



EEB

European
Environmental
Bureau

Priorities for the
**EUROPEAN
GREEN DEAL**
and the
**8TH ENVIRONMENT
ACTION PROGRAMME**

EUROPE'S LARGEST NETWORK OF ENVIRONMENTAL CITIZENS' ORGANISATIONS



We are the largest and most inclusive network of environmental citizens' groups in Europe. Our 150 members from 35 countries cooperate across a uniquely broad range of issues. Together, we advocate for progressive policies to create a better environment in the European Union and beyond.

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A European Green Deal and the 8th Environment Action Programme: Priorities, Links and Specific Opportunities for Policy Commitments and Action ¹

There is a Growing Urgency for Transformative Agendas

Evidence is indisputable that we are facing a **climate emergency**, existential loss of **biodiversity**, socially unacceptable **risks to health from chemicals and air pollution**, and unfathomable levels of **plastic pollution in our oceans**. Next to existential environmental crises, we are faced with **high levels of inequalities**, both within the EU and globally, as well as **decreasing levels of trust in governments, governance and policy-making**.

Citizens and especially young people are demanding that the EU does more to address climate and environmental challenges head on. **Economically viable and interesting opportunities** exist and action could make Europe a cleaner, greener and safer place to live.

There is therefore an increasingly recognised **need for an ambitious and transformative agenda**.

An effective European Green Deal could **boost jobs and opportunities, safeguard our climate and environment for future generations and become an era-defining policy** that will rebuild trust in EU institutions in the eyes of European citizens.

Transformative agendas: European Green Deal, 8th Environmental Action Programmes & Agenda 2030

Ursula von der Leyen's promise to deliver a **European Green Deal** is a major opportunity to respond to the triple existential threats of climate breakdown, biodiversity loss and pollution, including risks from chemicals. It can also catalyse a just transition for transformative change in Europe. It will be developed in the first 100 days of the new Commission and could potentially be a defining instrument of the 2019 to 2024 Commission term, with impacts to 2030 and beyond.

Implementing **Agenda 2030 and SDGs** in Europe is a European Commission and Member State commitment for 2030. Yet the EU still lacks specific targets for the realisation of the SDGs and indicators, and an overarching sustainable Europe 2030 strategy and Implementation Plan to 2030 and beyond.

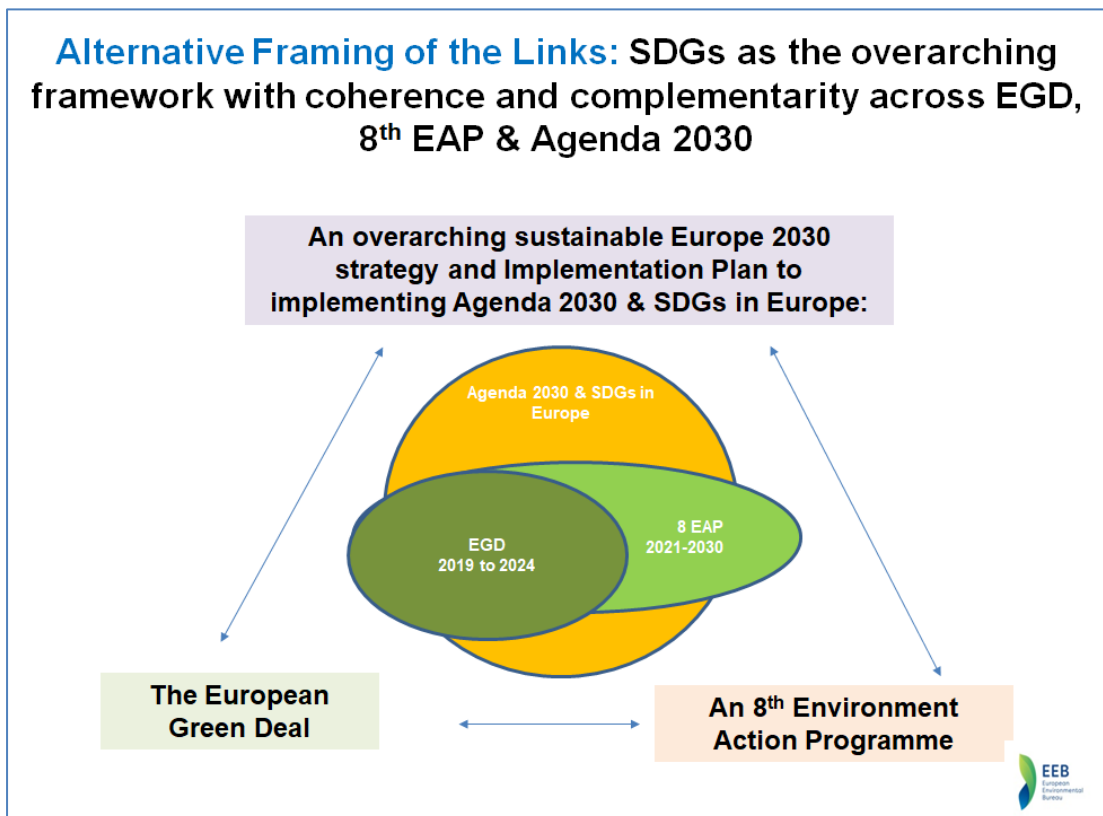
In addition, the 7th Environment Action Programme (7EAP), adopted by the European Parliament and the Council of the European Union in November 2013, is approaching its end (2020). The 7EAP evaluation concluded that it has been a valuable joint commitment by the Commission, Council and Parliament, but there are still gaps and weaknesses in delivery and the nine priorities remain relevant. Discussions are underway on developing the **8th Environment Action Programme**², which is expected to run to 2030. It should embrace and complement the Green Deal, while including measures to help reach the SDGs in 2030.

The decision as to the relationship between the 8th EAP, the European Green Deal and the implementation of Agenda 2030 and SDGs in Europe is critically important.

¹ The specific opportunities presented in this document have benefitted from discussion with a range of civil society representatives (EEB members, CSO partners & others) and wider stakeholders. We are grateful for the many suggestions received.

² For 4 October Council Conclusions : <https://www.consilium.europa.eu/media/40927/st12795-2019.pdf>

Figures 1 and 2 present schematics to illustrate the relationships between the three.



The above figure shows the potential overlaps and differences in focus of the European Green Deal, 8th EAP and Agenda 2030. The promised European Green Deal is expected to offer major political commitments to catalyse progress at an unprecedented rate in Europe. It is unlikely that it will cover in detail all of the issues that need to be addressed for a just and ecological transition.

