

Network of

European Environmental Advisory Councils (EEAC)



**Commission Staff Working Paper
CONSULTATION PAPER FOR THE PREPARATION OF A EUROPEAN UNION
STRATEGY FOR SUSTAINABLE DEVELOPMENT
SEC (2001) 517 – 27 March 2001**

**Response on behalf of the
EUROPEAN ENVIRONMENTAL ADVISORY COUNCILS**

24.04.01

This response is based on the statement *Greening Sustainable Development Strategies*, published by European Environmental Advisory Councils (EEACs) in February 2001 (see note at end for a list of the advisory councils which endorsed that statement.).

EEACs welcome the consultation paper issued by the European Commission in preparation for putting proposals for a European Sustainable Development Strategy to the Gothenburg European Council in June. In particular, they strongly support:

the acknowledgment of the crucial and overarching importance of sustainable development,

the emphasis on rigorous and scientifically based analysis of policies and the recognition that worrying long-term trends have emerged,

the recognition that protecting the natural environment (which is crucial for economic and social development in the long run), while maintaining a dynamic economy and a society offering opportunities to all, will entail improving resource productivity and decoupling growth from environmental degradation,

the commitment to a participative approach to policy development, demonstrated in the publication of this working document from the Commission services.

EEACs welcome the conclusion of the Stockholm European Council that sustainable development is an integral part of the Lisbon Process. They urge Heads of Government, in conjunction with the Commission, to expedite appropriate changes in the reporting procedures and other mechanisms of the Lisbon Process so as to ensure the environmental dimension will be taken fully into account.

The views of EEACs on the 10 questions posed in the present consultation paper can be summarised as follows:

Q1. EEACs support the approach of focusing initially on a **limited range of policy areas**, if that will ensure that a substantial difference can be made to policies and trends in those areas within a short period. Achieving sustainability means emphasising the interactions and linkages between policies and breaking down the barriers between the traditional compartments into which EU policies have been divided. From this perspective the 6 topics listed in the consultation paper appear to represent a broadly sensible choice.

There are two provisos however. The approaches adopted in relation to those 6 topics must be firmly located within a coherent conception of what will constitute sustainable development. At the moment, for example, the discussion in the consultation paper about the primarily social topic 5 'Ageing and demography', and about topic 6 'Mobility, land use and territorial development', does not take proper account of the need clearly apparent in other contexts for a new concept of economic development. There must also be an explicit recognition that there are other vital issues for sustainability in addition to those initially selected, and that the Strategy will also have to turn its attention to these at an early date.

Q2. European society on a more sustainable path is a crucial contribution to achieving **sustainability at global level**. EEACs strongly support the emphasis in this consultation paper on the need for the EU to lead by example. In a global perspective, even more far-reaching changes in European patterns of production and consumption are ultimately likely to be necessary. Action is in train, in preparation for the Rio + 10 Summit next year, to develop further the EU's role in helping to achieve sustainable development on a global scale.

All the EU's external policies must be assessed critically to check that they are contributing to global sustainability. The reform of the Common Agricultural Policy and the Common Fisheries Policy must take account of the situation in developing countries and their position in World Trade Organization negotiations, so as to avoid placing unrealistic demands or costs on such countries.

Q3. One aim of the Sustainable Development Strategy should be achieving equity in quality of life throughout the enlarged EU. The **accession countries** have suffered more severe environmental damage in some respects than the present Member States. Much of the countryside in the accession countries, on the other hand, has been less affected by the kinds of pressures for intensive production that have caused so much damage elsewhere. At the moment the accession countries are facing severe and acute pressures on their environment, as a result of construction of new infrastructure, increases in private transport and in energy consumption for other purposes, and a general rise in consumption and resource use.

The implication of aiming for equity throughout the enlarged EU is that increases in production, resource use and transport in the accession countries might have to be offset by reductions in the present Member States. Moreover, the European Commission and present Member States may have to provide assistance to the accession countries to help them towards sustainable development.

The most valuable forms of assistance may well be access to innovative technologies that make fewer demands on resources and funds to encourage the adoption of such technologies. With such assistance, the accession countries may be able to move more rapidly than the rest of the EU to a new concept of development based on such technologies, in preference to the traditional concept of economic growth based on heavy consumption of energy and materials. In the case of agriculture in the accession countries, on the other hand, the challenge for the EU is to protect the present biodiversity and cultural values by promoting models of integrated rural development which are sustainable both in those terms and in economic terms.

Q4. EEACs are in general agreement with the analysis in section 3 of the consultation paper of the **common problems** that have created the present unsustainable situation in the EU: inconsistencies between policies in different sectors, wrong incentives (including, in some cases, perverse subsidies provided by the EU), failure to take a long-term view, policy inertia, and

inadequate communication and dialogue. While limitations on current knowledge of causes and effects may also be a factor, the nature of many of the problems that are producing environmentally unsustainable trends is well understood; the key task is communicating that information clearly and honestly to the public.

