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Kære udvalgsmedlem

Vedrørende EU-topmødet i Göteborg

I maj måned fremlagde Europa-Kommissionen et forslag til en EU-strategi for bæredygtig udvikling. På topmødet i Göteborg den 15.-16. juni skal EU's regeringschefer diskutere strategien og udstikke retningslinierne for den fremtidige indsats.

Danmarks Naturfredningsforening og vore europæiske samarbejdspartnere i paraplyorganisationen EEB håber, at topmødet bliver et vendepunkt for det europæiske samarbejde, så det fremover vil bidrage effektivt til en global bæredygtig udvikling - til gavn for miljøet, borgernes livskvalitet og verdens fattige.

EU's pres på miljøet og naturen er steget siden Brundtland-Kommissionen introducerede begrebet bæredygtig udvikling i 1987. Der er behov for fundamentale forandringer i EU's produktions- og forbrugsmønstre hvis denne udvikling skal vendes.

Europa-Kommissionens forslag til en strategi for bæredygtig udvikling er, med visse forbehold, et godt og visionært bud på hvordan dette skal ske. Hvis strategien gennemføres er der efter vores mening udsigt til et væsentligt bedre miljø og en mere mangfoldig natur.

Hvis EU skal bidrage til en global bæredygtig udvikling er der imidlertid behov for en række tilføjelser til, og opstramminger af, Kommissionens forslag. I det vedlagte brev til EU's statsledere redegør EEB m.fl. for de nødvendige ændringer, herunder:

- At EU skal holde sig inden for sit eget og det globale miljøes bæreevne.
- At Cardiff-processen fortsættes, og der udarbejdes konkrete mål og tidsrammer for sektorerne.
- En reel indsats for fremme af grønne offentlige indkøb og en grøn skattereform.
- At Århus-konventionen implementeres i alle EU-institutioner og udvides til andre politikområder.
- At atomkraft som en løsning på miljøproblemerne afvises.
- At EU bekræfter det såkaldte OSPAR-mål om udfasning af farlige stoffer inden 2020.
- At EU tilslutter sig målet om en forøgelse af ressourceeffektiviteten med en faktor 4 inden 2015 og en faktor 10 inden 2030.
- At de kommende revisioner af landbrugspolitikken, fiskeripolitikken og regionalfondene konsekvent fremmer miljø- og naturbeskyttelse.
- At kandidatlandenes regeringer, parlamenter og befolkninger involveres i den videre udvikling og implementering af strategien.

Naturfredningsforeningen har bidraget til EEB's brev, og bakker fuldt op om alle synspunkterne. Vi håber at de vil indgå aktivt i den danske forhandlingslinie på topmødet.

Med venlig hilsen

Gunver Bennekou, direktør

Michael Minter, EU-medarbejder

Brussels, 30th May 2001

Dear Madam,
Dear Sir,

Concerning: The EU Sustainable Development Strategy

With five other environmental organisations we have given a general response to the Strategy as proposed by the Commission to the Göteborg Summit. In this letter we want to go into more detail on the content of the Commission proposal.

On the "longer-term vision"

The Commission has understood that sustainable development offers the EU *"a positive long-term vision of a society that is more prosperous and more just, and which promises a cleaner, safer, healthier environment - a society which delivers a better quality of life for us, for our children and for our grandchildren."* We think this goal should become the benchmark for all future EU policies and activities. And we are also pleased to see that such a goal requires decoupling and institutional reform, and that *"clear, stable, long-term objectives"* are needed to *"shape expectations and create the conditions in which business have the confidence to invest in innovative solutions, and to create new, high-quality jobs."*

However, we lack the global dimension in this vision. The EU is a major player on the global level, and its policies and activities have major impact on many, worse-off countries in the world. The vision should therefore include the responsibility for the EU to live within its own and the global carrying capacity, based on the principle of equal sharing of this capacity on a per/capita basis, as well as to contribute to sustainable development across the globe.

The Commission states that the most important contribution is to put its own house in order first, but that can be just **ONE** contribution, and it should, **in parallel**, actively promote sustainable production and consumption patterns worldwide, poverty alleviation and prevention of further decline of the worlds biodiversity, through its external trade and aid policies, agriculture and fisheries policies, etc.