The 8th EAP, which has a wider institutional endorsement, has the potential to provide additional detail on operationalizing the commitments, and furthermore can and should arguably cover a wider agenda given that it can embrace commitments that cover two Commission and EP terms (see 8th EAP box below). The overall Agenda 2030 and SDGs have a wider remit than the 8th EAP and potentially the European Green Deal given the range of social and economic targets that go beyond what might be embraced in the Green Deal and 8th EAP. Conversely, the needs for progress on health and environmental issues in the EU would require ambition beyond what is explicitly embraced by the SDGs in some areas (e.g. chemicals) and clear implementing measures.

This combination of European Green Deal and 8th EAP responds to the scientific evidence of environmental challenges and the calls from young people and grass roots civil society across the EU. It also offers to be a practical way to respond to the [Strategic Agenda 2019-2024](#) launched in June by the Council and the new **Commission President-elect's [Political Guidelines for the next European Commission 2019-2024](#)**, and helps to implement Agenda 2030.

The EEB concludes that all three – the European Green Deal, the 8th Environment Action Programme, and an overarching Europe 2030 Strategy and Implementation Plan are needed. They are complementary and mutually supportive.

EEB vision for the 8th Environmental Action Programme

The design of the 8th EAP – the narrative, the specific legal provisions – will depend on the ongoing discussions on the relationship between the EGD, the 8th EAP and related reflections on Agenda 2030 and the SDGs. The 8th EAP should arguably be a key document to help realise the ambitions set out in the promised European Green Deal, should help implement the environment-related SDGs, and should be a key transformative tool with cross EU institution commitment for the period to 2030, with a review in 2025 to facilitate buy-in by the new Commission and Parliament. The 8th EAP can and should be a transformative agenda by:

- a) **Stepping up specific actions and targets** to rise to specific environmental crises and challenges, while **enhancing the level of policy coherence** and ensuring **mechanisms to address emerging issues**;
- b) **Committing to transformative system change** that **addresses system lock-in** issues; and
- c) **Ensuring better, accelerated implementation and enforcement** so as to live up to promises made and to support the rule of law.

Without these, it will not be possible to have the transformative change needed. These, in turn, will require a number of enabling measures, notably:

- i. **Open, transparent, accountable and cooperative governance**, stakeholder engagement **from local to global**, as well as **increase corporate sustainability and responsibility**;
- ii. **Mainstreaming of environmental considerations** through a whole of government approach, enhanced coherence and an improved impact assessment process;
- iii. A change in **green finance and economics** (complementing a European Green Deal coherent MFF with both public finance and private, via the green taxonomy); and
- iv. Embracing and targeting **sustainable digitalisation**, including **artificial intelligence for people and planet**.

It can also keep the 7EAP vision for 2050 - *"In 2050, we live well, within the planet's ecological limits. Our prosperity and healthy environment stem from an innovative, circular economy where nothing is wasted and where natural resources are managed sustainably, and biodiversity is protected, valued and restored in ways that enhance our society's resilience. Our low-carbon growth has long been decoupled from resource use, setting the pace for a safe and sustainable global society."* <https://ec.europa.eu/environment/action-programme/>

The above measures can and should be **designed to ensure a just transition that will support the legitimacy of EU action and buy-in by the electorate**. They should also prove invaluable to help EU's progress towards meeting its commitments under Agenda 2030 and the SDGs, and support EU's standing and negotiating position in international fora.

Specific needs for a just transition: priorities for the European Green Deal and 8th EAP

A just transition that addresses the various environmental challenges should:

- Address the **climate** emergency: building towards a carbon neutral world that stays within 1.5 degrees;
- End **biodiversity loss** on land, seas and oceans, committing to increased restoration, management, financing and policy coherence;
- Commit to a **zero-pollution world**, free from pollution and harmful chemicals, embracing **clean air** and **clean water for all**;
- Develop a **Sustainable Common Food and Farming Policy** that provides sustainable nutrition for all;
- Spark a new **industrial transformation** and shift to a resource-efficient, toxic free **circular economy**;
- Embrace the need for a wider **economic transition** towards a **wellbeing economy within planetary limits** that builds on the evidence of the limits to growth, and seriously explore positive post-growth economic models;
- Commit to the **effective rule of law and democratic accountability** and **improve enforcement actions**;
- Put **wellbeing, social and environmental justice** at the heart of EU policy;
- **Implement**, and ensure sufficient **resources** to enable **commitments to be honoured**.

This will require **stepping up the ambition of commitments, responding to the problem of system lock-ins** by engaging in policies to enable systemic change, and **increasing efforts to ensure the implementation of existing commitments**. Furthermore, it requires that **EU policymaking be underpinned by principles of ecological resilience, social wellbeing, and respect ecosystem boundaries at global to local levels**.

What should the specific targets be for the priorities?

What falls within the European Green Deal and what in the 8th EAP, is currently the focus of debate. What is already clear is the need for stepping up action and addressing the crisis, commitments and calls from the electorate, the youth marches and science.

The following sections present key elements of the EEB's vision for different policy areas, with additional detail given in the annex. There are introduced in turn below.

1) Address the climate emergency: a carbon neutral world that stays within 1.5 degrees

The European Green Deal commits to Europe being the first climate neutral continent (see box). It has promised a Climate Law to enshrine the 2050 climate neutrality objective and an adjustment of the existing and insufficient 2030 targets. Also promises include a major change in finance and energy and carbon taxation.

Commitments made in the Political Guidelines (examples):

*Becoming the **world's first climate-neutral continent** is the greatest challenge and opportunity of our times. It involves taking decisive action now. We will need to invest in innovation and research, redesign our economy and update our industrial policy.*

*This will include the **first European Climate Law to enshrine the 2050 climate-neutrality target into law.***

*To complement this work, and to ensure our companies can compete on a level playing field, I will introduce a **Carbon Border Tax** to avoid carbon leakage.*

I will also review the Energy Taxation Directive.

