

European Commission Consultation on the Final Assessment of the 6th Community Environment Action Programme – Response from the Network of Heads of Environmental Protection Agencies

The Network of Heads of Environmental Protection Agencies welcomes the opportunity to contribute to the Commission's consultation on the Final Assessment of the 6th Community Environment Action Programme (EAP). This follows our submission in October 2010 to Commissioner Potočnik in which we set out our views on priorities for a new (7th) EAP. Members of the Network have also contributed to the work undertaken by Ecologic and the Institute of European Environmental Policy in reviewing the achievements of the 6th EAP, by participating in stakeholder workshops and responding to questionnaires.

This response addresses the questions in the consultation document collectively rather than answering them individually. We focus on the question of what progress has been made in tackling the priority themes of the 6th EAP and what more needs to be done. We are primarily concerned with the environmental outcomes that have been realised and therefore start with the evidence on the state of the environment and what this tells us.

The Community Environment Action Programmes have made an important contribution towards the achievement of a clean and healthy environment.

In general, we believe that the series of Community Environment Action Programmes which began in 1973 have made an important contribution to solving environmental problems and improving the quality of life across Europe. They have set out agendas with priorities for action and provided a valuable focus for planning and implementing a wide range of measures at European level and in Member States. Pressures and impacts on the environment have been reduced. For example there have been reductions in emissions of pollutants to air and water, and the quality of the environment has improved in many areas. We believe that the momentum created by these important agendas for action should be continued through a new EAP.

There has been some progress on the priority themes of the 6th EAP but more needs to be done.

The evidence brought together through the European Environment Agency's recently published *European environment – state and outlook (SoER 2010)* provides a valuable overview of progress on the four priority themes of the 6th EAP. Looking back over the period since it was introduced in 2002, environmental indicators show that there were some positive trends in the environment but more needs to be done.

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On **climate change**, the EU 27 has reduced its greenhouse gas emissions by 11.3% from the baseline year 1990. Since 2002 there has been a reduction of just over 2%. Achieving the agreed 20% emissions reduction target over the next 10 years and delivering much deeper cuts in the longer-term remains a considerable challenge. This does not take into account the significant emissions generated in countries outside the EU as a consequence of goods and services that are produced for use within the EU.

On **nature and biodiversity**, the global agreement to halt the loss of biodiversity by 2010 was not met. In 2008, only 17% of the target species under the Habitats Directive were considered to have a favourable conservation status. The recent commitment to halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020 presents a major challenge.

On **health and quality of life**, there has been some good progress in improving the quality of air and water. But exposure to particulates and ozone in air continue to pose health risks. The health costs from air pollution in the EU are estimated to be between 275 to 790 billion euros including 369,000 premature deaths. There is much to do to achieve the goal of good ecological status in all waters, particularly in addressing pollution from diffuse sources. Soil protection remains a major challenge in some countries. More needs to be done to assess the economic value of soils and the critical services they provide such as food and fibre production, the protection of water quality, and climate regulation. There are continuing concerns about the human and ecological health risks associated with exposure to combinations of chemicals, with new technologies, and with climate change.

On **natural resources and waste**, the overall environmental impacts of Europe's resource use continue to increase. Indicators show that the total amounts of materials used by the economy and wastes generated in the EU have continued to increase, although the rate of increase has been less than the rate of growth in economic output. The average amount of municipal waste generated in the EU per person has remained at around the same level since 2002, although there is wide variation between countries.

The 6th EAP set out an ambitious agenda but it is too early to make a full assessment of its impact on the environment.

The 6th EAP was the most ambitious and comprehensive of the series. Its longer (10 year) timescale, the introduction of 7 thematic strategies, and the large number (156) of individual actions make it very different from its predecessors.

We believe that the main benefit of the 6th EAP is that it set out a clear statement of intent to build on the progress of the previous EAPs in working towards the Community's ambitions for a clean and healthy environment. It

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has provided a focus for key areas of environmental policy through its priority themes and the related thematic strategies.

The 6th EAP resulted in agreement on policy and legislation in key areas such as the rationalisation of regulation on chemicals through REACH and in the prevention and re-cycling of waste through the revision of the Waste Framework Directive. But some new areas of policy that were introduced through the 6th EAP eventually were not agreed, most notably the proposed Directive on soils.

There have been delays in progressing some of the agreed actions in the 6th EAP. The long timescale of the 6th EAP and the ambitious number of actions may be contributory factors to this. In some areas it was also overtaken by political developments, for example, the agreement on the EU Climate and Energy package that went beyond the ambitions of the 6th EAP which had been centred around the Kyoto Protocol commitments.

In its communication on the mid-term review of the 6th EAP in 2007 the Commission pointed to several key areas where progress had been slow, for example, the integration of environmental concerns into other policy areas. There is little evidence to demonstrate that this position has changed and further concerted action is needed to re-vitalise the long-standing commitment (Cardiff agreement) to make this a reality.

Overall, we believe that it is too early to make a meaningful assessment of the impact of the 6th EAP on the state of the environment. Many of the measures arising from the 6th EAP have only very recently been implemented and some of the actions have yet to be completed. Positive outcomes arising from these measures are anticipated, but it will take many years to follow through and track the specific environmental impacts.

The priorities of the 6th EAP remain as priorities today. Further concerted action is needed to address them through a new and different kind of EAP.

The Commission's Final Assessment is important in looking at how the lessons learned from both the successes and failures of the 6th EAP can help to improve Community policy on the environment. We think that this exercise can be completed quickly to make way for the important task of developing and agreeing a new environment action programme as requested in the December 2010 Council conclusions.

The actions taken forward during the 6th EAP have been valuable but have not yet produced sustainable solutions to the serious environmental challenges that society faces in Europe and globally. It is clear that the priorities of the 6th EAP are still urgent priorities today. But the nature and

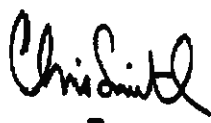
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scale of the challenges is changing rapidly. We believe that a new and different kind of EAP is needed to respond to these challenges which:

- sets out a clear statement of the outcomes that should be realised for people and the environment in Europe;
- makes the links between different environmental problems and the common economic and social causes that underlie them;
- recognises the global nature of many of the environmental challenges and the environmental impact of Europe's resource use in countries outside the EU;
- factors climate change into existing and proposed legislation on other environmental issues;
- places the value of natural resources and the services they provide in a proper economic and social context;
- provides a focus for mainstreaming environment into the key economic and social policies in different sectors and into the EU financial framework that will drive the achievement of the EU 2020 Strategy goals;
- promotes active participation of citizens and contributes to sustainable development in the EU;
- addresses the need to invest in targeted environmental training and education programmes, particularly for young people;
- develops and implements an evidence base that truly integrates economic, environmental and social dimensions in support of strategic decisions, and identifies priorities for future R&D that can be addressed in EU research and innovation programmes;
- strengthens the application of existing Treaty obligations - including the precautionary, polluter pays, prevention and restitution principles - whilst respecting the principle of subsidiarity;
- recognises the need for flexibility to respond to emerging risks and challenges; and
- has realistic actions, targets and milestones to achieve the agreed outcomes and success measures against which progress can be monitored and evaluated.

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