- **WE CALL UPON THE COUNCIL TO INTEGRATE THE GLOBAL DIMENSION INTO ITS CONCLUSIONS IN THE ABOVEMENTIONED WAY.**
- **WE CALL UPON THE COMMISSION TO PRESENT A DRAFT-COMMUNICATION ON THE GLOBAL DIMENSION BY THE END OF THIS YEAR, AND TO ORGANISE AN INTENSIVE DEBATE WITH THE PARLIAMENT AND CIVIL SOCIETY BEFORE FINALIZING IT FOR THE COUNCIL.**

On "urgent action is needed"

The Commission rightfully stressed the need for to confront the challenges to sustainability *"now"*. Indeed, no more time is to be lost to reverse trends that undermine the very natural basis of our existence. This is confirmed by recent reports of the European Environmental Agency, the OECD and UNEP.

WE CALL UPON THE COUNCIL AND PARLIAMENT TO EXPLICITLY SUPPORT THE COMMISSION IN THIS CALL FOR URGENCY.

On the issue of "leadership"

We see that the Commission has clearly understood the importance of political leadership to have the necessary changes realised. Political leadership is indeed necessary to decide on "*difficult trade-offs between conflicting interests*". And as is said in the part on "*improving policy coherence*" that policy makers need to help adapt groups that may have the burden of change, rather than promote compromising where the only loser in the end may be the environment.

WE CALL UPON THE COUNCIL TO TAKE UP THE CHALLENGE FROM THE COMMISSION AND COMMIT ITSELF TO TAKE UP POLITICAL LEADERSHIP FOR SUSTAINABLE DEVELOPMENT, BOTH AS EUROPEAN COUNCIL AND AS INDIVIDUAL HEADS OF GOVERNMENT AND STATE.

On "improving policy coherence"

The Commission rightfully states that "sustainable development should become the central objective of all sectors and policies". We need a reliable and transparent process to make this happen. The Commission's Action points on Common Policies however are not detailed enough. They do not say what the Commission will actually do to ensure they will meet the sustainable development test and by when. The only concrete Action Plan foreseen, by the end of this year, deals with "major legislative proposals" only. We think this is too restrictive.

In places we find the Commission not ambitious enough with regards to this coherence, in particular where it says that "EU and Member States should ensure that legislation does not hamper innovation." The EU should instead strive for all relevant legislation **should promote** sustainable development.

- **WE CALL UPON THE COUNCIL TO MANDATE THE COMMISSION TO SET UP A MECHANISM THAT WILL ENSURE THE SUSTAINABLE DEVELOPMENT TEST IN ALL COMMON POLICIES AND ALL LEGISLATION, AS WELL AS TO BUILD UP AN ADEQUATE INFRASTRUCTURE TO MAKE THIS HAPPEN, COMBINED WITH MAXIMUM TRANSPARENCY AND REGULAR REPORTING TO THE COUNCIL AND THE PARLIAMENT.**
- **WE STRONGLY SUPPORT THE CONTINUATION OF THE CARDIFF-PROCESS THAT HOWEVER NEEDS TO BE GUIDED BY SECTORAL TARGETS AND TIMETABLES.**

On "Getting Prices Right" and investment in science and technology

Also here the Commission is moving in the right direction, pleading for "*removing subsidies that encourage wasteful use of natural resources*" and "*putting a price on pollution*". All this to provoke changes in production and consumption patterns. This general notion is followed up by proposals for specific measures in the four areas of attention. It is essential that the EU finally choose without further delay for a comprehensive environmental tax and subsidy reform. Also OECD work (see recent Environmental Outlook) outlines how essential these policies can be in reducing considerably environmental problems. We miss however specific references to the tax instrument to reduce natural resources use (even though the 6th Environmental Action Programme has included such taxes) and the need to remove those subsidies in the Common Agricultural Policy with a negative environmental impact.

