniveau gesteigert werden?
- Welche neuen Reformen und/oder Investitionen, die gemäß Vorgaben bis Mitte 2026 abgeschlossen sein müssen, könnten für das "REPowerEU-Kapitel" aufgenommen werden?
- Welche bestehenden Reformen und/oder Investitionen basierend auf welchen objektiven Gründen sollten im Rahmen einer etwaigen Überarbeitung des Aufbau- und Resilienzplans angepasst werden?

Bis zum 31. März 2023 wurden insgesamt 14 verschiedene Beiträge eingereicht, darunter Beiträge von 3 Sozialpartnern, 3 Ländern, 2 Energieversorgern, 1 Privatperson und 5 anderen relevanten regionalen und wirtschaftlichen Akteuren.

Die Beiträge zur Konsultation umfassten insgesamt 72 Projekte, von denen 48 Projekte neue Maßnahmen und 24 Projekte die Ausweitung bestehender Maßnahmen vorschlugen, zum Beispiel:

Neue Maßnahmen:

- Reformen zur Beschleunigung von Genehmigungsverfahren für den Ausbau erneuerbarer Energien
- Investitionen in Bildung und Weiterbildung mit Schwerpunkt auf dem Energiesektor
- Ausbau der Wasserstoffwirtschaft
- Zusätzliche Subventionen und Ausweitung der Photovoltaik-Förderung

Ausweitung bestehender Maßnahmen:

- Ausweitung der Maßnahme "Transformation der Industrie in Richtung Klimaneutralität" (1.D.2) und Erhöhung des Fördervolumens für Einzelprojekte
- Aufstockung und Erweiterung bestehender Förderinstrumente für Elektrofahrzeuge und Infrastrukturinvestitionen - EBIN und ENIN (1.B.3/1.B.4).
- Ausweitung der Maßnahme "Bekämpfung von Energiearmut" (1.A.3) und Ergänzung begleitender Reformen wie einem "One-Stop-Shop Heizungs austausch".
- Aufstockung des Reparaturbonus (1.C.5) sowie des Austausches von Öl- und Gasheizungen (1.A.2)

Bei der Verabschiedung des REPowerEU-Kapitels legte die Bundesregierung den Schwerpunkt auf die Umsetzung der länderspezifischen Empfehlungen Österreichs für das Jahr 2023, insbesondere auf die Unabhängigkeit von fossilen Energieträgern. Hierzu sind Maßnahmen zur Beschleunigung des Ausbaus erneuerbarer Energien und zur Diversifizierung der Energieversorgung geplant. In diesem Zusammenhang wurden auch einige Vorschläge der kommunalen und regionalen Behörden sowie anderer relevanter Stakeholder umgesetzt:

Was die Investitionen im REPowerEU-Kapitel betrifft, so wurde in den Konsultationsbeiträgen mehrfach auf die Erhöhung der Förderung für emissionsfreie Nutzfahrzeuge hingewiesen. Auch die Ausweitung der Photovoltaik-Förderung findet sich in den Beiträgen wieder.

Was die Reformen betrifft, so deckt das UVP-Gesetz eine zentrale Forderung der Konsultation ab, nämlich die Beschleunigung der Genehmigungsverfahren für Projekte im Bereich der erneuerbaren Energien. Die Wasserstoffstrategie wiederum adressiert die Notwendigkeit schneller Anlaufzeiten sowie des gezielten Einsatzes der Wasserstoffwirtschaft.

Damit spiegeln die Investitionen und Reformen des österreichischen REPowerEU-Kapitels weitgehend die Ergebnisse der öffentlichen Konsultation wider. Aufgrund der begrenzten Gesamtmittelausstattung von REPowerEU ist es nicht möglich, alle in den Konsultationsbeiträgen vorgeschlagenen Maßnahmen zu berücksichtigen. Außerdem waren einige Vorschläge nicht mit der ARF-Verordnung vereinbar oder liegen außerhalb des Anwendungsbereichs von REPowerEU.

f) Digitale Dimension

Während im Rahmen der Maßnahme 5.B.1 Photovoltaikanlagen und Stromspeicher gefördert werden, werden Geräte, die IKT-basierte und datengesteuerte Dienste ermöglichen, Haushaltsgeräte im Kontext von "Smart Homes" als solche nicht gefördert. Es ist jedoch davon auszugehen, dass einige Empfängerinnen und Empfänger die Installation dieser Geräte auf eigene Kosten durchführen. Dies wiederum kann den Eigenverbrauch der

Haushalte optimieren, was insbesondere in Zeiten hoher Auslastung das Stromnetz entlasten kann.

g) Klima- und Umweltkennzeichnung

Beide Investitionsmaßnahmen tragen zu 100% zum Klimaziel bei:

5.B.1. Photovoltaikanlagen und Stromspeicher

Code	INTERVENTIONSFELD	Koeffizient für die Berechnung der Unterstützung der Klimaschutzziele	Koeffizient für die Berechnung der Unterstützung der Umweltziele
29	Erneuerbare Energie: Solar	100%	40%

5.B.2. Förderung von emissionsfreien Nutzfahrzeugen und Infrastruktur

Da es sich bei dieser Maßnahme um eine erweiterte Version von 1.B.4 Emissionsfreie Nutzfahrzeuge handelt, wird dieselbe "Adhoc"-Klassifizierung verwendet:

Code	INTERVENTIONSFIELD	Koeffizient für die Berechnung der Unterstützung für Klimaschutzziele	Koeffizient für die Berechnung der Unterstützung für Umweltziele
ADHOC	ADHOC - Ad hoc Interventionsfeld	100%	40%

h) 'Do No Significant Harm'

5.A.1. Beschleunigung der Genehmigungsverfahren für erneuerbare Energien

Bitte geben Sie an, welche der nachstehenden Umweltziele eine eingehende DNSH-Bewertung der Maßnahme erfordern.	Ja	Nein	Begründung für „Nein“

Klimaschutz		x	Neben den Bestimmungen zur Verfahrenseffizienz enthält die Reform 5.A.1 auch Regelungen zur Stärkung des Klimaschutzes, insbesondere durch die Konkretisierung der Genehmigungsvorschriften zur Minderung von Treibhausgasen nach dem Stand der Technik und zum Bodenschutz.
Anpassung an den Klimawandel		x	Die Reform 5.A.1 umfasst Maßnahmen gegen den Klimawandel, insbesondere durch die Stärkung des Bodenschutzes und die Vermeidung übermäßiger Landnutzung. Anpassungsmaßnahmen werden bei der Umweltverträglichkeitsprüfung (UVP) berücksichtigt.
Nachhaltige Nutzung und Schutz von Wasser- und Meeresressourcen		x	Die nachhaltige Wassernutzung wird durch Adaptierungen hinsichtlich der Pflicht zur Durchführung einer UVP und einer Einzelfallprüfung gestärkt, z. B. für Wasserkraftwerksprojekte in schutzwürdigen Gebieten und für Bodenentwässerungsprojekte.
Übergang zu einer Kreislaufwirtschaft		x	Die Kreislaufwirtschaft wird durch Adaptierungen hinsichtlich der Pflicht zur Durchführung einer UVP und einer Einzelfallprüfung für abfallwirtschaftliche Projekte gestärkt, z. B. bei Sortieranlagen oder Zwischenlagern .
Vermeidung und Verminderung der Umweltverschmutzung		x	Die Reform 5.A.1 enthält die Verpflichtung zur Vorlage eines Bodenschutzkonzepts als Teil der Umweltverträglichkeitserklärung des Projektantragstellers und ergänzende UVP-

			Anforderungen für Vorhaben auf bisher unversiegelten Flächen.
Schutz und die Wiederherstellung der Biodiversität und der Ökosysteme		x	Die Reform 5.A.1 enthält die Verpflichtung zur Vorlage eines Bodenschutzkonzeptes als Teil der Umweltverträglichkeitserklärung des Projektwerbers und zusätzliche Anforderungen für Vorhaben auf bisher unversiegelten Flächen.

5.A.2. Wasserstoff als Schlüsseltechnologie zur Klimaneutralität

Bitte geben Sie an, welche der nachstehenden Umweltziele eine eingehende DNSH-Bewertung der Maßnahme erfordern.	Ja	Nein	Begründung für „Nein“
Klimaschutz		x	Die Reform 5.A.2 hat keine oder nur unbedeutende vorhersehbare Auswirkungen auf das Umweltziel in Bezug auf die direkten und primären indirekten Auswirkungen der Maßnahme über ihren gesamten Lebenszyklus und wird daher als DNSH-konform für das relevante Ziel angesehen.
Anpassung an den Klimawandel		x	Die Reform 5.A.2 hat keine oder nur unbedeutende vorhersehbare Auswirkungen auf das Umweltziel in Bezug auf die direkten und primären indirekten Auswirkungen der Maßnahme über ihren gesamten Lebenszyklus und wird daher als DNSH-konform für das relevante Ziel angesehen.
Nachhaltige Nutzung und Schutz von Wasser- und Meeresressourcen		x	Die Reform 5.A.2 hat keine oder nur unbedeutende vorhersehbare Auswirkungen auf das Umweltziel in Bezug auf die direkten und primären indirekten Auswirkungen der Maßnahme über ihren gesamten Lebenszyklus und wird daher als DNSH-konform für das relevante Ziel angesehen.

Übergang zu einer Kreislaufwirtschaft		x	Die Reform 5.A.2 hat keine oder nur unbedeutende vorhersehbare Auswirkungen auf das Umweltziel in Bezug auf die direkten und primären indirekten Auswirkungen der Maßnahme über ihren gesamten Lebenszyklus und wird daher als DNSH-konform für das relevante Ziel angesehen.
Vermeidung und Verminderung der Umweltverschmutzung		x	Die Reform 5.A.2 hat keine oder nur unbedeutende vorhersehbare Auswirkungen auf das Umweltziel in Bezug auf die direkten und primären indirekten Auswirkungen der Maßnahme über ihren gesamten Lebenszyklus und wird daher als DNSH-konform für das relevante Ziel angesehen.
Schutz und die Wiederherstellung der Biodiversität und der Ökosysteme		x	Die Reform 5.A.2 hat keine oder nur unbedeutende vorhersehbare Auswirkungen auf das Umweltziel in Bezug auf die direkten und primären indirekten Auswirkungen der Maßnahme über ihren gesamten Lebenszyklus und wird daher als DNSH-konform für das relevante Ziel angesehen.

5.B.1. Photovoltaikanlagen und Stromspeicher

Bitte geben Sie an, welche der nachstehenden Umweltziele eine eingehende DNSH-Bewertung der Maßnahme erfordern.	Ja	Nein	Begründung für „Nein“
Klimaschutz		x	Die Investition 5.B.1 fördert die Erzeugung von Strom aus erneuerbaren Energien, wodurch fossile Brennstoffe ersetzt und Treibhausgasemissionen reduziert werden.

Anpassung an den Klimawandel		x	Der Schwerpunkt der Maßnahmen liegt auf dem Ausbau der erneuerbaren Energien und der Abschwächung des Klimawandels durch die gezielte Reduktion von Treibhausgasemissionen. Der österreichische Strommix basiert derzeit vor allem auf Wasserkraft. Es ist zu erwarten, dass diese aufgrund des Klimawandels stärker schwankt und vor allem im Sommer abnimmt. Die Umstellung auf PV ist daher auch eine Maßnahme zur Anpassung an den Klimawandel.
Nachhaltige Nutzung und Schutz von Wasser- und Meeresressourcen		x	Der Schwerpunkt der Maßnahmen liegt auf dem Ausbau der erneuerbaren Energien und der Abschwächung des Klimawandels durch die gezielte Reduktion von Treibhausgasemissionen. Von diesen Klimaschutzprojekten werden keine Auswirkungen auf die Ressource Wasser erwartet.
Übergang zu einer Kreislaufwirtschaft		x	Die Geräte und Komponenten haben eine hohe Lebensdauer und Wiederverwertbarkeit. Die Komponenten sind leicht zu demontieren und wiederzuverwenden.
Vermeidung und Verminderung der Umweltverschmutzung		x	Der Ausbau der Stromerzeugung durch Photovoltaikanlagen auf Dächern reduziert die Treibhausgasemissionen und trägt somit zum Klimaschutz bei. Negative Auswirkungen auf Wasser, Boden und Luft sind nicht zu erwarten.
Schutz und die Wiederherstellung der Biodiversität und der Ökosysteme		x	Die hier geförderten Photovoltaikanlagen werden ausschließlich auf Dächern realisiert, weshalb die Investition 5.B.1 keine zusätzliche Flächenversiegelung zur Folge hat.

5.B.2. Förderung von emissionsfreien Nutzfahrzeugen und Infrastruktur

Bitte geben Sie an, für welche der unten aufgeführten Umweltziele eine eingehende DNSH-Bewertung der Maßnahme erforderlich ist.	Ja	Nein	Rechtfertigung für "Nein"
Klimaschutz		x	<p>Die Maßnahme basiert auf 1.B.4 emissionsfreie Nutzfahrzeuge, die bereits mit einem Koeffizienten von 100% zur Erreichung der Klimaschutzziele beitragen.</p> <p>Die im Rahmen der Maßnahme geschaffene Infrastruktur zum Laden von Elektrofahrzeugen und zum Betanken mit Wasserstoff (ausschließliche Verwendung von Strom oder Wasserstoff aus erneuerbaren Quellen) fördert die Elektrifizierung und kann daher als notwendige Investition für den Übergang zu einer effektiven klimaneutralen Wirtschaft angesehen werden.</p> <p>Die Fahrzeuge sind nicht für den Transport fossiler Brennstoffe bestimmt.</p>
Anpassung an den Klimawandel		x	<p>Die durch diese Maßnahme geförderte Tätigkeit hat unter Berücksichtigung der direkten und primären indirekten Auswirkungen auf den Lebenszyklus keine wesentlichen vorhersehbaren Auswirkungen auf dieses Umweltziel.</p> <p>Insbesondere weisen die Empfängerinnen und Empfänger nach, dass sie die Kriterien der Taxonomie-Verordnung in Anhang A von Anhang I erfüllen.</p>
Nachhaltige Nutzung und Schutz von Wasser- und Meeresressourcen		x	<p>Die durch diese Maßnahme geförderte Tätigkeit hat unter Berücksichtigung der direkten und primären indirekten Auswirkungen auf den Lebenszyklus keine wesentlichen vorhersehbaren Auswirkungen auf dieses Umweltziel.</p> <p>Insbesondere weisen die Empfängerinnen und Empfänger die Einhaltung der Kriterien der</p>

			Taxonomie-Verordnung Anlage B der Anhänge I und II, nach.
Übergang zu einer Kreislaufwirtschaft		x	<p>Die durch diese Maßnahme geförderte Aktivität hat unter Berücksichtigung der direkten und primären indirekten Auswirkungen auf den Lebenszyklus keine wesentlichen vorhersehbaren Auswirkungen auf dieses Umweltziel.</p> <p>Im Einzelnen weisen die Empfängerinnen und Empfänger Folgendes nach:</p> <p>Fahrzeuge der Klassen N2 und N3:</p> <p>(a) wiederverwendbar oder zu mindestens 85 Gewichtsprozent recycelbar</p> <p>(b) wiederverwendbar oder zu mindestens 95 Gewichtsprozent recycelbar.</p> <p>Sowohl in der Nutzungsphase (Wartung) als auch am Ende der Lebensdauer der Flotte werden Maßnahmen zur Abfallbewirtschaftung ergriffen, einschließlich der Wiederverwendung und des Recyclings von Batterien und Elektronik (insbesondere der darin enthaltenen kritischen Rohstoffe), entsprechend der Abfallhierarchie.</p> <p>Lade- und Tankinfrastruktur:</p> <p>Mindestens 70% (nach Gewicht) der vor Ort anfallenden nicht gefährlichen Bau- und Abbruchabfälle (mit Ausnahme von natürlich vorkommendem Material definiert in Kategorie 17 05 04 des gemäß Entscheidung 2000/532/EG erstellten Europäischen Abfallverzeichnisses) sind für die Wiederverwendung, das Recycling und die sonstige stoffliche Verwertung vorzubereiten, einschließlich der Verfüllung unter Verwendung von</p>

			<p>Abfällen als Ersatz für andere Materialien in Übereinstimmung mit der Abfallhierarchie und dem EU-Protokoll über die Bewirtschaftung von Bau- und Abbruchabfällen. Die Betreibenden begrenzen die Abfallerzeugung aus prozessbedingten Bau- und Abbrucharbeiten in Übereinstimmung mit dem EU-Protokoll über die Bewirtschaftung von Bau- und Abbruchabfällen unter Berücksichtigung der besten verfügbaren Techniken und durch selektiven Abriss, um die Entfernung und sichere Handhabung gefährlicher Materialien zu ermöglichen und unter Verwendung verfügbarer Sortiersysteme für Bau- und Abbruchfälle die Wiederverwendung und ein hochwertiges Recycling durch selektive Entfernung von Materialien zu erleichtern.</p>
Vermeidung und Verminderung der Umweltverschmutzung		x	<p>Die durch diese Maßnahme geförderte Tätigkeit hat unter Berücksichtigung der direkten und primären indirekten Lebenszyklusauswirkungen keine signifikanten vorhersehbaren Auswirkungen auf dieses Umweltziel.</p> <p>Im Einzelnen weisen die Empfängerinnen und Empfänger Folgendes nach:</p> <p>Fahrzeuge der Klassen N2 und N3:</p> <p>Bei Straßenfahrzeugen der Klassen M und N erfüllen die Reifen die Anforderungen an das externe Rollgeräusch für die höchste Produktklasse und die Anforderungen an den Rollwiderstandskoeffizienten (die einen Einfluss auf die Energieeffizienz des Fahrzeugs haben) für die beiden höchsten Produktklassen, wie sie in der Verordnung (EU) 2020/740 festgelegt sind und über die Europäische Produktdatenbank für die Kennzeichnung der Gesamtenergieeffizienz (EPREL) überprüft werden können. Die Fahrzeuge erfüllen die Anforderungen der letzten anwendbaren Stufe der Typgenehmigung hinsichtlich der Emissionen</p>

			<p>schwerer Nutzfahrzeuge (Euro VI) 244 gemäß der Verordnung (EG) Nr. 595/2009. Die Fahrzeuge entsprechen der Verordnung (EU) Nr. 540/2014.</p> <p>Lade- und Tankinfrastruktur:</p> <p>Gegebenenfalls sind Lärm und Erschütterungen, die durch die Nutzung der Infrastruktur entstehen, durch die Einführung offener Gräben, Wandbarrieren oder andere Maßnahmen zu mindern und müssen der Richtlinie 2002/49/EG entsprechen. Es werden Maßnahmen ergriffen, um Lärm-, Staub- und Schadstoffemissionen während der Bau- und Wartungsarbeiten zu verringern.</p>
Schutz und die Wiederherstellung der Biodiversität und der Ökosysteme		x	<p>Die durch diese Maßnahme geförderte Tätigkeit hat unter Berücksichtigung der direkten und primären indirekten Lebenszyklusauswirkungen keine signifikanten vorhersehbaren Auswirkungen auf dieses Umweltziel.</p> <p>Im Einzelnen weisen die Empfängerinnen und Empfänger Folgendes nach:</p> <p>Lade- und Tankinfrastruktur:</p> <p>Die Tätigkeit entspricht den Kriterien in Anlage D des Anhangs zum Delegierten Rechtsakt über die Taxonomie. Gegebenenfalls wird durch die Pflege der Vegetation entlang der Straßeninfrastruktur sichergestellt, dass sich invasive Arten nicht ausbreiten. Um Kollisionen mit Wildtieren zu vermeiden, wurden Schutzmaßnahmen ergriffen.</p>

i) Finanzierung und Kosten

5.A.1. Beschleunigung der Genehmigungsverfahren für erneuerbare Energien

Die Reform ist nicht mit Kosten für den ARP verbunden.

5.A.2. Wasserstoff als Schlüsseltechnologie zur Klimaneutralität

Die Reform ist nicht mit Kosten für den ARP verbunden.

5.B.1. Photovoltaikanlagen und Stromspeicher

Die Pauschalsubventionen für Photovoltaikanlagen von Größen bis zu 10 kWpeak beträgt bis zu 285 EUR/kWpeak und für Anlagen zwischen 10 kWpeak bis 20 kWpeak bis zu 250 EUR/kWpeak. Stromspeichersysteme bis zu 50kWh werden mit bis zu 200 EUR/kWh gefördert.

Insgesamt wurden 2022 in den EAG-Calls rund 59.000 Anträge für Photovoltaikanlagen gestellt. Davon wurden 32.000 Anträge nur für Photovoltaikanlagen und 27.000 Anträge für Photovoltaikanlagen einschließlich Stromspeicheranlagen eingereicht. Auf Basis der durchschnittlichen Anlagengröße und der Verteilung der Anträge konnte eine durchschnittliche Förderung pro Antrag ermittelt werden, die für die Berechnung der Meilensteine und der erwarteten Leistung herangezogen wurde. Die Auswertung der 1. Ausschreibung 2023 ist noch nicht verfügbar.

Basierend auf den Erfahrungen aus den EAG-Ausschreibungen 2022 wird eine durchschnittliche Größe von ca. 10 kWpeak pro Förderung erwartet. Basierend auf der bisherigen Verteilung der beiden Größenklassen (ca. 74% mit einer Größe bis 10 kWpeak, 26% zwischen 10 bis 20 kWpeak) wird ein durchschnittlicher Fördersatz von rund 276 EUR/kWpeak angenommen.

Die folgende Tabelle zeigt die Ergebnisse der EAG-Ausschreibungen 2022, einschließlich der durchschnittlichen Größe der installierten Photovoltaikanlagen und einer durchschnittlichen Förderquote (sowie die durchschnittlichen Kosten der Photovoltaikanlagen pro kWpeak):

Photovoltaik-Anlagen 2022					
	<i>durchschnittliche Größe [kWp]</i>	<i>durchschnittliche Kosten [EUR/kWp]</i>	<i>Förderpauschalen [EUR/kWp]</i>	<i>Zahl der Anträge in 2022</i>	<i>Verhältnis in den Kategorien [%]</i>

<i>Kategorie A (≤10kWp)</i>	8,00	2 465,00	285,00	43 900	0,74
<i>Kategorie B (10-20kWp)</i>	15,00	1 760,00	250,00	15 592	0,26
<i>Durchschnitt</i>	9,83	2 220,00	275,83		

Des Weiteren wird von einer durchschnittlichen Speicherkapazität von 14 kWh für Speichersysteme ausgegangen, die mit 200 EUR/kWh gefördert werden. Die bisherige Verteilung von PV-Anlagen ohne und mit Speicher lag bei ca. 55% zu 45% (d.h. 32 000 von 59 000 ohne Speicher; 27 000 von 59 000 mit Speicher).

Die folgende Tabelle zeigt, dass ca. 27 000 der 59 000 Photovoltaikanlagen mit einem Stromspeicher ausgestattet waren.

Energiespeicherung 2022			
	<i>durchschnittliche Kosten [EUR/kWh]</i>	<i>Förderpauschalen [EUR/kWh]</i>	<i>Zahl der Anträge im Jahr 2022</i>
<i>Alle Kategorien</i>	705,00	200,00	27 003

Auf der Grundlage dieses Verhältnisses sowie der durchschnittlichen Größe der Projekte in Kombination mit den durchschnittlichen Fördersätzen lässt sich abschätzen, dass die durchschnittliche Förderung pro Projekt im Rahmen der Ausschreibungen 2022 rund 3 975 EUR beträgt.

Mit dem zur Verfügung stehenden Budget von 140,3 Mio. EUR könnten somit zumindest 35 292 Photovoltaikanlagen gefördert werden. Damit können theoretisch bis zu 345 MW_{peak} an zusätzlicher Photovoltaikleistung und 220 MWh an Speicherkapazität gefördert werden.

5.B.2. Finanzierung von emissionsfreien Nutzfahrzeugen und Infrastruktur

Die Kostenschätzung der ursprünglichen Maßnahme des österreichischen Aufbau- und Resilienzplans wurde für Nutzfahrzeuge der Kategorie N1 erstellt. Für Nutzfahrzeuge der Kategorien N2 und N3, die im Rahmen von REPower EU unterstützt werden, ist die Kostenaufstellung wie folgt:

1. Allgemeines:

Um die rasche Dekarbonisierung des Güterverkehrs mit dem Ziel der Klimaneutralität im Jahr 2040 voranzutreiben, ist es notwendig, geeignete Fördermöglichkeiten bereitzustellen. Das Modell für die Gestaltung des Förderprogramms "Emissionsfreie Nutzfahrzeuge und Infrastruktur (ENIN)" ist das Förderprogramm "SA.63278 - ARF - Österreich - Emissionsfreie Busse und Infrastruktur für den öffentlichen Verkehr (EBIN)". Die dort beschriebenen Förderintensitäten für die Anschaffung emissionsfreier Fahrzeuge und deren Infrastruktur erscheinen geeignet, einen Anreiz für die Anschaffung emissionsfreier Nutzfahrzeuge zu bieten und werden daher auch als Grundlage für die Berechnung des notwendigen Budgets herangezogen.

Die Förderintensität für emissionsfreie Nutzfahrzeuge liegt bei 80%, die für Lade- und Tankinfrastruktur bei 40%. Grundlage für die Berechnung sind die zusätzlich förderfähigen Investitionskosten eines emissionsfreien Nutzfahrzeugs (Nachrüstung oder Neuanschaffung) gegenüber einem fossil betriebenen vergleichbaren Fahrzeug oder die förderfähigen Investitionskosten der Lade- oder Tankinfrastruktur.

2. Berechnung der (zusätzlichen) Investitionskosten für schwere Nutzfahrzeuge der Fahrzeugklassen N2 & N3:

Die Berechnung des Mittelbedarfs und der Anzahl der subventionierten schweren Nutzfahrzeuge der Fahrzeugklassen N2 & N3, Sattelzugmaschinen und Sonderfahrzeuge erfolgt auf Basis der zusätzlichen Investitionskosten. Da es derzeit nicht möglich ist, eine hinreichend statistisch gesicherte Datenbasis auf der Basis von Vergleichsangeboten für die verschiedenen Fahrzeugtypen zu schaffen, werden die zusätzlichen Investitionskosten auf Basis aktueller Studienergebnisse berechnet.

Als Basis für die Berechnung wurden die in der ifeu-Studie "Potenzialanalyse für Batterie LKWs" für das Jahr 2025 prognostizierten Mehrkosten für Nutzfahrzeuge verschiedener Größenklassen herangezogen. Rückrechnungsfaktoren für die Batteriekosten (+64%) und die sonstigen technologiebedingten Fahrzeugmehrkosten (+30%) wurden verwendet, um die in der weiteren Berechnung verwendeten Fahrzeugkosten auf Werte für das Jahr 2023 zurückzurechnen. Da zu den Kosten von schweren Nutzfahrzeugen mit Wasserstoff-Brennstoffzellenantrieb aufgrund der noch sehr begrenzten Marktlage derzeit keine Aussagen getroffen werden können, haben die Expertinnen und Experten des Bundesministeriums für Klimaschutz für diesen Fahrzeugtyp Mehrkosten von 100% geschätzt. Der Anteil batterieelektrischer schwerer Nutzfahrzeuge an allen Nutzfahrzeugen wird über die gesamte Laufzeit des Förderprojekts auf 70% prognostiziert.

Die folgende Aufschlüsselung zeigt die Kosten für schwere Nutzfahrzeuge im Jahr 2025 gemäß der zitierten Studie:

Größe	ICEV (in EUR)	BEV (ohne Batterie, in EUR)	BEV (inkl. Batterie, in EUR)	Batteriekosten (in EUR)	Zusätzliche Kosten (in EUR)
LKW 3.5-7.5t	41 300	36 900	56 800	19 900	15 500
LKW 7.5-12t	56 000	58 500	79 700	21 200	23 700
LKW 12-18t	66 300	80 400	116 900	36 500	50 600
LKW 18-26t	89 500	104 800	161 800	57 000	72 300
LKW ≥26t	103 000	126 900	195 100	68 200	92 100

Da diese Zahlen bereits eine Kostendegression aufgrund sinkender Preise für Batterie- und Antriebskomponenten bis 2025 erwarten lassen, ist eine Anpassung notwendig. Nach Anwendung der oben genannten Rückrechnungsfaktoren ergeben sich folgende Kosten für schwere Nutzfahrzeuge im Jahr 2023:

Größe	ICEV (in EUR)	BEV (ohne Batterie, in EUR)	BEV (inkl. Batterie, in EUR)	Batteriekosten (in EUR)	Zusätzliche Kosten (in EUR)
LKW 3.5-7.5t	41 300	47 970	80 534	32 564	39 234
LKW 7.5-12t	56 000	76 050	110 741	34 691	54 741
LKW 12-18t	66 300	104 520	164 247	59 727	97 947
LKW 18-26t	89 500	136 240	229 513	93 273	140 013
LKW ≥26t	103 000	164 970	276 570	111 600	173 570

Für die weiteren Berechnungen wurden für die Fahrzeugklasse N2 die Kosten der Größenklasse "Lkw 7,5-12t" und für die Fahrzeugklasse N3 die Kosten der Größenklasse "Lkw >26t" herangezogen.

Unter Berücksichtigung eines Anteils von 10% der Fahrzeuge der Fahrzeugklasse N2 an der Gesamtzahl der schweren Nutzfahrzeuge und den oben beschriebenen Annahmen (Anteil von 30% Nutzfahrzeugen mit Wasserstoff-Brennstoffzellenantrieb) belaufen sich die vorläufigen zusätzlichen Investitionskosten auf 210 193 EUR und die Förderung auf 168 155 EUR pro Fahrzeug.