*I intend to put forward a **strategy for green financing** and a **Sustainable Europe Investment Plan**. As part of this, **I will also propose to turn parts of the European Investment Bank into Europe's climate bank.***

EEB vision of key priorities:

1. **Strengthen the targets: at least 65% GHG by 2030** supported by **strengthened 2030 energy efficiency and renewables targets upwards within the 2019-24 Commission term - at least 40% energy efficiency, 45% renewables - and commit to climate neutrality by 2040;** and **set binding energy efficiency and greenhouse gas performance standards** e.g. through BAT standards on decarbonisation through **a reformed Industrial Emissions Directive (IED)**.
2. **Improve implementation and enforcement of the 2030 energy framework** in order to close the energy efficiency and renewable energy target gaps including by proposing/revising legislation and applying the energy efficiency first principle in funding, planning and impact assessments.
3. **Commit to a climate neutral industry:** that uses energy from sustainably sourced renewable sources, is energy-efficient, **integrates circular economy benefits for climate change** and **achieves climate neutrality by 2040;** **have a dedicated agenda for decarbonization of Energy Intensive Industry (EII); accelerate building renovation** (e.g. by factor 3 in order to ensure climate-proof home for all Europeans by 2050) to accelerate energy efficiency – via dedicated funding (EIB) and legislation (e.g. minimum renovation standards, dedicated decarbonisation BAT standards).
4. **Green finance and pricing: Make the EU budget a truly climate-friendly budget and catalyse stronger ambition and financing by Member States and the private sector:** Ensure that national and EU public funding for the next budgetary cycle post-2020 excludes all fossil fuels (including gas) and support increased funding for the just and clean transition; ensure a green taxonomy and also a brown taxonomy to help catalyse and guide private funding; exclude fossil fuels from taxonomy; promote carbon pricing at EU and national level (carbon taxes, strengthened EU-ETS) and commit to reforming harmful subsidies.
5. **Ensure policy coherence:** Making biodiversity, land use, coastal and agricultural policies climate friendly and reflect on climate impacts and adaptation in these areas, while respecting the policy objectives in these areas.

See annex for details, and for **finance:** <https://www.finance-watch.org/publication/game-changer-financing-the-european-green-deal/> & <https://eeb.org/work-areas/climate-energy/an-eu-budget-to-address-the-climate-crisis/>

2) End biodiversity loss, committing to restoration, management and policy coherence

The findings of the International Science-Policy Panel on Biodiversity and Ecosystem Services (IPBES) must inform the EU Biodiversity Strategy to 2030 promised to be adopted as part of the European Green Deal. Ambitious EU Biodiversity Strategy will give the EU a credible and leading voice in the adoption of the global Deal for Nature and People in 2020.

Commitments made in the Political Guidelines (examples):

As part of the European Green Deal, we will present a Biodiversity Strategy for 2030.

Our environment, our natural jewels, our seas and oceans, must be conserved and protected. Europe will work with its global partners to curtail biodiversity loss within the next five years. I want us to lead the world at the 2020 Conference of the Parties to the Convention on Biological Diversity, just as we did at the 2015 Paris Climate Conference.

EEB vision of key priorities:

- 1. In 2019-2020 lead the world in adopting Global Deal for Nature and People:** to finally bend the curve of biodiversity loss and ecosystem degradation by 2030. Commit to global targets:
 - To have zero extinction of species and ensuring that wildlife populations are stable or increasing.
 - To have zero loss of natural spaces, ensuring that protected areas are financed and effectively managed across the globe.
 - To tackle the main sectors responsible for biodiversity and nature loss: agriculture, fishing, forestry, extractives and infrastructure.
- 2. In early 2020 adopt the EU Biodiversity Strategy to 2030 with specific targets such as:**
 - Ensuring that **all species and habitats** protected under the Nature Directives **are in favourable or improving conservation status** by 2030 as well as ensuring that **environmental objectives** of the nature, water and marine laws are achieved **by their respective deadlines**.
 - Propose a **legal instrument on restoration** with specific **targets on restoration of ecosystems important for climate change mitigation and adaptation**, for example peatlands, wetlands floodplains, grasslands. In the marine environment, a specific focus should be on the restoration (including carbon rich sea grass meadows and reefs) and sustainable management of damaged habitats.
- 3. Full implementation and enforcement of nature, water and marine laws and mainstreaming of biodiversity into sectoral policies and budgets:**
 - Strengthen implementation of the nature, water and marine legislation through a well-resourced European Commission services working to rigorously evaluate Member States' implementation. and in case of inadequate implementation, launch infringement proceedings.
 - Ring-fence funding for biodiversity conservation – for example 15billion euros per year from EU CAP budget, leverage national funding and integrate nature and ecosystem health into Green Taxonomy.

See annex for further details and for **forestry** and **oceans** see respectively:

https://www.fern.org/fileadmin/uploads/fern/Documents/2019/Green_New_Deal_for_Forests_final.pdf

https://seas-at-risk.org/images/pdf/publications/SAR_priorities_to_European_Commission_2019-2024_-_June_2019.pdf

3) Commit to a zero-pollution world: free from exposure to pollution and harmful chemicals

The European Green Deal promises a zero-pollution strategy (see box). This strategy must address industrial chemicals, air pollution (next section), environmental impacts from industrial installations and water pollution (subsequent sections).

Commitments made in the Political Guidelines (examples):

*For the health of our citizens, our children and grandchildren, **Europe needs to move towards a zero-pollution ambition.** I will put forward a cross-cutting strategy to protect citizens' health from environmental degradation and pollution, addressing air and water quality, **hazardous chemicals**, industrial emissions, pesticides and **endocrine disruptors**.*

EEB vision of priorities:

The EU cuts pollution and prevents exposure to harmful chemicals thanks to an ambitious EU chemicals policy for 2030 and beyond:

1. The EU develops a long term (2030 and beyond) **overarching framework for chemicals policy** that horizontally tackles the various relevant pieces of legislation and policies. The framework establishes clear goals to prevent exposure to harmful chemicals (including mercury) and ensure a non-toxic environment for current and future generations, including protecting vulnerable populations. It aims to reduce the production of harmful substances and enable actions based on the precautionary principle.
2. **The EU develops an accelerated EU-wide substitution strategy that promotes financial incentives for green chemistry, substitution, innovation and clean production.** The strategy also includes disincentives on the use of harmful substances and establishes an EU substitution centre. The strategy should ensure **transparency, coherence, prevention, rapid phase out and substitution of chemicals of concern** within the chemicals regulatory framework.
3. **The EGD and the 8th EAP must build upon the commitments already made** in the 7th EAP, the conclusions of the EU chemicals policy 2030, as well as the conclusions from both REACH and chemicals regulations REFITs. They should also build on the recommendations of the [non-toxic environment study](#), and the Communication on the interface between chemicals, products and waste. **The EGD and 8th EAP should apply the prevention first, precautionary and polluter pays principles** while promoting **sustainable innovation of industrial chemicals**. They should ensure a **clean circular economy** and put in place a **public information system** on substances present in materials, articles, products and waste.
4. **Streamline implementation and enforcement of REACH and other chemicals laws such as the EU Mercury Regulation**, with the EU institutions proposing new mechanisms for improved implementation and enforcement to complement national actions. In addition, **legislative revisions should close regulatory gaps, including on imports and groups of substances.** And **ECHA should be reformed and strengthened** so as to enable better REACH implementation.
5. **Commit to fully phase out mercury use** - from dentistry (latest 2030) and from fluorescent lamps (not later than 2021) – at the EU level, and strengthen the **Minamata Convention**.
6. Develop transparent, simple, fast, streamlined and efficient regulatory tools that can take **early action on early warnings** – and **extend early warning systems for key chemicals and species**.
7. Integrate an **action plan to protect most vulnerable populations** that is underpinned by the precautionary principle across legislation.