Beyond direct influence on prices, the Commission also mentions "*public procurement to favour environmentally friendly products and services*". We know that in practise the Commission is preparing for a quite restricted use of public procurement as there is strong opposition from the side of industry against anything that may discriminate on the basis of environmental performance of the entire life-cycle. We know that a life-cycle and eco-label oriented procurement policy may also cause problems for some exporters from developing countries, but then the abovementioned role of policy makers to help adapt groups that may have the burden of change, rather than promote compromising where the only loser in the end may be the environment, applies.

Influencing costs and prices and using the purchasing power of public authorities are tools to "**green the economy**". Another element of this is environmental liability and we are pleased to see that the Commission aims to have EU legislation in place on "strict environmental liability" by 2003.

Missing in the entire document is the instrument of Extended Producers Responsibility. Introducing this in all relevant legislation will structurally drive producers towards producing goods have carry an ever lower waste management burden with them.

- **WE CALL UPON THE COUNCIL, PARLIAMENT AND COMMISSION TO FURTHER STRENGTHEN THE REQUIRED "GREENING THE ECONOMY" BY MAKING IT POSSIBLE TO PUBLIC PROCUREMENT FULLY FOR THIS PURPOSE, BY RE-EMPHASISING THE POLLUTER PAYS PRINCIPLE, BY A COHERENT ENVIRONMENTAL TAX REFORM, INCLUDING TAXES ON NATURAL RESOURCE USES, AND THE APPLICATION OF THE EXTENDED PRODUCERS RESPONSIBILITY PRINCIPLE.**

On "improve communication and mobilise citizens and business"

While the Commission recognises the role business has to play, it does not refer to the existence of a civil society that expresses itself in different interest groups, including environmental, workers and socially oriented organisations. Its only reference is to consumers organisations at one point. An important contribution to achieve sustainable development can come from civil society, its organisations and individual citizens. They need to be given the opportunity to fully play this role. A specific element we have proposed in our letter of May 10 was to create a culture of **accountability to citizens, to ensure that citizens can hold businesses, governments and other institutions accountable for sustainable development in a democratic manner.**

- **WE CALL UPON THE COUNCIL AND PARLIAMENT TO STRESS THE ROLE OF CIVIL SOCIETY IN THE REALISATION OF THE SUSTAINABLE DEVELOPMENT STRATEGY.**
- **WE CALL UPON THE COUNCIL TO DECLARE ITS FULL COMMITMENT TO RATIFY, IMPLEMENT AND ELABORATE THE AARHUS CONVENTION ON THE EU AND NATIONAL LEVELS, INCLUDING THE RIGHT TO ACCESS TO JUSTICE FOR CITIZENS AND ENVIRONMENTAL GROUPS, TO BE REALISED AT THE LATEST BY THE NEXT IGC.**
- **WE CALL UPON THE COUNCIL TO GIVE THE GOOD EXAMPLE IN PROMOTING TRUST AND TRANSPARENCY BY FROM NOW ON GIVE DETAILED REPORTS ON THE DISCUSSIONS AND VOTINGS, IN THE COUNCIL ITSELF.**

On "long-term objectives and targets"

We welcome the decision of the Commission to propose long-term objectives and targets, to provide the framework for actions in the coming years. These objectives and targets are mainly process oriented, and do not describe the state of the environment the Commission wants to achieve within the life-time of the Strategy (which by itself remains undefined). Environmental objectives and timetables should have been part of the 6th Environmental Action Programme, but there the Commission refused to systematically propose. We think the EU Institutions should finally agree on a simple set of headline targets and timetables, to be the basis for headline indicators, without any further delay.

- **WE CALL UPON THE COUNCIL TO ESTABLISH A SET OF AMBITIOUS INDICATORS AND TIMETABLES INCLUDING THE ONES PRESENTED IN THIS PAPER**

On "climate change and energy"

We welcome the proposal of the Commission to set an objective for greenhouse gas emissions for 2020. However, the target is unclear, is the Commission counting with 1% reduction from 2008 or 2012? Is the 1% reduction to be achieved entirely inside the EU or will the EU run away again into joint implementation and other forms of virtual reductions? Furthermore, a long term objective is absent.

