



Overall Approach to the Review of EU SDS

While the overall approach is sound and there have been achievements, the review of the EU SDS should take the opportunity to identify delivery gaps, intensify implementation measures, and foster better links with national sustainable strategies. The overall approach needs a clear leadership and, as the conceptual framework is concerned; the parallelism of the SD review and the Lisbon process needs to be straightened out. A stronger political commitment and willingness to tackle difficult issues will be essential to meet the challenges. Enhanced stakeholder participation is also needed if the revised strategy is to address the difficulty of mobilising public support for long term goals. All sectors of society must be persuaded of the need to change patterns of behaviour and consumption in order to build positive scenarios for the future. Communication of sustainable development in a more accessible way is necessary as well as the integration of sustainable development principles into the formal education system.

The SD policy needs a higher political visibility and a feasible approach for a better horizontal integration of EU- policies. An EU commitment to be the world’s most eco-efficient region by 2010 could serve this aim.

On Lisbon Strategy and EU SD Strategy

As both processes concern some of the major future challenges in Europe, there ought to be a close relation between the Lisbon review and the EU SD review. However, in practical terms, it seems that both processes are often misconceived as a competitive relation between environment and economy.

The two strategies must be coherent with the overarching objective of long-term sustainable development and a commitment to move away from unsustainable patterns of production and consumption to a new pattern of responsible competitiveness. In this way, Europe can make the Lisbon strategy work for sustainable development. A major move towards eco-efficiency would clearly serve as a guiding principle for the economic and social coherence of the enlarged EU.

Scope of the SD Strategy, Additional Priority Issues

In line with the Johannesburg commitments, we suggest as additional priority issue: “sustainable production and consumption patterns”. In our view, this important topic is not covered well enough in the 6 existent priority issues.

Community Policies

The policy making processes must ensure effective balance and promote synergies between the three pillars of sustainable development, in particular through decoupling economic growth from environmental degradation, and give renewed momentum to the integration of environmental concerns into sectoral policies.

Unfortunately, the EU SDS is not yet perceived as the encompassing long-term strategy of the EU it is meant to be. The principles and instruments for sustainable development are not applied with sufficient coherence in the Union’s various policy domains. Horizontal integration clearly falls short.

This unsatisfactory implementation of the EU SDS is the result of a number of inherent shortcomings, namely the lack of clarity, concrete objectives, and timing, but likewise of a number of defects in terms of the conduct of the policy. The structure and the functioning of the EU institutions, on the one hand, and the absence of political will, on the other, complicate and delay the implementation of a sustainable development strategy. Both within the Commission, the Council, and in Parliament, a different approach is called for, plus greater *leadership* and engagement, to give the general importance of a sustainable development priority over sectoral and national interests.

Impact Assessment

The introduction of the Impact Assessment process in 2001 for the Commission’s own proposals is a welcome development. Tools are needed, on one hand to evaluate actual achievements (ex-post evaluation), and on the other to evaluate and assess future development (ex-ante evaluation). The implementation of Strategic Environmental Assessment is welcome. Further work is necessary to put in place a comprehensive impact assessment and reporting system for sustainable development purposes.

In practice, the preliminary impact assessments that were published this year, are of uneven quality. An “*assessment of the impact assessments*” seems an appropriate step. Within the context of the EU’s “governance” approach, also the social and environmental stakeholders ought to be enlisted in order to broaden the transparency and the scope of the process.

The application of sustainability impact assessments should be extended to external as well as internal impacts of EU policy proposals, e.g., in the area of trade. Analysis of policy proposals should quantify the costs of not taking action in terms of their impacts on human health and the environment and set it out alongside the benefits of taking action.

Exchange of Information, Capacity Building

Efforts should be made to promote dissemination and sharing of information on examples of best practice in the area of SD assessment, reporting and monitoring which exist within and outside the EU, both in international and national organisations. Best practice needs to be evaluated and fully integrated into European policy-making processes.