See also the annex; and an EEB position paper will be on www.eeb.org mid-November.

4) Commit to a zero-pollution world: Clean Air for all

The European Green Deal will embrace a zero-pollution ambition (see box) and the Political Guidelines explicitly mention that it will address air pollution, an issue that leads to hundreds of thousands of premature deaths per year, with a growing scientific evidence base on wider health impacts from early onset dementia, to cognitive loss, increased risk of heart attack, smaller baby sizes and reduced lung capacity. Air pollution also has negative impacts on the environment, causing acidification and eutrophication of soil and water.

Commitments made in the Political Guidelines:

*For the health of our citizens, our children and grandchildren, **Europe needs to move towards a zero-pollution ambition.** I will put forward a cross-cutting strategy to protect citizens' health from environmental degradation and **pollution**, addressing **air** and **water quality**, hazardous chemicals, industrial emissions, pesticides and endocrine disrupters.*

EEB vision of priorities

Clean air for all: Achieve zero adverse impact to health and the environment from anthropogenic emissions and deposition and exposure below critical loads and levels

Air pollution is drastically reduced via the following measures:

1. **EU air quality standards are aligned with the World Health Organisation** guidelines (and forthcoming 2020/21 new guidelines);
2. **National Emission Ceilings Directive is fully implemented** and a **revision for strengthening and widening the scope starts at the latest by 2025**; the new NEC Directive will include reduction targets for **methane, black carbon** and **mercury** emissions;
3. The European Commission **immediately adopts implementing legislation to clarify the requirements for air quality plans** and **air quality monitoring** and **assessment**;
4. **Emission controls are strengthened** targeting sectors which are lagging behind (e.g. agriculture, small scale combustion, urban transport and shipping);
5. The European Union commits towards a **revised Gothenburg Protocol which includes** reduction targets for emissions of **methane, mercury and black carbon**;
6. **Policy coherence** aimed at mainstreaming environmental objectives, including those on air quality, is embedded by EU legislation;
7. **Harmful subsidies are stopped** and the **polluter-pays principle is respected**.

More details are given in the Annex.

5) Commit to a zero-pollution world: Industrial production

The European Green Deal will embrace a zero-pollution ambition (see box) and the Political Guidelines explicitly mention that it will address industrial emissions, still a major source despite progress with the Industrial Emissions Directive and associated BREFs.

Commitments made in the Political Guidelines (examples):

*For the health of our citizens, our children and grandchildren, **Europe needs to move towards a zero-pollution ambition**. I will put forward a cross-cutting strategy to protect citizens' health from environmental degradation and pollution, addressing air and water quality, hazardous chemicals, **industrial emissions**, pesticides and endocrine disrupters.*

To help drive the change we need, I will put forward my plan for a future-ready economy, our new industrial strategy.

EEB vision of priorities - towards a safe, sustainable, circular and decarbonised industrial production

1. **Ensure an ambitious overhaul of the EU Industrial Emissions Directive, following the currently on-going evaluation:**
 - a) **Extend the IED scope** to capture new major sources and issues e.g. intensive aquaculture, GHGs;
 - b) **Extend and update the EU 'safety net' requirements** for preventing impacts from the most polluting industrial sectors (e.g. energy intensive industries in particular coal/lignite combustion);
 - c) Strengthen the uptake of BAT standards.
2. **Lead the transition to a truly sustainable industry framework at EU level (via a reformed IED):**
 - a) Change the approach of how industrial activities are regulated by setting BAT for best ratio 'environmental impact of industrial activity' versus 'public good/service provided', in order to promote the industrial activity with the least environmental impact for the provision of a given product/service e.g. for energy production, water quality and supply, protein production, resource management;
 - b) Develop the necessary drivers so that the IED delivers on the wider circular economy and decarbonisation objectives.
3. Strengthening the provisions on **public access to information and participation** in the **permitting procedure** as well as **access to justice**;
4. **Overhaul of reporting requirements and strengthen enforcement (IED / PRTR)**
 - a) Harmonisation of reporting formats for key IED documents e.g. IED Electronic Permit Template (EPT) allowing centralised reporting on relevant permit conditions;
 - b) Centralized and powerful database allowing better benchmarking of real-time environmental performance and better use of information for other purposes e.g. BREF reviews;
 - c) Establishment of the IED registry – revisited PRTR covering also diffuse emissions from products and enabling progress tracking towards SDG achievement, with proper consultation of end-users.

More details are given in the Annex.

6) Commit to a zero-pollution world: Clean Water for all

The European Green Deal will embrace a zero-pollution ambition (see box) and the Political Guidelines explicitly mention that it will address water quality.

Commitments made in the Political Guidelines (examples):

*For the health of our citizens, our children and grandchildren, **Europe needs to move towards a zero-pollution ambition**. I will put forward a cross-cutting strategy to protect citizens' health from environmental degradation and pollution, addressing air and **water quality**, hazardous chemicals, industrial emissions, pesticides and endocrine disrupters.*

To help drive the change we need, I will put forward my plan for a future-ready economy, our new industrial strategy.