We consider the phasing out of subsidies on fossil fuel production and consumption by 2010 as too long away. Governments should have been working on this for the last ten years, since they agreed the Climate Convention, and in this way irresponsible lack of performance is rewarded. The Environmental Outlook of the OECD recently described that a good policy of abolition of energy subsidies and energy taxes could lead to a 25% reduction of greenhouse gases!

The Commission wants to promote in particular biofuels. We have serious concerns about the environmental impact of the production of biofuels. We call for strict environmental criteria for biofuels so that only those that have a real positive impact will be considered as alternative fuels. A **major issue for concern** is the sudden promotion of nuclear energy in the Strategy. We believe that nuclear energy that is sufficiently safe to take away the concerns of millions of citizens is an illusion. Furthermore, we believe that investing in energy efficiency and real alternatives is a much more cost-effective use of government and EU research money.

- **WE CALL UPON THE COUNCIL TO MENTION THE IPCC LONG TERM TARGET OF 450 TO 550 PPM GREENHOUSE GASES IN THE ATMOSPHERE; AGREE THAT THIS MEANS SOME 80-90% REDUCTION IN THE EU, AND THAT BY 2020 A 30% REDUCTION IS TO BE ACHIEVED, OF WHICH THE VAST MAJORITY IS TO BE REALISED WITHIN THE EU ITSELF.**
- **WE CALL UPON THE COUNCIL, PARLIAMENT AND COUNCIL TO INSIST ON THE COMPLETE PHASING OUT OF FOSSIL FUEL RELATED SUBSIDIES BY THE YEAR 2005 AND TO UNAMBIGUOUSLY REJECT THE NUCLEAR OPTION AS PART OF THE SOLUTION.**
- **WE CALL UPON THE COMMISSION TO MAKE A CRITICAL ENVIRONMENTAL ASSESSMENT OF THE DIFFERENT PRODUCTION PROCESSES FOR BIOFUELS,**
- **WE CALL UPON THE COUNCIL AND COMMISSION TO INCREASE EFFORTS TO PROMOTE ENERGY CONSERVATION, COMBINED-HEAT AND POWER GENERATION AND OTHER RENEWABLE ENERGY SOURCES.**
- **WE CALL UPON THE COUNCIL AND PARLIAMENT TO FIRMLY REJECT ANY ATTEMPT FROM THE COMMISSION TO RE-INTRODUCE THE NUCLEAR OPTION.**

On "threats to public health"

The target for chemicals is a weakening of the OSPAR Convention agreement, signed by most EU countries and the Commission and a basis for the new Chemicals Strategy. This object is to phase out entirely the production and use of hazardous chemicals, on the basis of their inherent characteristics, not the specific uses (as this does not guarantee unwanted exposure to the environment or human beings).

On consumer information it is important that the need to have a waterproof system of labelling and traceability of GMO's is guaranteed.

We very much support the phasing out of subsidies of tobacco production, and are happy the Commission proposes a process to do so. However, it is amazing to hear that at the very same time the Commission is proposing an **increase** of such subsidies for 2002!

- **WE CALL UPON THE COUNCIL TO RECONFIRM THE OSPAR CONVENTION TO CEASE ALL RELEASES OF HAZARDOUS SUBSTANCES TO THE ENVIRONMENT BY 2020 AND THE NEED FOR FULL INFORMATION ON GMOS.**
- **WE CALL UPON THE COMMISSION TO WITHDRAW ITS RECENT PROPOSAL TO INCREASE SUBSIDIES FOR TOBACCO PRODUCTION, AND, IF NEEDED, THE PARLIAMENT AND COUNCIL TO DECIDE ON PHASING OUT IN THREE YEARS FROM NOW ON.**

On "management of natural resources"

Policies to promote eco-efficiency need a very clear overall target, to show political leaders, business and civil society the dimension of changes needed and to develop indicators that can help us in judging whether or not more needs to be done. We need ambitious targets, that aim to show the level of ambition we need to have, also in order to provide for developing countries the "environmental space" to create more prosperity in their societies.