More emphasis should be placed on the heavy and increasing use of natural resources as the fundamental force driving unsustainability in the EU. The correlation between growth of European economies and mounting demands for natural resources reflects the prevalence of traditional patterns of production and consumption. As the consultation paper recognises, one reason why such patterns continue to dominate is that the prices of goods and services still do not reflect the costs imposed by pollution and by consumption of natural resources.

Section 4 of the consultation paper, which seeks to provide a **policy toolkit** for sustainable development in Europe, parallels in most respects the analysis that EEACs have made.

If effective use is to be made of the policy toolkit, there must be strong commitment to sustainable development at the highest political level. The President of the Commission and Heads of Government must be involved regularly in setting the direction of the Sustainable Development Strategy, in checking progress towards quantified targets, and in taking corrective actions wherever necessary to ensure those targets are achieved. There must also be a much stronger emphasis on the positive participation of citizens at all stages in formulating and reviewing policies.

Q5. Under the Cardiff Process established in 1998 some progress has been made in integrating environmental considerations into sectoral policies; thus far, 9 formations of the Council of Ministers have produced a strategy for that purpose. As this consultation paper highlights, however, incoherence between policies in different sectors remains one of the fundamental barriers to achieving sustainability in the EU. The Cardiff Process should therefore continue, but should now form a component within the wider Sustainable Development Strategy.

Recent research by the Institute for European Environmental Policy and Ecologic has led to the following recommendations for improving the Cardiff Process:

- there should be common guidelines for integration strategies
- stakeholders should be fully involved in producing strategies
- steps should be taken to raise awareness and understanding in Councils and improve the information available to them
- there should be mechanisms for reviewing the experience gained in producing integration strategies and exchanging best practice among Councils
- a body such as the General Affairs Council should be given responsibility for overseeing and monitoring the Cardiff Process.

To give practical effect to the principle of policy integration, other mechanisms will also be needed:

- directorates-general in the Commission should collaborate to carry out a programme of joint policy reviews, in order to consider future EU policies from a long-term perspective
- all proposed EU legislation and policies, and under a phased programme all existing legislation and policies, should be subject to a detailed assessment to determine their environmental impacts and their implications for sustainability, and those assessments should be published.

Q6. There must be **active participation** at all stages by stakeholders, and by civil society more generally. That must start with the setting of objectives and targets and extend right through to the implementation of policies. At the stage of setting objectives, the Commission should explore the use of innovative methods which have been employed by Member States, such as citizens juries and consensus conferences. It is also essential however to ensure the full involvement of elected representatives at all levels from the European Parliament to local authorities.

Experience has shown that wide political support for sustainable development can be obtained broadly based councils for sustainable development, high-level stakeholder conferences, joint statements on basic principles.

There must also be effective communication to people at large that a Sustainable Development Strategy exists, and what its key features are. To facilitate this, the EU Strategy should be clear and comprehensible, and positive and inspirational in tone. The Commission should ensure it receives maximum publicity.

Creative dialogues between different sectors should be established at all levels to address specific issues, involving in particular industry and non-governmental organisations.

At the stage of implementing policies, new methods must be adopted to engage people and draw on their life experiences and skills. This requires approaches to learning which bring theory and practice together in a unified process. Provision of information by technical experts is not sufficient; there must also be strong grassroots involvement. Local Agenda 21 may provide a mechanism for that.

More generally, innovative approaches to learning should be incorporated into the *educational curriculum*. Programmes directed at adults should address business practices, personal behaviour and consumption, and the implications for public policy at all levels. Programmes will have to be established to train staff to adopt such approaches.

Q7. The move towards a new concept of development will involve a progressive change in life-styles and patterns of consumption, as well as in patterns of production. There will be situations where this new concept of development will offer immediate win-win **opportunities**, in that actions to achieve environmental sustainability will also bring economic and social benefits. By taking the lead in technological and commercial innovations that decouple economic growth from resource use and pollution, the EU can simultaneously improve the quality of life for all its peoples, increase the competitiveness of its industries and stimulate employment.

The EU Sustainable Development Strategy can, and should, provide European companies with the secure basis for long-term planning which they will need if they are to take full advantage of such opportunities. This must take into account the need to establish a level playing field, in order to encourage and facilitate the necessary changes. In addition, taxes raised in the process of facilitating this shift in development must be re-invested into activities that continue to assist and encourage the move towards greater sustainability.