Diese Werte wurden anschließend mit den von den potenziellen Antragstellenden übermittelten Kostendaten verglichen. Im Durchschnitt ergeben sich daraus Fahrzeugkosten von ca. 440 000 EUR für Fahrzeuge der Fahrzeugklasse N3. Die zusätzlichen Investitionskosten belaufen sich demnach auf ca. 340.000 EUR, woraus sich eine durchschnittliche Fördersumme von 272.000 EUR pro Fahrzeug ergibt. Diese Abweichung lässt sich damit begründen, dass das Prognosejahr 2025 (das den Ausgangspunkt für die Rückrechnung darstellt) auf einem bereits entwickelten Markt basiert. Faktoren wie Lieferengpässe, Komponenten- und Ressourcenknappheit, Preissteigerungen, mangelnder Wettbewerb und Herstellervielfalt, die aller Voraussicht nach im Laufe der nächsten Jahre in den Hintergrund treten werden, bleiben daher hier unberücksichtigt. Aufgrund des von der Fazilität gesetzten Zeitrahmens werden für diese Maßnahme voraussichtlich nur Ausschreibungen im Jahr 2023 berücksichtigt, weshalb es nicht möglich sein wird von den positiven Effekten der Marktentwicklung in den kommenden Jahren zu profitieren. Da es derzeit kein flächendeckendes öffentlich zugängliches Ladenetz für schwere Nutzfahrzeuge gibt, müssen die Fahrzeuge eine größere Reichweite haben, um in die jeweiligen Betriebsabläufe integriert werden zu können. Dadurch erhöhen sich die Kosten für die Antriebsbatterien, was einen direkten Einfluss auf die zusätzlichen Investitionskosten und damit auf die Förderhöhe hat. In der nachfolgenden Berechnung wird daher ein Anpassungsfaktor von 125% hinzugerechnet⁵.

2.2 Zusätzliche Investitionen Infrastruktur N2 & N3:

Da für die jeweiligen Anwendungsfälle unterschiedliche Arten von Ladeinfrastruktur in Frage kommen, wurde hier eine Mischkalkulation aus AC- und DC-Ladeinfrastruktur verwendet. Als Grundannahme wird jedem Elektrofahrzeug eine Ladeinfrastruktur und

⁵ Der Anpassungsfaktor kann anhand der Angaben der Antragstellenden, die in den Beratungsgesprächen mit der Abwicklungsstelle eingeholt wurden, überprüft werden. Die Antragstellenden gaben Fahrzeugpreise für batterieelektrische Nutzfahrzeuge der Klasse N3 in einer Spanne von 250 000 bis 790 000 EUR an. Der Durchschnittswert liegt bei 439.214 EUR, dem stehen durchschnittliche Referenzkosten (Nutzfahrzeug der Klasse N3 mit Verbrennungsmotor) in Höhe von 100.590 EUR gegenüber. Die durchschnittlichen zusätzlichen Investitionskosten für batterieelektrische Nutzfahrzeuge der Klasse N3 belaufen sich auf 338 624 EUR, woraus sich ein Förderbedarf von 270 889 EUR ergibt (vergleichbar mit dem Förderbedarf mit Anpassungsfaktor in Höhe von 291 037 EUR). Berücksichtigt man doppelt so hohe Investitionskosten für Nutzfahrzeuge der Klasse N3 mit Wasserstoff-Brennstoffzellenantrieb, so betragen die zusätzlichen Investitionskosten 777 838 EUR, was zu einem Förderbedarf von 622 270 EUR führt (vergleichbar mit dem Förderbedarf mit Anpassungsfaktor, der 582 074 EUR beträgt). Bei der oben genannten Aufteilung von 70 zu 30 (BEV zu FCEV) beträgt der durchschnittliche Förderbedarf 376 310 EUR (vergleichbar mit dem durchschnittlichen Förderbedarf mit Anpassungsfaktor, der sich auf 378 348 EUR beläuft).

jedem Wasserstoff-Brennstoffzellen-LKW ein Anteil an den Kosten einer Wasserstofftankstelleninfrastruktur zugewiesen. Die Berechnung der Ladeinfrastrukturkosten basiert auf der Annahme von 500 EUR/kW. Diese Annahme orientiert sich an der Fraunhofer-Studie "E-Bus-Standard", die von ca. 700 EUR/kW ausgeht. Darin sind jedoch auch Kosten für Ladesäulen und straßenseitige Kontaktsysteme enthalten, die in dieser Kostenschätzung nicht berücksichtigt werden.

Art der Ladeinfrastruktur	Investitionskosten [in EUR]	Anteil
AC <=22 kW	11 000	20%
DC >=150 kW	75 000	40%
DC >= 150 kW	175 000	40%

Die Berechnung der Investitionskosten für die Wasserstofftankstelleninfrastruktur basiert auf der folgenden Annahme. Für die Wasserstofftankstelleninfrastruktur werden Investitionskosten von 1,2 Mio. EUR für jeweils 10 Fahrzeuge angenommen.

Somit werden für die weitere Berechnung Investitionskosten von 102 200 EUR und eine Förderhöhe von 40 880 EUR pro Ladepunkt und Fahrzeug angesetzt. Des Weiteren werden für die weitere Berechnung Investitionskosten von 120.000 EUR und eine Fördersumme von 48.000 EUR für die Wasserstofftankstelleninfrastruktur pro Wasserstofffahrzeug herangezogen.

3. Ergebnisse und Zusammenfassung:

Aus den zuvor beschriebenen Informationen ergeben sich die folgenden Größenordnungen und Ausgaben.

Spezifische Förderhöhen pro Fahrzeugkategorie:

N2/N3 Fahrzeug	378 348 EUR pro Fahrzeug
N2/N3 Lade-/Betankungsinfrastruktur	43 016 EUR pro Fahrzeug
Gesamt	421 364 EUR pro Fahrzeug

Mit einem Budget von 70 Mio. EUR können 167 emissionsfreie Nutzfahrzeuge der Fahrzeugkategorie N2 & N3 (umfasst auch Sattelzugmaschinen und Sonderfahrzeuge)

einschließlich der für ihren Betrieb erforderlichen Lade- und Betankungsinfrastruktur gefördert werden.

3. Vorfinanzierungsantrag

Im Anschluss an die Annahme des Durchführungsbeschlusses gemäß Artikel 20 Abs. 1 und Artikel 21 Abs. 2 der Verordnung (EU) 2021/241 durch den Rat möchte Österreich bis zu zwei Vorfinanzierungszahlungen in Höhe von insgesamt 20% der zusätzlich beantragten Mittel zur Finanzierung des RePowerEU-Kapitel beantragen.

Österreich ist sich bewusst, dass die Vorfinanzierung, soweit möglich und vorbehaltlich der verfügbaren Mittel, in bis zu zwei Tranchen ausgezahlt wird; die erste Vorfinanzierung innerhalb von zwei Monaten nach Abschluss der rechtlichen Einzelverpflichtung gemäß Artikel 23 der Verordnung 2021/241 durch die Kommission und Österreich und die zweite Vorfinanzierung innerhalb von zwölf Monaten nach Inkrafttreten des Durchführungsbeschlusses des Rates zur Genehmigung der Bewertung des Aufbau- und Resilienzplans einschließlich eines REPowerEU-Kapitels.

TEIL 2.2: GEÄNDERTE KOMPONENTEN

Allgemeiner Hinweis:

Teil 2.2 behandelt alle von Österreich beantragten Änderungen des rechtsgültigen Durchführungsbeschlusses zum österreichischen Aufbau- und Resilienzplan. Da die englischsprachige Version des Durchführungsbeschlusses rechtsverbindlich für die Bewertung der Europäischen Kommission ist, beziehen sich alle intendierten Änderungen auf ebendiese Version.

Dementsprechend ist Teil 2.2 der Überarbeitung in englischer Sprache verfasst.

COMPONENT 1: SUSTAINABLE RECOVERY / SUBCOMPONENT 1.A RENOVATION WAVE	
Investment/ reform reference	Investment 1.A.2.
Investment/ reform name	Exchange of oil and gas heating systems
Type of change compared to CID	modified
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input checked="" type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input type="checkbox"/> None of the above, correction of clerical error
Elements modified (only for modified measures)	<input type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment
Investment: 1.A.2 Exchange of oil and gas heating systems	
<u>Initial description:</u>	
Investment 1.A.2 consists of three targets:	

Target 3:

At least 6 360 projects of replacement of heating systems have been implemented and audited.

Target 4:

At least 15 900 projects of replacement of heating systems have been implemented and audited.

Target 5:

At least 31 800 projects of replacement of heating systems have been implemented and audited.

Requested amendments and justification of the change:

Target 3 was fulfilled as part of the first payment request. Targets 4 and 5 are supposed to be part of the third and sixth payment requests respectively.

Fast implementation of the investment has resulted in achievement of targets 4 and 5 already at the end of Q2/2022 and Q4/2022 respectively. Therefore, both targets can be shifted forward in time to be part of the second payment request.

Modified elements	Current version	Amended version
<i>Component and / or measure description</i>		No changes.
<i>Milestones and targets</i>	T4 Indicative timeline for completion: Q4/2023 T5 Indicative timeline for completion: Q2/2026	T4 Indicative timeline for completion: Q2/2022 T5 Indicative timeline for completion: Q4/2022
<i>Estimated cost</i>		No changes.
<i>Green and digital tagging</i>		No changes.
<i>DNSH self-assessment</i>		No changes.

COMPONENT 1: SUSTAINABLE RECOVERY / SUBCOMPONENT 1.A RENOVATION WAVE	
Investment/ reform CID reference	Investment 1.A.3
Investment/ reform name	Combating energy poverty
Type of change compared to CID	modified
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input checked="" type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input type="checkbox"/> None of the above, correction of clerical error
Elements modified (only for modified measures)	<input checked="" type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment
Investment: 1.A.3 Combating energy poverty	
<p><u>Initial description</u></p> <p><u>Target 7:</u> At least 1 000 thermal renovation projects approved by BMK under the support scheme</p> <p><u>Target 8:</u> At least 2 250 thermal renovation projects completed as part of the support scheme</p> <p><u>Requested amendments and justification of the change</u></p> <p><u>Background:</u></p> <p>During the development of the RRF, the objective to create a support programme for low-income households to combat energy poverty in addition to existing national subsidies was pursued.</p>	

A tailor-made programme was aimed at which provides support in the renovation process, and enables effective and comprehensive renovations for dwellings for this population group ("Leave no one behind").

The Council Implementing Decision outlines the following objectives:

The investment shall support thermal renovation of dwellings of low-income households prone to energy poverty, and thus reduce their energy consumption and costs in a sustainable manner.

Therefore, the aim was to offer subsidies for thermal renovations of multi-storey residential buildings and single-family houses, thereby significantly reducing energy demand, greenhouse gas emissions, and energy costs of the residents.

Adjustment of the text of the Council Implementing Decision:

The following argumentation explains why, for objective reasons, the measure is not feasible in accordance with Article 21 of the RRF Regulation and therefore needs to be adjusted.

1. Difficulties in data acquisition due to Austria's federalist principle:

The subsidy is a federal subsidy and is processed through the KPC. However, since social policy falls under the jurisdiction of the federal states and is therefore administered by them, the federal government (and its implementing agency) does not have access to the data of welfare aid recipients⁶. Due to the time constraints in the RRF planning phase, these difficulties in obtaining consistent and uniform data were underestimated. Therefore, an alternative option had to be found to achieve the same objectives nationwide with a redesigned measure.

2. A more targeted measure has been identified, also in line with the objective reasons stated in Article 21:

People at risk of poverty often have such a low income that they cannot afford housing at all. Charitable and community organisations therefore provide low-cost housing and accommodation in buildings exclusively for vulnerable people. This is housing for

⁶ Therefore, national subsidies for heating replacement in low-income households are limited to the confirmations of households' poverty status issued by the authorities of the respective federal states. However, these confirmations cannot be uniformly and comprehensively verified and standardised at the federal level. Consequently, a subsidy financed by EU funds cannot be organised in this manner since a stringent and consistent traceability of poverty risk is not achievable.

medium- to long-term use, where a contract is established with the residents. Since these organisations rely mainly on donations, the buildings are usually in poor condition and energy costs are therefore particularly high.

The residents are charged a fee by these organisations. These fees also include operating costs⁷. In order to reduce these costs in the long term, thermal refurbishment is a sensible approach. Eligible for funding are the respective buildings, which means the dwellings as well as common or administrative rooms.

The amendment to the plan ensures that the reduction in energy costs resulting from the subsidised thermal refurbishment must benefit the residents.

The group of vulnerable persons is diverse. Youth in youth shelters, women or entire families in women's shelters or refugee shelters, etc. may benefit from the funding.

Submissions for this RRF funding can be made by non-profit organisations, associations and religious institutions that are listed on the "List of beneficial recipients of donations" of the Federal Ministry of Finance, as well as municipalities that operate or own a building primarily for the purpose of housing low-income or vulnerable persons as part of a charitable/non-profit institution. The savings in energy costs, however, benefit the residents of the buildings both financially and through a more pleasant living environment.

This programme addresses:

- exclusively people who are in need of protection and at risk of poverty,
- the most vulnerable people in Austria
- only non-profit organisations and municipalities

This is the most effective way to help these vulnerable people with the capital invested.

Adjustment of milestones:

An adjustment of the milestones is necessary due to the aforementioned modification of the measure, as well as price increases and delivery delays.

1. Price increases:

Compared to the original calculation of renovation costs within the framework of the RRF 2021 (and the data from the previous three years), the renovation costs have significantly increased. Construction costs have even risen disproportionately by 18.4% compared to the general inflation rate.

⁷ <https://www.fsw.at/p/winterangebote>

[https://www.gruft.at/unsere-](https://www.gruft.at/unsere-hilfe/angebote#:~:text=Um%205%20Euro%20pro%20Monat,50%20Cent%20ein%20warmes%20Mittagessen)

[hilfe/angebote#:~:text=Um%205%20Euro%20pro%20Monat,50%20Cent%20ein%20warmes%20Mittagessen](https://www.gruft.at/unsere-hilfe/angebote#:~:text=Um%205%20Euro%20pro%20Monat,50%20Cent%20ein%20warmes%20Mittagessen)

2. Modification of the measure and changes in cost structure:

The modification of the funding measure results in changes in costs per renovated dwelling. Based on the projects examined so far, the following cost structure can be derived. This cost structure also reflects increased prices due to the disproportionately high inflation.

Environmental Related Investment Costs: EUR 4 076 941

Number of thermally renovated dwellings: 88

Renovation costs/dwelling: EUR 46 329

In addition to inflation, the higher costs can be explained by the fact that when the original RRF was created, the goal was to develop new funding programmes. However, this meant that experience on the resulting costs was not yet available. Specifically, there were no accurate cost projections of thermal renovations of multi-story residential buildings. Therefore, the cost calculation is based on single-family homes. Since this programme is now an object subsidy and entire buildings with dwellings for persons in need of protection are thermally renovated, staircases, common rooms such as therapy rooms, workshops, kitchens, etc. are also included and therefore the actual costs are much higher than they were estimated.

In light of the cost structure of the initial reviewed projects, with a funding budget of EUR 50 million, it is possible to thermally renovate a total of 1,079 residential units in non-profit organisation (NPO) buildings. Therefore, with the available funds, target 7 needs to be adjusted to **480 dwellings**, and target 8 to **1 079 dwellings**.

3. Delivery delays:

Due to the late finalisation of the OA, the start of the subsidy programme was delayed. The resulting time pressure was exacerbated by delivery bottlenecks and delays in the construction industry. Numerous inquiries to the implementing agency testify to the impossibility of completing large- projects in multi-storey residential buildings by end-2025. This is reflected in the new timeline for the targets as well as the more concrete formulation of target 8.

Ambition level:

The changing of the design as well as the decrease in number of dwellings does not adversely affect our ambition level. We are targeting exclusively people in need of protection and at risk of poverty. Therefore, this design of the measure is even more suitable to support the most vulnerable people than the original programme.

A substantive number of people will benefit from the reduced costs as well as from better living conditions. It is common that more than one person lives in one dwellings. (Youths

in youth shelters, women and entire families in women's shelters or refugees in shelters are sharing rooms or accommodations.

Moreover, further steps are taken on a national level to support people facing energy poverty.

Since 2022, the following qualification and information measures have been taken within the framework of the Austrian Climate Protection Initiative (klimaaktiv):

1. Development of the quality standard "Energy advice for households at risk of poverty." The quality standard contains recommendations on the advice at the intersection of energy consulting and social work, in particular information on the appropriate format, duration and location, suitable methods, materials and equipment and the qualification of advisors (social and energy advisors, peer advisors) The perspective of energy and social advisors and affected households was included in the process. The quality standard was presented nationally at a conference and EU-wide at several stakeholder events: <https://www.klimaaktiv.at/service/publikationen/klimaaktiv/soziale-energieberatung.html>

2. Training programme for social workers
200 social workers have been trained as social energy advisors since October 2022. The training programme continues with further training modules in the autumn and monthly online networking.

3. Materials and equipment
Information materials for households and equipment for the advisors have been distributed to social workers, including electricity meters, room thermometers and low-threshold information leaflets on heating, cooling and electricity in several languages (Farsi, English, Turkish, German, Arabic, Bosnian/Serbian/Croatian). More than 100 000 leaflets have been distributed to households since January 2023.

Modified elements	Current version	Amended version
Component and / or measure description	The objective of the investment is to contribute to a reduction in energy consumption in buildings, while supporting a just transition. The investment shall support thermal renovation of dwellings of low-income	The objective of the investment is to contribute to a reduction in energy consumption in buildings, while supporting a just transition. The investment shall support thermal renovation of dwellings of low-income households prone to energy buildings used by social non-profit-organisations (NPOs) sheltering

	<p>households prone to energy poverty, and thus reduce their energy consumption and costs in a sustainable manner.</p> <p>The measure targets low-income households living in older buildings which cannot afford an own contribution to existing national and regional schemes supporting energy efficiency measures.</p> <p>The investment consists of an integrated support scheme that shall provide tailored support and funding for renovation of family houses, comprising thermal insulation of walls and roof, replacement of windows and heaters as well as planning support. Part of the investment shall be dedicated to consultancy services and awareness raising, in cooperation with social NGOs, building on the reform included in this subcomponent.</p> <p>The implementation of the measure is expected to start by 31 March 2022 and shall be completed by 31 December 2025.</p>	<p>vulnerable people prone to poverty and thus reduce their energy consumption and costs in a sustainable manner.</p> <p>The measure targets low income households living in older buildings which NPOs buildings, as these organisations operate on a donation basis and cannot afford an own contribution to existing national and regional schemes supporting energy efficiency measures.</p> <p>The final beneficiaries are the inhabitants of these buildings, as they profit from a reduction in energy costs.</p> <p>The investment consists of an integrated support scheme that shall provide tailored support and funding for renovation of family houses, comprising social NPOs buildings, such as thermal insulation of walls and roof, replacement of windows and heaters as well as planning support.</p> <p>Part of the investment shall be dedicated to consultancy services and awareness raising, in cooperation with social NGOs, building on the reform included in this subcomponent.</p> <p>The implementation of the measure is expected to start by 31 March 2022 and shall be completed by 31 December 2025 30 June 2026.</p>
<p>Milestones and targets</p>	<p>Target 7: Q4/2023: At least 1 000 thermal renovation projects</p>	<p>Target 7: Q2/2024: At least 1000 480 thermal renovation projects (dwellings) have</p>

	approved by BMK under the support scheme Target 8: Q4/2025: At least 2 250 thermal renovation projects completed as part of the support scheme	been approved by the BMK under the support scheme Target 8: Q2/2026: 1 079 projects shall be completed on the basis of the established contractual and planning principles in accordance with the building permit
<i>Estimated cost</i>		No changes.
<i>Green and digital tagging</i>		No changes.
<i>DNSH self-assessment</i>		No changes.

COMPONENT 1: SUSTAINABLE RECOVERY / SUBCOMPONENT 1.B ECO-FRIENDLY MOBILITY		
Investment/ reform CID reference	Investment 1.B.3	
Investment/ reform name	Zero-emission buses	
Type of change compared to CID	modified	
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input checked="" type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input type="checkbox"/> None of the above, correction of clerical error	
Elements modified (only for modified measures)	<input type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment	
Investment: 1.B.3 Zero-emission buses		
<p><u>Initial description</u></p> <p><u>Target 15:</u> On the basis of grant agreements, the beneficiaries have procured and received at least 682 buses with zero-emission technology.</p> <p><u>Target 16:</u> On the basis of grant agreements, the beneficiaries have installed the charging infrastructure (overnight/deposit and occasional loading at stops), overhead contact lines and hydrogen refuelling points necessary for the operation of at least 682 zero-emission buses.</p>		

Requested amendments and justification of the change

Current situation:

EBIN is a subsidy scheme for zero-emission buses where the basis for the calculation of the subsidy amount is the additional costs of a zero-emission bus over a Diesel bus. 80% of these additional costs will be subsidised. Infrastructure costs for zero-emission buses is subsidised by 40% of the total costs. The 5th and expected last call for expression is planned to be completed in the beginning of 2024. According to the CID-Annex the last call should be completed before the end of 2024.

The first two tenders have already been completed. Funding commitments have been made for 14 projects (see “20230426_EBIN_Projektliste AS1 und AS2.xlsx”; the projects “moving2zero” and “E-ÖV-I/T” were withdrawn) for a total of 375 subsidised zero-emission buses (one project on hold). The total funding amounts to approximately EUR 141 million (see “20230426_EBIN_Projektliste AS1 und AS2.xlsx” cell Q38).

Update of costing due to increased costs (inflation):

Due to higher costs for emission free buses the initial goal of 682 busses cannot be met. Expected funding in the official costing amounted to EUR 256 million which breaks down to EUR 300 000 to 550 000 additional investment costs per battery electric bus (see following tables). The actual (additional investment) costs for emissionfree busses exceed the originally calculated (additional investment) costs for electric buses in the ARP (for information of the actual additional bus costs please see the available tender documents “Anträge EBIN 1.AS.zip” and “Anträge EBIN 2.AS.zip” or “20230525_EBIN_Projektliste AS1 und AS2.xlsx” and the document “20230616_EBIN12_Auswertung_Details.xlsx” which is a document summerising the data of the official tender documents). Note, tender documents show additional costs as the calculation basis for the subsidy. The additional investment costs exceed the originally planned additional investment costs according to the official costing in the different size categories by 4% to 27.3% (cf. information from the tender documents). The result is shown in the following table.

The inflation in additional investment costs is driven by changes in prices of busses, that is, by inflation of zero-emission bus prises and deflation of Diesel bus prices .

Bus size	Information from tender documents
12m	16.8%

18m	4.0%
24m	27.3%

Since the price increases are different for the different vehicle sizes (see "20230616_EBIN12_Auswertung_Details.xlsx"), a weighted average is used for further calculation (12m 285 buses, 18m 59 buses, 24m 16 buses; see „20230525_Berechnung Planänderung ARF-Basis.xlsx“ E22 bis E26). This results in 15.17% higher additional investment costs for the electric buses, which also have a direct impact on the needed funding, resulting in a target reduction from 682 buses to 579 buses⁸. Based on a market analysis carried out timely before the first EBIN call, the reference costs for the buses were updated to better reflect the actual situation.

Bus size	ARP			EBIN 1. and 2. call		
	Reference costs ⁹	Costs BEV bus	Additional investment costs ¹⁰	Reference costs ¹¹	Costs BEV bus	Additional investment costs ¹²
12m	250 000	550 000	300 000	230 000	580 424	350 424
18m	350 000	750 000	400 000	310 000	725 847	415 847
24 m	450 000	1 000 000	550 000	500 000	1 200 000	700 000

Modified elements	Current version	Amended version
Component and / or measure description		No changes.

⁹ see ARP p. 82 table 4

¹⁰ see ARP S. 87 table 11

¹¹ see EBIN Ausschreibungsleitfaden ([LINK](#)) p. 39 table 12 (EBIN Klasse 2 und Klasse 4)

¹² see „20230525_Berechnung Planänderung ARF-Basis.xlsx“ C23 und C25

Milestones and targets	<p>T15: On the basis of grant agreements, the beneficiaries have procured and received at least 682 buses with zero-emission technology.</p> <p>T16: On the basis of grant agreements, the beneficiaries have installed the charging infrastructure (overnight/deposit and occasional loading at stops), overhead contact lines and hydrogen refuelling points necessary for the operation of at least 682 zero-emission buses.</p>	<p>T15: On the basis of grant agreements, the beneficiaries have procured and received at least 682 579 buses with zero-emission technology.</p> <p>T16: On the basis of grant agreements, the beneficiaries have installed the charging infrastructure (overnight/deposit and occasional loading at stops), overhead contact lines and hydrogen refuelling points necessary for the operation of at least 682 579 zero-emission buses.</p>
Estimated cost		No changes.
Green and digital tagging		No changes.
DNSH self-assessment		No changes.

COMPONENT 1: SUSTAINABLE RECOVERY / SUBCOMPONENT 1.D TRANSFORMATION TO CLIMATE-NEUTRALITY	
Investment/ reform CID reference	Reform 1.D.1
Investment/ reform name	Renewables Expansion Law
Type of change compared to CID	modified
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input checked="" type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input checked="" type="checkbox"/> Correction of clerical error
Elements modified (only for modified measures)	<input type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment
Reform: 1.D.1 Renewables Expansion Law	
<p><u>Initial description</u></p> <p><u>Target 40:</u> Hydrogen production capacity from renewable sources of at least 200 MW has been installed.</p> <p><u>Requested amendments and justification of the change</u></p> <p><u>Amendment due to clerical error:</u> A mistake was made with the unit of measure in the CID. The correct unit of measure for energy production capacity under Target 39 and Target 40 is MW.</p> <p><u>Amendment due to objective circumstances:</u> The current Milestone and Target for Target 40 “Newly installed hydrogen production capacity” states that by Q4 2025 hydrogen production capacity from renewable sources of at least 200 MWh has been installed. This is not expected to be achievable, thus Austria would like to amend the milestone to “90 MW has been installed by Q2 2026”.</p>	

We justify an amendment of the milestone guided by the following reasoning:

Challenging global economic conditions and the recent disruptions in supply chains through COVID-19 have impacted also the timely uptake of hydrogen production capacity in Austria. This is an issue prevalent across Europe. Recently it has also been recognised on European level that these particular challenges for electrolyser investment which lead to a postponement and issues in the timely execution. Thus, we expect a ramp-up for the up-scaling and the mass production phase of hydrogen later than anticipated, when the milestone was originally defined. The original assumption for this target was based on the draft government bill of the Renewables Expansion Law, which foresaw a higher yearly funding from the national budget than the final adopted bill. In addition, the adoption of the ordinance specifying the investment subsidies for electrolysers is currently delayed. The overall ambition of Austria to install 1 GW electrolyser capacity as well as the underlying bill of the Renewables Expansion Law remain unchanged, however it is expected that the realisation of the majority of electrolyser projects will only take place in the second half of this decade.

The recent developments on the global markets put pressure on projects through uncertainties concerning the supply chain, in Austria as well as also in other EU-Member States. Already in 2021 involved companies described in their project portfolios how the immaturity of the manufacturers' and suppliers' markets, implying high costs and risk of equipment supply, as well as the lack of large electrolyser manufacturing capacity in Europe represent significant challenges. In fact, the raw materials needed for the manufacturing of electrolysers are likely to be in tight or even endangered supply in the coming years.

In addition, the supply chain resilience risk (i.e. the risk of inability to switch to other materials or technologies) for H₂ infrastructure / electrolysers is rather high. Manufactures are already affected by delays in the supply chain. However, there are several big electrolyser projects announced and in the early planning stages in Austria, of which the biggest foresees a 60 MW electrolyser by end of 2027 and 300 MW by 2030. Therefore, as described above, the overall ambition of Austria to install 1 GW electrolyser capacity remains unchanged, however it is expected that the realisation of the majority of electrolyser projects will only take place in the second half of this decade.

To keep the ambition level of Austria's RRP high, we can propose an increase of target 39 **from 1 100 MW to 1 300 MW** of additional renewable electricity generation capacity.

This will be achieved by the end of 2023. Yet, final data on the implementation of this goal will only be available by Q4/2024. Austria thus intends to postpone the milestone to Q4 2024. This does not lower the ambition level, as the postponement merely reflects the time needed to collect the data.

Modified elements	Current version	Amended version
Component and / or measure description		No changes.
Milestones and targets	<p>T40: Q4 2025</p> <p>Hydrogen production capacity from renewable sources of at least 200 MWh has been installed.</p> <p>T39: Q4 2023</p> <p>Additional generation capacity from renewable sources of at least 1 100 MWh has been installed.</p>	<p>T 40: Q2 2026</p> <p>Hydrogen production capacity from renewable sources of at least 200 MWh 90 MW has been installed.</p> <p>T 39: Q4 2024</p> <p>Additional generation capacity from renewable sources of at least 1 100 MWh 1 300 MW has been installed.</p>
Estimated cost		No changes.
Green and digital tagging		No changes.
DNSH self-assessment		No changes.