EEB vision of priorities

Tackling the water crisis and reversing the decline in freshwater biodiversity:

1. The **Water Framework Directive** is evaluated to be “fit for purpose” and new implementation and enforcement actions are stepped up to address the identified implementation gaps such as inadequate use of economic instruments to achieve sustainable water management. The Green Deal should build upon the crucial next river basin management cycle to reach the 2027 goals of bringing all water bodies in the EU to ecological health (“good ecological status”). Important measures include: river restoration, large scale deployment of nature-based solutions, preventing deterioration from new infrastructure projects (making effective use of SEA and EIA), mitigating negative impacts from existing infrastructure;
2. **Tackling pollution from substances of emerging concern** (e.g. pharmaceuticals, microplastics) through both tackling pollution at source as well as through legal updates of the Environmental Quality Standards (EQS) Directive, Groundwater Directive and Urban Waste Water Treatment (UWWT) Directive;
3. **A joined-up restoration agenda** as part of the Biodiversity Strategy to 2030 and supporting the implementation of the Water Framework and Floods Directives to specifically address collapsing freshwater biodiversity with focus on protecting and restoring rivers, as well as important freshwater ecosystems such as wetlands, dam removal and improving river connectivity for migratory fish;
4. **Access to water** via implementation of the revised Drinking Water Directive and supported by MFF expenditure to improve the level of public water supply in public spaces. This will create an important public good and reduce plastic pollution;
5. **Improve policy coherence and integration:** notably in relation to agriculture, energy and transport policies, to avoid pressures from these sectors (via pesticides, nitrates, thermal pollution, hydromorphological alterations, over-abstraction);
6. **Implement the nitrates directive to improve water quality** and reduce agriculture pressure on ground and surface waters and through these on biodiversity.

For recommendations on how to improve the implementation of the EU Water Framework Directive see also: <https://eeb.org/library/bringing-life-back-to-europes-waters-the-eu-water-law-in-action/>

7) Catalyse a new industrial transformation and promoting a resource-efficient circular economy

The European Green Deal promises a New Circular Economy Action Plan to advance the transition already started from a linear to a circular economy. While it is clear that new sectors will be targeted for progress – e.g. textiles and construction – the overall ambitions and specific instruments are still to be decided.

Commitments made in the Political Guidelines (examples):

We will be a world leader in circular economy and clean technologies. We will work to decarbonise energy-intensive industries.

I will propose a New Circular Economy Action Plan focusing on sustainable resource use, especially in resource-intensive and high impact sectors such as textiles and construction.

I want Europe to lead on the issue of single use plastics... I want to open a new front in our fight against plastic waste by tackling micro-plastics.

EEB vision of priorities

Realising the Circular Economy transition's opportunities for the environment, jobs and prosperity means:

1. **Reducing the overall quantity of resources used in the economy**, supported by an EU headline target for virgin resource use reduction by weight per capita with staged objectives until 2030 to unleash further CE actions (e.g. 30-50% reduction by 2030 following a lead set by the Netherlands);
2. Broadening the circular economy action plan to **target the textile, furniture, construction and battery sectors** with **integrated and comprehensive product policies** including mandatory sustainability design requirements, extended producer responsibility and labelling;
3. **Better aligning policies on decarbonisation and dematerialization**, including establishing tools to account for the embedded emissions in products (e.g. using carbon footprinting) and dedicated BAT standards;
4. Establishing an **EU harmonised product information system** to relay information on environmental performance of products, material and chemical contents through the supply chain;
5. **Phasing out hazardous substances** through requiring information provision on chemicals and not reducing thresholds for secondary materials;
6. **Supporting waste prevention and reuse in the packaging sector** through zero waste, refillable/deposit refund systems and waste prevention targets. Increasing actions on plastics, notably addressing microplastic release from pellets, tyres and microfibres;
7. Making **green procurement the default approach** for public authorities and for companies engaged in corporate social responsibility.

See annex for further details on the above proposals and additional demands. For an **integrated and coherent approach to product policy** and **EU harmonised product information system** see also : <https://eeb.org/library/towards-a-eu-product-policy-that-works-for-people-and-the-planet/>

8) Transform EU Waste Policy towards Prevention

The European Green Deal promises a New Circular Economy Action Plan 2.0 and as regards waste, focuses on single-use plastics.

Commitments made in the Political Guidelines (examples):

I will propose a New Circular Economy Action Plan focusing on sustainable resource use, especially in resource-intensive and high-impact sectors such as textiles and construction.

I want Europe to lead on the issue of single-use plastics. By 2050, there will be more plastic in the ocean than fish. We need to get serious about how we turn the tide. European legislation already applies to the ten most found plastic items on European beaches. I want to open a new front in our fight against plastic waste by tackling micro-plastics.

EEB vision of priorities

Transform EU Waste Policy towards Prevention, via the following asks by the informal Prevent Waste Coalition that brings together a group of NGOs:

1. **Establish ambitious and binding waste prevention and reuse targets:** A progressive 2030 roadmap following the principles of the EU waste hierarchy should be adopted, including a binding overall waste reduction target and a maximum cap expressed in kg/capita/year of residual waste. This should be complemented by binding targets and measures on the reuse of waste and products;
2. **Set a mandatory food waste prevention target of 50% by 2030:** All Member States should reach this target through effective measures covering all stages of the food supply chain, from harvesting to processing, from retail to consumer;
3. **Prioritise waste prevention within Extended Producer Responsibility (EPR) Schemes:** All EPR schemes should support waste prevention by financing and promoting reuse of waste and products and **using eco-modulation of fees** to discourage non-circular products. Additionally, we encourage the **extension of EPR systems** as policy tools for other groups of products (beyond packaging and WEEE), provided that all stakeholders - social economy actors, recyclers, civil society, consumer organisations, local authorities - are involved in designing those systems.

For a wider set of “asks” by the **Prevent Waste Coalition** a manifesto will be on www.eeb.org mid-November with ten priorities for waste. See also the annex to this document.

10) Develop a Sustainable Common Food and Farming Policy that provides good food for all

The Political Guidelines and mission letters state that the EGD will include a 'Farm to Fork' strategy that improves sustainability of food production across the value chain, including through organic farming. These are important and timely commitments.

Commitments made in the Political Guidelines (examples):

*Climate change, biodiversity, food security, deforestation and land degradation go together. **We need to change the way we produce, consume and trade.***

In the Mission Letters

*... the new 'Farm to Fork' strategy for sustainable food, [will look] at how the agri-food sector can **improve the sustainability of food production across the food chain**, including through organic production.*

EEB vision of priorities

A Farm to Fork Strategy to drive a transition to sustainable food systems

1. **This requires first and foremost a greener and fairer Common Agricultural Policy (CAP).**
 - The CAP must support EU agriculture to transition to agro-ecological practices and to production models that prioritise nutrition and sustainability over trade and growth. This change must take place both within the EU-level CAP framework and in national CAP Strategic Plans.
2. **Food systems governance for food systems transition**
 - To move away from the current siloed approach to agricultural policy, the CAP should no longer be under the exclusive competence of agricultural authorities, whether at EU, national, or regional level. Environmental, health, rural development, and social policy authorities should be equally involved in shaping, implementing, and evaluating agricultural policy.
3. **Seek full coherence between agriculture, climate, biodiversity, trade, and public health policies**, in the context of our international commitments (Paris Agreement, SDGs, Aichi, ...)
4. **Set SMART targets for all dimensions of sustainability in food systems, for example on the following issues:**
 - Cutting GHG emissions from food production;
 - Reducing the land footprint of EU food consumption in third countries;
 - Achieving good nutrition for all EU citizens;
 - Restoring farmland biodiversity;
 - Ending pollution and over-extraction of groundwater and water courses from agriculture;
 - Setting limits on reactive nitrogen use in the EU.