It is inevitable that some actions to achieve environmental sustainability will involve short-term **costs** in the form of adverse economic or social effects in some sectors. Although the move to more sustainable models of production and consumption will be in society's overall interests, these immediate costs raise political challenges. But that must not be allowed to act as a barrier to attaining the longer-term opportunities a more sustainable society can offer. In economic and social terms the most forceful argument for this new concept of development is that it will avert

or mitigate disastrous consequences in the long term. Most obviously, the consequences that will follow if effective measures are not taken to limit the concentrations of greenhouse gases in the atmosphere.

Adverse effects must be carefully assessed and sensitively managed so that the relevant policies will continue to receive public acceptance. The savings gained from removing perverse subsidies should make it possible to use the EU budget to support and promote sustainable models of production and consumption and mitigate adverse transitional effects.

Q8. EEACs have identified the following policy areas as clearly requiring **action at EU level** in order to achieve sustainable development:

Energy: To be in a credible position to play a leading role successfully in international negotiations to limit greenhouse gas emissions, the EU must first establish convincing and robust policies to comply with the Kyoto limits. Further efforts must be made to establish a carbon tax, with a minimum rate applying throughout the EU. To exert further pressure for reductions in emissions, carbon dioxide should be formally classified as a pollutant for the purposes of the Integrated Pollution Prevention and Control Directive. There should be new and demanding energy efficiency standards for products and for buildings, under a unified system. The liberalised electricity market must be structured and managed in ways that facilitate and encourage the large-scale development of renewable energy sources and combined heat and power schemes.

Transport: Further targets must be set for reducing the fuel consumption of vehicles, beyond the levels that will be achieved under the existing voluntary agreements with car manufacturers. However, technical changes in vehicles will not be sufficient on their own; an evolution in business practices and personal lifestyles will also be necessary. EC legislation should set a high minimum rate for taxes on road fuels in all Member States. A fuel tax or emissions trading could play a vital role in controlling the environmental impact from growth in air transport. Effective action is needed at EU level to encourage transfer of freight from road to short sea routes or to rail. The environmental impacts of big infrastructure projects (road, canal or rail) should be thoroughly assessed, and comparisons made between alternative modes, before specific proposals are put forward: transport projects supported by the Structural Funds must be critically examined to determine whether the outcome can be regarded as sustainable.

Industry: Policies must be based on reducing use of materials and energy over the whole life cycles of industrial products, including the wastes produced when they reach the end of their life. The Commission's Green Paper on integrated product policy marks an important step forward, and hopefully will be followed quickly by legislation. There is considerable scope for improving the inefficient EU assessment procedure for managing risks from chemicals. An alternative approach has to be found, based on the precautionary principle, and probably incorporating deadlines for phasing out certain substances currently used.

Agriculture: The Common Agricultural Policy is a glaring example of an EU policy which provides perverse subsidies that encourage damage to the environment. Agenda 2000 should be seen as only a start; more radical changes are needed for the longer term. Agricultural policy should give support to maintaining regional and local landscape character, to sustaining local communities, to protecting and extending biodiversity, and to protecting soils and aquatic ecosystems. EU agriculture, energy and environmental policies should be co-ordinated in exploring the potential for encouraging cultivation of energy crops, and in assessing environmental side-effects and the overall energy balance. There are some signs that the response to the spread of bovine spongiform encephalopathy

(BSE) and foot and mouth disease could be a fundamental reappraisal of the approach adopted in agriculture, with a resulting shift to methods that are less damaging to the environment. The Commission should be alert to opportunities to take advantage of, and foster, any such trend.

Fisheries: EEACs particularly welcome what the consultation paper says about fisheries. The review of the Common Fisheries Policy in 2002 may be the last opportunity to achieve sustainable solutions to this longstanding problem. Adequate measures must be put in place to deal with the social and economic issues involved in transition to a sustainable fishing industry.

Nature conservation: EU policies in all fields should have regard to the EU Biodiversity Strategy; indicators, targets and timetables must be established to promote biodiversity in the longer term. The Commission should maintain pressure on Member States to ensure Natura 2000 is fully implemented on 15% of EU territory by 2004. To complement Natura 2000, a trans-European network of 'green frontiers' should be created along the political boundaries within the EU, with the aim of simultaneously promoting nature conservation, sustainable development, and social and cultural contacts.

These examples are not intended to be exhaustive. They cover some of the key areas in which action at EU level is most urgent in order to move towards sustainable development.

Q9. The **most urgent steps** the EU must take in order to establish the framework for the Sustainable Development Strategy are:

- ensure **commitment at the highest political level**
- there should be an **annual review** of the Strategy at the spring European Council, and each part should be reviewed in detail at least every four years, not least to extend the scope of the Strategy beyond the six initial policy areas identified by the European Commission
- those reports should be integrated with the annual reports made to the Spring European Council on the **Lisbon Process**, so that social, economic and environmental objectives can be considered together
- the **Cardiff Process** for integrating environmental considerations into other policy areas must continue and be reinforced
- to secure better co-ordination of policies, the directorates-general of the European Commission should establish a programme of **joint policy reviews**
- all EU legislation and policies should be subject to **detailed assessment** to determine their environmental impacts and their implications for sustainability
- **perverse subsidies** given at present should be phased out at the earliest possible date.

