

To: Commissioner Wopke Hoekstra

European Commission

Berlaymont Building

Rue de la Loi / Wetstraat 200

1049 Brussels

Belgium

Neustadt/Spree, 10 July 2025

Subject: Concerns regarding the "Spreestraße K9281" measure as part of the Net Zero Valley Lausitz (NZVL)

Dear Commissioner Hoekstra,

As committed citizens of the Lusatia region who strongly support the goals of the European Green Deal and the Net Zero Industry Act, we expressly welcome the idea of establishing the first European model region for climate-neutral industry in Lusatia.

However, we are increasingly concerned that some projects included in the action plan contradict these goals. Particularly critical is the planned "Spreestraße K9281", Section 2 - a new road construction project between Schwarze Pumpe (Brandenburg) and Boxberg (Saxony).

In the NZVL action plan (measure 1.3.7), the project is justified by stating that it connects "economically closely linked industrial areas". This statement does not reflect current reality: the two locations are historically connected through the lignite industry - but not through other industries or relevant value chains. Since the politically mandated coal phase-out, there is no comprehensible economic basis for this road.

The reference to innovative construction methods (recycled materials, carbon elements, thermo-active surfaces) as justification in the application lacks practical substance - especially since these technologies are not part of the current planning approval decision and may require their own permits.

Furthermore, to date, there is no industry apart from lignite known to be interested in locating in Boxberg. The only conceivable demand would be potential truck traffic from a future combined transport (CT) terminal serving the Boxberg region. However, this assumes that Boxberg no longer has a functional rail connection or that such a connection cannot be made usable - an assumption that remains unsubstantiated.

In fact, the NZVL action plan contains no mention of rail or industrial development in Boxberg. While the Schwarze Pumpe location is detailed with a rail connection in the application and considered with its own development outline, Boxberg is completely left out. Yet, it is also connected to existing rail lines such as the lignite company's industrial railway. This discrepancy is striking - and further calls into question the necessity of a connecting road.

Particularly serious is that the road project includes a roughly 500-meter-long elevated bridge through a designated Flora-Fauna Habitat (FFH) - specifically through the Spree River and the Spree floodplain landscape near Spreewitz. The associated intrusion into protected natural areas and ecosystems is ecologically highly problematic and is hardly compatible with the goals of a "Net Zero Valley".

The existing road (S130) is fully functional, was comprehensively renewed in 2009, and shows no deficiencies. According to traffic data, its usage is even below the forecast at the time.

We believe that this project in its current form is not compatible with the principles of the Net Zero Industry Act. It is emblematic of the danger that new funding structures could be undermined by old fossil infrastructure logic.

Designation as a Net Zero Valley should not be jeopardized by individual measures that do not reflect the intent of the legislator or meet the requirements of sustainability.

We therefore appeal to you to critically review the "Spreestraße K9281" measure as part of the NZVL application - particularly with regard to its ecological impact, actual necessity, and compatibility with the goal of climate-neutral industrial development.

We would be happy to provide you with further background information, maps, or statements.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Böttcher', with a long horizontal stroke extending to the right.

Friederike Böttcher

(Chairwoman, Eine Spinnerei - vom nachhaltigen Leben e.V.)