COMPONENT 1: SUSTAINABLE RECOVERY / SUBCOMPONENT 1.D TRANSFORMATION TO CLIMATE-NEUTRALITY	
Investment/ reform CID reference	Reform 1.D.2
Investment/ reform name	Transforming industry towards climate neutrality
Type of change compared to CID	modified
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input checked="" type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input type="checkbox"/> None of the above, correction of clerical error
Elements modified (only for modified measures)	<input checked="" type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment
Reform: 1.D.2 Transforming industry towards climate neutrality	
<p><u>Initial description</u></p> <p><u>Target 42:</u> At least 15 projects to decarbonise industrial production have been completed under the support scheme.</p> <p><u>Requested amendments and justification of the change</u></p> <p>The intention of the measure is the decarbonisation of the economy and thus the reduction of greenhouse gas emissions from the economy. In order to achieve this goal, the focus should be on switching to renewable energies, energy efficiency measures and other measures to reduce greenhouse gas emissions. The current energy policy situation also requires this focus.</p> <p>Two calls for proposal have already been launched, one of which is already completed bringing forward three successful projects in the area of switching to renewable energies and thus saving 4 100 tonnes of GHG emissions per year. The second call for proposals is</p>	

open until 28 June 2023 and targets the following measures: switching to renewable energies, energy efficiency and other measure reducing GHG emissions. Those areas were identified as high priority for decarbonizing the economy and tackling the energy crisis. Of course, the reduction of environmental impact of hazardous waste treatment is also crucial, however given the current energy and climate crises it was not identified as a high priority and thus is not explicitly part of the calls for proposals.

The original intention while drafting this measure was to describe a rather broad scope of this **measure based the legal basis (“Umweltförderungsgesetz” and “Investitionsrichtlinie der Umweltförderung im Inland”)** and leave it to the specific calls to set an individual focus on specific topics, **this also included funding of industrial eco-innovations and technologies reducing the environmental impact of hazardous waste treatment.**

The current calls for tender, however, only cover part of the description according to page 157 of the annex of the Austrian NRP which states:

„Es sollen Förderungen im Rahmen der Umweltförderung im Inland vergeben werden. Gefördert werden Investitionen zum effizienten Einsatz von Energie, zur Erzeugung und zum effizienten Einsatz erneuerbarer Energieträger in ortsfesten oder mobilen Anlagen; zur Umstellung der Produktion auf den effizienten Einsatz von biogenen Rohstoffen oder zur sonstigen Vermeidung oder Verringerung von Treibhausgasemissionen. Des Weiteren werden Investitionen zur Steigerung der Ressourceneffizienz und der Kreislaufwirtschaft, zur Verringerung der Umweltbelastungen durch Behandlung oder stoffliche Verwertung von gefährlichen Abfällen gefördert.“

Translation: “This measure supports investments in the efficient use of energy, the generation and the efficient use of renewable energy sources in stationary or mobile installations; the transformation of production to the efficient use of biogenic raw materials or to otherwise avoid or reduce greenhouse gas emissions. Furthermore, investments to increase resource efficiency and the circular economy, to reduce environmental pollution through the treatment or recycling of hazardous waste may also be supported.”

The current energy and climate crisis and the necessary focus on decarbonisation led to the decision to focus this measure on switching to renewables, energy efficiency and further measures to reduce GHG emissions rather than hazardous waste treatment or industrial eco-innovations.

The target groups are producing companies and energy supply companies, as they were identified as the most affected sectors. The first two calls were designed to favour

projects with the most efficient GHG emissions savings (€/reduced t of GHG). Projects focusing on hazardous waste treatment or eco-innovation were not able to compete in a reasonable way in these calls as other projects lead to more efficient GHG emissions savings. An additional call for proposals would be needed. Due to the limited time frame of the RRF, this is not possible.

Hence adapting the measure description **to reflect the aim of the two already launched calls more precisely** is suggested.

In addition, projects with investment costs of over EUR 2 million require a plausible period of time to implement the measures submitted for funding. With the war of aggression against Ukraine investment decisions have been postponed due to uncertainties also in supply chains and increased prices (see proof of increased prices in graphic).

Furthermore, the timelines until when projects within the RRF have to be completed is very ambitious, especially for decarbonisation projects that also face permitting processes. This was brought forward by companies following various workshops and information exchanges related to this funding programme. This is also reflected in the rather limited number of project submission within the first call for proposals. The ambitious timeline to complete projects was the main reason pointed out by companies discouraging them from participating in the call.

Nevertheless, the measures aimed at as part of this funding programme are essential in order to decrease energy consumption, get independent from Russian gas and to reduce greenhouse gas emissions to achieve national and European energy and climate goals. The implementation deadline according to the 2nd call for proposals (see stipulations) for companies is currently 31 March 2025, in reasoned exceptions 30 September 2025, which is perceived as very ambitious by the target group. We therefore consider an adjustment as necessary.

This adjustment will not reduce the original level of ambition of the final milestone to complete 20 decarbonisation projects (T43) and will also not postpone the date of reaching this number of completed projects but slightly adjust the target 42 in order to be able to reach the final milestone 43 of 20 completed decarbonisation projects.

We therefore propose amendments to the CID below.

Modified elements	Current version	Amended version
<i>Component and / or measure description</i>	The investment measure aims to accelerate the decarbonisation of industry, increase its resource and	The investment measure aims to accelerate the decarbonisation of industry, by supporting measures to switch to renewable energies,

	energy efficiency, support industrial eco-innovations and advanced technology reducing the environmental impact of hazardous waste treatment.	energy efficiency measures as well as other measures leading to a reduction of greenhouse gas emissions.
Milestones and targets	<p><u>T 42 (Q4 2024):</u> At least 15 projects to decarbonise industrial production have been completed under the support scheme.</p> <p><u>Verification Mechanism Point d):</u> copies of certificates of completion, issued by the competent authority Kommunalkredit Public Consulting (KPC), demonstrating the completion of the projects.</p>	<p><u>T42 (Q2 2024):</u> At least 20 projects to decarbonise industrial production have been approved for funding under the support scheme.</p> <p><u>Verification Mechanism Point d):</u> copies of the approval of funding, issued by the Austrian “Klima- und Energiefonds”, demonstrating the successful funding decision of the projects.</p>
Estimated cost		No changes.
Green and digital tagging		No changes.
DNSH self-assessment		No changes.

COMPONENT 2: DIGITAL RECOVERY / SUBCOMPONENT 2.A BROADBAND EXPANSION	
Investment/ reform CID reference	Investment 2.A.2.
Investment/ reform name	Widespread availability of Gigabit capable access networks and creation of new symmetric Gigabit connections
Type of change compared to CID	modified
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input checked="" type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input checked="" type="checkbox"/> Correction of clerical error
Elements modified (only for modified measures)	<input checked="" type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment
Investment: 2.A.2 Widespread availability of Gigabit capable access networks and creation of new symmetric Gigabit connections	
<p><u>Initial Description</u></p> <p><u>Target 46:</u> At least 46 % of all Austrian households shall have access to Gigabit capable connections (compared to 43 % in Q3 2020) as result of the broadband rollout project funded under the RRP, as assessed in the broadband reports published by the Austrian authorities.</p> <p><u>Target 47:</u> At least 48 % of all Austrian households shall have access to Gigabit capable connections (compared to 46 % in Q3 2022) as result of the broadband rollout project funded under the RRP, as assessed in the broadband reports published by the Austrian authorities.</p> <p><u>Target 48:</u> At least 50% of all Austrian households shall have access to Gigabit capable connections (compared to 48% in Q3 2024) as a result of the broadband roll-out projects funded under the RRP, as assessed in the broadband reports published by the Austrian authorities</p>	

Requested amendments and justification of the change

During the translation of the Austrian RRP, submitted to the Commission on 30 April 2021, into the CID, a clerical error occurred concerning the measure “2.A.2 Widespread availability of Gigabit capable access networks and creation of new symmetric Gigabit connections” .

The Austrian RRP provided the following time frame:

“Zeitplan: Die ersten Ausschreibungen in der Initiative Breitband Austria 2030 sind nach Notifikation der Europäischen Kommission ab Q4/2021 vorgesehen und sollen jährlich stattfinden. Bis Ende Q3 2026 werden alle mit RRF-Mittel finanzierten Ausbauprojekte einen unterschriebenen Vertrag aufweisen.“

Meaning that „The first tenders under the Broadband Austria 2030 initiative will take place after the notification by the European Commission in Q4/2021 on an annual basis. By end of Q3/2026 all projects funded by the RRF will have a signed contract”.

Indeed, after the notification of the Broadband Austria 2030 initiative by the European Commission, the first round of tenders started in March 2022 and it is expected that most contracts, benefiting from the RRF support, are signed by the end of June 2023 (thus way ahead of Q3/2026 since it was decided to frontload RRF support to the first tenders, with the remaining annual tenders financed from national funds).

The Austrian RRP also clarifies on page 188 that projects, once contracts are signed, have “in principle 3 years” or in case they are major projects (i.e. projects with > 10 million Euro cost) 5 years to be completed. In addition an extension by one year is under certain conditions possible. The funding guidelines specify that this extension by one year is only permissible if the project has been delayed through no fault of the funding recipient and the eligibility of funding still exists. **It is thus evident that by the last possible payment request in Q3/2026 only a part of the projects that have been contracted will have been finished and accordingly only a fraction of households will have access.**

The Austrian RRP was drawn up with the following 4 milestones/targets:

„Meilenstein/Ziel 1: Q1/2023: Inanspruchnahme der Förderung durch die mit RRF-Mittel initiierten Breitband-Ausbauprojekte betreffend die initiale Ausschreibung (Planwert: 20%)

Meilenstein/Ziel 2: Q4/2024: Inanspruchnahme der Förderung durch die mit RRF-Mittel initiierten Breitband-Ausbauprojekte zu folgenden Zwischen-Meilensteinen: Interim-Evaluierung der Folge-Ausschreibungen (Planwert: 50%)

Meilenstein/Ziel 3: Q3/2026: Inanspruchnahme der Förderung durch die mit RRF-Mittel initiierten Breitband-Ausbauprojekte zu folgenden Zwischen-

Meilensteinen: Vertragsabschluss-Zeitpunkt von Ausbauvorhaben vorangegangener Ausschreibungen (Planwert: 100%)

Meilenstein/Ziel 4: Q3/2026: Erreichen einer Verfügbarkeit von Gigabit-fähigen Anschlüssen für mindestens 50 Prozent der Haushalte mit den durch RRF-Mittel initiierten Breitband-Ausbauvorhaben.“

Above milestones/targets 1-3 aimed at capturing the signed contracts (20% by Q1/2023, 50% by Q4/2024 and 100% by Q3/2026), while milestone/target 4 aimed at “Achieving the availability of gigabit-capable connections for at least 50 percent of households with the broadband expansion projects initiated with RRF funds”.

Following the submission of the RRP and subsequent discussions between the Austrian authorities and the Commission, the initially proposed milestones have evolved. As a result, the CID differs from this gradual build-up of the funding scheme reflected in the initial milestones above and focuses solely on the final target of 50% with two preceding targets with the earliest to be achieved in Q3/2022.

Since the starting point is 43% (data from Q3/2020, i.e. prior to RRF support), the impression is given that the increase to 50% shall be solely attributable to the RRF support. If this were the case, this 7% point increase would mean access to Gigabit capable connections for additional 275.000 households by Q3/2026 due to RRF support alone. **This is in contradiction with what the Austrian RRP states on p 181:**

„Ausgehend von der aktuellen Kostenabschätzung durch das nationale Breitbandbüro können mit finanziellen Mitteln des RRF im geschätzten Ausmaß von 891,3 Mio. EUR eine Summe von 150.000 bis 220.000 Haushalte einen Gigabit-fähigen Anschluss erhalten.“

This means that RRF support of EUR 891.3 million would lead to 150 000 - 220 000 additional households gaining access to gigabit-capable connections. This figure is based on a public consultation of the special guidelines and the target area of the initiative Broadband Austria 2030 which was conducted in April 2021. Based on this public consultation around 520 000 households would have been in eligible areas for subsidies. Based on a funding estimation between EUR 4 000 and 6 000 per household, 150 000 to 220 000 households could have been reached.

It therefore appears that there was a clerical error in the CID in the sense that the CID should have reflected a target between 150 000 and 220 000 households rather than 50% of the population.

With the signature of the contracts finished by the end of June 2023, a clearer picture has emerged that within these cost estimates, only the lower bound of the range, i.e. contracts for an additional 150 000 households can be reached. This is due to costs per project reaching the higher end of the cost estimation as set out during the drafting of the plan, for instance due to larger than expected private broadband expansion, leaving

only more costly areas to access for RRF funded projects. After the notification of the Broadband Austria 2030 initiative to the European Commission, the first round of tenders started in March 2022. Due to the private deployment, the number of eligible households has been reduced to 418 000 (from 520 000 in 2021). The average funding per household turned out to be around EUR 6 000 in the first calls which equals to the higher end of the price estimates made during the drafting of the plan.

In addition to the clerical error described above, the following objective circumstance is also evoked: The notification of the Broadband Austria 2030 initiative took longer than initially envisaged, delaying the calls for proposals which in turn created a knock on effect on the selections of projects and, in turn, on the signature of contracts which are currently envisaged to be completed by June 2023.

The European Commission was informed in August 2021 as planned that following the public consultation, the revision of the special directives “*BBA2030: Access*” and “*BBA 2030: OpenNet*” have been completed. In addition to the directives the EC was provided with all stakeholder’s statements on the special directives. Considering the fact that the Austrian scheme is implemented under the RRF, the European Commission intended that the notification process would be given priority with a notification foreseen already by November 2021. Under this timeline, first calls could have started still in 2021 and been assessed by a Jury before summer 2022. The official notification process was, however, delayed to 21st of March 2022. This delay in the notification ultimately led to the first calls starting on the 23rd of March with juries in September and November of 2022.

In addition, since these contracts foresee “in principle 3 years” or in case of major projects (> EUR 10 million cost) 5 years to be completed, the knock-on effects created by the delay in notification means that only a portion of the estimated 150 000 – 220 000 will be accessible by Q3/2026, namely a total of 130 000 households by the end of 2026 and a total of 150 000 by the end of 2027.

In addition, there is also a time lag between finalised construction and the reporting to the Austrian broadband authority. Stakeholders are obligated to submit a report every year. From the end date, stakeholders have three months to submit the report to the settlement office (i.e. funding agency, FFG). Once the settlement office receives the report, the audit and controlling process (validation) starts which takes at least another six months. In case the stakeholders need to submit additional documents, this process may take even longer. Therefore, there is a delay between the finalisation of a project and the validation of a project by the settlement office. Thus, the actual number of households on which a report can be submitted by Q3/2026 is estimated at 80 000, with projects representing an estimated additional 20 000 households submitted for validation to the settlement office by that deadline.

Amending the milestones and targets of this measure to reflect the given circumstances would ensure the completion and proof of such completion for a large number of households (80 000) by Q3 2026. However, a larger share of completion would be achieved by the end of the facility (December 2026). At the same time, the high ambition

of providing access to at least 150 000 households is kept by Austria and can be ensured to be completed through the signed contracts.

It is therefore proposed amend both measure description as well as the milestones/targets:

Modified elements	Current version	Amended version
Component and / or measure description	<p>The investment consists of the two funding directives, Access and OpenNet, of the Austria Broadband Programme 2030. Both funding directives have the objective to improve broadband availability in those areas of Austria, which, due to a market failure, are not or are insufficiently developed by the private sector. The measure shall increase the availability of Gigabit-capable access networks, as a result of the RRP support, to cover at least 50% of Austrian households. (...)</p>	<p>The investment consists of the two funding programmes, Access and OpenNet, of the Austria Broadband Programme 2030. Both funding programmes have the objective to improve broadband availability in those areas of Austria, which, due to a market failure, are not or are insufficiently developed by the private sector. The measure shall increase the availability of Gigabit-capable access networks, as a result of the RRP support, to cover at least 50% of to at least an additional 150 000 Austrian households. (...)</p>
Milestones and targets	<p>46 (Q3/2022): At least 46 % of all Austrian households shall have access to Gigabit capable connections (compared to 43 % in Q3 2020) as result of the broadband rollout project funded under the RRP, as assessed in the broadband reports published by the Austrian authorities.</p> <p>47 (Q3/2024): At least 48 % of all Austrian households shall have access to Gigabit capable connections (compared to 46 % in Q3 2022) as result of the broadband rollout project funded under the RRP, as assessed in the broadband reports published by the Austrian authorities.</p>	<p>46 (Q3/2022): Calls for tenders under Broadband Austria 2030 completed with award decisions issued.</p> <p>47 (Q2/2023): Signature of all contracts related to the completed calls for tenders under Broadband Austria 2030. The signed contracts represent projects increasing the availability of Gigabit-capable networks to at least an additional 150 000 Austrian households by 2027.</p>

	<p>48 (Q3/2026): At least 50% of all Austrian households shall have access to Gigabit capable connections (compared to 48% in Q3 2024) as a result of the broadband roll-out projects funded under the RRP, as assessed in the broadband reports published by the Austrian authorities</p>	<p>48 (Q3/2026): Out of the projects representing at least 150 000 households, projects providing access to Gigabit-capable networks for at least 80 000 Austrian households are completed and projects representing 20 000 households submitted for validation to the settlement office (funding agency).</p>
Estimated cost		No changes.
Green and digital tagging		No changes.
DNSH self-assessment		No changes.

COMPONENT 2: DIGITAL RECOVERY / SUBCOMPONENT 2.B DIGITILISATION OF SCHOOLS	
Investment/ reform reference	Investment 2.B.2
Investment/ reform name	Provision of digital end-user devices to pupils
Type of change compared to CID	modified
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input checked="" type="checkbox"/> None of the above, correction of clerical error
Elements modified (only for modified measures)	<input type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment
Investment 2.B.2: Provision of digital end-user devices to pupils	
<p><u>Initial Description</u></p> <p><u>Target 55:</u> Digital terminals for the first year of the new cycle of secondary school</p> <p><u>Requested amendments and justification of the change</u></p> <p>The objective of the investment 2.B.2 is to provide the pedagogical and technical requirements for IT-supported lessons at all school locations, by handing out digital devices to all pupils at lower secondary level.</p> <p>The corresponding milestones 53-55 are named as follows:</p> <p>53: Digital devices for the first two year of secondary school</p> <p>54: Digital devices for the remaining grades of lower secondary school</p> <p>55: Digital terminals for the first year of the new cycle of secondary school</p> <p>The term “terminals” as found in name of milestone 55 represents a clerical error in the drafting of the CID. Clearly, all these milestone refer to the same intention to provide digital</p>	

“devices” to students. This is also reflected by the name of the overall measure 2.B.2 as well as the description of the measure in the CID.

Furthermore, the description of milestone 55 refers again to digital “devices”. It is clear, that the inclusion of the word “terminal” instead of “device” has been a clerical error to be fixed. This error is not reflected in the DE version of the CID, where all three milestones under this measure correctly refer to “digitale Endgeräte”.

Modified elements	Current version	Amended version
<i>Component and / or measure description</i>		No changes.
<i>Milestones and targets</i>	T55: Digital terminals for the first year of the new cycle of secondary school	T55: Digital terminals devices for the first year of the new cycle of secondary school
<i>Estimated cost</i>		No changes.
<i>Green and digital tagging</i>		No changes.
<i>DNSH self-assessment</i>		No changes.

COMPONENT 2: DIGITAL RECOVERY / SUBCOMPONENT 2.C DIGITALISATION OF PUBLIC ADMINISTRATION		
Investment/ reform reference	CID	Investment 2.C.2.
Investment/ reform name		Digitalisation fund public administration
Type of change compared to CID		modified
Legal base of the change (select at least one)		<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input checked="" type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input checked="" type="checkbox"/> Correction of clerical error
Elements modified (only for modified measures)		<input type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input checked="" type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment
Investment: 2.C.2 Digitalisation fund public administration		
<p><u>Initial Description</u></p> <p><u>Milestone 60:</u> Projects have been selected and selection decisions have been published. Of the EUR 160 000 000 allocated to the measure, at least EUR 80 000 000 shall be earmarked for cross-departmental projects to implement IT consolidation. The remaining funds shall be earmarked for projects with a cross-departmental impact for the development of citizen and business services and for projects aimed at accelerating and improving the efficiency of procedures.</p> <p><u>Requested amendments and justification of the change</u></p> <p>The digitalisation fund for public administration was a demand driven fund; its legal base expired by the end of 2022 and all calls have been finished.</p> <p>The budget of the fund was indeed EUR 160 million as indicated in the RRP and the corresponding milestone description. Up to EUR 80 million were allocated (i.e. budgeted) in 2021 and up to EUR 80 million in 2022 (§2 of the Digitalisation Fund Act) . It was therefore, to be understood as the maximum available amount in accordance with §2 of the Digitalisation Fund Act.</p>		

However, by 31.12.2022, i.e. the last day of the legal base being in force (§4 of the Digitalisation Fund Act), projects worth EUR 118 854 865.22 were selected via several calls. These funds were legally committed and will be paid out in due time. Since the legal base is no longer in force, no more calls can be launched.

Out of the EUR 118 854 865.22 committed, a total of 95 projects worth EUR 81 328 632.54 were committed ("earmarked") for cross-departmental projects to implement IT consolidation and the remainder, i.e. EUR 37 526 232.68 were committed ("earmarked") for a total of 60 projects with a cross-departmental impact for the development of citizen and business services and for projects aimed at accelerating and improving the efficiency of procedures.

The first part of the requirement, i.e. "at least EUR 80 000 000 shall be earmarked for cross-departmental projects to implement IT consolidation", is met. If the interpretation of the 2nd requirement, i.e. "The remaining funds shall be earmarked for..." is to be interpreted to be the residual to the overall budget of EUR 160 million, this part of the requirement would not be met.

The objective reason for this is that the digitalisation fund was a demand driven scheme and while interest in cross-departmental projects to implement IT consolidation slightly exceeded the indicative amount of "at least EUR 80 million", the overall demand was well below the anticipated amounts. In general, we propose to change the milestone description to the number of selected projects for each of the two funding areas - "cross-departmental projects to implement IT consolidation" and projects with a cross-departmental impact for the development of citizen and business services and for projects aimed at accelerating and improving the efficiency of procedures" in order to better reflect the impact and performance of the fund.

A potential reason for the lack of demand could be the fact that the digitalisation fund was foreseen to run only for a limited time span from 2021 to 2022. It had been planned that the Digitalisation Fund Act enters into force in Q1 2021, however after having passed the vote in the first parliamentary chamber (Nationalrat) on 24 March 2021, the second parliamentary chamber (Bundesrat) rejected the motion not to raise objection on 30 March 2021, which triggered an 8 week waiting period. Only after the expiration of this waiting period could the Act be published in the Official Journal on 27 May 2021 and retroactively enter into force as of 1 January 2021. This delay in the parliamentary process could not have been foreseen and laid outside of the control of the national administration. This delay and legal uncertainty about the entry into force of the Digitalisation Fund Act led many Ministries to implement their IT projects, which otherwise would have been eligible under the digitalisation fund, using their own IT budget, thus reducing the demand for funding under the digitalisation fund. This allowed ministries, to secure funding earlier, rather than having to wait for the publication of the Digitalisation Fund Act and the funding decision by the Task Force once the tranches have closed. Once, Ministries had already secured funding through their internal IT budgets, there was little incentive to retrospectively submit the projects to the Digitalisation Fund.

Other general factors, of why the ministries' chose to use their own IT budget over the Digitalisation Fund in some instances, are the higher requirements under the Digitalisation Fund, such as the cross-ministerial dimension of projects and the application procedure taking place in tranches rather than on a rolling basis (i.e. one has to wait for the Task Force decision of the respective tranche).

Lastly, we would like to correct a discrepancy between our plan and the CID Annex (clerical error). In our plan we do not specify that the selection decisions will be published. Selection decisions are communicated to all applicants via the electronic act (ELAK). This is in line with the description of the measure in our plan (see p.236/237), which specifies that the Task Force will process the submitted projects via file.

Therefore, the following changes are proposed:

Modified elements	Current version	Amended version
Component and / or measure description		No changes.
Milestones and targets	M60: Projects have been selected and selection decisions have been published. Of the EUR 160 000 000 allocated to the measure, at least EUR 80 000 000 shall be earmarked for cross-departmental projects to implement IT consolidation. The remaining funds shall be earmarked for projects with a cross-departmental impact for the development of citizen and business services and for projects aimed at accelerating and improving the efficiency of procedures.	M60: At least 95 projects have been selected in the area of "cross-departmental projects to implement IT consolidation" and at least 60 projects have been selected in the area of "projects with a cross-departmental impact for the development of citizen and business services and for projects aimed at accelerating and improving the efficiency of procedures" and selection decisions have been communicated.
Estimated cost	EUR 160 000 000.00	EUR 118 854 865.22
Green and digital tagging		No changes.
DNSH self-assessment		No changes.

COMPONENT 2: DIGITAL RECOVERY / SUBCOMPONENT 2.D DIGITAL AND ECOLOGICAL TRANSFORMATION OF ENTERPRISES	
Investment/ reform CID reference	Investment 2.D.2
Investment/ reform name	Digital investments in enterprises
Type of change compared to CID	modified
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input checked="" type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input type="checkbox"/> None of the above, correction of clerical error
Elements modified (only for modified measures)	<input type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment
Investment: 2.D.2 Digital investments in enterprises	
<p><u>Initial Description:</u></p> <p>Investment 2.D.2 consists of one milestone and two targets:</p> <p><u>Milestone 65:</u> Entry into force of the amendment to the Investment Premium Act providing for a budget increase to reflect the availability of the RRP funds for support of eligible digital investments by companies</p> <p><u>Target 66:</u> Support granted to at least 3 000 companies for their digital investments (such as in hardware, software, digital infrastructure and e-commerce).</p> <p><u>Target 67:</u> Support granted to at least 7 000 companies for their digital investments (such as in hardware, software, digital infrastructure and e-commerce).</p> <p><u>Requested amendments and justification of the change</u></p> <p>Milestone 65 was fulfilled as part of the first payment request. Targets 66 and 67 are supposed to be part of the third and fifth payment requests respectively.</p>	

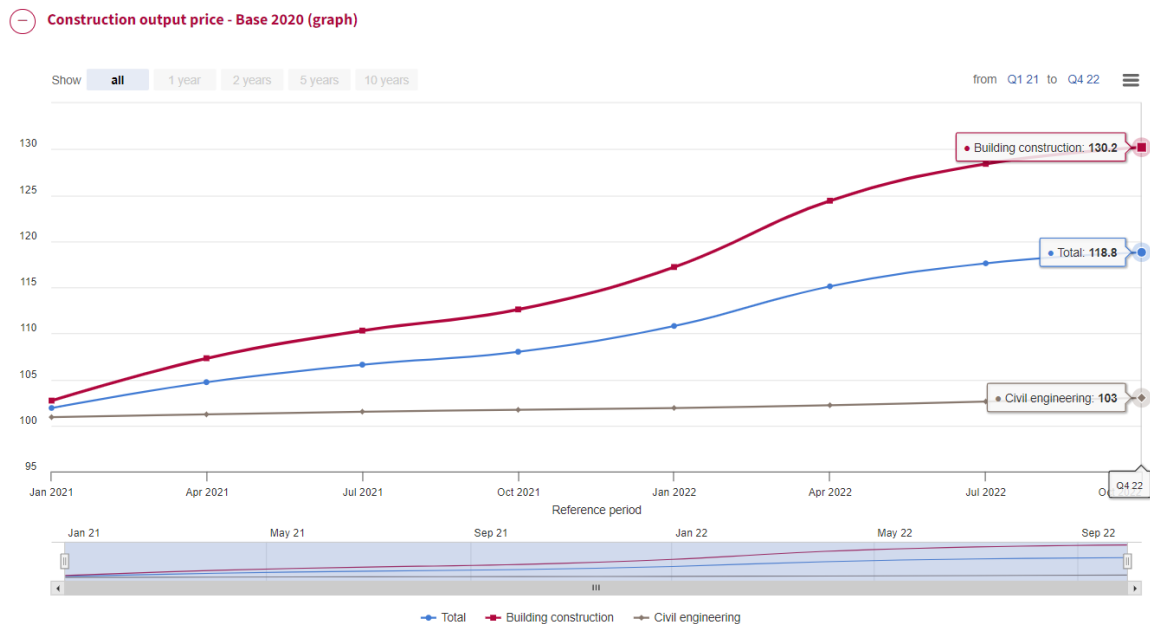
Fast implementation of the investment has resulted in achievement of targets 66 and 67 already at the end of Q2/2022 and Q4/2022 respectively. Therefore, both targets can be shifted forward in time to be part of the second payment request.

Modified elements	Current version	Amended version
Component and / or measure description		No changes.
Milestones and targets	T66 Indicative timeline for completion: Q1/2023 T67 Indicative timeline for completion: Q1/2025	T66 Indicative timeline for completion: Q2/2022 T67 Indicative timeline for completion: Q4/2022
Estimated cost		No changes.
Green and digital tagging		No changes.
DNSH self-assessment		No changes.

COMPONENT 2: DIGITAL RECOVERY / SUBCOMPONENT 2.D DIGITAL AND ECOLOGICAL TRANSFORMATION OF ENTERPRISES	
Investment/ reform CID reference	Investment 2.D.3
Investment/ reform name	Green investments in enterprises - Investments in thermal renovation
Type of change compared to CID	modified
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input checked="" type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input type="checkbox"/> Correction of clerical error
Elements modified (only for modified measures)	<input type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging <input type="checkbox"/> DNSH self-assessment
Investment: 2.D.3 Green investments in enterprises	
<u>Initial description</u>	
<p><u>Target 70:</u> Support granted to at least 1 000 companies for their investments in thermal renovation</p>	
<u>Requested amendments and justification of the change</u>	
<p>Measure 2.D.3 <i>Green investments in enterprises</i> aims to encourage companies' investments into ecological transformation and to direct them towards forward-looking priority areas. The investment consists of a 14% investment premium granted to companies for investments in the priority areas of green transition.</p> <p>The proposed amendment concerns Target 70 Thermal renovation under the RRP, which is partially no longer achievable due to objective circumstances, particularly, a lack of demand for the investment premium in the area of thermal renovations and energy savings (T72) due to companies facing unforeseeable price increases and investment uncertainty.</p> <p>The application period for funding for investments in thermal renovation under the Investment Premium Act has been open from the beginning of September 2020 until the end of February 2021. The implementation of the planned investment, however, has been a challenging undertaking for the enterprises, facing unexpected developments of costs of construction works. Rising fundamental costs (materials and labour), a rapid increase of costs</p>	

of construction works, and then in turn an increase of the price level in the sector, could be observed. This tendency continued over a two-year period, starting from the first quarter of 2021, and reaching a peak by the fourth quarter of 2022, which would have been the implementation period for the planned investments.