See also: ***This [report by IPES-Food on a Common Food Policy](#) which summarises a civil society consultation process of which the EEB was a key partner.***

11) Green Financing: an EU Budget coherent with a European Green Deal

What is financed today will be the energy system of the future: we have to prepare the current investment for net-zero carbon. Furthermore, we need to ensure that what we spend actually delivers on long-term greenhouse gas reduction. If not, green-spending risks becoming green-washing and a major missed opportunity for the use of EU funds. The European Green Deal commits to ambition and underlines the importance of green financing (see box).

Commitments made in the Political Guidelines (examples):

*(Under 1. A European Green Deal): I intend to put forward a strategy for **green financing** and a Sustainable Europe Investment Plan. As part of this, I will also propose to turn parts of the European Investment Bank into Europe's climate bank. [...]*

EEB vision of priorities

An EU budget that respects people and planet – using the European Green Deal to add additional momentum and political capital to negotiations and implementation

1. **Commit to a “Green-Deal-coherent” EU multi-annual budget, that supports public goods, invests in resilient ecosystems, respects planetary boundaries and promotes European cohesion and social wellbeing.** It should prioritise that public money flow to common goods and public services, integrate sustainability principles, and fund binding reviews of budget lines and programmes. Public investment should be facilitated by making use of the flexibility mechanism of the European Semester, while the green taxonomy can leverage needed private investments;
2. **Commit to a net zero carbon budget and coherence with Paris and 1.5 degrees** – a 40% climate and environment spending target, via ringfencing; blacklisting of Paris-incompatible investments and measures that lock in future emissions; conditionality, improve real results-based monitoring and allocations;
3. **Coherence with biodiversity objectives** - funding for biodiversity (land based and marine) and conditions for agricultural practice to ensure respect for the rule of law and biodiversity. €15 bn per year for biodiversity. Reform CAP;
4. **Increase funding for LIFE** – to 1% of the budget, to build on the added value of the LIFE programme ensure sufficient funding for agencies that will take on additional tasks related to the EDG: EEA, ECHA, EFSA;
5. **Link MFF funding to the rule of law** – to make use of the MFF as a lever for good governance.

More details are given in the Annex. See also:

- **Joint briefing #1** https://www.finance-watch.org/wp-content/uploads/2019/09/Financing-the-European-Green-Deal_Sept2019_03.pdf
- **Joint briefing #2: An EU Budget to Address the Climate Crisis:** <https://eeb.org/work-areas/climate-energy/an-eu-budget-to-address-the-climate-crisis/>

12) An Economy that works for People: Carbon Pricing

An economy that works for people can only work if economic signals factor in climate change, pollution, and resource values. Furthermore, it needs to put “wellbeing” at its core and recognise the evidence on market failures (what cannot be addressed by the market) and evidence on the limits of what green growth alone can achieve. The need to address pricing is recognised in the Political Guidelines, also noting that given unanimity for tax issues within the EU a move towards qualified majority voting (QMV) is essential for EU-wide progress, and a border tax adjustment to protect European ambition and economy.

Commitments made in the Political Guidelines (examples):

(Under 2. An economy that works for people): I will make use of the clauses in the Treaties that allow proposals on taxation to be adopted by co-decision and decided by **qualified majority voting in the Council**. This will make us more efficient and better able to act fast when needed.

(Under 6. A new push for European democracy): We need to move towards **full co-decision power for the European Parliament** and away from unanimity for climate, energy, social and **taxation policies**.

EEB vision of priorities

Reform economic incentives to catalyse the European Green Deal:

- 1. Prioritise progress on carbon taxes across the EU and border tax adjustments:** aim for an **EU carbon tax** (via the Energy Tax Directive reform), aim to move to **Qualified Majority Voting** for this carbon tax (using the “passerelle” clause), or use **enhanced cooperation mechanism** for coalition of the willing nations. **Target rate of €100 per tonne of carbon by 2030** to incentivise transformative change, with ramping up of rates (€50/tC by 2025), **revenue recycling**, and **measures for a just transition**;
- 2. Kerosene taxes to make shipping and flying greener:** commit to a decarbonising fuel package, spearheaded by an ambitious kerosene tax;
- 3. Continue the reform of the EU-ETS: reduce the share of free auctions** to zero over time; pursue greater auctioning (committing to 100% auctioning, and encourage targeting revenue uses for Paris compatible funding); **tighten the allocations** to be in line with the higher ambitions, by withdrawing allocations for future periods (i.e. faster than the planned withdrawal rate of 2.2% per year from 2021), and **develop a floor pricing system** to protect the price incentives from too much variation, and raise that price over time;
- 4.** In parallel, commit to **harmful** subsidies reporting across Member States and launch an **open method of coordination process to reduce national harmful subsidies**, complemented by “harmful subsidies” reform at EU level - e.g. within MFF, remove excise tax exemptions for aviation, fisheries, agriculture. Also make use of the **reform of the State Aid guidelines** to rule out environmentally harmful subsidies;
- 5. Socially progressive taxes:** tax systems should be designed with a sufficient **redistributive effect** (in the design and/or use of revenues) to protect disadvantaged groups and reduce the risk of social protests similar to the *gilets jaunes*.

More details are given in the Annex. See also: **Destination Climate Neutrality**.
<https://eeb.org/library/destination-climate-neutrality/>

13) Turning the Semester into a Sustainable Development Cycle

The European Semester, which currently has a macro-economic focus, needs to become a process that fully reflects the promises of a European Green Deal and commitments to Sustainable Development and addressing the climate emergency, and hence ensure overall policy coherence for sustainable development, and impetus for the needed transformative agenda.

Commitments made in the Political Guidelines (examples):

I will refocus our European Semester to make sure we stay on track with our Sustainable Development Goals.