Q10. Clear **objectives** are an essential part of a Sustainable Development Strategy, and they must be converted into quantified indicators and targets.

To be relevant in the context of sustainable development, the targets must be long-term targets, extending at least 20-25 years into the future.

There must be clear milestones in the form of quantified targets for intermediate dates, so that it will be possible to check regularly that policies are indeed on the right track to achieve the long-term objectives.

The objectives and targets adopted must address the most important environmental problems. They should certainly therefore cover the key policy areas identified above in response to question 8.

The annual review of the Strategy advocated above will provide the mechanism for monitoring whether satisfactory progress is being made towards the agreed objectives and targets, and for ensuring that corrective action is taken where necessary.

The roles of the Commission and the Council are of central importance if sustainable development is to be achieved. But changes are urgently needed also in **other European institutions** :

a **Sustainable Development Committee of the European Parliament** should be established to keep under review the extent to which EU policies are environmentally sustainable.

where international obligations which the EU has accepted as a contribution to global sustainability have been allocated between Member States, the **European Court of Justice** should have powers to impose penalties on any Member State that fails to meet its obligation.

EEACs hope that the Sustainable Development Strategy which emerges from the Gothenburg European Council will be a vital document in establishing both a long-term vision for the EU and the capability to realise that vision. But Gothenburg will be the end of the beginning. What happens afterwards will be of crucial importance. EEACs look forward to **a continuing and wide-ranging dialogue** with the European institutions and with other actors about the best ways of moving towards sustainability. They hope that this year's conference of EEACs, at Gent (Belgium) in November with the theme 'Instruments for sustainable development', can make a valuable contribution to that.

24 April 2001

London/Peterborough/Stockholm/Copenhagen/Wiesbaden

NOTE:

The European Environmental Advisory Councils (EEACs) are bodies established by the national and regional governments in Member States and accession countries to provide advice on environmental issues. Some of them are expert bodies, others more in the way of stakeholder bodies, but an essential point is that they provide independent advice.

At their annual conference held at Sesimbra in June 2000 EEACs identified the EU Sustainable Development Strategy as an issue of vital and fundamental importance. They established a working group to contribute to forming the Strategy, and consider what must be done to move the EU towards a more environmentally sustainable path. The statement produced by the working group, Greening Sustainable Development Strategies, contains more extensive analysis and more detailed recommendations for the preparation of a Sustainable Development Strategy for the EU. The general orientation of that statement has been formally endorsed by the following 23 advisory councils in 15 countries:

Austria	Austrian Association for Agricultural Research (ÖVAF) Clean Air Commission of the Austrian Academy of Sciences (KRL)
Belgium	Environmental and Nature Council of Flanders (MiNa-Raad)
Denmark	Danish Nature Council (DNC)
Estonia	Estonian Commission on Sustainable Development (ECSD)
Finland	Finnish Council for Natural Resources (FCNR)
Germany	German Council for Environmental Advisors (SRU) German Advisory Council on Global Change (WGBU) German Council for Land Stewardship (DRL)
Hungary	Hungarian National Council on the Environment (NEC)
Ireland	Heritage Council of Ireland (HC)
Lithuania	Lithuanian National Council for Sustainable Development (LNCSD)
The Netherlands	Council for the Rural Area (RLG) Advisory Council for Research on Nature and Environment (RMNO) Council for Housing, Spatial Planning and the Environment (VROM-Raad)
Portugal	Portuguese National Council on Environment and Sustainable Development (CNADS)
Slovak Republic	Council of the Government for Sustainable Development of the Slovak Republic
Slovenia	Council for Environmental Protection of the Republic of Slovenia (CEPRS)
Sweden	Swedish Environmental Advisory Council (MVB)
United Kingdom	Royal Commission on Environmental Pollution (RCEP) English Nature (EN) Countryside Council for Wales (CCW) Scottish Natural Heritage (SNH)

The common secretariat for EEACs is currently located at the German Council of Environmental Advisors:

Focal Point of EEAC
c/o The German Council of Environmental Advisors (SRU)
Postfach
D – 65180 Wiesbaden
direct line: +49 / 611 / 75-4197
fax: +49 / 611 / 731269
mobile: +49 / 179 / 9900379
e-mail: ingeborg.niestroy@uba.de

Copies of Greening Sustainable Development Strategies can be requested at the secretariat and are available at
www.EEAC-network.org