The construction output price index provides information on the change in actual prices that the customer must pay for construction activities and serves as a deflator to determine the real change in construction output figures. Since the 1st quarter of 2021, the indices have been calculated and published taking the average for 2020 = 100 as the base.



Source: STATISTICS AUSTRIA (<https://www.statistik.at/en/statistics/industry-construction-trade-and-services/short-term-business-statistics/construction-output-price-index>, on 02.03.2022).

The construction output price index for the entire building construction and civil engineering sector (base year 2020) reached an annual average of 105.3 index points (+5.3%) in 2021, according to calculations by Statistics Austria. In the fourth quarter of 2021, this index altered to 108.0 points, which represents a growth of 7.4% over the fourth quarter of 2020. The construction output price index of building construction reached an annual average of 108.2 index points for the year 2021, which is an increase of 8.2% in comparison to 2020.

The development of prices in the construction sector had a direct effect on the sub-sector of thermal renovations, as the rising prices of materials and labour, lead to rising costs for construction companies, followed by an increase in the end price for the customers. Especially the ongoing increase and uncertainty on the market in the period from the beginning of 2021 until the end of May 2021, which would have been the deadline to set the first measure for the planned investments, according to the Investment Premium Implementation Act, has been an obstacle for the companies to start the implementation of the investments. In this period the price level of building construction continued to grow,

with the price index of building construction reaching 110.3 index points, which is increase of more than 10% in comparison with the previous year, when the investments were planned.

The tendency continued in the following year, as a further price increases on quarter-to-quarter, as well on year-on-year levels occurred. A further significant increase of construction output price could be observed, with the construction output price index of building construction reaching an annual average of 125.1 index points in 2022, which is an increase of 15.6 % in annual comparison and more than 25% in comparison to the base line year, when the investment was planned.

Results (overview): Construction output price index, base year 2020

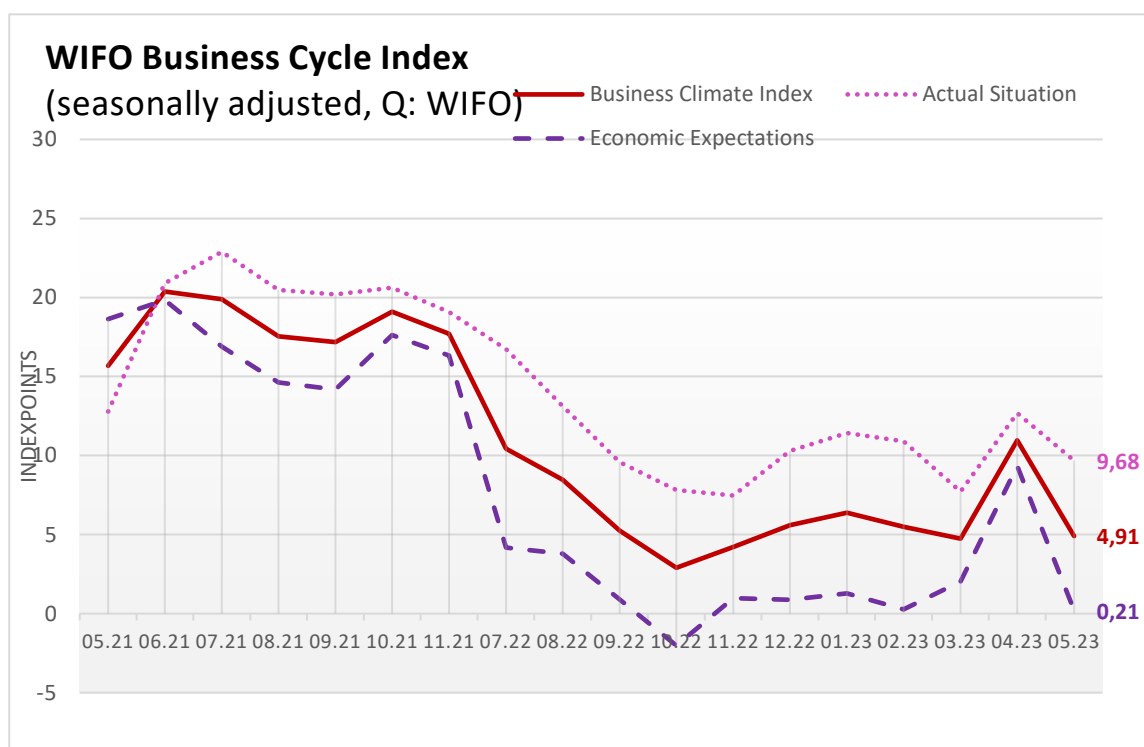
Year/Quarter	Total	Building construction									Civil en	
		Total	Building constructors work	Other building work	Residential buildings			Other building construction			Total	Road construction
					Total	Building constructors work	Other building work	Total	Building constructors work	Other building work		
Ø 2022	115,6	125,1	122,2	127,0	124,2	122,1	125,8	126,3	122,6	128,3	102,4	102,2
Ø 2021	105,3	108,2	108,0	108,4	108,0	107,9	108,0	108,6	108,1	108,9	101,3	101,1
Ø 2020	100,0	100,0	100,0	100,0	100,0	100,0	100,0	100,0	100,0	100,0	100,0	100,0
2022 IV.	118,8	130,2	126,5	132,7	129,1	126,3	131,4	131,7	126,9	134,3	103,0	103,1
III.	117,6	128,4	125,4	130,4	127,4	125,2	129,2	129,8	125,8	131,9	102,6	103,1
II.	115,1	124,4	121,8	126,1	123,5	121,6	124,9	125,7	122,2	127,5	102,2	102,1
I.	110,8	117,2	115,2	118,6	116,6	115,1	117,8	118,1	115,5	119,5	101,9	102,1
2021 IV.	108,0	112,6	111,6	113,3	112,1	111,5	112,7	113,3	111,7	114,1	101,7	102,1
III.	106,6	110,3	110,2	110,3	110,0	110,1	109,9	110,7	110,4	110,9	101,5	101,1
II.	104,7	107,3	107,4	107,2	107,1	107,4	106,8	107,6	107,5	107,6	101,2	101,1
I.	101,9	102,7	102,7	102,7	102,7	102,7	102,6	102,8	102,8	102,8	100,9	101,1
2020 IV.	100,6	100,7	100,7	100,6	100,6	100,7	100,5	100,7	100,6	100,7	100,6	100,0
III.	100,4	100,4	100,4	100,3	100,4	100,4	100,3	100,3	100,4	100,3	100,2	100,0
II.	99,8	99,9	100,1	99,8	99,9	100,1	99,8	99,9	100,1	99,8	99,8	99,0
I.	99,1	99,1	98,8	99,3	99,0	98,7	99,3	99,1	98,8	99,2	99,3	99,0

Source: STATISTICS AUSTRIA (<https://www.statistik.at/en/statistics/industry-construction-trade-and-services/short-term-business-statistics/construction-output-price-index>, on 02.03.2022).

The prices reaching up to 30% more in comparison with the period when the investments were planned, and the grant being 14% of the total costs of the investment, affected the expected profitability of the company's investments. An investment incentive was no longer present for them, despite the grant agreement. As extensive thermal renovation investments were an economic risk, and the grant funding could not compensate the macroeconomic conditions, a lot of beneficiaries opted out for single thermal renovation measures. Single measures are however not eligible for funding under the Investment Premium Implementation Act, as they are not depreciable capital assets. Eligible for funding are new tangible and intangible investments in depreciable capital assets.

Initially, over 7 000 applications for funding of thermal renovation investments were submitted and awarded a grant agreement. However, due to the rise of costs and the development of prices, by the deadline for submission of final reports on 31.5.2023 only 500 companies implemented thermal renovation investments.

Investment activities are highly influenced by demand, resp. demand expectations. According to the WIFO Business Cycle Index, these expectations have decreased almost steadily since July 2021 - a few months after enterprises applied for the Investment Premium¹³. Business climate deteriorated from the maximum of 20.4 points in June 2021 to 4.9 in May 2023 (with a minimum of 2.9 in October 2022). Expectations worsened enormously from 19.8 points in June 2021 to 0.2 points in May 2023. With worsening expectations, the perceived need of investment decreased. The reason for the deterioration of expectations is mainly due to the slower than expected worldwide recovery after Covid, the Russian war in Ukraine and the resulting price increases and demand reductions. These factors could not be foreseen when the milestones were designed.



Whilst cost for planned investment increased drastically, investments were scaled back as a response leading to costs per investments staying relatively in line with cost expectations made under the initial RRP. For Target 70, EUR 20 million were estimated for support in 1000 thermal renovation investments, meaning an average contribution of EUR 20 000 per investment. To date, the actual contribution per investment is estimated at around EUR 19 697 based on 420 settled projects, thus even slightly below the original costing estimates originally made during the drafting of the plan.

This means that for 500 projects, a total of EUR 9 848 396 Euros is expected to be contributed, staying EUR 10 151 604 below the original estimation of EUR 20 million.

¹³ [WIFO-Konjunkturtest Indexreihen](#)

In order to keep the high ambition of the plan, Austria proposes to proportionately scale up Target 71 Investment in Solar Energy. With an average cost of EUR 7 418.90 per solar energy project to date, an additional 1 368 investments could be financed from the 'remaining' funding originally foreseen for thermal renovation projects. Due to the compensation of the lack of demand, the total costing of the measure remains stable.

In addition to the proposed scale-up due to a reduction in Target 72, Austria foresees Target 71 to require support for at least 13 558 companies (10 800 + 1 368 + 1 390) for their investments in solar energy and electricity storage.

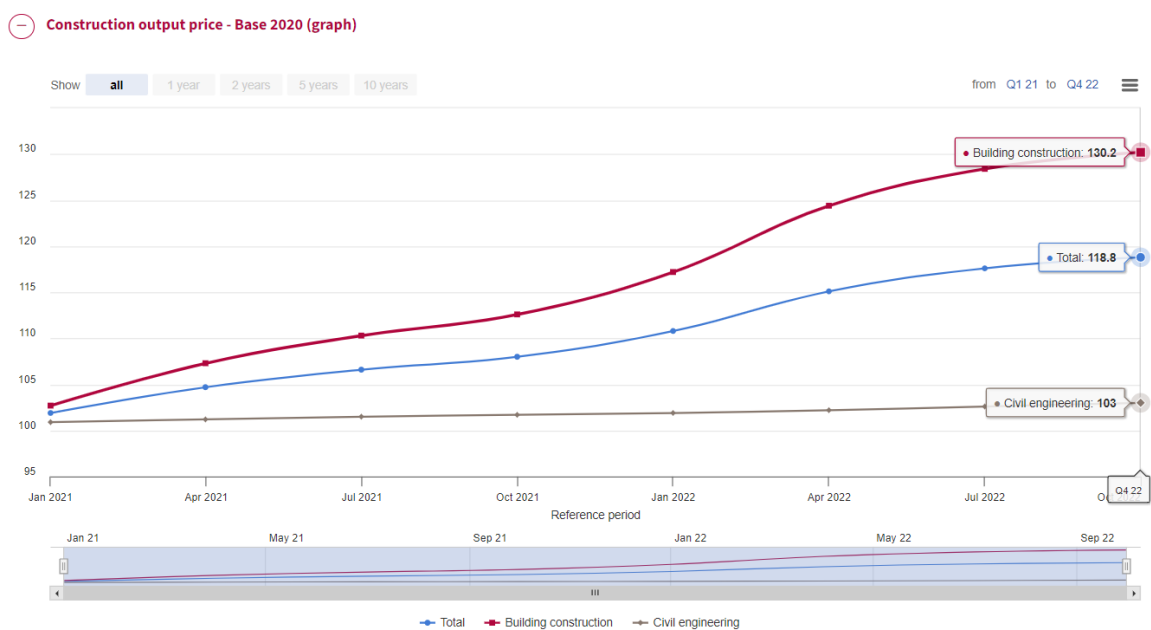
Therefore, the following changes are suggested:

Modified elements	Current version	Amended version
<i>Component and / or measure description</i>		No changes.
<i>Milestones and targets</i>	<p>T70: Support granted to at least 1 000 companies for their investments in thermal renovation</p> <p>T71: Support granted to at least 10 800 companies for their investments in solar energy and electricity storage</p>	<p>T70: Support granted to at least 500 companies for their investments in thermal renovation</p> <p>T71: Support granted to at least 13 558 companies for their investments in solar energy and electricity storage</p>
<i>Estimated cost</i>		No changes.
<i>Green and digital tagging</i>		No changes.
<i>DNSH self-assessment</i>		No changes.

COMPONENT 2: DIGITAL RECOVERY / SUBCOMPONENT 2.D DIGITAL AND ECOLOGICAL TRANSFORMATION OF ENTERPRISES	
Investment/ reform CID reference	Investment 2.D.3
Investment/ reform name	Green investments in enterprises - Investments in energy savings
Type of change compared to CID	modified
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input checked="" type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input type="checkbox"/> Correction of clerical error
Elements modified (only for modified measures)	<input type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging <input type="checkbox"/> DNSH self-assessment
Investment: 2.D.3 Green investments in enterprises	
<p><u>Initial description</u></p> <p><u>Target 72:</u> Support granted to at least 1 300 companies for their investments in energy savings</p> <p><u>Requested amendments and justification of the change</u></p> <p>Measure 2.D.3 <i>Green investments in enterprises</i> aims to encourage companies' investments into ecological transformation and to direct them towards forward-looking priority areas. The investment consists of a 14% investment premium granted to companies for investments in the priority areas of green transition.</p> <p>The proposed amendment concerns Target 72 Investments in energy savings to support companies under the RRP. Eligible investments in energy savings include all projects with energy savings of at least 10%, such as investments in increased efficiency of industrial processes, machinery, control electronics, as well as optimisation of lighting, the use of heat pumps, heat exchangers and others.</p> <p>Target 72 is partially no longer achievable due to objective circumstances, particularly, a lack of demand for the investment premium in the area of energy savings and thermal renovations (T70) due to companies facing unforeseeable price increases and investment uncertainty.</p>	

The application period for funding for investments in energy savings under the Investment Premium Act has been open from the beginning of September 2020 until the end of February 2021. The implementation of the planned investment, however, has been a challenging undertaking for the enterprises, facing unexpected developments of costs. Rising fundamental costs (materials and labour), a rapid increase of costs of construction works, and then in turn an increase of the price level in the sector, could be observed. This tendency continued over a two-year period, starting from the first quarter of 2021, and reaching a peak by the fourth quarter of 2022, which would have been the implementation period for the planned investments.

The construction output price index provides information on the change in actual prices that the customer must pay for construction activities and serves as a deflator to determine the real change in construction output figures. Since the 1st quarter of 2021, the indices have been calculated and published taking the average for 2020 = 100 as the base.



Source: STATISTICS AUSTRIA (<https://www.statistik.at/en/statistics/industry-construction-trade-and-services/short-term-business-statistics/construction-output-price-index>, on 02.03.2022).

The construction output price index for the entire building construction and civil engineering sector (base year 2020) reached an annual average of 105.3 index points (+5.3%) in 2021, according to calculations by Statistics Austria. In the fourth quarter of 2021, this index altered to 108.0 points, which represents a growth of 7.4% over the fourth quarter of 2020. The construction output price index of building construction reached an annual average of 108.2 index points for the year 2021, which is an increase of 8.2% in comparison to 2020.

The development of prices in the construction sector had a direct effect on the price of energy savings measures, as the rising prices of materials and labour lead to rising costs for construction companies, followed by an increase in the end price for the customers. Especially the ongoing increase and uncertainty on the market in the period from the beginning of 2021 until the end of May 2021, which would have been the deadline to set the first measure for the planned investments, according to the Investment Premium Implementation Act, has been an obstacle for the companies to start the implementation of the investments. In this period, the price level of building construction continued to grow, with the price index of building construction reaching 110.3 index points, which is increase of more than 10% in comparison with the previous year, when the investments were planned.

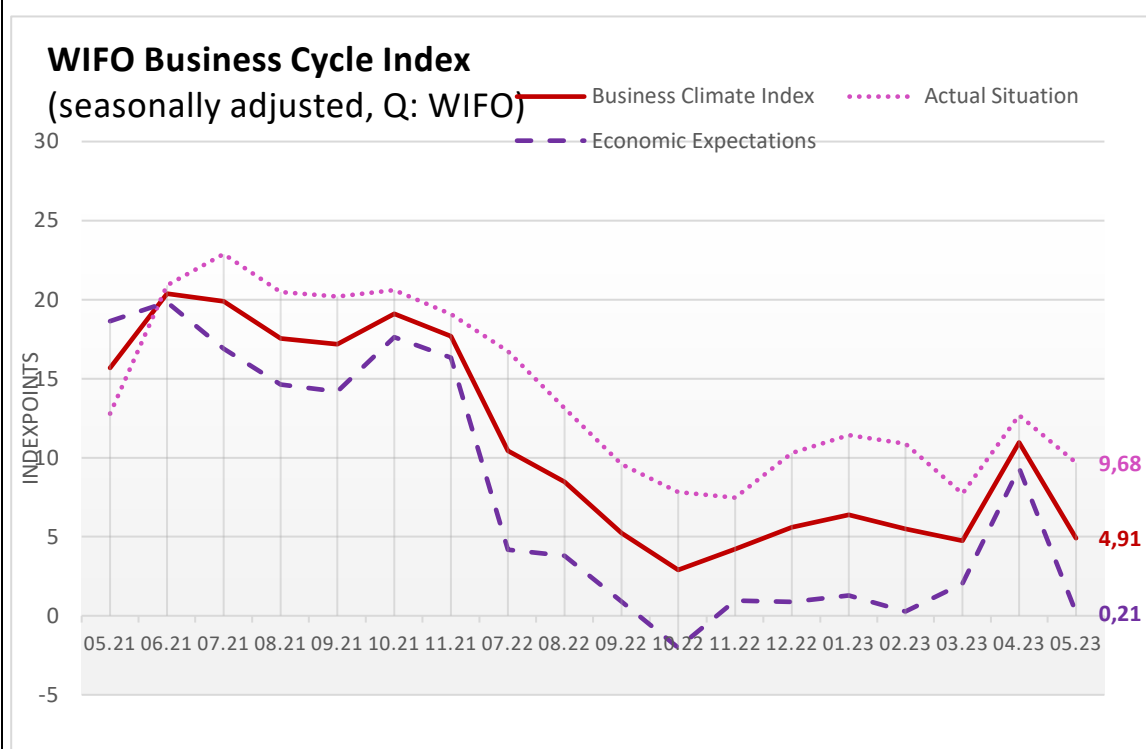
The tendency continued in the following year, as a further price increases on quarter-to-quarter, as well on year-on-year levels occurred. A further significant increase of construction output price could be observed, with the construction output price index of building construction reaching an annual average of 125.1 index points in 2022, which is an increase of 15.6 % in annual comparison and more than 25% in comparison to the base line year, when the investment was planned.

Results (overview): Construction output price index, base year 2020													
Year/Quarter	Building construction											Civil engineering	
	Total	Total	Building constructors work	Other building work	Residential buildings			Other building construction			Total	Road construction	Bridge construction
					Total	Building constructors work	Other building work	Total	Building constructors work	Other building work			
Ø 2022	115,6	125,1	122,2	127,0	124,2	122,1	125,8	126,3	122,6	128,3	102,4	102,9	103
Ø 2021	105,3	108,2	108,0	108,4	108,0	107,9	108,0	108,6	108,1	108,9	101,3	101,5	101
Ø 2020	100,0	100,0	100,0	100,0	100,0	100,0	100,0	100,0	100,0	100,0	100,0	100,0	100
2022													
IV.	118,8	130,2	126,5	132,7	129,1	126,3	131,4	131,7	126,9	134,3	103,0	103,6	104
III.	117,6	128,4	125,4	130,4	127,4	125,2	129,2	129,8	125,8	131,9	102,6	103,1	103
II.	115,1	124,4	121,8	126,1	123,5	121,6	124,9	125,7	122,2	127,5	102,2	102,6	103
I.	110,8	117,2	115,2	118,6	116,6	115,1	117,8	118,1	115,5	119,5	101,9	102,3	102
2021													
IV.	108,0	112,6	111,6	113,3	112,1	111,5	112,7	113,3	111,7	114,1	101,7	102,1	102
III.	106,6	110,3	110,2	110,3	110,0	110,1	109,9	110,7	110,4	110,9	101,5	101,7	102
II.	104,7	107,3	107,4	107,2	107,1	107,4	106,8	107,6	107,5	107,6	101,2	101,3	101
I.	101,9	102,7	102,7	102,7	102,7	102,7	102,6	102,8	102,8	102,8	100,9	101,0	101
2020													
IV.	100,6	100,7	100,7	100,6	100,6	100,7	100,5	100,7	100,6	100,7	100,6	100,8	100
III.	100,4	100,4	100,4	100,3	100,4	100,4	100,3	100,3	100,4	100,3	100,2	100,2	100
II.	99,8	99,9	100,1	99,8	99,9	100,1	99,8	99,9	100,1	99,8	99,8	99,9	99
I.	99,1	99,1	98,8	99,3	99,0	98,7	99,3	99,1	98,8	99,2	99,3	99,1	99

Source: STATISTICS AUSTRIA (<https://www.statistik.at/en/statistics/industry-construction-trade-and-services/short-term-business-statistics/construction-output-price-index>, on 02.03.2022).

When applying for the Investment Premium, enterprises calculated their investment plans on the basis of the actual costs in 2020/2021. The costs which an enterprise faces are now tremendously higher than at that time. This is not only true for investment costs, but also for running costs (wages, operating resources, preliminary products). The running costs will not taper off in the short run and therefore restrict the financial means of the enterprises. Hence enterprises cut their investment plans in order to save costs. Due to the rise of costs and the development of prices, by the deadline for submission of final reports on 31.5.2023 only 800 companies implemented energy saving investments.

Investment activities are highly influenced by demand, resp. demand expectations. According to the WIFO Business Cycle Index, these expectations have decreased almost steadily since July 2021 - a few months after enterprises applied for the Investment Premium¹⁴. Business climate deteriorated from the maximum of 20.4 points in June 2021 to 4.9 in May 2023 (with a minimum of 2.9 in October 2022). Expectations worsened enormously from 19.8 points in June 2021 to 0.2 points in May 2023. With worsening expectations, the perceived need of investment decreased. The reason for the deterioration of expectations is mainly due to the slower than expected worldwide recovery after Covid, the Russian war in Ukraine and the resulting price increases and demand reductions. These factors could not be foreseen when the milestones were designed.



Whilst cost for planned investment increased drastically, investments were scaled down as a response leading to costs per investments staying relatively in line with cost expectations made under the initial RRP. For Target 72, EUR 32.5 million. were estimated for support in 1 300 investments into energy savings, meaning an average contribution of EUR 25 000 per investment. To date, the actual contribution per investment is estimated at around EUR 27 733 Euros based on 686 settled projects, thus slightly above the original costing estimates originally made during the drafting of the plan.

This means that for 800 projects, a total of EUR 22 186 006 is expected to be contributed, staying EUR 10 313 994 below the original estimation of EUR 32.5 million.

¹⁴ [WIFO-Konjunkturtest Indexreihen](#)

In order to keep the high ambition of the plan, Austria proposes to proportionately scale up Target 71 Investment in Solar Energy. With an average cost of EUR 7 418.90 per solar energy project to date, an additional 1 390 investments could be financed from the 'remaining' funding originally foreseen for energy saving projects. Due to the compensation of the lack of demand, the total costing of the measure remains stable.

In addition to the proposed scale-up due to a reduction in Target 72, Austria foresees Target 71 to require support for at least 13 558 companies (10 800 + 1 368 + 1 390) for their investments in solar energy and electricity storage.

Therefore, the following changes are suggested:

Modified elements	Current version	Amended version
<i>Component and / or measure description</i>		No changes.
<i>Milestones and targets</i>	<p>T72: Support granted to at least 1 300 companies for their investments in energy savings</p> <p>T71: Support granted to at least 10 800 companies for their investments in solar energy and electricity storage</p>	<p>T72: Support granted to at least 800 companies for their investments in energy savings</p> <p>T71: Support granted to at least 13 558 companies for their investments in solar energy and electricity storage</p>
<i>Estimated cost</i>		No changes.
<i>Green and digital tagging</i>		No changes.
<i>DNSH self-assessment</i>		No changes.

COMPONENT 3: KNOWLEDGE BASED RECOVERY / SUBCOMPONENT 3.A RESEARCH	
Investment/ reform CID reference	Reform 3.A.1
Investment/ reform name	Research, Innovation and Technology Strategy 2030 (RTI Strategy 2030)
Type of change compared to CID	modified
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input checked="" type="checkbox"/> None of the above, correction of clerical error
Elements modified (only for modified measures)	<input checked="" type="checkbox"/> Component / Measure description <input type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment
Reform: 3.A.1 Research, Innovation and Technology Strategy 2030 (RTI Strategy 2030)	
<u>Initial description</u>	
<p><u>3.A.1 – Measure description:</u></p> <p><i>The objective of this reform is to design the overarching framework for the research, innovation and technology policy in Austria in the coming ten years. The aims are to become an international innovation leader and to strengthen Austria as an RTI location, to focus on effectiveness and excellence, and to focus on knowledge, talent and skills. The implementation of the reform is organised with the research financing act and the operationalisation with three-year pacts for research, technology and innovation. The investments included in this subcomponent complement the RTI Pact 2021-2023 adopted in 2020 and will be covered by the future pacts. The ‘RTI-Strategy 2030’ is to be implemented by the end of 2030.</i></p> <p><i>The implementation of the part of the reform under the recovery and resilience plan shall be completed by 31 December 2025.</i></p>	
<u>Requested amendments and justification of the change</u>	
Usage of the word “will” in the requirements set out in the Council Implementing Decision creates ambiguity in the understanding of said requirements. The word “will” does not	

create a clear legal understanding of a requirement as an *obligation* (indicated by the usage of the word “shall”) compared to an *expectation* (indicated by the usage of the phrase “is expected to”).

In order to create legal certainty as well as coherence throughout the CID, the measure description is amended to more clearly reflect the intentions of the original recovery and resilience plan. Therefore, the following changes are suggested:

Modified elements	Current version	Amended version
Component and / or measure description	<p>The objective of this reform is to design the overarching framework for the research, innovation and technology policy in Austria in the coming ten years. The aims are to become an international innovation leader and to strengthen Austria as an RTI location, to focus on effectiveness and excellence, and to focus on knowledge, talent and skills. The implementation of the reform is organised with the research financing act and the operationalisation with three-year pacts for research, technology and innovation. The investments included in this subcomponent complement the RTI Pact 2021-2023 adopted in 2020 and will be covered by the future pacts. The ‘RTI-Strategy 2030’ is to be implemented by the end of 2030.</p> <p>The implementation of the part of the reform under the recovery and resilience plan shall be completed by 31 December 2025.</p>	<p>The objective of this reform is to design the overarching framework for the research, innovation and technology policy in Austria in the coming ten years. The aims are to become an international innovation leader and to strengthen Austria as an RTI location, to focus on effectiveness and excellence, and to focus on knowledge, talent and skills. The implementation of the reform is organised with the research financing act and the operationalisation with three-year pacts for research, technology and innovation. The investments included in this subcomponent complement the RTI Pact 2021-2023 adopted in 2020 and will be expected to be covered by the future pacts. The ‘RTI-Strategy 2030’ is to be implemented by the end of 2030.</p> <p>The implementation of the part of the reform under the recovery and resilience plan shall be completed by 31 December 2025.</p>
Milestones and targets		No changes.
Estimated cost		No changes.
Green and digital tagging		No changes.
DNSH self-assessment		No changes.

COMPONENT 3: KNOWLEDGE BASED RECOVERY / SUBCOMPONENT 3.A RESEARCH		
Investment/ reform CID reference	Investment 3.A.2	
Investment/ reform name	Quantum Austria — Promotion of Quantum Sciences	
Type of change compared to CID	modified	
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input checked="" type="checkbox"/> None of the above, correction of clerical error	
Elements modified (only for modified measures)	<input type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment	
Investment: 3.A.2 Quantum Austria — Promotion of Quantum Sciences		
<p><u>Initial description</u></p> <p><u>Milestone 77 – Milestone description:</u> As part of the preparation and negotiation of the performance agreements with research institutions, both the adaptation of the technical infrastructure and the transfer of operations to the research institutions will be embedded shall be part of the performance agreements by the Ministry (BMBWF).</p> <p><u>Requested amendments and justification of the change</u></p> <p>In the milestone description of milestone 77, there is still wording present which has been crossed out during the drafting of the CID.</p> <p>This crossed out section serves no purpose and has clearly been left in the milestone description on accident during the drafting of the CID.</p>		
Modified elements	Current version	Amended version
<i>Component and / or measure description</i>		No changes.
<i>Milestones and targets</i>	As part of the preparation and negotiation of the performance agreements	As part of the preparation and negotiation of the performance agreements

	with research institutions, both the adaptation of the technical infrastructure and the transfer of operations to the research institutions will be embedded shall be part of the performance agreements by the Ministry (BMBWF).	with research institutions, both the adaptation of the technical infrastructure and the transfer of operations to the research institutions shall be part of the performance agreements by the Ministry (BMBWF).
<i>Estimated cost</i>		No changes.
<i>Green and digital tagging</i>		No changes.
<i>DNSH self-assessment</i>		No changes.