Absent here is also the proposal of natural resource use taxes and on agriculture the entire issue of environmentally damaging subsidies is absent.

- **WE CALL UPON THE COUNCIL TO LAUNCH THE FACTOR 4 AND FACTOR 10 OBJECTIVES FOR 2015 AND 2030 AND IN THIS WAY TO SHOW REAL LEADERSHIP.**
- **WE CALL UP COUNCIL, COMMISSION AND PARLIAMENT TO WORK TOGETHER FOR A MAJOR RE-FORM OF THE COMMON AGRICULTURE POICY IN 2003, AWAY FROM ENVIRONMENTALLY DAMAGING SUBSIDIES, AS WELL AS FOR THE SWIFT INTRODUCTION OF NATURAL RESOURCE USE TAXES, BASED ON THE "ECOLOGICAL RUCKSACK" PRINCIPLE.**

On "transport and land-use management"

We think a stabilisation of the relation between road and air on the one hand, and rail, water and public transport on the other is not ambitious enough. We want to see a real modal-shift away from road and air

We agree fully with the objective for price signals in transport and removal of subsidies. However we think that for both environmental and social reasons, public transport should be dealt with in a preferential way, given the strategic importance of this alternative.

- **WE CALL UPON COMMISSION, COUNCIL AND PARLIAMENT TO BE MORE**

AMBITIOUS AND PROMOTE, AND TAKE EFFECTIVE MEASURES TO, A REAL MODAL SHIFT AWAY FROM ROAD AND AIR TOWARDS RAIL, PUBLIC TRANSPORT, WATER AND NON-MOTORISED ALTERNATIVES.

On "implementation and review"

The process of setting clear targets, timetables and headline indicators should be concluded by the Barcelona Summit. The indicators should include environmental performance, resource input and sectoral indicators. The Commission should fully involve the Parliament and civil society in this process.

We agree with the Commission that all Institutions need to reform their working methods so that policy coherence and the sustainable development test will be applied as a matter of course in the Commission, the Parliament and the Council.

We would like to see more clear proposals for involvement of citizens in decisionmaking than just the promise of hearing for major policy proposals. In an earlier occasion (public commission hearing 13/3/01) the EEB has given specific proposals for Commission procedures (see also website www.eeb.org). These proposals include early warnings on new policy initiatives and legislation, invitations for input in early stages of the process and, very importantly, an explanation on what the Commission has done with the input.

We support the annual stocktaking of progress at the annual Spring Summit, but want to see an ongoing stakeholder involvement process, with annual discussions organised between the Commission and stakeholders several weeks before this Summit.

We support in principle the establishment of a "Sustainable Development Roundtable", but the roundtable should have appropriate working conditions and resources to truly carry out its work in an independent way.

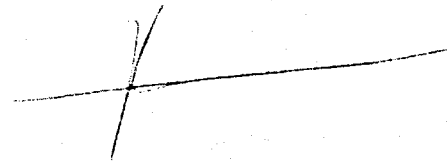
- **WE CALL UPON THE COMMISSION TO START A DIALOGUE WITH ENVIRONMENTAL ORGANISATIONS AND EXPERTS ON THE NECESSARY TARGETS, TIMETABLES AND INDICATORS IMMEDIATELY AFTER GOTEBOG, AS WELL AS ON A COMPREHENSIVE POLICY FOR ONGOING PUBLIC PARTICIPATION IN EU'S ENVIRONMENT RELEVANT POLICIES AND LEGISLATION.**

Finally, on the role for accession countries

Most of the 13 Accession countries can expect membership in the next 3 to 10 years. In the further development and implementation of the Sustainable Development Strategy they should therefore have a prominent role. The Commission has so far neglected this.

- **WE CALL UPON ALL THREE INSTITUTIONS TO CONSULT AND INVOLVE THE GOVERNMENTS, PARLIAMENTS AND CIVIL SOCIETIES OF THE ACCESSION COUNTRIES IN THE FURTHER DEVELOPMENT AND IMPLEMENTATION OF THE STRATEGY.**

Yours sincerely



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Cc: The Members of the European Council
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