

Environmental Organisations' views on the new action programme

Twenty four responses were received. Contributors are listed at the end of this note, which sets out the main issues emerging from the input of environmental organisations to consultation on the new environmental action programme. Many, more detailed proposals were made, which cannot be included in this summary, but which have all been noted by DG Environment.

1) **Sustainable Development.** Many of the responses have addressed the relationship between the sustainable development strategy being developed by the Forward Studies Unit. It is clear that the new programme is seen as the environmental pillar of this strategy, though a number of responses advocate more crossover into sustainable development than others do. There is certainly consensus that it should act as an umbrella for all various existing initiatives on environment (eg biodiversity strategy) and integration (the Cardiff process). The Commission is urged to ensure that the programme will be flexible enough to accommodate changes in legislation and international frameworks.

2) **Leadership.** The Community is urged to lead Member States and stakeholders in work on environmental sustainability, and encourage strong action on issues outside our competence such as taxation, tourism and education. A high profile and strong line in international fora such as the WTO and UNCSO is also seen as important.

3) **Ownership.** Another reason cited for the perceived weakness of the Fifth Environmental Action Programme (5EAP) is lack of ownership outside the Commission. There are a number of complaints that the Commission's process of consultation needs to be changed to incorporate all stakeholders. Industry bodies' opinions are felt to dominate the Commission's thinking, thereby alienating potential allies in the environmental sphere.

4) **Implementation.** Most submissions pick up on poor implementation of legislation as being a key factor in what is seen as the limited success of the 5EAP. Various strategies are proposed to address this including more rigorous and transparent enforcement, use of infraction proceedings and linking non-implementation of legislation to non-payment of structural funds.

5) **Education.** There is much desire to see some kind of communication strategy for environmental issues built into the programme, setting out the importance of environmental issues for policy makers, economic actors and consumers. More specifically, almost all responses feel it should be a priority to proactively educate, by various means, consumers and especially children to help them understand the environmental impacts of their consumption and thereby encourage them to make environmentally sound purchasing decisions.

6) **Sectoral integration.** The programme should set responsibilities for other sectors and identify problem areas of policy, with some correspondents asking for targets and time-scales to be attached to these as well. It is suggested that where this might be controversial, the programme could simply identify the contributions which sectors should make to environmental goals, and place them in the context of the forthcoming sustainable development strategy. As well as those sectors already

identified by the “Cardiff process”, planning, fisheries, trade, education and development are all pinpointed as requiring further integration.

7) **Priority environmental issues.** Most inputs stress the need to use the European Environment Agency’s State of the Environment report (1999) as a basis for identifying priority issues, and the need for continued research to underpin future programmes. The following issues are repeatedly mentioned: climate change, transport, waste, water, urban environment, and biodiversity. In addition some commentators suggest risk management, chemicals, genetically modified organisms, coastal zones and spatial planning as priorities.

8) **Targets.** There is clear consensus that the new programme should identify quantitative as well as qualitative targets and include timetables, benchmarks, and indicators. Targets that have already been agreed, such as those set down at Kyoto on climate change, should most definitely be included.

9) **Resources.** De-coupling of society’s increasing rate of resource use from economic growth was seen as essential. The Commission was urged to use the new programme to set out ways to move towards increased resource efficiency, especially given the inequity in resource use between developed and less developed countries. The concept of factor reduction in resource use and the associated impacts was raised, with “factor four” suggested as a bare minimum, though some submissions went considerably further.

10) **Full pricing.** The use of economic instruments was at the forefront of most submissions – and it was clear that a shift towards taxation of environmentally damaging activities was seen as fundamental. Prices should reflect the full cost of any activity and include environmental externalities. Reform of perverse and environmentally damaging subsidies was also consistently mentioned.

11) **Other Tools.** Use of Strategic Environmental Assessments of all Community legislation, programmes and action plans was suggested, as was the continued extension of environmental liability regimes. Voluntary agreements were mentioned several times as being less prescriptive and therefore weaker than hard legislation. Contributors feared that voluntary agreements encourage poor standards as the incentive to raise standards is not legally binding. It was felt that “free-riders” always benefited from soft instruments.

12) **Enlargement.** Immediate and complete adoption of the environmental acquis by accession countries was seen as essential to some and potentially dangerous to others. There appeared to be agreement however that spatial planning, agricultural changes and industrial development in accession countries must be very carefully managed to ensure continued environmental protection.

Contributing organisations

Austrian Environmental Protection Organisations (joint submission)
Birdlife International
Carrefour Lombardia (Italy)
Cooperativa Garte (Spain)
CSS (formerly County Surveyors Society) (UK)
Danish Society for the Conservation of Nature
Education and Sustainable Development Services (UK)
Environmental Sciences Association of Ireland
European Coalition to End Animal Experiments
European Environmental Advisory Councils
European Olympic Committee
European Environmental Bureau
European Union for Coastal Conservation (EUCC)
Foundation for Environmental Education in Europe
Friends of the Earth Mediterranean Network
Fundacion Ecologia Y Desarrollo (Spain)
International Friends of Nature
International Society of Doctors for the Environment
Legambiente Valceresio (Italy)
The National Trust (UK)
Oekomedia Institute (Germany)
Royal Commission on Environmental Pollution (UK)
Sustainable Development Education Panel (England)
Umwelt Management Austria