COMPONENT 3: KNOWLEDGE BASED RECOVERY / SUBCOMPONENT 3.B RE-SKILLING AND UP-SKILLING		
Investment/ reform CID reference	Investment 3.B.2	
Investment/ reform name	Promoting re-skilling and up-skilling	
Type of change compared to CID	modified	
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input checked="" type="checkbox"/> None of the above, correction of clerical error	
Elements modified (only for modified measures)	<input type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment	
Investment: 3.B.2 Promoting re-skilling and up-skilling		
<p><u>Initial description</u></p> <p><u>CID ‘Related Measure (Reform or Investment)’ for Milestone 87:</u></p> <p>3.B.1 Promoting re-and upskilling</p> <p><u>Requested amendments and justification of the change</u></p> <p>In the Austrian CID, the ‘Related Measure (Reform or Investment)’ column for M87 reads: <i>3.B.1 Promoting re-and upskilling</i></p> <p>However, as this milestone is part of the measure <i>3.B.2 Promoting re-skilling and up-skilling</i>, this clerical error should be corrected.</p>		
Modified elements	Current version	Amended version
<i>Component and / or measure description</i>		No changes.
<i>Milestones and targets</i>	M87 - Related Measure (Reform or Investment):	M 87 - Related Measure (Reform or Investment):

	3.B.1 Promoting re-and upskilling	3.B.2 Promoting re-skilling and up-skilling
<i>Estimated cost</i>		No changes.
<i>Green and digital tagging</i>		No changes.
<i>DNSH self-assessment</i>		No changes.

COMPONENT 3: KNOWLEDGE BASED RECOVERY / SUBCOMPONENT 3.B RE-SKILLING AND UP-SKILLING		
Investment/ reform CID reference	Investment 3.B.2	
Investment/ reform name	Promoting re-skilling and up-skilling	
Type of change compared to CID	modified	
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input checked="" type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input type="checkbox"/> None of the above, correction of clerical error	
Elements modified (only for modified measures)	<input type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment	
Investment: 3.B.2 Promoting re-skilling and up-skilling		
<u>Initial description</u>		
<p><u>Target 89:</u> At least 94 000 people shall have benefited from re- and up-skilling measures over the period of implementation as stated in the annual implementation report issued by the responsible Ministry.</p>		
<u>Requested amendments and justification of the change</u>		
<p>Target 89 was originally intended to be achieved in line with the fourth payment request.</p> <p>Fast implementation of the investment has resulted in achievement of target 89 already at the end of Q4/2022. Therefore, this target can be shifted forward in time to be part of the second payment request.</p>		
Modified elements	Current version	Amended version
<i>Component and / or measure description</i>		No changes.
<i>Milestones and targets</i>	T89: Indicative timeline for completion: Q4/ 2024	T89: Indicative timeline for completion: Q4/ 2022
<i>Estimated cost</i>		No changes.
<i>Green and digital tagging</i>		No changes.
<i>DNSH self-assessment</i>		No changes.

COMPONENT 3: KNOWLEDGE BASED RECOVERY / SUBCOMPONENT 3.C EDUCATION	
Investment/ reform CID reference	Reform 3.C.1
Investment/ reform name	Improved Access to education
Type of change compared to CID	modified
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input checked="" type="checkbox"/> None of the above, correction of clerical error
Elements modified (only for modified measures)	<input checked="" type="checkbox"/> Component / Measure description <input type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment
Reform: 3.C.1 Improved access to education	
<p><u>Initial description</u></p> <p>3.C.1 – Measure description:</p> <p><i>The reform measure provides the framework for the two investment measures. It aims to improve the basic skills of disadvantaged groups in order to guarantee equal opportunities in education. It seeks to set the scene for the investments that are part of the same subcomponent to be successfully implemented and for the share of pupils completing lower secondary education to be increased. It describes the same conditions and actions as the investments, but with a longer timeframe. It will depend on investments beyond the Recovery and Resilience Facility for the part of the implementation that exceeds the investments of the subcomponent.</i></p> <p><i>The implementation of the measure shall be completed by 31 December 2025.</i></p> <p><u>Requested amendments and justification of the change</u></p> <p>Usage of the word “will” in the requirements set out in the Council Implementing Decision creates ambiguity in the understanding of said requirements. The word “will” does not</p>	

create a clear legal understanding of a requirement as an *obligation* (indicated by the usage of the word “shall”) compared to an *expectation* (indicated by the usage of the phrase “is expected to”).

In order to create legal certainty as well as coherence throughout the CID, the measure description is amended to more clearly reflect the intentions of the original recovery and resilience plan.

Therefore, the following changes are suggested:

Modified elements	Current version	Amended version
Component and / or measure description	<p>The reform measure provides the framework for the two investment measures. It aims to improve the basic skills of disadvantaged groups in order to guarantee equal opportunities in education. It seeks to set the scene for the investments that are part of the same subcomponent to be successfully implemented and for the share of pupils completing lower secondary education to be increased. It describes the same conditions and actions as the investments, but with a longer timeframe. It will depend on investments beyond the Recovery and Resilience Facility for the part of the implementation that exceeds the investments of the subcomponent.</p> <p>The implementation of the measure shall be completed by 31 December 2025.</p>	<p>The reform measure provides the framework for the two investment measures. It aims to improve the basic skills of disadvantaged groups in order to guarantee equal opportunities in education. It seeks to set the scene for the investments that are part of the same subcomponent to be successfully implemented and for the share of pupils completing lower secondary education to be increased. It describes the same conditions and actions as the investments, but with a longer timeframe. It will depends on investments beyond the Recovery and Resilience Facility for the part of the implementation that exceeds the investments of the subcomponent.</p> <p>The implementation of the measure shall be completed by 31 December 2025.</p>
Milestones and targets		No changes.
Estimated cost		No changes.
Green and digital tagging		No changes.
DNSH self-assessment		No changes.

COMPONENT 3: KNOWLEDGE BASED RECOVERY / SUBCOMPONENT 3.C EDUCATION					
Investment/ reform CID reference	Reform 3.C.1				
Investment/ reform name	Improved Access to education				
Type of change compared to CID	modified				
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input checked="" type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input type="checkbox"/> None of the above, correction of clerical error				
Elements modified (only for modified measures)	<input type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment				
Reform: 3.C.1 Improved access to education					
<u>Initial description</u>					
<p><u>Target 90: Pupils eligible for promotion from 5th school year:</u> Total of all pupils from the fifth school year who had an eligibility for promotion to the next grade or a successful completion of a school type at the end of the reference school year / total of all pupils from the 5th school year in the reference year.</p> <table border="1"> <tbody> <tr> <td>Base (school year 2017/18)</td> <td>92.4%</td> </tr> <tr> <td>Goal (Q4/2025 – school year 2023/2024)</td> <td>94.7%</td> </tr> </tbody> </table> <p><i>Data basis: Statistics Austria</i></p>		Base (school year 2017/18)	92.4%	Goal (Q4/2025 – school year 2023/2024)	94.7%
Base (school year 2017/18)	92.4%				
Goal (Q4/2025 – school year 2023/2024)	94.7%				
<u>Requested amendments and justification of the change</u>					
<p>Measure 3.C.1 Improved Access to education aims to improve access to high quality education for all students and in particular for students from disadvantaged and/or migrant backgrounds. The current target T90 addresses the promotion of all pupils from 5th year onwards and sets the goal at 94.7% with an indicative target date of Q4/2025.</p>					

This means it is to be reached during the school year 2023/2024 as data on the eligibility for promotion is only made available by “Statistik Austria” in retrospect for the last year.

The goal of an eligibility rate for promotion of 94.7% was already surpassed in 2019/2020 with a value of 95.2% reached, while in school year 2020/21, the eligibility rate for promotion was 93.7%. This overall increase in the promotion rate can be mainly explained by various substantial changes in the regulations for eligibility for promotion adopted during the pandemic in order to counteract negative impacts of lock-downs and distance learning on educational careers (2019/20: BGBl. II Nr. 208/2020, BGBl. II Nr. 164/2020; 2020/21: BGBl. II Nr. 384/2020).

At the time of drafting the ARP it was unclear how long the pandemic would last and the more flexible rules would be in place. In school year 2021/22, Austria focused on the goal to quickly ensure a return to high quality educational outcomes and grading/degrees. Therefore, the Ministry decided to gradually return to pre-pandemic rules for eligibility for promotion (2021/22: BGBl. II Nr. 374/2021 from August 2021). After the 2021/22 school year, there were no COVID-19 provisions regarding promotion eligibility. As one related consequence, students who had been promoted (more easily) during COVID-19 years now face an even higher risk of not being eligible for promotion.

Another unforeseen development, which will most likely have a negative impact on the indicator, is the high intake of displaced persons from UA since 2022. The requirement to first support displaced Ukraine students with German language support measures in order for them to successfully participate in the education process means that a promotion to the next school level might not materialise immediately in a lot of cases.

These objective circumstances will make it impossible to reach the ARP target Target 90, as the Ministry anticipates a further downward adjustment of the related indicator until 2025 as a result of the described changes in the rules for promotion since drafting the ARP and the uncertainties connected to the Russian aggression against UA.

While Austria will continue to pursue increasing the promotion rate of pupils, it is suggested to **change the target T90 into a milestone that captures better the spirit of measure 3.C.1** “Improved Access to education” and which aims to improve access to high quality education for all pupils.

As of 2022, the newly introduced national standardised assessments of the “Individual Competence Assessment PLUS” (iKMPLUS) assesses – annually and compulsorily – the extent to which students achieve national standards in German, Maths at grades 3, 4, 7 and 8 as well as English at grades 7 and 8. Each year the results are used immediately to support individual learning and to improve teaching and learning processes at the school and classroom level.

We now propose to include as a milestone a new reform which implements the full spectrum of “modules” and instruments offered by the “iKMPLUS” alongside the already implemented compulsory modules via two legal acts: an amendment to the School

Education Act (Schulunterrichtsgesetz) will build the framework for the legal anchoring of further modules of “iKMPLUS) while an addition legal act will be adopted which implements the additional modules.

Through additional diagnostic instruments and didactical materials, schools and teachers will receive targeted support in helping their students achieve their educational goals. For instance, students, who perform low in reading will obtain a more detailed diagnostic analysis of their skills followed by targeted support in their language development. That way, special attention will be given to the aspect of equal opportunities. With the additional modules of iKMPLUS, a more complete picture of learning processes and learning levels will be generated, teaching practice will be informed through additional data and the realisation of competence-oriented teaching and learning will be supported.

In the long term, the entirety of instruments and measures implemented with the iKMPLUS aim at reducing the number of students, who do not meet or only partially meet the educational standards and to increase the number of students, who achieve or exceed the educational standards by the end of grade 4 and grade 8. They are seen as an important contribution to further supporting and developing individualised and evidence-based learning and to supporting students to achieve their own best potential.

This measure would contribute to the improvement of pupils’ access to education across the Austrian school system through the provision of targeted and timely support resulting from the additional diagnostic instruments.

Therefore, we suggest the following amendments:

Modified elements	Current version	Amended version
<i>Component and / or measure description</i>		No changes.
<i>Milestones and targets</i>	<p><u>Milestone 90:</u></p> <p>Name: Pupils eligible for promotion from 5th school year</p> <p>Baseline: 92.4 (2018) Goal: 94.7 (Q4 2025)</p> <p>Unit of measure: Percentage of pupils entitled for promotion to the next grade or successful completion of a school type</p> <p>Description of the target:</p>	<p><u>Milestone 90 – Q1/2023</u></p> <p>Entry into force of the amended School education Act (Schulunterrichtsgesetz) which builds the framework for the legal anchoring of further modules (full implementation) of the national standardised assessments “Individual Competence Assessment PLUS” (iKMPLUS)</p> <p><u>Milestone 90-bis – Q2/2024</u></p>

	Total of all pupils from the fifth school year who had an eligibility for promotion to the next grade or a successful completion of a school type at the end of the reference school year / total of all pupils from the 5th school year in the reference year.	Legal act is adopted which implements and specifies additional modules to the national standardised assessments (iKMPLUS). Together with the compulsory modules implemented in 2022 the additional modules enable targeted support for pupils in these focus areas.
<i>Estimated cost</i>		No changes.
<i>Green and digital tagging</i>		No changes.
<i>DNSH self-assessment</i>		No changes.

COMPONENT 3: KNOWLEDGE BASED RECOVERY / SUBCOMPONENT 3.C EDUCATION	
Investment/ reform CID reference	Reform 3.C.1
Investment/ reform name	Improved Access to education
Type of change compared to CID	modified
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input checked="" type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input type="checkbox"/> None of the above, correction of clerical error
Elements modified (only for modified measures)	<input type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment
Reform: 3.C.1 Improved access to education	
<p><u>Initial description</u></p> <p><u>Target 91:</u> Pupils from migration background having achieved secondary level II degree: Pupils with a migration background (first and second generation) aged 20-24 who have achieved a secondary level II degree as a share (in % of all people with a migration background (first and second generation) in the resident population of the same age).</p> <p><u>Requested amendments and justification of the change</u></p> <p>Education remains the best way for people to escape poverty and reach their full potential. Education gives people the knowledge and skills they need to stay healthy, get jobs and foster tolerance.</p> <p>Measure 3.C.1 (Improved access to education) aims to improve the skills of disadvantaged groups, specifically pupils with a migration background. In response to the 2019/2020 CSRs on education, Austria is taking a comprehensive set of measures to further develop the education system and to ensure the best possible education opportunities for all, including disadvantaged learners.</p>	

This implies the aim that more pupils with a migration background achieve a Secondary level II qualification. The initially chosen indicator to measure progress in this regard measures the rate of pupils with a migration background (first and second generation) aged 20-24 who have achieved a secondary level II degree as a share (in %) of all people with a migration background (first and second generation) in the resident population of the same age.

Often times, first-generation migrants have achieved their highest secondary degree abroad and not in Austria. In fact, statistics generated by Statistik Austria in the "Arbeitskräfteerhebung 2021" show that for those migrants who have reached Austria at an age of 15-24, 78.3% receive their highest degree of education abroad. It can be assumed that this is even higher for those migrants who are entering Austria at age 20 and above.

This shows that the set indicator for pupils with migration background (first and second generation) is highly susceptible to changes in migration patterns. For instance, a large number of first-generation migrants entering Austria with a particularly high (low) share of secondary degrees would push up (down) the set indicator, although there have been no changes in the Austrian school system to warrant this development.

The indicator has shown an overall downward trend since 2016, particularly among 1st generation migrants, who – as described - often immigrate without bringing the corresponding qualifications with them. For 2nd generation migrants, on the other hand, there has been a relative increase in secondary II degrees. Between school years 2015/16 until 2019/20, the ratio of 1st and 2nd generation to the total number of all migrants in the age group of the indicator was quite stable (it amounted to approx. 69% 1st generation and 31% 2nd generation migrants, respectively). Therefore, a trend toward positive development and achievement of the original target value for this indicator could be assumed in the medium term.

However, since the development of the ARP objective circumstances have occurred that could not have been foreseen: Since 2020, Austria again had unpredictably high immigration rates in the 20-24 age group (2020: approx. 24 000; 2022: approx. 38 000 meaning a plus of around 60%). This leads to a substantial increase in the share of the 1st generation group (which tends to have less sec II qualifications than the 2nd generation) in the total number of migrants.

Due to the extreme sensitivity of the indicator to such sudden and unpredictable changes in the composition of the group, it will be impossible for Austria to achieve the set target of 67.9% (Q4 2025).

While Austria will continue to pursue increasing the rate of migrants with a secondary level II degree, it is suggested to **change the target T91 into a milestone that captures better the spirit of measure 3.C.1** "Improved Access to education" and which aims to improve access to high quality education for all pupils and in particular for pupils from disadvantaged and/or migrant backgrounds.

To this end, we propose to **introduce a new reform** that aims at **establishing criteria for the specification of the socio-economic background and the socio-economic baseline of schools** by ways of a legal act (regulation).

School careers and educational success in Austria depend to a large extent on socio-economic background, which is usually captured by education, occupation and income as well as occasionally the parents' first language or migration status. Austrian schools, or the composition of the population of students there, are often markedly different with respect to these dimensions. Risk of educational poverty increases when social disadvantages at school increase, i.e. when the composition of the student body is more socially unfavourable.

The distribution of resources is a central way of responding to these different framework conditions of the schools. The 2017 education reform established by law factors that the boards of education have to take into account when allocating teacher resources to individual schools, incl. the socio-economic background. At present, the BMBWF is working with the Federal Institute for Quality Assurance in the Austrian School System (IQS) to develop a permanent and quality-assured calculation basis for an index.

The new measure will consist of the **adoption of a regulation which will specify criteria of the socio-economic background**. It aims at ensuring that students who attend schools with a low supportive personal background are given the necessary support.

Therefore, we **suggest the following amendment:**

Modified elements	Current version	Amended version
<i>Component and / or measure description</i>		No changes.
<i>Milestones and targets</i>	T91: Pupils from migration background having achieved secondary level II degree; Baseline: 65.4 (2018); Target: 67.9 (Q4 2025)	<u>T91</u> : A legal act which establishes criteria for the specification of the socio-economic background Target date for implementation: Q2/2025
<i>Estimated cost</i>		No changes.
<i>Green and digital tagging</i>		No changes.
<i>DNSH self-assessment</i>		No changes.

COMPONENT 3: KNOWLEDGE BASED RECOVERY / SUBCOMPONENT 3.C EDUCATION	
Investment/ reform CID reference	Investment 3.C.3.
Investment/ reform name	Expansion of elementary education
Type of change compared to CID	modified
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input checked="" type="checkbox"/> None of the above, correction of clerical error
Elements modified (only for modified measures)	<input checked="" type="checkbox"/> Component / Measure description <input type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment
Investment: 3.C.3 Expansion of elementary education	
<p><u>Initial description</u></p> <p>3.C.3 – Measure description: <i>The objective of the investment is to expand the provision of childcare facilities, particularly for the under three year old and the opening hours for the three to six years old, to facility the reconciliation of work and family life. Additionally, with a focus improving early childhood education and care at the earliest possible age of learners, the quality of early childhood education and care facilities is expected to be improved.</i></p> <p><i>The investment consists of funding to expand the provision of suitable early childhood education and care facilities for the under three year old, to meet the Barcelona target for children under the age of three (childcare rate 33%). In addition, incentives will be created to extend the opening times of elementary educational institutions for three to six year olds. The quality of education and care for children until the start primary school shall be further developed, notably by improving the staff/child ratio.</i></p> <p><i>The implementation of the measure shall be completed by 30 September 2023.</i></p> <p><u>Requested amendments and justification of the change</u></p>	

Usage of the word “will” in the requirements set out in the Council Implementing Decision creates ambiguity in the understanding of said requirements. The word “will” does not create a clear legal understanding of a requirement as an *obligation* (indicated by the usage of the word “shall”) compared to an *expectation* (indicated by the usage of the phrase “is expected to”).

In order to create legal certainty as well as coherence throughout the CID, the measure description is amended to more clearly reflect the intentions of the original recovery and resilience plan. Therefore, the following changes are suggested:

Modified elements	Current version	Amended version
<p>Component and / or measure description</p>	<p>The objective of the investment is to expand the provision of childcare facilities, particularly for the under three year old and the opening hours for the three to six years old, to facility the reconciliation of work and family life. Additionally, with a focus improving early childhood education and care at the earliest possible age of learners, the quality of early childhood education and care facilities is expected to be improved.</p> <p>The investment consists of funding to expand the provision of suitable early childhood education and care facilities for the under three year old, to meet the Barcelona target for children under the age of three (childcare rate 33%). In addition, incentives will be created to extend the opening times of elementary educational institutions for three to six year olds. The quality of education and care for children until the start primary school shall be further developed, notably by improving the staff/child ratio.</p>	<p>The objective of the investment is to expand the provision of childcare facilities, particularly for the under three year old and the opening hours for the three to six years old, to facility the reconciliation of work and family life. Additionally, with a focus improving early childhood education and care at the earliest possible age of learners, the quality of early childhood education and care facilities is expected to be improved.</p> <p>The investment consists of funding to expand the provision of suitable early childhood education and care facilities for the under three year old, to meet the Barcelona target for children under the age of three (childcare rate 33%). In addition, incentives will are expected to be created to extend the opening times of elementary educational institutions for three to six year olds. The quality of education and care for children until the start primary school shall be further developed, notably by improving the staff/child ratio.</p>

	The implementation of the measure shall be completed by 30 September 2023.	The implementation of the measure shall be completed by 30 September 2023.
<i>Milestones and targets</i>		No changes.
<i>Estimated cost</i>		No changes.
<i>Green and digital tagging</i>		No changes.
<i>DNSH self-assessment</i>		No changes.

COMPONENT 3: KNOWLEDGE BASED RECOVERY / SUBCOMPONENT 3.C EDUCATION	
Investment/ reform CID reference	Investment 3.C.3.
Investment/ reform name	Expansion of elementary education
Type of change compared to CID	modified
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input checked="" type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input checked="" type="checkbox"/> Correction of clerical error
Elements modified (only for modified measures)	<input type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment
Investment: 3.C.3 Expansion of elementary education	
<p><u>Initial description</u></p> <p><u>Target 95:</u> The childcare quota for under 3-year-olds shall be increased by 1 percentage point per Land and year; however, the common goal is to aim for an increase of 5 percentage points.</p> <p>Baseline: 28% Goal: 33%</p> <p><u>Requested amendments and justification of the change</u></p> <p>There are two requested amendments with respect to Target 95, one concerning the correction of a clerical error and the second amendment due to objective circumstances according to Art. 21.</p> <p>1. <u>Correction of a clerical error</u> The correction of the clerical error concerns the target description as well as the baseline value for target 95.</p>	

Under the Austrian RRP, measure 3.C.3 aims to expand the provision of childcare facilities, particularly for the under 3-year-olds and the opening hours for the three to six years old, to facilitate the reconciliation of work and family life.

For children under three years old, the first challenge identified in the RRP relates to achieving the Barcelona target for under 3-year-olds which for this age-group has not been reached by Austria.

“Während bei der Altersgruppe der 3- bis 6-Jährigen bereits 2009 das Barcelona-Ziel von 90% erreicht wurde und sich die österreichweite Betreuungsquote bei knapp 95% stabilisiert hat, wurde für die Altersgruppe der unter Dreijährigen zwar eine Verdopplung der Betreuungsquote von 14% auf 30,1% erreicht, aber das Barcelona-Ziel von 33% noch verfehlt. Aktuell fehlen rund 2,95 Prozentpunkte oder ca. 7.500 Plätze zur Zielerreichung.” (AT RRP, p. 376)

The RRP mentions that in order to reach the goal of 33% of under 3-year-old children being in high quality and affordable childcare facilities incl. children cared for by childminders, Austria still needs to increase their quota by 2.95 percentage points. At the time of the drafting of the plan, the latest available data from kindergarten year 2019/2020 had shown a childcare quota of 30.1% for under 3-year-olds.

Correcting for this baseline value, it becomes clear that the target description set for target 95 does not accurately reflect the goal of the measure which is explained in the Austrian RRP:

„Das Barcelona-Ziel für die unter Dreijährigen (Betreuungsquote 33%) soll mit dem Ausbau des Betreuungs- und Bildungsangebotes in geeigneten elementaren Bildungseinrichtungen erfüllt werden.“ (AT RRP, p. 379)

The goal of the measure and the achievement of target 95 is clearly indicated as reaching the Barcelona target (childcare quota of 33% for under 3-year-olds). For a baseline value of 28%, the 5 percentage point increase (as it is currently part of the target description) would correspond to a final target of 33%. However, the selection of this baseline value constitutes a clerical error as stated above. Instead, it is explicitly mentioned that the gap to reach the Barcelona target is at 2.95 percentage points.

We would therefore propose to fix this error and rephrase the target (including the deletion of references to Länder due to objective circumstances) to:

The childcare quota for under 3-year-olds shall be increased by 2.95 percentage points.

Baseline: 30.1% (2020)

Goal: 33%

2. Amendments due to objective circumstances according to Art. 21

Austria pursues ambitious goals to expand elementary education in all federal states, which are also set in Article 15a B-VG agreement between the Federal Government and

the Federal States on early childhood education for the kindergarten years 2022/23 to 2026/27 (“Vereinbarung gemäß Art. 15a B-VG zwischen dem Bund und den Ländern über die Elementarpädagogik für die Kindergartenjahre 2022/23 bis 2026/27”).

When setting the targets and target dates for the RRP in 2021, the most recent basis for data was the day-care centre statistics¹⁵ by Statistik Austria from September 2020 which provided data for the kindergarten year 2019/2020. Data for the childcare quota for under 3-year-olds (excl. childminder) can be found in table 18 of said statistics. The more relevant data for the childcare quota (incl. childminder) comes from the Bundeskanzleramt (BKA). Childminders counted into the statistics go through obligatory training courses and therefore should be counted towards the quota. Training courses which are carried out according to the quality standards specified in the curriculum, receive a stamp of quality. Training providers who conduct courses for childminders according to the nationwide standard curriculum receive a seal of quality as a positive award for the quality of the course.

Based on this data (day-care centre statistics 2019/20) and the calculation of the BKA, the development of the childcare quota was assumed as a continuous linear upwards trend in line with the past three years. The increase in the childcare quota (incl. childminders) for children aged 0 to 3 from kindergarten year 2017/18 to 2019/20 averaged 0.75 percentage points (PP). A simple extrapolation of this increase indicated that the target of 33% could be reached in kindergarten year 2023/24.

Year	Excl. childminders		Incl. childminders	
	Rate in %	Projection in 2021	Rate in %	Projection in 2021
2017/18	26.10%		28.60%	
2018/19	26.50%		29.00%	
2019/20	27.60%		30.10%	
2020/21		28.35%		30.85%
2021/22		29.10%		31.60%

¹⁵ [Publikationvorlage für Standpublikation \(statistik.at\)](https://www.statistik.at)

2022/23		29.85%		32.35%
2023/24		30.60%		33.10%
2024/25		31.35%		33.85%
2025/26		32.10%		34.60%

Table 1: Development of childcare quota for children under three years old (target 95)

Source: Statistics Austria day-care centre statistics¹⁶

It should be noted, that the original target date Q4/2023 represents the point in time, when the childcare quota was predicted to reach the goal of 33 %, i.e. this point in time falls into the middle of the relevant kindergarten year 2023/2024. However, what the original target disregarded was the delay in the availability of data, as the day-care centre statistics for the year 2023/2024, and thus, proof for the achievement of the target, would only be available in Q3/2024.

The target date was in this sense misunderstood in the original drafting of the plan, as the earliest possible date to prove the target based on the official statistics is only after the end of the kindergarten year, in which the relevant quota is fulfilled.

Furthermore, during the drafting of the plan in 2021, i.e. **with only preliminary data on effects of the COVID-19 pandemic**, additional factors such as high infection rates in or closures of kindergartens due to further lockdowns, and accompanying economic developments could not yet be estimated.

These unforeseeable effects of the COVID-19 pandemic and additional lockdowns were already indicated in the risk assessment in the original submission of the plan, which foresaw in the 'Assumptions/risks' column of the Excel Fiche for the achievement of Target 95 that:

“Durch COVID-19 bedingte Lockdown-Maßnahmen auf regionaler oder nationaler Ebene sowie individuell Lehrpersonen betreffende Quarantänemaßnahmen kann die Inanspruchnahme der für den Präsenzunterricht vorgesehenen Förderstunden in vollem Umfang erheblich gefährdet sein. Personalmangel in einzelnen Unterrichtsgegenständen oder an einzelnen Schulstandorten, könnte zusätzlich

¹⁶ The child-care quota for under 3-year-olds can be derived from the Austrian children day-care centre statistics.

All children day-care centre statistics back to 2018/19 can be accessed here:

[Kindertagesheime, Kinderbetreuung - STATISTIK AUSTRIA - Die Informationsmanager](#)

The children day-care centre statistics on the kindergarten year 2017/2018 can be accessed here:

[kindertagesheimstatistik_201718_1.pdf](#)

dazu führen, dass die Fördermaßnahmen nicht in vollem Umfang in Anspruch genommen werden könnten.“

English:

"COVID-19-related lockdown measures at regional or national level, as well as quarantine measures affecting individual teachers, may significantly jeopardise the full use of the support hours provided for classroom teaching. In addition, staff shortages in individual subjects or at individual school sites could mean that the support measures could not be fully utilised."

Unfortunately, this risk materialised with the second COVID-19 related lockdown from November 2021. In essence, the second COVID-19 related lockdown during the kindergarten year 2020/21 exacerbated two effects, which had a negative impact on the childcare quota of under three-year olds. First, short-time work was very prevalent during the period April 2020 to March 2022 (see Figure 1). In particular, the third big COVID-19 wave, starting in November 2021, could not have been factored in at the time of drafting the plan.

At the same time, the rate of employees working from home was particularly high in 2021 with 26.6% of Austrians working from home regularly in the first quarter of 2021 (according to Statistik Austria¹⁷) and continued to be above pre-pandemic levels also in 2022 (e.g. in the spring of 2022, one in five employees were working from home)¹⁸. Taken together, the increase of people in short-term work schemes and those regularly working from home meant that on average, (working) parents spent more time at home. This additional time spent at home means that they had more time to care for their children at home and were thus less incentivised to send children to child care.