I will make full use of the flexibility allowed within the Stability and Growth Pact.

EEB vision of priorities

1. **Reform the European Semester to help it drive the social, environmental and economic transformation** in the long-term – and **integrate 2030 Agenda** and the **European Green Deal** at all levels (from indicators to priorities). It should also evolve to take on board the Council Conclusions on the “Economy of Wellbeing”³ - to include an economy of wellbeing perspective horizontally in Union policies and to put people and their wellbeing at the centre of policy design. This will support the Treaties and the Charter of Fundamental Rights of the European Union;
2. **Launch a process to have a high-level reform of the mandate of the European Semester to focus on wider sustainable development** - replace the ***Stability and Growth Pact*** with a ***Sustainability and Wellbeing Pact***;
3. **Recognise the evidence that it is not possible to maintain a policy of permanent economic growth** and succeed in **adequately decoupling growth** from resource use, environmental harm and climate change, and hence achieve a sustainable economy;
4. **Move focus away from economic and financial targets towards a set of priorities and indicators that reflects SDGs and the European Green Deal** - commit to transparent and participatory monitoring and reporting of the progress towards SDGs, with consultation of civil society on indicators, regular full SDG monitoring report published by EU with analysis of how EU policies influence, positively or negatively, the achievement of the 2030 Agenda both domestically and globally (including negative spill-over effects);
5. **Regular country specific recommendations (CSRs) to promote implementation of SDGs and Green Deal through the Semester**. As a first step, the flexibility mechanism needs to exempt climate expenditure from the 3% GDP debt ceiling;
6. **The EU Semester should be a mechanism to monitor progress towards the wellbeing of people and sustainability** in the EU and globally.

More details are given in the Annex. See also forthcoming ***Policy Recommendations for the EU: Wellbeing and sustainability at the centre of policy and decision-making*** from the knowledge co-creation conference **Beyond growth – Indicators and Politics for People and Planet** in Helsinki, on 28-29th October 2019.

³ <https://data.consilium.europa.eu/doc/document/ST-13171-2019-INIT/en/pdf>

14) Trade and Corporate Accountability

Trade is a core part of EU's international dimension and it is essential that sustainability concerns are integrated if EU's global responsibility is to be embraced and hence that the promise of a Green Deal is to be realised. EU businesses play an important role in global supply chains with international impacts and again it is essential that the level of accountability is the same whether in the EU or internationally.

Commitments made in the Political Guidelines (examples):

*I will ensure that **every new agreement concluded will have a dedicated sustainable-development chapter and the highest standards of climate, environmental and labour protection, with a zero-tolerance policy on child labour.***

EEB vision of priorities

The EU becomes a champion of a new **UN Treaty on Business and Human Rights**, adopts a **European Due Diligence Directive**, and **integrates sustainability into trade policies and agreements** so that they are **coherent with the European Green Deal** and **reflect EU's global responsibilities**.

- 1. The EU should not enter into trade agreements that contain investor-state arbitration mechanisms such as ISDS or ICS** which fail to address the concerns of citizens and invariably will undermine the efficacy in practice of EU law and the ambition of its policies and laws. It needs to ensure that sustainability can be implemented and enforced in all its trade agreements. The EU should renegotiate, or if that fails, leave all trade deals with such mechanisms in them. A chapter on climate, environment and labour standards does not stop the harm to people and planet that comes from secretive courts that allow investors to circumvent our legal system to extort states to the tune of billions of euros;
- 2. The sustainable development chapters need binding obligations and control mechanisms.** Binding commitments (rules, regulations and enforcement mechanisms) need to be integrated into the sustainability and human rights chapters in trade agreements. The SDGs must become the horizontal benchmark for any mandates and in evaluation reports of trade negotiations and agreements;
- 3. With France's law on the "duty of vigilance" and other Member States going forward with their national commitments, the EU needs to adopt an overarching Directive on Human Rights and Environmental Due Diligence;**
- 4. EU trade agreements should promote the trade of sustainable goods and services and reduce trade flows of unsustainable goods.** The EU must account for the environmental harm and climate impacts from import (e.g. by carbon border tax adjustments) and exports, and should reform incentives to decouple food production from international trade chains, shifting towards local or regional agriculture production;
- 5. The Energy Charter Treaty** currently stops governments from ending their environmentally harmful subsidies, due to the ISDS mechanism that comes with the ECT. The EU should not try to modernise the ECT, it should leave the ECT, just like Italy did.

More details are given in the Annex. See also: **Stop ISDS. Rights for People, Rules for Corporations:** <https://stopisds.org/> and **One Treaty to rule them all:** <https://www.tni.org/en/energy-charter-dirty-secrets>

15) Enforcement initiative

Enforcement of EU law remains a major challenge, recognised by the priorities given in the political guidelines and the missions letters. This touches upon all fields of environmental policy and beyond.

Commitments made in the Political Guidelines (examples):

(Under Political Guidelines - 4. Protecting our European Way of Life)

*I intend to focus on **tighter enforcement**, using recent judgements of the Court of Justice showing the impact of rule-of-law breaches on EU law as a basis. I stand by the proposal to make the **rule of law** an integral part of the next Multiannual Financial Framework.*

*In addition, in **Timmerman's Mission Letter**:*

*Given that any legislation is only as good as its implementation, I want you to **focus on the application and enforcement of EU law** within your field. You should provide support and continuous guidance to Member States on implementation, and be ready to take swift action if EU law is breached.*

EEB vision of priorities

An environmentally just EU with respect for the rule of law:

- 1. Increase effectiveness of authorities, regulators and inspectors:** There is a general lack of capacity, resources, know-how and information available to authorities to be able to monitor compliance and act on enforcement. This is a cross-cutting problem for all environmental policies which needs to be confronted.
- 2. Coherence, coordination and cooperation:** There is a need to link different authorities and ministries together to overcome gaps in enforcement in certain areas, such as the placing on the market of products produced with toxic recycled plastics. Identifying the interconnections between the roles of authorities in the Member States should be coupled with an increased cooperation between the EU Commission Services so that environmental policies can be integrated at the highest level.
- 3. Commit more resources to legal and technical units responsible for enforcement:** This is necessary both at EU and Member State levels. At EU level, the Commission needs to strengthen its enforcement capacity if it is to deliver on the commitment in the Political Guidelines. At Member State level, training and capacity building for public authorities, police, prosecutors and judges is waning. Lack of skills, capacity and resources jeopardise implementation and enforcement efforts, meaning that a lot of non-compliance goes undetected and unpunished.
- 4. Strengthen compliance and enforcement by coordinating inspections** across the EU, ensure that revision of legislation leads to effective protection of the environment in the Member States.
- 5. Transparency and access to information:** The development and use of information tools, that enable information to be shared and disseminated, including by the public through citizen science, and including information related to implementation and compliance, needs to be prioritised in all areas. Greater exchange of real-time and reliable information increases citizen engagement and facilitates monitoring and compliance assurance.
- 6. The space for civil society engagement in the public debate** needs to be promoted and safeguarded at all time. Legal protection of NGOs, journalists and activists from harassment and persecution are needed. The EU should guarantee that there is transparency in decision-making and ensure that the public is given the opportunity to engage in processes in a meaningful way.