Market Instruments

The reform of CAP and the adoption of the Energy Tax Directive are welcome. However, more needs to be done; the Commission, together with Member States, should intensify efforts to remove subsidies from environmentally harmful activities and to shift the tax burden from employment and labour to activities which give rise to environmental pollution. As provided for in the March 2004 Environment Council Conclusions, the Commission should establish, by the mid-term review of the 6th EAP, a list of criteria allowing such environmentally negative subsidies to be recorded, with a view to gradually eliminating them.

Research, Science and Technology

The publication of the Environmental Technologies Action Plan (ETAP) and inclusion of sustainable development as one of the seven key areas in the 6th Framework Programme are welcome developments. There is a need for strong links between the ETAP, LIFE and the 7th Research Framework Programme to ensure complementarity.

Communication and Stakeholder Involvement

Better communications begins with earlier consultation with stakeholders and, in particular, with those who are most directly affected. National Sustainable Development Councils can play a key role. They do not yet exist in every country but where they do exist they provide valuable support for the process of creating, implementing and monitoring national strategies. They work best and have most positive influence where they are established as independent bodies drawing in many stakeholder interests and able to comment publicly on emerging issues and Government policies from a sustainability perspective. At the same time, they need to be responsible bodies that build trust and can earn the respect of Government and the wider public and be given good access to influence the process of policy formation and decision-taking. The revised Sustainable Development Strategy might promote the formation of National Councils in every country of the Union and propose some informal guidelines as to their mode of formation and operation.

The revised EU SDS should be summarised in a single, self-contained document, which explains clearly to the citizens of Europe where we are going and how we intend to get there.

EU Policy Making Process

The planned mid-term review of the Lisbon Strategy in 2005 should take full account of the revised SDS and of the 6th EAP as well as the EU's environmental agenda; it should refocus on the imperative of greater environmental integration, notably in the transport and energy sectors, including through the development of overall and sectoral objectives as well as of effective monitoring mechanisms, and review and promote progress towards agreed targets. The Commission, together with the Member States, should examine the extent to which the open method of co-ordination could be used to spread best practice and achieve greater convergence towards the main EU environmental goals, including in the area of environmental technologies. The European Parliament should be better involved in the current review. Contributions from the Members of Parliament could open the scope and provide greater credibility and authority to the sustainable development strategy.

As an additional support for communication and stakeholder engagement a sounding board on sustainable development should be established at European level with appropriate linkages to national councils, either as an independent advisory body or by building up the role of the European Economic and Social Council.

Indicators

The shortlist of headline indicators agreed in December 2003 should be conveyed to public opinion in order to monitor the progress made in achieving the goals of the Lisbon, Gothenburg and Stockholm Councils. A publicly accessible database could help to fully monitor structural reforms. The Spring Report should continue to base its analysis on the longer list of indicators. Further progress is desirable to enhancing the balance of headline indicators according to the priorities of the EU Sustainable Development Strategy and the 6th Environmental Action Plan. Indicators on biodiversity and health should be included in conjunction with the review of the EU Sustainable Development Strategy.

Furthermore, indicators on the external dimension and on the impact of consumption and production methods could be added. The implementation of WSSD commitments should continue to have a high priority and be integrated into all relevant internal and external policies of the EU. There is a need to ensure that the SDS addresses adequately the global footprint of the EU and that international commitments are fully taken into account.

Enlargement of the European Union

The enlargement of the European Union raises new challenges and brings new aspirations to bear. The cohesion gap and welfare differentials are a huge challenge. As recommended by the European Environment and Sustainable Development Advisory Council's *Kinsale Challenge*, there is considerable scope for an EU initiative to enhance the effectiveness of national strategies; such an initiative might form an important element to emerge from the review of the SDS. It might:

- encourage the creation of national strategies in every country in the Union so as to achieve comprehensive coverage,
- define a common vision of sustainability in Europe and propose some shared goals and targets,
- promote best practice in the way in which strategies can be created, and engage a wide range of actors and stakeholders in making their own commitments, and
- reinforce monitoring of progress.

The transport sector is particularly challenging with a likely trend towards a still increasing mobility levels in Europe, with all the consequences in terms of environmental degradation that such a trend implies.

Overall, to ensure coherence, the Member States could report to the Spring Summit on the implementation of their SD strategy. More specifically, instruments as the open method of coordination, tripartite contracts and conventions could be used more often to obtain a coordinated approach.