¹⁷ <https://www.statistik.at/fileadmin/announcement/2022/06/20220609AKEQ12022.pdf>

¹⁸ https://viecer.univie.ac.at/fileadmin/user_upload/z_viecer/Blog_145_-_Kurzarbeit_oder_Home_Office_wer_in_der_Pandemie_wie_arbeitete.pdf
<https://www.statistik.at/fileadmin/announcement/2022/09/20220908ArbeitsmarktQ222.pdf>

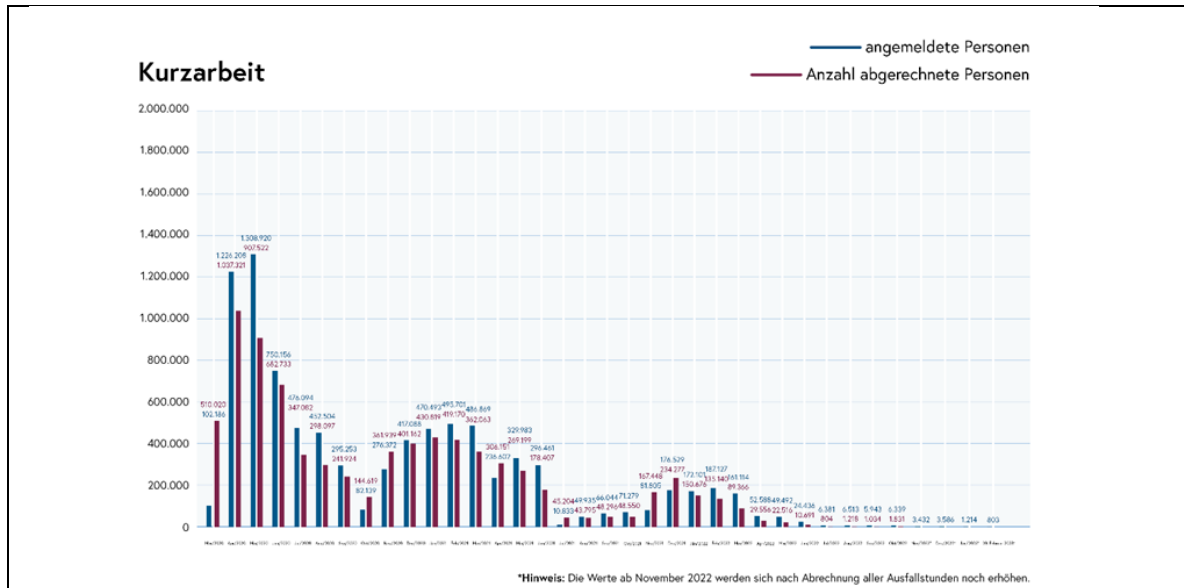


Figure 1: Short time work in Austria between November 2020 and March 2023. Source: Federal Ministry of Labour and Economy, <https://www.bmaw.gv.at/Presse/Aktuelles/Aktuelle-Arbeitsmarktzahlen.html>

Indeed, the **rate of childcare** for children **under the age of three declined in the kindergarten year 2020/21** (see Table 2), which may be partly attributed to the two effects outlined above.

These trends are also reflective of an overall trend of a slight decrease in the employment of women with children under the age of three, which decreased by one percentage point from 38.2% in 2019 to 37.1% in 2021 based on statistics by Statistik Austria¹⁹, likely due to the effects of the COVID-19 pandemic.

The quantitative impact of the second and third COVID-19 lockdowns (17 November to 7 December 2020 and 26 December 2020 to 8 February 2021), which happened during the kindergarten year 2020/21, could not yet have been determined at the time of drafting the plan, especially considering the rather soft impact of the first COVID-19 lockdown on the childcare quota of year 2019/20.

Rate of children in childcare (incl. childminders) under the age of three					
Year	2017/18	2018/19	2019/20	2020/21	2021/22
Rate in %	28.6	29.1	30.1	29.9	31.2

¹⁹ [https://www.statistik.at/fileadmin/pages/258/08 Familien Erwerbstaetigkeit 2022.ods](https://www.statistik.at/fileadmin/pages/258/08_Familien_Erwerbstaetigkeit_2022.ods)

Proj. 2021	28.6	29.1	30.1	30.9	31.6
------------	------	------	------	------	------

Table 2: Based on data from the day-care centre statistics by Statistics Austria for the respective kindergarten year (as indicated). *Source: Statistic Austria,*

The trend was additionally intensified due to a significant lack of childcare personnel, which developed, especially from 2021 onwards, in Austria. This led to bottlenecks in the provision of (additional) childcare places and slowed down the increase of the childcare quota compared to the rate originally foreseen. Reports²⁰ about a lack of personnel leading to reduced hours for childcare institutions as well as closing down whole childcare groups have been prominent over the last two years. The magnitude of the shortage in qualified personnel was also not foreseen during the drafting of the plan.

Due to this break in the (assumed) linear trend, a 1 percentage point per Land per year is no longer feasible.

Nevertheless, for the near future, an upward trend is predicted for the overall childcare quota for under 3-year-olds as can be seen in table 6. The evolution of the data series for under 3-year-olds has been extrapolated from the updated past data to show a trend for the future (average increase of 0.7PP per year). This extrapolated data shows that for the kindergarten year 2024/25 the Barcelona target will be reached if a linear trend can be maintained (see below for substantiating reasons). This assumption substantiates a delay of reaching the Barcelona target of 33% of children under three in childcare facilities (incl. childminders) until 2025.

Year	Excl. childminders			Incl. childminders		
	Actual	Proj. 2021	Proj. 2023	Actual	Proj. 2021	Proj. 2023
2017/18	26.10%			28.60%		
2018/19	26.50%			29.00%		
2019/20	27.60%			30.10%		

²⁰ [Mangel an Personal: - Grazer Kindergarten schließt plötzlich viel früher | krone.at](#)

[Personalmangel im Kindergarten spitzt sich zu, 350 Dienstposten unbesetzt - Bildung - derStandard.at](#) › [Inland Personalnot in Kindergärten: Stadt Innsbruck geht in die Offensive | Tiroler Tageszeitung – Aktuelle Nachrichten auf tt.com](#)

2020/21	27.60%	28.35%		29.90%	30.85%	
2021/22	29.10%	29.10%		31.20%	31.60%	
2022/23		29.85%	29.85%		32.35%	31.85%
2023/24		30.60%	30.60%		33.10%	32.50%
2024/25		31.35%	31.35%		33.85%	33.15%
2025/26		32.10%	32.10%		34.60%	33.80%

Table 3: Development of childcare quota for children under three years old incl. new projections (target 95)

At least a linear increase in the childcare quota can be achieved for under 3 year olds until the kindergarten year 2024/25 according to current expectations.

One of the main reasons for the delay which is the take-up of work from home for parents, is slowly diminishing in Austria. Already in Q3/2022, only 14% of Austrians made use of work from home options, down from 26.6% in Q1/2021. At the same time, the number of people in short-time work schemes is also back at the pre-pandemic level (see Figure 1). This suggests that incentives for working parents to fully care for children at home are being reduced.

Most importantly, the new agreement according to Art. 15a B-VG on elementary education for the kindergarten years 2022/23 to 2026/27 **will make a total of EUR 1 billion available** from the federal government for elementary educational offers. The annual special-purpose grant **increases from previously EUR 142.5 million for kindergarten years 2019/20 to 2021/22 to EUR 200 million per year (plus 40%)**. The funds will go towards the expansion of early-childcare places and language support. In addition, there are still funds from the **co-financing of the federal states in the amount of 52.5%** of the special-purpose grant from the federal government with the exception of the compulsory kindergarten years. Attendance at kindergarten is compulsory for all children who have reached the age of 5 before September 1 of the respective kindergarten year and who will be required to attend school in the following year. These children must attend kindergarten for at least 16 to 20 hours per week (for one kindergarten year). EUR 200 million is available annually as an earmarked grant. Of this, EUR 80 million is for compulsory visits. The remaining EUR 120 million are for expansion and language support. The mandatory co-financing of 52.5% by the federal states relates to the special-purpose grants without compulsory visits, i.e. the EUR 120 million.

Since the agreement has been reached/adopted in the spring of 2022, the **federal states have already started to implement new programmes to accelerate the expansion of elementary education**. For example, Lower Austria amended ([RIS - LGBLA_NI_20221230_97 - Landesgesetzblatt authentisch für Niederösterreich \(bka.gv.at\)](#)) the Lower Austrian Kindergarten Act 2006 (*Niederösterreichisches Kindergartengesetz 2006*) and the Lower Austrian Childcare Act 1996 (*Niederösterreichisches Kinderbetreuungsgesetzes 1996*), to **lower the entry age** for children to attend kindergarten from 2,5 to 2 years. Furthermore, **opening hours** of kindergartens in Lower Austria have been **extended** to provide childcare compatible with full-time employment of parents. A recent amendment of the law also creates **new forms of employments for childcare staff**, such as “pedagogical specialists” or “pedagogical-administrative assistance” in order to address bottlenecks in finding the necessary staff ([RIS - LGBLA_NI_20230612_27 - Landesgesetzblatt authentisch für Niederösterreich \(bka.gv.at\)](#)).

Carinthia also amended ([RIS - LGBLA_KA_20230221_13 - Landesgesetzblatt authentisch für Kärnten \(bka.gv.at\)](#)) the Carinthian Children Education and Care Act ([RIS - Kärntner Kinderbildungs- und -betreuungsgesetz – K-KBBG - Landesrecht konsolidiert Kärnten, Fassung vom 04.07.2023 \(bka.gv.at\)](#)) to modify their funding model for municipalities **setting financial incentives to expand** opening hours in kindergartens. The same goes for Salzburg ([LGBLA_SA_20230324_29.pdf \(salzburg.gv.at\)](#))

Furthermore, pursuant to the agreement of Art. 15a B-VG on elementary education, the federal states are required to draw up plans on resources, targets and performance annually (*RZL Plan*). These plans function as a planning tool and analysis tool for the implementation of goals. In the plans, measures are formulated, which describe both the expansion and the early language support in elementary educational institutions over a time horizon of 5 years. The targets are typically formulated either in terms of the actual childcare quota to be reached, i.e. an increase of 1 percentage point per year in the childcare quota for under 3-year-olds, or in terms of more concrete targets, i.e. the number of new kindergarten groups being set up, the number of newly trained kindergarten teachers/child minders etc.

Talks are also held annually between the federal government and the federal states about the progress of the implementation of the plans on resources, targets and performance (*RZL Plan*). Unfortunately, reliable forecasts on the evolution of the childcare quota cannot be made from the resource targets set by the Länder due to the wide array of more and less concrete targets, difficult to measure effects, i.e. average effect of one additional child-minder or size of an average new group in kindergartens, as well as uncertainty in meeting the set targets.

Complementarily, the Ministry for Education, Science and Research has taken important steps to alleviate the shortage of kindergarten personnel. The Ministry for Education, Science and Research has put forward additional offers for education starting from the school year 2021/22 and even expanded upon them in the year 2023/24. Since the academic year 2021/22, the university course "Elementarpädagogik" has been available at the 'Pädagogische Hochschule', which serves as a lateral entry option into the

professional field of elementary education in the sense of qualification as a "group-leading elementary teacher" for groups of persons with relevant prior training.

From the academic year 2023/24 onwards, a new university course "Quereinstieg Elementarpädagogik" (lateral entry elementary education) will be available at the 'Pädagogische Hochschule', which serves as a lateral entry opportunity into the professional field of elementary education in the sense of qualification as a "group-leading elementary teacher" for graduates of non-subject-related studies in the scope of 180 ECTS. Also, from 2023/24, graduates of the Bildungsanstalt für Sozialpädagogik (5-year form or college) who would like to enter the field of elementary education can complete a two-semester course for elementary education at a *Bildungsanstalt für Elementarpädagogik* (BAfEP).²¹

Also, a new federal initiative 'Elementar+' is being launched at the University of Graz²² in 2023 which is intended to be subsequently rolled out across Austria. The initiative aims to professionalise employees who are already practicing in elementary education and have low qualifications (e.g. assistant carers). This qualification relies on flexibility through a mixture of formats. The participants are accompanied by experts from science and practical work.

Hence, considering recent developments, in line with the agreement according to Art. 15a B-VG, as well as further initiatives from the Federal States to expand elementary education, it can be expected that **Target 95**, a childcare quota for under 3-year-olds of at least 33% ("Barcelona target"), **can be reached in two years** (i.e. by Q3 2025).

Furthermore, whilst the overall target of an increase in the childcare quota to 33% is expected to be achieved until Q3/2025, an increase in the childcare quota for under 3-year-olds by 1 percentage point per Land and year cannot be reached by Austria due to objective circumstances.

An increase of 1 percentage point per Land per year would mean that there is an equal focus on those Länder with a comparatively high child-care quota which have reached or surpassed the Barcelona target as for those regions which are underserved or with a low coverage of childcare.

However, in order to reach the 33% target across Austria, there needs to be a refocus on those Länder lagging behind. Data from the day-care centre statistics 2021/22 (Table 4) shows that the childcare quota for under 3-year olds has already surpassed the Barcelona target for Burgenland and Vienna with Länder such as Styria and Upper Austria lagging behind.

²¹ [Berufsfeld Elementarpädagogik/ Sozialpädagogik \(bmbwf.gv.at\)](https://www.bmbwf.gv.at/berufsfeld-elementarpaedagogik-sozialpaedagogik)

²² [Elementar+ \(uni-graz.at\)](https://www.uni-graz.at/elementar-plus)

	Population	Children in childcare (without child- minders)	Children in childcare with child-minders	Childcare Quota 21/22
Age	0–2 Years	0–2 Years	0–2 Years	0–2 Years
Austria	253 884	73 933	5 299	31.21%
Burgenland	6 927	2 566	37	37.58%
Carinthia	13 709	3 800	210	29.25%
Lower Austria	45 859	13 098	817	30.34%
Upper Austria	45 082	8 820	1 084	21.97%
Salzburg	17 025	4 129	594	27.74%
Styria	33 037	6 141	1 415	22.87%
Tyrol	22 506	6 246	339	29.26%
Vorarlberg	12 929	3 990	85	31.52%
Vienna	56 810	25 143	718	45.52%

Table 4: Child-care quota for under 3-year olds for the kindergarten year 2021/22
Source: Statistics Austria day-care centre statistics 2021/22

As Austria aims to reach a common target for the whole country with a Barcelona target of 33%, the 1 percentage point increase per Land and year, i.e. an identical focus on improvement for all regions is not beneficial. This is why under the recent agreements according to Art. 15a B-VG, one particular focus is lying on underserved regions.

Agreement according to Art. 15a B-VG between Austria and the Länder - Art. 1, Abs. (6):

(6) Vor diesem Hintergrund kommen die Vertragsparteien über folgende Punkte überein:

1. [...]
2. **Flächendeckender Ausbau, insbesondere von Plätzen für unter Dreijährige und Fokus auf noch unterversorgte Regionen;**
- 3.-6. [...]

English translation:

(6) Accordingly, the Contracting Parties agree on the following points:

1. [...]
2. **Nationwide expansion of places, especially of places for under 3-year olds with a focus on regions still underserved;**
- 3.-6. [...]

As some Länder have already surpassed the Barcelona target and with a shift in focus on underserved regions, we suggest to delete the reference to a 1-point increase per Land

and year as this is not the most efficient way to reach the overall goal of an overall increase in the childcare quota for under 3-year olds in Austria to 33%.

Therefore, we **suggest a postponement of the target date as well as an amendment of the target 95 as follows:**

	Current version	Amended version
Component and / or measure description		No changes.
Milestones and targets	<p>T95: The childcare quota for under 3-year-olds shall be increased by 1 percentage point per Land and year; however, the common goal is to aim for an increase of 5 percentage points.</p> <p>Indicative timeline for completion: (Q4/2023)</p> <p>Baseline: 28 % Goal: 33%</p>	<p>T95: The childcare quota for under 3-year-olds shall be increased by 2.95 percentage points ± percentage point per Land and year; however, the common goal is to aim for an increase of 5 percentage points. reach 33%.</p> <p>Indicative timeline for completion: (Q3/2025)</p> <p>Baseline: 30.1% Goal: 33%</p>
Estimated cost		No changes.
Green and digital tagging		No changes.
DNSH self-assessment		No changes.

COMPONENT 3: KNOWLEDGE BASED RECOVERY / SUBCOMPONENT 3.C EDUCATION							
Investment/ reform CID reference	Investment 3.C.3.						
Investment/ reform name	Expansion of elementary education						
Type of change compared to CID	modified						
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input checked="" type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input checked="" type="checkbox"/> Correction of clerical error						
Elements modified (only for modified measures)	<input type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment						
Investment: 3.C.3 Expansion of elementary education							
<u>Initial description</u>							
<u>Target 96:</u> The offer of places in early childhood education institutions for children aged three to six years of age shall increase and be compatible with fulltime employment of parents. The increase shall be accompanied by yearly resource targets and performance reviews with the Laender. The data of the increased offer shall be available at Statistik Austria.							
<table border="1"> <tbody> <tr> <td>Base (kindergarten year 2019/20)</td> <td>46.8%</td> </tr> <tr> <td>Current Value (kindergarten year 2021/22)</td> <td>49.3%</td> </tr> <tr> <td>Goal (kindergarten year 2023/24)</td> <td>52.8%</td> </tr> </tbody> </table>		Base (kindergarten year 2019/20)	46.8%	Current Value (kindergarten year 2021/22)	49.3%	Goal (kindergarten year 2023/24)	52.8%
Base (kindergarten year 2019/20)	46.8%						
Current Value (kindergarten year 2021/22)	49.3%						
Goal (kindergarten year 2023/24)	52.8%						
<i>The data basis is formed by the day-care center statistics of Statistics Austria for the respective kindergarten year.</i>							
<u>Requested amendments and justification of the change</u>							

There are two requested amendments with respect to Target 96, one concerning the correction of a clerical error and the second amendment due to objective circumstances according to Art. 21.

3. Correction of a clerical error

The correction of the clerical error concerns the target description of target 96.

It is proposed to change the target 96 to the following:

*The offer of places in early childhood education institutions for children aged three to six years of age **which are compatible with fulltime employment of parents** shall increase ~~and be compatible with fulltime employment of parents~~. The increase shall be accompanied by yearly resource targets and performance reviews with the Laender. The data of the increased offer shall be available at Statistik Austria.*

This target better reflects the goal of the measure. As per the Austrian Recovery and Resilience Plan (AT RRP), achieving the target is to improve the childcare offer of early childhood education institutions which is compatible with fulltime employment of parents:

Verbesserungsbedarf besteht für die Altersgruppe der Drei- bis Sechsjährigen hinsichtlich der Öffnungszeiten. So sind elementare Bildungseinrichtungen zwar flächendeckend vorhanden, aber nur weniger als die Hälfte der betreuten Kinder (46,8%) besucht Einrichtungen, deren Öffnungszeiten mit einer Vollbeschäftigung ihrer Eltern vereinbar sind (VIF-konform). (AT RRP, p. 376)

The way the target has been translated in the CID suggests that the overall offer of places in early childhood education institutions for children in the respective age group shall increase in general. The compatibility with fulltime employment of parents could then be understood as an additional requirement to the general increase of the offer of places.

However, an overall increase in the offer of places is not intended under the measure. Rather, it aims at a targeted increase in the offer of places which are compatible with full-time employment as a share of all places. Rephrasing the target in this way would thus correct the clerical error and avoid confusion in the understanding of the target.

4. Amendments due to objective circumstances according to Art. 21

When setting the targets and target dates for the RRP in 2021, the most recent basis for data was the day-care centre statistics by Statistik Austria from September 2020 which provided data for the kindergarten year 2019/2020.

Data for the childcare quota for children aged three to six years in institutions compatible with full time employment of parents (according to "Vereinbarkeitsindikator Beruf und

Familie", VIF-compliant) is derived from table 28 of the day-care centre statistics²³. It reflects the proportion of children in VIF-compliant facilities of all children in childcare facilities in the same age group.

When drawing up the Austrian RRP, the statistics for the kindergarten year 2019/2020 were the most recent available data regarding childcare quotas. Based on this data, the development of the childcare quota for VIF-compliant places was assumed as a continuous linear upwards trend in line with the past three years. The available data in 2021 suggested that the childcare quota of 52.8% for 3- to 6-year-olds could be reached in the kindergarten year 2023/24 according to a simple linear extrapolation. For this subgroup, the childcare quota saw an average increase of 1.56 PP from year 2017/18 to year 2019/20.

Year	Rate in %	Projection in 2021
2017/18	43.63%	
2018/191	44.34%	
2019/20	46.75%	
2020/21		48.32%
2021/22		49.88%
2022/23		51.44%
2023/24		53.01%
2024/25		54.57%

Table 1: Development of childcare quota for children aged three to six years (target 96)

²³ [Publikationvorlage für Standpublikation \(statistik.at\)](#); Note: Table 28 refers to children aged 3-5 years old at the cut-off date for the respective kindergarten year (1st of September). This means, that this group also includes children who become six years old throughout the kindergarten year which is why the target was phrased in this way.

It should be noted, that the original target date Q4/2023 represents the point in time, when the childcare quota was predicted to reach the goal of 52.8%, i.e., this point in time falls into the middle of the relevant kindergarten year 2023/2024. However, what the original target disregarded was the delay in the availability of data, as the day-care centre statistics for the year 2023/2024, and thus, proof for the achievement of the target, would only be available in Q3/2024.

The target date was in this sense misunderstood in the original drafting of the plan, as the earliest possible date to prove the target based on the official statistics is only after the end of the kindergarten year, in which the relevant quota is fulfilled.

Data²⁴ on the ratio of children aged three to six in VIF-compliant child care institutions for the kindergarten year 2020/2021 (at 51.8%) suggested that the projected linear increase could be surpassed. However, in the kindergarten year 2021/2022, data²⁵ by Statistik Austria shows a significant drop for the quota of children aged three to six in VIF-compliant childcare institutions to 49.3%.

The drop in the relevant childcare quota was not evenly distributed across Austria as Table 2 shows.

	Kindergarten Year 2020/21	Kindergarten Year 2021/22	Δ Year-on-Year in percentage points
	Rate in %	Rate in %	
Austria	51.8	49.3	- 2.5
Burgenland	61.5	60.0	- 1.5
Carinthia	38.9	36.3	- 2.6
Lower Austria	41.5	31.4	- 10.1
Upper Austria	24.7	26.2	+ 1.5
Salzburg	54.1	54.3	+ 0.2
Styria	49.9	49.4	- 0.5
Tyrol	37.6	38.8	+ 1.2
Vorarlberg	42.1	44.8	+ 2.7
Vienna	94.5	89.3	- 5.2

²⁴ [Kindertagesheimstatistik 2020 21.pdf](#)

²⁵ [Kindertagesheimstatistik 2021/22](#)

Table 2: Childcare quota (VIF-compliant) for children aged three to six years in 2020/21 and 2021/22

The reduction in the childcare quota results from a combination of factors, i.e. ongoing effects of the COVID-19 pandemic as well as the shortage of qualified personnel in elementary child education and care (ECEC).

For one, ongoing effects of the COVID-19 pandemic on working patterns, i.e. an increased trend towards work from home and short-term work following multiple lockdowns still impacted the demand of parents for VIF-compliant childcare. Further effects of the COVID-19 pandemic and additional lockdowns were already indicated in the risk assessment in the original submission of the plan, which foresaw in the 'Assumptions/risks' column of the Excel Fiche for the achievement of Target 96 that:

“Durch COVID-19 bedingte Lockdown-Maßnahmen auf regionaler oder nationaler Ebene sowie individuell Lehrpersonen betreffende Quarantänemaßnahmen kann die Inanspruchnahme der für den Präsenzunterricht vorgesehenen Förderstunden in vollem Umfang erheblich gefährdet sein. Personalmangel in einzelnen Unterrichtsgegenständen oder an einzelnen Schulstandorten, könnte zusätzlich dazu führen, dass die Fördermaßnahmen nicht in vollem Umfang in Anspruch genommen werden könnten.“

English:

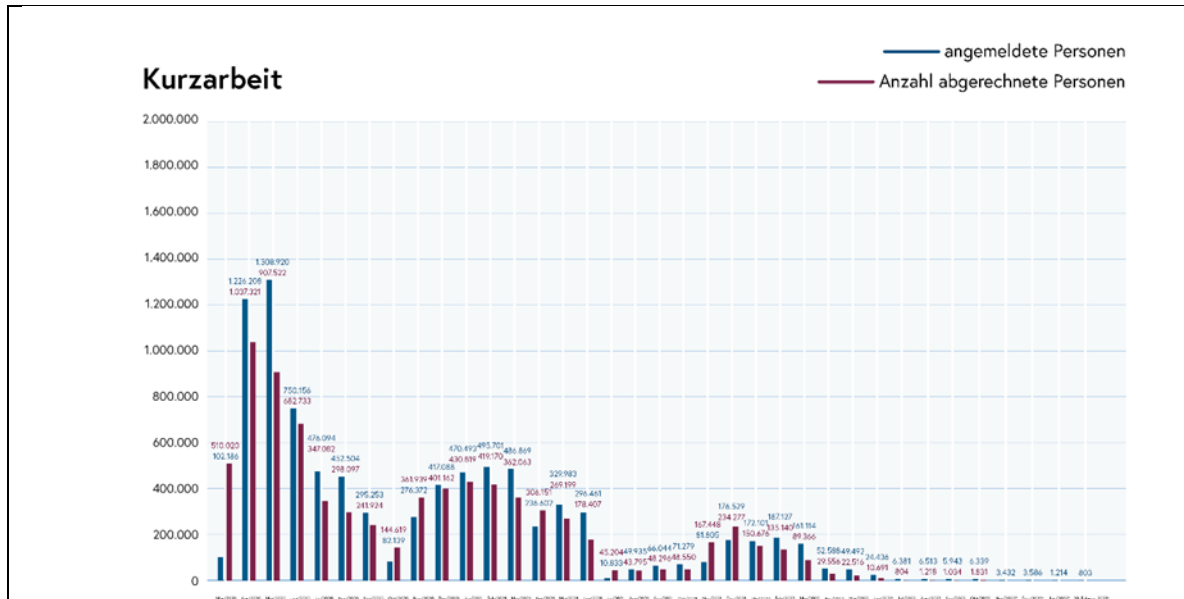
"COVID-19-related lockdown measures at regional or national level, as well as quarantine measures affecting individual teachers, may significantly jeopardise the full use of the support hours provided for classroom teaching. In addition, staff shortages in individual subjects or at individual school sites could mean that the support measures could not be fully utilised."

Unfortunately, this risk materialised with the second COVID-19 related lockdown from November 2021 which led to a significant increase of work from home in Austria. The ratio of work from home was particularly high in 2021 and continued to be above pre-pandemic levels also in 2022 according to Statistik Austria²⁶.

At the same time, during winter of 2021, there was again an increase in short-term working (see Figure 1) due to the COVID-19 related lockdown. Both, the increased work from home levels as well as the uptick in short-term work lead to parents being less inclined to keep their child in a childcare education that is compatible with full-time employment of parents.

²⁶ <https://www.statistik.at/fileadmin/announcement/2022/06/20220609AKEQ12022.pdf>

<https://www.statistik.at/fileadmin/announcement/2022/09/20220908ArbeitsmarktQ222.pdf>



*Hinweis: Die Werte ab November 2022 werden sich nach Abrechnung aller Ausfallstunden noch erhöhen.

Figure 1: Short time work in Austria between November 2020 and March 2023. Source: Federal Ministry of Labour and Economy, <https://www.bmaw.gv.at/Presse/Aktuelles/Aktuelle-Arbeitsmarktzahlen.html>

However, a lack of qualified personnel was the largest challenge for the expansion of VIF. This lack of personnel led to bottlenecks in the provision of (additional) childcare places and slowed down the increase of the childcare quota compared to the rate originally foreseen. As a response to the lack of personnel, childcare institutions had to reduce opening hours and, thus, more often failed to comply with the VIF-criteria which requires opening hours of at least 45 hours per week.

The labour shortage in childcare education has been identified also by the social partners as the most important trend which led to a reduction in the VIF-compliant childcare places for 3- to 6-year olds in the year 2021/22. For instance, the Lower Austrian Chamber of Labour (Arbeiterkammer) analysed²⁷ the childcare situation in Lower Austria, which has seen the largest drop in the VIF-compliant childcare ratio across all Länder with a reduction of more than 10 percentage points. The labour shortage is pointed out as the biggest issue facing (Lower) Austrian municipalities. P.33 reads:

Von fast allen [Gemeinden] wurde Personalmangel als große Herausforderung genannt. Es ist laut Angaben der Städte und Gemeinden schwierig, qualifiziertes Personal zu finden, vor allem für den Nachmittag und für Vertretungen bei Krankenständen´.

²⁷ [Analyse kinderbetreuung 2021-22 V2.pdf \(arbeiterkammer.at\)](#).

Also, the Austrian Trade Union Federation (ÖGB) recently called for new measures to address the shortage of personnel, clearly identifying this issue as the most important to increase the quota of children in VIF-compliant childcare institutions.²⁸

Due to the underlying circumstances and the interruption of the (assumed) linear trend, a 1.56 percentage point increase per year is no longer feasible leading to delays in the achievement of the set target.

Nevertheless, for the near future, an upward trend is again predicted for the childcare quota for children aged three to six years in VIF-compliant institutions as can be seen in table 3. An evolution of the data series has been extrapolated from the updated past data to show a trend for the future (average increase of 1.4PP per year). This extrapolated data shows that for the kindergarten year 2024/25 the 52.8% target will be reached if a linear trend persists. This is the assumption which substantiates a delay until 2025 until the target is reached.