More details are given in the Annex. See also: <https://eeb.org/library/power-for-the-people/>

16) Environmental democracy

The rights of access to information, public participation and access to justice are fundamental to ensuring that the public can play a meaningful role in the transition to sustainable development and is able to hold governments to account for their actions in relation to the environment. These rights are guaranteed under international law by the Aarhus Convention. The EU and its Member States are all Parties to the Aarhus Convention but implementation of its provisions is far from perfect. An extreme example is the lack of effective access to justice at the level of the EU institutions, which has led to the Convention's independent compliance review body finding the EU in non-compliance with the Convention. This has undermined the EU's credibility when it seeks to promote the rule of law.

Commitments made in the Political Guidelines (examples):

*(Under 6. A new push for European democracy): I want Europe to strive for more in **nurturing, protecting and strengthening our democracy**. [...] The record-high turnout in the 2019 European elections shows the vibrancy of our democracy. We must respond to that call by **giving Europeans a stronger role in decision-making**. We will go further than ever before to make this happen.*

EEB vision of priorities

Ensuring democratic, transparent, participatory, accountable environmental governance:

1. **Full ambitious implementation of the Aarhus Convention** at EU and Member State level:
2. In particular, ensure effective **access to justice** in environmental matters ensure that NGOs have standing and can challenge environmental decisions before national and EU courts, by proposing:
 - a. **An amendment to the Aarhus Regulation** so as to end the situation whereby NGOs have virtually no access to the Court of Justice of the EU other than in access to documents cases, and thereby bring the EU into compliance with the Aarhus Convention;
 - b. A new **Directive on Access to Justice** to ensure remove the obstacles to access to justice at Member State level;
3. Bringing together the **environmental, consumer and digital agendas** through developing digital technologies that provide consumers with sufficient product information to enable them to make informed environmental choices (e.g. 'product passports');
4. Support a robust and progressive implementation of the **Espoo Convention** with a strong implementation and compliance mechanism which acts effectively to protect the public from impacts beyond national borders from both new projects and activities and from extensions to existing operations;
5. Increased focus on the **rights of citizens to uphold their EU law rights** under Article 47 of the EU Charter of Fundamental Rights and the associated inherent rights for effective access to justice as has been highlighted by the EU Court of Justice in certain cases.⁴

More details are given in the Annex. See also: <https://eeb.org/library/challenge-accepted-how-to-improve-access-to-justice-for-eu-environmental-laws/>

⁴ E.g. C-243/15 and C-664/15.

17) “Better Regulation” / “one in one out”

“Better Regulation” has been a contentious policy as on the one hand it aims at improving the quality of regulation through a more rigorous evaluation process, but at the same time it explicitly aims to reduce burdens, and that part of the narrative has been more dominant, and manifest in the way the tools have been used. In practice Better Regulation has embraced deregulation. The European Green Deal, however, if it is to rise to the challenges set by the environmental crisis, needs to embrace better regulation for people and planet and not the “red tape”, the “burdens” or “one-in-one-out” principles. The contention between the objectives continues and needs to be resolved if there is to be a convincing European Green Deal. In this context, the commitment in several of the mission letters to develop a new instrument to deliver on the ‘one-in-one-out’ principle is potentially problematic.

Commitments made in the Political Guidelines (examples):

(Under 2. An Economy that Works for People)

*I will put forward a **dedicated SME strategy** to ensure they can thrive by **reducing red tape** and improving their access to the market*

*However, in the **mission letters**:*

*We need to ensure that regulation is targeted, easy to comply with and does not add unnecessary regulatory burdens... **...the Commission will develop a new instrument to deliver on a ‘One In, One Out’ principle. Every legislative proposal creating new burdens should relieve people and businesses of an equivalent existing burden at EU level in the same policy area.** We will also work with Member States to ensure that, when transposing EU legislation, they do not add unnecessary administrative burdens.*

EEB vision of priorities

Inclusive governance - prioritising people and planet, engaging with citizens, and regulatory reform for a healthy planet:

1. Recognise the **principle that all laws should be passed, reformed or withdrawn on their merits** and help the European Commission implement its role as **Guardian of the Treaties, honour its commitments in EU policy and international agreements, and protect EU citizen’s rights & the environment.**
2. Law-making should **not be beholden to burden reduction targets** that run counter the principles of good regulation and risk running against the ambitions of the European Green Deal.
3. **Exclude the “one in one out” text that is in the mission letters so that it does not appear in the European Green Deal.**
4. Replace the principle with a **“think sustainability first”** principle for the Commission’s law-making procedures, which will help achieve the objectives of the European Green Deal – i.e. **commit to regulation for people and planet.**

Of course, regulation needs to be cost-effective, but it should be driven by a desire to live up to commitments and protect people and planet, the public and public goods.

More details are given in the Annex. See also: <https://meta.eeb.org/2019/09/19/one-in-one-out-biggest-threat-to-european-green-deal/> and <https://green10.org/wp-content/uploads/2019/09/Green-10-reaction-on-one-in-one-out-principle-13-Sept-2019.pdf>

For further recommendations and policy guidance please refer to the annex or get in touch with EEB staff for additional details.

We look forward to further discussions on details and priorities with decision makers and civil society partners to ensure that the European Green Deal and the 8th Environmental Action Programme allow the EU to respond to young people and citizens' concerns about our climate and environment, meet Europe's commitments to the Sustainable Development Goals and deliver a better future where people and nature can thrive together.

The EEB is the largest network of environmental citizens' organisations in Europe. It currently consists of around 150 member organisations in more than 30 countries (all EU Member States plus some accession and neighbouring countries), including a growing number of European networks, and representing some 30 million individual members and supporters. See eeb.org and our news channel META: meta.eeb.org



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