Year	Childcare Quota Age 3-6 (% VIF-compliant)		
	Actual	Proj. 2021	Proj. 2023
2017/18	43.63%		
2018/19	44.34%		
2019/20	46.75%		
2020/21	51.84%	48.32%	
2021/22	49.28%	49.88%	
2022/23		51.44%	50.69%
2023/24		53.01%	52.10%
2024/25		54.57%	53.51%

Table 3: Development of childcare quota for children aged three to six years incl. new projections (target 96)

²⁸ÖGB - Neues Modell zur Aus- und Weiterbildung

Recent projections thus suggest that target 96 will be reached in the kindergarten year 2024/2025 only. In order to correct the misunderstanding in setting the target date during the original plan drafting, it is suggested to shift the target date of Target 96 to Q3/2025 as statistics on the childcare quota for this kindergarten year will be available at the earliest in Q3/2025.

Over the next years, at least a linear increase in the VIF-compliant childcare quota is assumed to be achieved for children aged three to six years old.

Most importantly, the new agreement according to Art. 15a B-VG²⁹ on elementary education for the kindergarten years 2022/23 to 2026/27, which includes the expansion of VIF-compliant childcare education as one of its two main targets, **will make a total of EUR 1 billion available** from the federal government for elementary educational offers. As such, the annual special-purpose grant **increases from previously EUR 142.5 million for kindergarten years 2019/20 to 2021/22 to EUR 200 million per year (plus 40%)**. Out of the EUR 200 million available annually as an earmarked grant, EUR 80 million are for the compulsory visits (compulsory kindergarten year after reaching the age of 5). The remaining EUR 120 million are for early childcare expansion and language support to be used for the following purposes: investments to extend childcare places, to extend opening hours to be VIF-compliant, for childminders, for the compulsory free visit, investments in structural quality (accessibility, quality improvement and improvement of staff-child ratio) and for the early language support.

In addition, there are still funds from the **co-financing of the federal states in the amount of 52.5%** of the special-purpose grant from the federal government with the exception of the compulsory kindergarten years, i.e. co-financing on the annual grant of EUR 120 million. These funds will go towards the expansion of early-childcare places, including the increase of the childcare quota for three- to six-year-olds in VIF-compliant childcare institutions, as well as language support.

Since the agreement has been reached/adopted in the spring of 2022, the **federal states have already started to implement new programmes to accelerate the expansion of elementary education**. For example, Lower Austria amended ([RIS - LGBLA NI 20221230 97 - Landesgesetzblatt authentisch für Niederösterreich \(bka.gv.at\)](#)) the Lower Austrian Kindergarten Act 2006 (*Niederösterreichisches Kindergartengesetz 2006*) and the Lower Austrian Childcare Act 1996 (*Niederösterreichisches Kinderbetreuungsgesetzes 1996*), to **lower the entry age** for children to attend kindergarten from 2.5 to 2 years. Furthermore, **opening hours** of kindergartens in Lower Austria have been **extended** to provide childcare compatible with full-time employment of parents. A recent amendment of the law also creates **new forms of employments for childcare staff**, such as “pedagogical specialists” or “pedagogical-administrative assistance” in order to address bottlenecks in finding the necessary staff

²⁹ RIS - BGLA 2022 I 148 - Bundesgesetzblatt authentisch ab 2004 (bka.gv.at)

([RIS - LGBLA NI 20230612 27 - Landesgesetzblatt authentisch für Niederösterreich \(bka.gv.at\)](#)).

Carinthia also amended ([RIS - LGBLA_KA_20230221_13 - Landesgesetzblatt authentisch für Kärnten \(bka.gv.at\)](#)) the Carinthian Children Education and Care Act ([RIS - Kärntner Kinderbildungs- und -betreuungsgesetz – K-KBBG - Landesrecht konsolidiert Kärnten, Fassung vom 04.07.2023 \(bka.gv.at\)](#)) to modify their funding model for municipalities **setting financial incentives to expand** opening hours in kindergartens. The same goes for Salzburg ([LGBLA SA 20230324 29.pdf \(salzburg.gv.at\)](#))

Furthermore, pursuant to the agreement of Art. 15a B-VG on elementary education, the federal states are required to draw up plans on resources, targets and performance on annually (*RZL Plan*). These plans function as a planning tool and analysis tool for the implementation of goals. In the plans, measures are formulated, which describe both the expansion and the early language support in elementary educational institutions over a time horizon of 5 years. The targets are typically formulated either in terms of the actual childcare quota to be reached, i.e. an increase of 1 percentage point per year in the childcare quota for under 3-year-olds, or in terms of more concrete targets, i.e. the number of new VIF-compliant kindergarten groups being set up, the number of newly trained kindergarten teachers etc.

Talks are also held annually between the federal government and the federal states about the progress of the implementation of the plans on resources, targets and performance (*RZL Plan*). Unfortunately, reliable forecasts on the evolution of the childcare quota cannot be made from the resource targets set by the Länder due to the wide array of more and less concrete targets, difficult to measure effects, i.e. average effect of one additional child-minder or size of an average new group in kindergartens, as well as uncertainty in meeting the set targets.

On the federal level, with regards to the lack of labour shortages in elementary education, the Ministry for Education, Science and Research in 2022 commissioned a study by the *öibf* (Österreichisches Institut für Bildungsforschung – *Austrian institute for education research*) in cooperation with the University of Klagenfurt. The study aims to determine the motivation of students and graduates of BAfEPs (i.e., educational institutions for elementary education) (5-year) and colleges, their expectations of and experiences with the chosen occupational field and possible reasons for dropping out to analyze the framework conditions of the activities of elementary teachers, to create a demand forecast for 2030 and to develop proposals for measures to make the professional field more attractive.³⁰

Areas of action identified (p. 89 ff.) included for instance an improvement of incentives on the job, i.e. through financial incentives, opportunities for further training etc. In

³⁰[Bildungs- und Berufsverläufe von Absolvent/inn/en der Bildungsanstalten und Kollegs für Elementarpädagogik \(oeibf.at\)](#)

addition, the need to provide more options for lateral entrants as well as diversification of education for kindergarten teachers were amongst the recommendations by *öfib*.

The Ministry for Education, Science and Research has put forward additional offers for education starting from the school year 2021/22 and even expanded upon in the year 2023/24. Since the academic year 2021/22, the university course "Elementarpädagogik" has been available at the 'Pädagogische Hochschule' (, which serves as a lateral entry option into the professional field of elementary education in the sense of qualification as a "group-leading elementary teacher" for groups of persons with relevant prior training.

From the academic year 2023/24 onwards, a new university course "Quereinstieg Elementarpädagogik" (lateral entry elementary education) will be available at the 'Pädagogische Hochschule', which serves as a lateral entry opportunity into the professional field of elementary education in the sense of qualification as a "group-leading elementary teacher" for graduates of non-subject-related studies in the scope of 180 ECTS. Also, from 2023/24, graduates of the Bildungsanstalt für Sozialpädagogik (5-year form or college) who would like to enter the field of elementary education can complete a two-semester course for elementary education at an Bildungsanstalt für Elementarpädagogik (BAfEP).³¹

Also, a new federal initiative 'Elementar+' is being launched at the University of Graz³² in 2023 which is intended to be subsequently rolled out across Austria. The initiative aims to professionalise employees who are already practicing in elementary education and have low qualifications (e.g. assistant carers). This qualification relies on flexibility through a mixture of formats. The participants are accompanied by experts from science and practical work.

Lastly, the Ministry for Education, Science and Research also addressed the circumstances leading to a drop in the childcare quote (2021/22) by applying for support on '*improving staff working conditions for better quality in early childhood education and care in Austria*' via the EU Technical Support Instrument (TSI).³³ The project which lasts until 2024 aims to address the labour shortage by improving framework conditions and developing better education opportunities as well as advocacy campaigns towards the uptake of the Early Childhood Education and Care (ECEC) profession.

Hence, considering recent developments and ongoing efforts, in line with the agreement according to Art. 15a B-VG, as well as further initiatives from the Federal States to expand elementary education, it can be expected that **Target 96 is to be reached in two years** (i.e. by Q3 2025).

³¹ [Berufsfeld Elementarpädagogik/ Sozialpädagogik \(bmbwf.gv.at\)](https://www.bmbwf.gv.at)

³² [Elementar+ \(uni-graz.at\)](https://www.uni-graz.at)

³³ [BMBWF gewinnt EU-weites Projekt für Elementarpädagogik: Bis zu 480.000 EUR für technische Unterstützung und Expertise](#)

Therefore, we suggest a postponement of the target date for target 96 to Q3 2025.		
	Current version	Amended version
Component and / or measure description		No changes.
Milestones and targets	<p>T96:</p> <p>The offer of places in early childhood education institutions for children aged three to six years of age shall increase and be compatible with fulltime employment of parents. The increase shall be accompanied by yearly resource targets and performance reviews with the Laender. The data of the increased offer shall be available at Statistik Austria.</p> <p>Indicative timeline for completion: (Q4/2023)</p>	<p>T96:</p> <p>The offer of places in early childhood education institutions for children aged three to six years of age which are compatible with fulltime employment of parents shall increase and be compatible with fulltime employment of parents. The increase shall be accompanied by yearly resource targets and performance reviews with the Laender. The data of the increased offer shall be available at Statistik Austria.</p> <p>Indicative timeline for completion: (Q3/2025)</p>
Estimated cost		No changes.
Green and digital tagging		No changes.
DNSH self-assessment		No changes.

COMPONENT 3: KNOWLEDGE BASED RECOVERY / SUBCOMPONENT 3.D STRATEGIC INNOVATION		
Investment/ reform CID reference	Investment 3.D.2	
Investment/ reform name	IPCEI Hydrogen	
Type of change compared to CID	modified	
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input checked="" type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input type="checkbox"/> None of the above, correction of clerical error	
Elements modified (only for modified measures)	<input type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment	
Investment: 3.D.2 IPCEI Hydrogen		
<p><u>Initial description</u></p> <p><u>Target 103:</u> The available budget of EUR 125 000 000 has been allocated to the approved projects (including expenses of the implementing agency). At least 80% of the budget has been disbursed to the beneficiary companies.</p> <p><u>Requested amendments and justification of the change</u></p> <p>The final milestones of IPCEI H2 states that EUR 125 000 000 are allocated and at least 80% of the aid has to be disbursed to the projects. This is not expected to be achievable.</p> <p>In IPCEI H2, Austrian projects receive EUR 125 million (including costs for funding agencies). Based on the current estimation and project plans, approx. EUR 54 million will</p>		

be disbursed by Q3/2026. The outstanding and largest share of funding will be disbursed after Q3/2026 based on the costs incurred in the final project year.

Thus, in its current definition the milestone is not achievable. We justify an amendment of the milestone guided by the following reasoning:

Back in April 2021 when the milestone and the RRP was formulated, we based our assessment on the previous experiences with other IPCEIs, namely Microelectronics I (ME I) and EUBatIn. All IPCEI projects are designed to consist of a R&D&I-phase and a first industrial deployment (FID) phase^{34, 35}. As the latter is the ramp-up for the mass production phase, it is not unusual in IPCEI projects that the most significant investments tend to be made towards the end of the period. This has turned out to be particularly true for IPCEI Hydrogen projects (Austria is involved in Hy2Tech and Hy2Use); more so than we could expect based on our experiences with ME I and EUBatIn.³⁶

In August 2021, we received the first project portfolios from the companies setting out the work plans for the first time. After an intensive exchange with DG COMP and adaptation to the plans, DG COMP notified and approved the final versions of the project portfolios in July 2022 (for Hy2Tech) and September 2022 (for Hy2Use). The subsequent submission on the exact cost forecasts – submitted by the participating companies in autumn 2022 – showed that the quantitatively most significant investments can only be made in the last year of funding³⁷. Therefore, when the milestones were defined in April 2021, this incompatibility with the final milestone could not have been anticipated.

³⁴ “First industrial deployment (FID) means the upscaling of pilot facilities, demonstration plants or of the first-in-kind equipment and facilities covering the steps subsequent to the pilot line including the testing phase and bringing batch production to scale, but not mass production or commercial activities. The end of first industrial deployment is determined taking into account, inter alia, the relevant R&D&I-related performance indicators pointing at the ability to start mass production. First industrial deployment activities can be financed with State aid as long as the first industrial deployment follows on from an R&D&I activity and itself contains an important R&D&I component which constitutes an integral and necessary element for the successful implementation of the project. The first industrial deployment does not need to be carried out by the same entity that carried out the R&D&I activity, as long as that entity acquires the rights to use the results from the previous R&D&I activity, and the R&D&I activity and the first industrial deployment are both described in the project.” (Communication from the Commission: *Criteria for the analysis of the compatibility with the internal market of State aid to promote the execution of important projects of common European interest* [2021/C 528/02])

³⁵ Additional information on the contents and objectives of the FID phases in IPCEI Hydrogen can be found in “ANNEX 2_further explanation FID”

³⁶ As can be seen by 3.D.1 IPCEI Microelectronics and Connectivity, where the final milestones are expected to be achieved.

³⁷ IPCEI Hydrogen projects often make substantial investments towards the end of the FID phase, for instance, in equipment and instruments like pipes, electrolysers, or spend significantly higher amounts of resources in the process of scaling up the projects. H2 investments are typically low-tech, e.g. pumps, piping, civil engineering and conventional control technology, and are therefore more competitive, may have longer delivery times, and are more likely to become expenditure-effective later in the course of the project.

The milestones indicating the transition from RDI phase to FID phase are described in the respective project portfolios and are approved by DG COMP for each project individually. Taken from the project portfolios, these milestones are aggregated in detail in “ANNEX 1_transition to FID”.

Additional reasoning for the adaption of the RRP is provided by the recent developments on the global markets that put pressure on projects through uncertainties concerning the supply chain. Already in 2021 involved companies described in their project portfolios how the immaturity of the manufacturers’ and suppliers’ markets, implying high costs and risk of equipment supply, as well as the lack of large electrolyser manufacturing capacity in Europe represent significant challenges. In fact, the raw materials needed for the manufacturing of electrolysers are likely to be in tight³⁸ or even endangered³⁹ supply in the coming years. In addition, the supply chain resilience risk (i.e. the risk of inability to switch to other materials or technologies) for H2 infrastructure / electrolysers is rather high^{40,41}. Manufactures are already affected by delays in the supply chain⁴².

Hence, we propose a modification of the milestone:

Milestone 103a: All approved projects have entered the first-industrial-deployment-phase.

Milestone 103b: EUR 125 million (including costs for funding agencies) have been committed to the approved projects.

The achievement of milestone 103a can be verified by confirmations of the termination of RDI-phase for each project by the funding agencies based on the notified project portfolios and submitted project reports⁴³.

The achievement of milestone 103b can be verified by the submitted reports as well as by confirmations of payments (disbursed funding) and issuance of the funding contracts provided by the funding agencies.

Finally, the proposed modification is a marginal adjustment and does not change the measure at its core. As such, it continues to represent a comprehensive and adequately

³⁸ Parkes (2022). Biden invokes wartime legislation to ramp up US hydrogen electrolyser production, but what will this mean in practice? Recharge News.

³⁹ [The supply of critical raw materials endangered by Russia’s war on Ukraine \(oecd.org\)](https://www.oecd.org/)

⁴⁰ [IEA \(2023\), Energy Technology Perspectives 2023, IEA, Paris https://www.iea.org/reports/energy-technology-perspectives-2023](https://www.iea.org/reports/energy-technology-perspectives-2023), License: CC BY 4.0

⁴¹ Ansari, Grinschgl, and Pepe (2022). Electrolysers for the Hydrogen Revolution: Challenges, dependencies, and solutions. Retrieved from: <https://www.swp-berlin.org/10.18449/2022C57/>.

⁴² [Akoto \(2022\). Enapter struggles with supplier problems. energate-messenger.com.](https://www.energate-messenger.com/)

⁴³ These reports are obligatory tasks under IPCEI. For such a report, a company registers its eligible costs for the past calendar year and gives information on the progress of the project.

balanced response to the economic and social situation. It also contributes appropriately to all six pillars of Article 3 of the RRF Regulation. Upholding the current formulation of the final milestone would put the success of the measure IPCEI H2 at risk, which in turn would negatively affect the green transition pillar. In addition, adhering to the current formulation of the final milestone would also inhibit the implementation of the fourth recommendation in Austria's country specific recommendations (CSRs)⁴⁴.

Modified elements	Current version	Amended version
Component and / or measure description		No changes.
Milestones and targets	<p>MS 103: The available budget of EUR 125 000 000 has been allocated to the approved projects (including expenses of the implementing agency). At least 80% of the budget has been disbursed to the beneficiary companies.</p> <p>Q3/2026</p>	<p>MS 103a: All approved projects have entered the first-industrial-deployment-phase</p> <p>Q4/2025</p> <p>MS 103b: EUR 125 million (including costs for funding agencies) have been committed to the approved projects</p> <p>Q3/2026</p>
Estimated cost		No changes.
Green and digital tagging		No changes.
DNSH self-assessment		No changes.

⁴⁴ See Council Recommendation on the 2022 National Reform Programme of Austria and delivering a Council opinion on the 2022 Stability Programme of Austria

COMPONENT 4: JUST RECOVERY / SUBCOMPONENT 4.A HEALTH	
Investment/ reform CID reference	Reform 4.A.1
Investment/ reform name	Enhancing primary health care
Type of change compared to CID	modified
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input checked="" type="checkbox"/> None of the above, correction of clerical error
Elements modified (only for modified measures)	<input checked="" type="checkbox"/> Component / Measure description <input type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment
Reform: 4.A.1 Enhancing primary health care	
<p><u>Initial description</u></p> <p><u>4.A.1 – Measure description:</u></p> <p><i>The Austrian platform for primary health care is intended to serve as an information and communication hub between health professionals, patient organisations, education, science, the public administration of the health care system and other health care stakeholders. It will also promote social innovation within primary health care in Austria.</i></p> <p><i>The overall objectives of the measure is to promote the attractiveness of working conditions for general practitioners and other health and social professions in primary health care, particularly in rural areas. Besides improved health care provisions, the reform aims also at promoting a culture of interprofessional cooperation and mutual understanding of roles and competencies between health care and social professions in the field of primary health care.</i></p> <p><i>The implementation of the measure shall be completed by 31 August 2026.</i></p>	

Requested amendments and justification of the change

Usage of the word “will” in the requirements set out in the Council Implementing Decision creates ambiguity in the understanding of said requirements. The word “will” does not create a clear legal understanding of a requirement as an *obligation* (indicated by the usage of the word “shall”) compared to an *expectation* (indicated by the usage of the phrase “is expected to”).

In order to create legal certainty as well as coherence throughout the CID, the measure description is amended to more clearly reflect the intentions of the original recovery and resilience plan.

Therefore, the following changes are suggested:

Modified elements	Current version	Amended version
<i>Component and / or measure description</i>	<p>The Austrian platform for primary health care is intended to serve as an information and communication hub between health professionals, patient organisations, education, science, the public administration of the health care system and other health care stakeholders. It will also promote social innovation within primary health care in Austria.</p> <p>The overall objectives of the measure is to promote the attractiveness of working conditions for general practitioners and other health and social professions in primary health care, particularly in rural areas. Besides improved health care provisions, the reform aims also at promoting a culture of interprofessional cooperation and mutual understanding of roles and competencies between health care and social professions in the field of primary health care.</p>	<p>The Austrian platform for primary health care is intended to serve as an information and communication hub between health professionals, patient organisations, education, science, the public administration of the health care system and other health care stakeholders. It will is expected to also promote social innovation within primary health care in Austria.</p> <p>The overall objectives of the measure is to promote the attractiveness of working conditions for general practitioners and other health and social professions in primary health care, particularly in rural areas. Besides improved health care provisions, the reform aims also at promoting a culture of interprofessional cooperation and mutual understanding of roles and</p>

	The implementation of the measure shall be completed by 31 August 2026.	competencies between health care and social professions in the field of primary health care. The implementation of the measure shall be completed by 31 August 2026.
<i>Milestones and targets</i>		No changes.
<i>Estimated cost</i>		No changes.
<i>Green and digital tagging</i>		No changes.
<i>DNSH self-assessment</i>		No changes.

COMPONENT 4: JUST RECOVERY / SUBCOMPONENT 4.A HEALTH	
Investment/ reform CID reference	Investment 4.A.2
Investment/ reform name	Funding of primary health care projects
Type of change compared to CID	modified
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input checked="" type="checkbox"/> None of the above, correction of clerical error
Elements modified (only for modified measures)	<input checked="" type="checkbox"/> Component / Measure description <input type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment
Investment: 4.A.2. Funding of primary health care projects	
<p><u>Initial description</u></p> <p><u>4.A.2 – Measure description:</u> <i>The objectives of the measure are to expand rapidly multi-professional primary health care units in Austria and to ensure low-threshold decentralised access to services for the population, especially in rural areas.</i></p> <p><i>The investment consists of two major funding parts: firstly to invest in at least 60 new primary care units (Primärversorgungseinrichtungen/PVE) compared to January 2021 and secondly to finance different projects in existing primary health care settings with a focus on environmental and social sustainability, digital and spatial infrastructure and training opportunities. Targeted measures will be developed and implemented together with relevant stakeholders, such as the municipal association. When setting up new primary health care units (either in form of centres or networks), environmental aspects shall also be taken into account. A special focus shall be placed on establishing multi-professional primary health care networks in rural areas by closely involving the respective municipalities.</i></p> <p><i>The implementation of the measure shall be completed by 31 August 2026.</i></p>	

Requested amendments and justification of the change

Usage of the word “will” in the requirements set out in the Council Implementing Decision creates ambiguity in the understanding of said requirements. The word “will” does not create a clear legal understanding of a requirement as an *obligation* (indicated by the usage of the word “shall”) compared to an *expectation* (indicated by the usage of the phrase “is expected to”).

In order to create legal certainty as well as coherence throughout the CID, the measure description is amended to more clearly reflect the intentions of the original recovery and resilience plan. Therefore, the following changes are suggested:

Modified elements	Current version	Amended version
<p>Component and / or measure description</p>	<p>The objectives of the measure are to expand rapidly multi-professional primary health care units in Austria and to ensure low-threshold decentralised access to services for the population, especially in rural areas.</p> <p>The investment consists of two major funding parts: firstly to invest in at least 60 new primary care units (Primärversorgungseinrichtungen/ PVE) compared to January 2021 and secondly to finance different projects in existing primary health care settings with a focus on environmental and social sustainability, digital and spatial infrastructure and training opportunities. Targeted measures will be developed and implemented together with relevant stakeholders, such as the municipal association. When setting up new primary health care units (either in form of centres or networks), environmental aspects shall also be taken into account. A special focus shall be placed on establishing multi-professional primary health care networks in</p>	<p>The objectives of the measure are to expand rapidly multi-professional primary health care units in Austria and to ensure low-threshold decentralised access to services for the population, especially in rural areas.</p> <p>The investment consists of two major funding parts: firstly to invest in at least 60 new primary care units (Primärversorgungseinrichtungen/ PVE) compared to January 2021 and secondly to finance different projects in existing primary health care settings with a focus on environmental and social sustainability, digital and spatial infrastructure and training opportunities. Targeted measures will be expected to be developed and implemented together with relevant stakeholders, such as the municipal association. When setting up new primary health care units (either in form of centres or networks), environmental aspects shall also be taken into account. A special focus shall be placed on establishing multi-professional primary health care networks in</p>

	rural areas by closely involving the respective municipalities. The implementation of the measure shall be completed by 31 August 2026.	rural areas by closely involving the respective municipalities. The implementation of the measure shall be completed by 31 August 2026.
<i>Milestones and targets</i>		No changes.
<i>Estimated cost</i>		No changes.
<i>Green and digital tagging</i>		No changes.
<i>DNSH self-assessment</i>		No changes.

COMPONENT 4: JUST RECOVERY / SUBCOMPONENT 4.A HEALTH	
Investment/ reform CID reference	Investment 4.A.2
Investment/ reform name	Funding of primary health care projects
Type of change compared to CID	modified
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input checked="" type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input type="checkbox"/> None of the above, correction of clerical error
Elements modified (only for modified measures)	<input type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment
Investment: 4.A.2. Funding of primary health care projects	
<p><u>Initial description</u></p> <p><u>Target 108:</u> At least 50 projects related to primary health care shall be funded, out of which at least 20 shall consist in the establishments of new primary health care units (centres and networks – also in rural areas).</p> <p><u>Target 109:</u> At least 100 projects related to primary health care shall be funded, out of which at least 35 shall consist in the establishments of new primary health care units (centres and networks – also in rural areas).</p> <p><u>Target 110:</u> At least 170 projects related to primary health care shall be funded, out of which at least 60 shall consist in the establishments of new primary health care units (centres and networks - also in rural areas)</p>	

Requested amendments and justification of the change

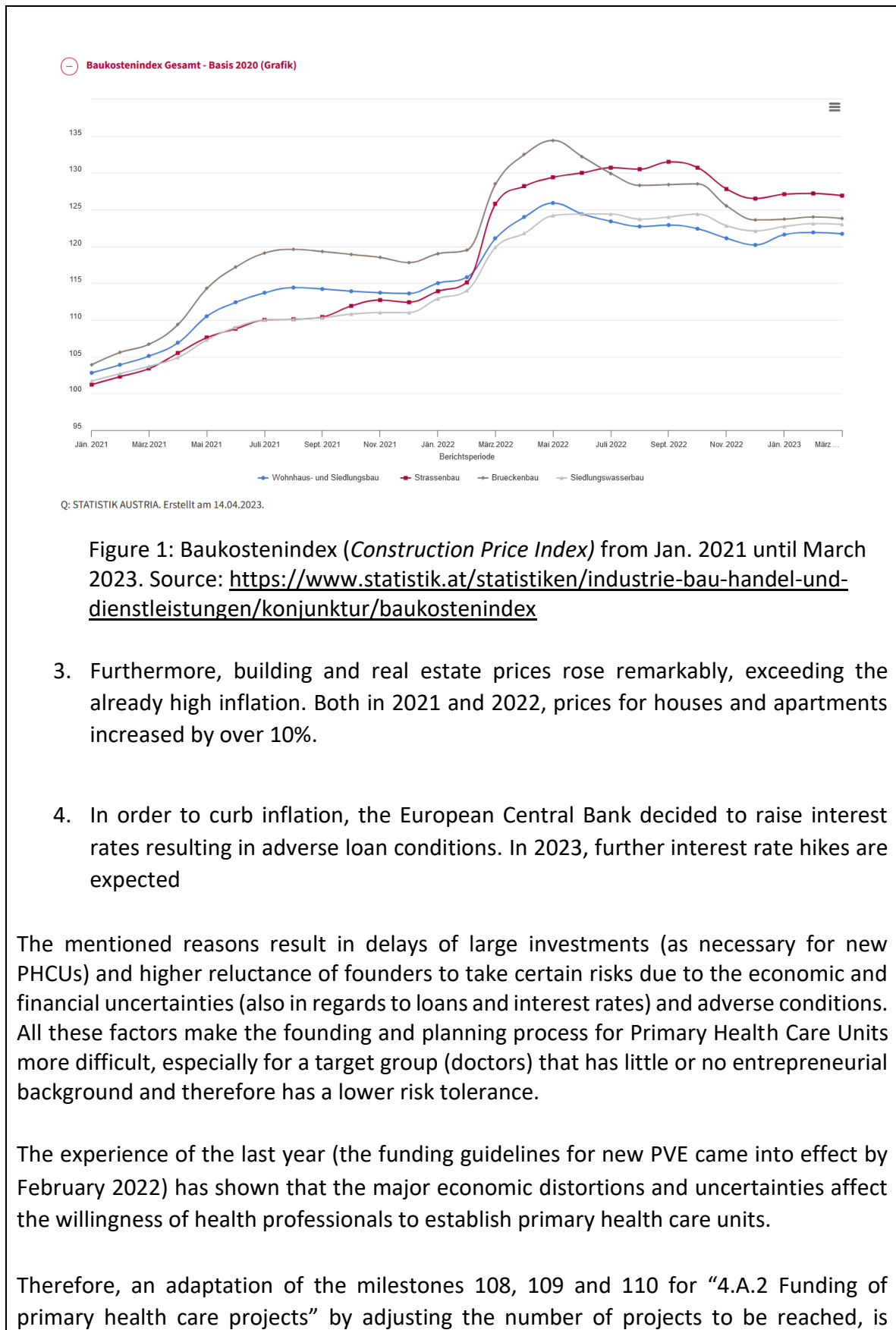
The RRF project 4.A.2 regarding the funding of primary health care projects has two major funding parts: “firstly to invest in at least 60 new primary [health] care units (Primärversorgungseinrichtungen/PVE) compared to January 2021 and secondly to finance different projects in existing primary health care settings with a focus on environmental and social sustainability, digital and spatial infrastructure and training opportunities.”

The establishment of new primary health care units usually requires construction activities for new or in existing buildings or the acquisition of suitable facilities in order to be able to offer the legally required range of multiprofessional primary health care services.

Although substantial funding is provided through the RRF, 50% of the investments must be borne by the founders themselves. In that regard, PVE founders are facing a number of challenges that were not predictable at the time of the RRF application in the beginning of 2021 - first and foremost, high inflation, which primarily affects construction costs and financing:

1. Whilst drafting the plan, a rather stable continuation of the inflation was assumed with the potential of a predictable increase. The inflation was around 1,5 – 2% between 2018 and 2020. In 2021 the inflation reached 2.8%. At the time of the the RRP draft, it was not foreseeable that inflation would reach 8.6% in 2022 and thereby triple or even quadruple compared to the original assumptions.
(For annual inflation statistics in 2022, see: <https://www.statistik.at/fileadmin/announcement/2023/01/20230116VPIJahr2022.pdf>).
2. The construction industry was hit by supply bottlenecks and shortages, especially in 2021, leading to higher prices. In 2022, high energy prices as a result of the war against Ukraine further accelerated construction costs. According to Statistik Austria⁴⁵, construction costs increased by over 10% compared to 2021. This stark increase can also be seen in figure 1 below.

⁴⁵<https://www.statistik.at/fileadmin/announcement/2023/01/20230113BaukostenindexDez2022.pdf>



proposed – see amended version below. Instead of 170 projects (of which at least 60 should be new PVE), 155 projects (with at least 45 PVE) shall be funded until Q2 2026.

The proposal does not reduce the amount of projects in existing Primary Health Care settings. The reduction only concerns the establishment of new primary health care units due to the factors stated above (i.e. high initial investment costs and therefore higher perceived risk and uncertainty level). The reduction in the total amount of projects is only derived from these cuts (-15 in total until 2026, so 155 instead of 170 projects).

Modified elements	Current version	Amended version
<p>Component and / or measure description</p>	<p>The objectives of the measure are to expand rapidly multi-professional primary health care units in Austria and to ensure low-threshold decentralised access to services for the population, especially in rural areas.</p> <p>The investment consists of two major funding parts: firstly to invest in at least 60 new primary care units (<i>Primärversorgungseinrichtungen/PVE</i>) compared to January 2021 and secondly to finance different projects in existing primary health care settings with a focus on environmental and social sustainability, digital and spatial infrastructure and training opportunities. Targeted measures will be developed and implemented together with relevant stakeholders, such as the municipal association. When setting up new primary health care units (either in form of centres or networks), environmental aspects shall also be taken into account. A special focus shall be placed on establishing multi-professional primary health care networks in rural areas by closely involving the respective municipalities.</p>	<p>The objectives of the measure are to expand rapidly multi-professional primary health care units in Austria and to ensure low-threshold decentralised access to services for the population, especially in rural areas.</p> <p>The investment consists of two major funding parts: firstly to invest in at least 60 45 new primary care units (<i>Primärversorgungseinrichtungen/PVE</i>) compared to January 2021 and secondly to finance different projects in existing primary health care settings with a focus on environmental and social sustainability, digital and spatial infrastructure and training opportunities. Targeted measures will be developed and implemented together with relevant stakeholders, such as the municipal association. When setting up new primary health care units (either in form of centres or networks), environmental aspects shall also be taken into account. A special focus shall be placed on establishing multi-professional primary health care networks in rural areas by closely involving the respective municipalities.</p>

	The implementation of the measure shall be completed by 31 August 2026.	The implementation of the measure shall be completed by 31 August 2026.
Milestones and targets	<p>T108: At least 50 projects related to primary health care shall be funded, out of which at least 20 shall consist in the establishments of new primary health care units (centres and networks – also in rural areas).</p> <p>T109: At least 100 projects related to primary health care shall be funded, out of which at least 35 shall consist in the establishments of new primary health care units (centres and networks – also in rural areas).</p> <p>T110: At least 170 projects related to primary health care shall be funded, out of which at least 60 shall consist in the establishments of new primary health care units (centres and networks - also in rural areas)</p>	<p>T108: At least 50 45 projects related to primary health care shall be funded, out of which at least 20 15 shall consist in the establishments of new primary health care units (centres and networks – also in rural areas).</p> <p>T109: At least 100 90 projects related to primary health care shall be funded, out of which at least 35 25 shall consist in the establishments of new primary health care units (centres and networks – also in rural areas).</p> <p>T110: At least 170 155 projects related to primary health care shall be funded, out of which at least 60 45 shall consist in the establishments of new primary health care units (centres and networks - also in rural areas)</p>
Estimated cost		No changes.
Green and digital tagging		No changes.
DNSH self-assessment		No changes.

COMPONENT 4: JUST RECOVERY / SUBCOMPONENT 4.B RESILIENT MUNICIPALITIES	
Investment/ reform CID reference	Investment 4.B.1
Investment/ reform name	Soil protection strategy
Type of change compared to CID	modified
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input checked="" type="checkbox"/> None of the above, correction of clerical error
Elements modified (only for modified measures)	<input checked="" type="checkbox"/> Component / Measure description <input type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment
Reform: 4.B.1 Soil protection strategy	
<u>Initial description</u>	
<p><u>4.B.1 – Measure description:</u></p> <p><i>The objective of the development of a soil protection strategy is to set up a framework for consensus-finding and coordination processes with all relevant planning bodies (federal level, Laender and municipalities) to agree on a strategic guidance to curb land use. The final aim of the soil protection strategy is to gradually reduce the land use in Austria to net 2.5 hectare per day until 2030.</i></p> <p><i>The first step of the reform is the development of, and the agreement on, the key elements of an Austrian soil protection strategy and a roadmap for its implementation. These shall be developed by all relevant institutional actors (federal level, Laender, municipalities) and shall be agreed upon in the framework of the Austrian Conference on Spatial Planning (Oesterreichische Raumordnungs-konferenz). The main elements for the development of the implementation strategy shall be the definition of concrete milestones and the agreement on an indicator-based monitoring system. Besides the overall objective (reduction of land use to 2.5 hectare per day), additional quantifiable targets and milestones will be determined, based on negotiations between the Laender in the framework of the Austrian Conference on Spatial Planning. At the end of the implementation of the reform, the Austrian quantitative soil protection strategy, including</i></p>	

the overall objective of reducing the land use in Austria to net 2.5 hectare per day until 2030 will be adopted.

The measure shall enter into force by 31 December 2022.

Requested amendments and justification of the change

Usage of the word “will” in the requirements set out in the Council Implementing Decision creates ambiguity in the understanding of said requirements. The word “will” does not create a clear legal understanding of a requirement as an *obligation* (indicated by the usage of the word “shall”) compared to an *expectation* (indicated by the usage of the phrase “is expected to”).

In order to create legal certainty as well as coherence throughout the CID, the measure description is amended to more clearly reflect the intentions of the original recovery and resilience plan.

Therefore, the following changes are suggested:

Modified elements	Current version	Amended version
<i>Component and / or measure description</i>	<p>The objective of the development of a soil protection strategy is to set up a framework for consensus-finding and coordination processes with all relevant planning bodies (federal level, Laender and municipalities) to agree on a strategic guidance to curb land use. The final aim of the soil protection strategy is to gradually reduce the land use in Austria to net 2.5 hectare per day until 2030.</p> <p>The first step of the reform is the development of, and the agreement on, the key elements of an Austrian soil protection strategy and a roadmap for its implementation. These shall be developed by all relevant institutional actors (federal level, Laender, municipalities) and shall be agreed upon in</p>	<p>The objective of the development of a soil protection strategy is to set up a framework for consensus-finding and coordination processes with all relevant planning bodies (federal level, Laender and municipalities) to agree on a strategic guidance to curb land use. The final aim of the soil protection strategy is to gradually reduce the land use in Austria to net 2.5 hectare per day until 2030.</p> <p>The first step of the reform is the development of, and the agreement on, the key elements of an Austrian soil protection strategy and a roadmap for its implementation. These shall be developed by all relevant institutional actors (federal level, Laender, municipalities) and shall be agreed upon in the</p>

	<p>the framework of the Austrian Conference on Spatial Planning (Oesterreichische Raumordnungs-konferenz). The main elements for the development of the implementation strategy shall be the definition of concrete milestones and the agreement on an indicator-based monitoring system. Besides the overall objective (reduction of land use to 2.5 hectare per day), additional quantifiable targets and milestones will be determined, based on negotiations between the Laender in the framework of the Austrian Conference on Spatial Planning. At the end of the implementation of the reform, the Austrian quantitative soil protection strategy, including the overall objective of reducing the land use in Austria to net 2.5 hectare per day until 2030 will be adopted.</p> <p>The measure shall enter into force by 31 December 2022.</p>	<p>framework of the Austrian Conference on Spatial Planning (Oesterreichische Raumordnungs-konferenz). The main elements for the development of the implementation strategy shall be the definition of concrete milestones and the agreement on an indicator-based monitoring system. Besides the overall objective (reduction of land use to 2.5 hectare per day), additional quantifiable targets and milestones will be determined, based on negotiations between the Laender in the framework of the Austrian Conference on Spatial Planning. At the end of the implementation of the reform, the Austrian quantitative soil protection strategy, including the overall objective of reducing the land use in Austria to net 2.5 hectare per day until 2030 will shall be adopted.</p> <p>The measure shall enter into force by 31 December 2022.</p>
<i>Milestones and targets</i>		No changes.
<i>Estimated cost</i>		No changes.
<i>Green and digital tagging</i>		No changes.
<i>DNSH self-assessment</i>		No changes.

COMPONENT 4: JUST RECOVERY / SUBCOMPONENT 4.B RESILIENT MUNICIPALITIES	
Investment/ reform CID reference	Investment 4.B.3
Investment/ reform name	Investment in climate-friendly town centres
Type of change compared to CID	modified
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input checked="" type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input type="checkbox"/> None of the above, correction of clerical error
Elements modified (only for modified measures)	<input type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment
Investment: 4.B.3 Investment in climate-friendly town centres	
<p><u>Initial description</u></p> <p><u>Target 123:</u> At least 100 thermal renovation projects of companies and municipalities in town centres are completed.</p> <p><u>Target 124:</u> At least 250 thermal renovation projects of companies and municipalities in town centres are completed.</p> <p><u>Target 125:</u> At least 60 roof and façade greening projects are completed.</p> <p><u>Target 126:</u> At least 100 roof and façade greening projects are completed.</p> <p><u>Target 127:</u> At least 1 150 projects for the connection to high-efficiency district heating are completed.</p> <p><u>Target 128:</u> At least 2 490 projects for the connection to high-efficiency district heating are completed.</p>	

Requested amendments and justification of the change

The funding guidelines for the programmes within this measure were adopted in October 2021 and subsequently the information sheets were published. The funding programmes for

- thermal renovation projects for enterprises,
- roof and façade greening projects for enterprises and
- projects for the connection to high-efficiency district heating in town centres for enterprises

started in October 2021.

Those funding programs, when drafted in the beginning of 2021, were intended to supplement existing national funding programmes in place (“Thermische Gebäudesanierung” and “Raus aus Öl und Gas”, both part of the Programme “Sanierungsoffensive”) with additional financial incentives for projects located in town centres (“klimafitte Ortskerne”). That means additional funding bonuses were provided for thermal renovation projects or for switching from natural gas to district heating in town centres. In addition, funding for roof and facade greening in town centres was provided.

Due to the Russian aggression against Ukraine and the subsequently high energy prices⁴⁶, it became clear that higher subsidy rates for the thermal renovation projects and the exchange of heating systems will be necessary. The Austrian government therefore took additional steps to support and accelerate the energy transition. The package of measures included an increase in the subsidy rates of the national funding programmes “Thermische Gebäudesanierung” and “Raus aus Öl und Gas”. This way the government provides increased funding not only for thermal renovation projects and connection to district heating within town centres - as planned in the Austrian RRP- but across Austria. As a consequence, the funding rate was increased with the “Gas-Bonus” to the same level as the “klimafitte Ortskerne” – up to EUR 9 500 from the federal side. The funding rate in “klimafitte Ortskerne” was already a flat rate of EUR 9 500 and there are additional regional subsidies available (between EUR 3 000 and 6 000 per project, see: <https://www.umweltfoerderung.at/privatpersonen/raus-aus-oel-und-gas#c6404>). The

⁴⁶Increased energy prices for commercial and private use in 2022 are demonstrated in [these graphics](#).

framework of state aid law and the national guidelines made it impossible to increase support for projects in town centres any further (because of a high possibility to transgress the total subsidy rate of 50%) and thus it was rendered impossible to further incentivise the funding scheme “klimafitte Ortskerne”.

Therefore, we have equally high subsidy rates for projects within and outside town centres. Thus, potential recipients of funding avoid applying for the funding for town centres as this would require additional documents from the municipalities as proof of being located in the centre. To receive funding, applicants (in both cases) need the proof of having a gas heating so far (protocol of the energy consultant). In the case of the town centre funding, an additional certification by the municipality is needed which requires extra-effort.

(https://www.umweltfoerderung.at/fileadmin/user_upload/umweltfoerderung/uebergordnete_dokumente/UFI_Bestaetigung_Ortskern.pdf). Subsequently, we face reduced demand and hence fewer project submissions in the 2 different sub-programmes within the measure “climate – friendly town centres”. It is therefore necessary to reduce the targets according to the suggestions in the table below.

The subsidy programme for **green facades** was an attempt to provide an incentive for additional measures. The conventional existing subsidies for thermal insulation of buildings already comprise the possibility for an additional subsidy for green facades when conducting thermal insulation measures. We wanted to extend this possibility to already renovated buildings without the need to conduct thermal insulation measures. Our calculation of the costs of the stand-alone measures was derived from the well-known renovation costs but it turned out, that the specific costs for a stand-alone green facade (without insulation) are much higher than expected. In our calculation we took into account the physical costs of the facades but not the construction. It turned out that the costs of the scaffolding were underestimated. Therefore, fewer buildings than expected applied for this subsidy. Due to these circumstances, we don't expect an increase in the next 2 years. Nevertheless, we will continue our call until 2025 but need a significant reduction of the number of projects for the next milestones.

To date we have

- 34 projects relating to thermal renovation (refurbishment) in the town centres,
- 8 green façade projects,
- 375 projects concerning the connection to high-efficiency district heating in the town centres.

It is planned to close the additional “Ortskern-Bonus” for thermal insulation in town centres and the connection to district heating at the end of September 2023.

Throughout Austria, we have already approved 591 thermal renovation (refurbishment) projects and 74 689 projects in the “Sanierungsoffensive” in total. Since the start of the programme 9 300 projects were connections to high-efficiency district heating, 375 of them were in town centres.

This clearly depicts that the demand in town centres only accounts for a small share of the total demand for subsidies. Since the increase of the subsidies of the Sanierungsoffensive with the “Gas-Bonus”, projects implemented in town centres were simply submitted under the normal “Sanierungsoffensive” scheme. There is no indication of a change in demand in the future, mainly because we will continue with the “Gas-Bonus” in the next years. Actually, we see in the decreasing number of building permits that the inflation and the high prices lead to a stop of thermal insulations of multi-story buildings. Therefore, we expect also a decrease especially in town centres.

The projects already approved are in the construction phase. We assume that the funding figure will remain stable for the projects already approved. However, since the final review of the grants is approved when the final payment is made by KPC, there is also a 5% range of fluctuation here, because the case may arise that applicants do not realise their project as approved.

The new milestones represent the realistically achievable values, derived from the projects already available/submitted. The calculation of the numbers corresponds to the weekly applications in the KPC. As we intend to close the call for thermal insulation in town centres and the connection to district heating at the end of September, we don’t expect many more projects. The call for green facades will stay open. At this stage, these projects are not yet finalised and some of them still have to be approved and there may still be queries or additional demands from the beneficiaries. Consequently, the time of approval cannot be determined yet.

It is important to stress, that this does not mean Austria lags behind in the transition to renewable heating and more energy efficiency in buildings. On the contrary, the national funding programmes “Sanierungsoffensive” and the partly RRF financed “Raus aus Öl und Gas” very successfully reduce Austria’s fossil fuel consumptions and thereby reduce the dependency on Russian gas.

The fourth programme “brownfield recycling” within this measure is expected to reach the targets as indicated and hence no changes are proposed.

Modified elements	Current version	Amended version
Component and / or measure description		No changes.
Milestones and targets	123 (Q4 2023): At least 100 thermal renovation	123 (Q4 2023): At least 34 thermal renovation

	<p>projects of companies and municipalities in town centres are completed.</p> <p>124 (Q2 2026): At least 250 thermal renovation projects of companies and municipalities in town centres are completed.</p> <p>125 (Q4 2023): At least 60 roof and façade greening projects are completed.</p> <p>126 (Q2 2026): At least 100 roof and façade greening projects are completed.</p> <p>127 (Q4 2023): At least 1 150 projects for the connection to high-efficiency district heating are completed.</p> <p>128 (Q2 2026): At least 2 490 projects for the connection to high-efficiency district heating are completed.</p>	<p>projects of companies and municipalities in town centres are completed.</p> <p>124: To be removed</p> <p>125: To be removed</p> <p>126: At least 15 roof and façade greening projects are completed.</p> <p>127: At least 375 projects for the connection to high-efficiency district heating are completed.</p> <p>128: To be removed</p>
Estimated cost		No changes.
Green and digital tagging		No changes.
DNSH self-assessment		No changes.

COMPONENT 4: JUST RECOVERY / SUBCOMPONENT 4.C ARTS AND CULTURE	
Investment/ reform CID reference	Investment 4.C.3
Investment/ reform name	Renovation of Volkskundemuseum Wien and Prater Ateliers
Type of change compared to CID	modified
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input checked="" type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input type="checkbox"/> None of the above, correction of clerical error
Elements modified (only for modified measures)	<input type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment
Investment: 4.C.3 Renovation of Volkskundemuseum Wien and Prater Ateliers	
<p><u>Initial description</u></p> <p><u>Milestone 138:</u> The renovation of the Prater Ateliers has been completed and artists may use the building.</p> <p><u>Requested amendments and justification of the change</u></p> <p>With regard to the Milestone 138: Reopening of Prater Ateliers the indicative timeline for completion shall be postponed to Q2 2025 due objective circumstances. The proposed change does not decrease the overall ambition of the measure.</p> <p>1) Delay due to an appeal in the tendering procedure</p> <p>The Republic of Austria, represented by the Ministry of Arts, Culture, Public Service and Sport (BMKÖS), and Bundesimmobiliengesellschaft (BIG) concluded an agreement on 13.12.2021 regarding the preparation of planning documents for the renovation of the Prater Ateliers. The call for tender for the selection of the general planner was published</p>	

on 26.1.2022 on the websites of Tenders Electronic Daily and BIG. The deadline of the first stage of the tendering procedure ended on 23.2.2022 and the commission meeting took place on 8.3.2022 with 7 offices invited to the second stage. The initial schedule included another commission meeting on 7.6.2022 and the award of contract until the end of June 2022.

However, one architecture office, which was excluded from further participation in the tendering procedure due to a formal deficiency that could not be remedied, appealed against the exclusion to the Federal Administrative Court on 14.4.2022. Therefore, the tendering procedure had to be stopped, resulting in a delay of several months.

A decision of the Federal Administrative Court was made on 8.8.2022 (reference: W139 2253938-1/22E). The 2nd stage of the tendering procedure could be resumed with a deadline for applications on 22.9.2022. The commission meeting took place on 29.11.2022. On 9.1.2023, the contract was finally awarded to the architectural office DI Guenter Palme zT GmbH.

Next project steps include detailed architectural and technical planning and tenders for the construction services. The winning project now provides two construction phases, with the first, early construction phase comprising the renovation of the building envelope, and the **start of construction in August 2023**. The second construction phase, including the renovation of the interior of the building, will start in February 2024, and the **target completion date for the renovation should be end of December 2024**. The initial schedule foresaw completion in May 2024. Thus, the total delay in the timeline is approximately 8 months.

Since further time delays still cannot be ruled out, a reopening of the Prater Ateliers as well as the occupation by new users and artists seems **realistic in the course of Q2 2025**.

2) Delay due to the current situation in the construction industry

The rough cost estimate based on the feasibility study on the renovation of the Prater Ateliers from **08.10.2021 assumed EUR 11 298 485 net construction costs** with an accuracy of +/- 30%. Currently, the valorised total costs including planning services are **estimated at EUR 15 268 721 net**.

Russia's aggression against Ukraine has drastically affected prices and global supply chains of construction materials. The severity of these developments could not have been anticipated at the time Austria submitted the Recovery and Resilience Plan. This also meant, that there was a fear of a direct impact on the schedule and preparatory measures for the construction work.

The Ministry of Arts, Culture, Public Service and Sport (BMKÖS) analyzed this situation immediately in March 2022 and commissioned a **civil engineer's expert opinion** on

whether the two renovation projects funded by RRF would be feasible under these circumstances in terms of budget and time. These analyses and expert opinions were based on the following parameters and indices:

- The construction cost index for total construction costs (Baukostenindex, BKI) was between 100.4 and 105.1 in spring 2021, and increased to 124 in April 2022.
- The increases of construction costs between the start and completion of the projects were estimated between 30.4% and 60.6%.
- The Austrian National Bank (OeNB) had increased its forecast of the Harmonised Index of Consumer Prices (HICP) inflation rate for 2022 from 5.6% to 7.0% by April 2022. An HICP of 4.2% was forecast for 2023, and an HICP of 3.0% for 2024, but subject to the end of the war in Ukraine by the end of 2022. The BMKÖS therefore assumed an HICP of up to 10% in its analyses.
- There were immediate reactions in the construction industry, e.g. construction companies cancelled existing contracts in April 2022 (to prevent major financial losses on contract fulfilment) and bid only conditionally in tenders.
- The shortage of energy-intensive or petroleum-based construction materials resulted in limited availability (insulation, insulations, cement, and concrete), long delivery times, and sometimes hourly changing market prices (e.g. structural steel mesh).

The civil engineer's report was available in May 2022 and concluded that the projects would still be feasible but that possible effects in terms of time and a significant increase of construction costs are to be expected.

On the one hand, the present schedule assumes that appropriately qualified companies in the construction and ancillary construction trades will participate in the tenders: In the past, this was mainly ensured by the quality and the level of detail of the tendering of the respective construction works. The current situation, however, is now such that if tenders are too specific, there are too few or no firms bidding, while if tenders for construction work are too broad, there is a risk of supplementary bids being submitted by the firms carrying out the work, and this **could result in uncontrollable additional costs**. On the other hand, **delivery times for construction materials have not been guaranteed** by the building materials industry for over a year now, so that **construction delays are occurring**. Current construction schedules must respond to this with appropriate time buffers in order to avoid additional costs for the increased staffing that would otherwise be necessary in advance.

Due to this situation, additional national funds for both RRF renovation projects amounting to EUR 5 million were requested by the Ministry (BMKÖS) and provided in the Federal Finance Act 2023, adopted by the Parliament on 17.11.2022. The budget increase secured the continuation and implementation of the two RRF projects ([website BMKÖS](#)).

Modified elements	Current version	Amended version
<i>Component and / or measure description</i>		No changes.
<i>Milestones and targets</i>	Milestone 138: Target Date: Q2/2024	Milestone 138: Target Date: Q2/2025
<i>Estimated cost</i>		No changes.
<i>Green and digital tagging</i>		No changes.
<i>DNSH self-assessment</i>		No changes.

COMPONENT 4: JUST RECOVERY / SUBCOMPONENT 4.D RESILIENCE THROUGH REFORMS	
Investment/ reform CID reference	Reform 4.D.1
Investment/ reform name	Spending review focusing on green and digital transformation
Type of change compared to CID	modified
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input checked="" type="checkbox"/> None of the above, correction of clerical error
Elements modified (only for modified measures)	<input type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment
Reform: 4.D.1 Spending review focusing on green and digital transformation	
<p><u>Initial description</u></p> <p><u>Milestone description – M146:</u></p> <p><i>The report shall be internally disseminated. This report shall focus on the analysis of the climate and energy policy support and incentive landscape. Based on this, examination of further funding and incentives related to their impact on climate and energy policy may take place. It will include climate responsibility mechanisms for Ministries and the setting of specific greenhouse gas reduction targets with given budget ceilings.</i></p> <p><u>Requested amendments and justification of the change</u></p> <p>Usage of the word “will” in the requirements set out in the Council Implementing Decision creates ambiguity in the understanding of said requirements. The word “will” does not create a clear legal understanding of a requirement as an <i>obligation</i> (indicated by the usage of the word “shall”) compared to an <i>expectation</i> (indicated by the usage of the phrase “is expected to”).</p>	

In order to create legal certainty as well as coherence throughout the CID, the milestone description is amended to more clearly reflect the intentions of the original recovery and resilience plan.

Therefore, the following changes are suggested:

Modified elements	Current version	Amended version
Component and / or measure description		No changes.
Milestones and targets	<p>M146: The report shall be internally disseminated. This report shall focus on the analysis of the climate and energy policy support and incentive landscape. Based on this, examination of further funding and incentives related to their impact on climate and energy policy may take place. It will include climate responsibility mechanisms for Ministries and the setting of specific greenhouse gas reduction targets with given budget ceilings.</p>	<p>M146: The report shall be internally disseminated. This report shall focus on the analysis of the climate and energy policy support and incentive landscape. Based on this, examination of further funding and incentives related to their impact on climate and energy policy may take place. It will is expected to include climate responsibility mechanisms for Ministries and the setting of specific greenhouse gas reduction targets with given budget ceilings.</p>
Estimated cost		No changes.
Green and digital tagging		No changes.
DNSH self-assessment		No changes.

COMPONENT 4: JUST RECOVERY / SUBCOMPONENT 4.D RESILIENCE THROUGH REFORMS	
Investment/ reform CID reference	Reform 4.D.5
Investment/ reform name	Eco-social tax reform
Type of change compared to CID	modified
Legal base of the change (select at least one)	<input type="checkbox"/> Article 14(2) – loan request <input type="checkbox"/> Article 18(2) – update of the maximum financial contribution <input type="checkbox"/> Article 21 – amendment due to objective circumstances <input type="checkbox"/> Article 21a – REPowerEU non-repayable financial support (ETS revenue) <input type="checkbox"/> Article 21b (2) – BAR transfers <input checked="" type="checkbox"/> None of the above, correction of clerical error
Elements modified (only for modified measures)	<input type="checkbox"/> Component / Measure description <input checked="" type="checkbox"/> Milestones and targets <input type="checkbox"/> Estimated cost <input type="checkbox"/> Green and digital tagging (potentially relevant, because there is a substantive change to the underlying measure) <input type="checkbox"/> DNSH self-assessment
Reform: 4.D.5 Eco-social tax reform	
<p><u>Initial description</u></p> <p><u>Milestone description – M159:</u></p> <p><i>Entry into force of the eco - social tax reform, including a price for CO₂ emissions, which will reduce annual CO₂ emissions by at least 2.6 million tonnes by 2030 (compared to 2019).</i></p> <p><u>Requested amendments and justification of the change</u></p> <p>Usage of the word “will” in the requirements set out in the Council Implementing Decision creates ambiguity in the understanding of said requirements. The word “will” does not create a clear legal understanding of a requirement as an <i>obligation</i> (indicated by the usage of the word “shall”) compared to an <i>expectation</i> (indicated by the usage of the phrase “is expected to”).</p>	

In order to create legal certainty as well as coherence throughout the CID, the milestone description is amended to more clearly reflect the intentions of the original recovery and resilience plan.

Therefore, the following changes are suggested:

Modified elements	Current version	Amended version
<i>Component and / or measure description</i>		No changes.
<i>Milestones and targets</i>	M159: Entry into force of the eco - social tax reform, including a price for CO ₂ emissions, which will reduce annual CO ₂ emissions by at least 2.6 million tonnes by 2030 (compared to 2019).	M159: Entry into force of the eco - social tax reform, including a price for CO ₂ emissions, which will is expected to reduce annual CO ₂ emissions by at least 2.6 million tonnes by 2030 (compared to 2019).
<i>Estimated cost</i>		No changes.
<i>Green and digital tagging</i>		No changes.
<i>DNSH self-assessment</i>		No changes.

TEIL 3: KOMPLEMENTARITÄT UND UMSETZUNG DES PLANS

1. Kohärenz mit anderen Initiativen

Der AT ARP steht weiterhin im Einklang mit anderen Initiativen, insbesondere mit dem nationalen Reformprogramm im Rahmen des Europäischen Semesters und dem Nationalen Energie- und Klimaplan.

2. Komplementarität der Finanzierung

Die bisherigen Angaben zur Komplementarität der Finanzierung bleiben unverändert, zwei neue Investitionen im Rahmen des Kapitels REPowerEU werden durch nationale Mittel ergänzt.

3. Wirksame Umsetzung

Die bisherigen Angaben bleiben unverändert.

4. Konsultationsprozess der Stakeholder

Der Änderung des AT ARP ging eine Konsultation der Stakeholder voraus, deren Einzelheiten im Kapitel REPowerEU zu finden sind.

5. Kontrolle und Audit

Die bisherigen Angaben bleiben unverändert.

6. Kommunikation

Die bisherigen Angaben bleiben unverändert.

TEIL 4: GESAMTKOHÄRENZ UND AUSWIRKUNGEN DES PLANS

1. Kohärenz

Die Maßnahmen des Plans sind weiterhin kohärent, wobei insbesondere die neuen Maßnahmen des REPowerEU-Kapitels die Maßnahmen der Komponente 1 ("Nachhaltige Erholung") verstärken.

2. Gleichstellung der Geschlechter und gleiche Chancen für alle

Es wird nicht erwartet, dass sich die Änderungen auf diesen Abschnitt auswirken.

3. Stärkung der wirtschaftlichen, sozialen und institutionellen Resilienz

Da die Änderungen an dem ARP im Vergleich zu dem zuvor angenommenen ARP inhaltlich und vom Umfang her nicht signifikant sind, bleiben die bisherigen Angaben unverändert.

4. Vergleich mit der Investitionsgrundlage

Eine Aktualisierung dieses Abschnitts ist insofern nicht gerechtfertigt, als die vorliegende Überarbeitung keinen nennenswerten Umfang hat. Die bisherigen Angaben bleiben daher unverändert.

Bundesministerium für Finanzen

Johannesgasse 5, 1010 Wien

+43 1 514 33-0

bmf.gv.at

