

## **Response from the Network of Heads of Environmental Protection Agencies in Europe to the Commission's consultation on the future "EU 2020" Strategy**

The Network of Heads of Environmental Protection Agencies in Europe<sup>1</sup> welcomes the opportunity to comment on the Commission's working document on the future "EU 2020" Strategy. A common Strategy with clear priorities will help to promote the cooperation that is needed among Member States and between EU institutions to respond to economic, social and environmental challenges in a rapidly changing world. We support the thematic priorities presented in the Strategy, and in particular the need to create a smarter, greener, more resource-efficient economy that achieves sustainable growth. We also agree with the emphasis given to innovation and the development of new knowledge and skills. However, we believe that the Strategy should stress the importance of environmental protection measures in ensuring that a clean and healthy environment supports a competitive economy.

*Environmental protection is fundamental to achieving the goals of this new Strategy*

The Strategy should address the urgent need to tackle climate change and biodiversity loss, and the prevention of environmental degradation so that they do not jeopardise economic recovery and the pathway to more sustainable growth. It should more explicitly recognise the need to protect and improve the environment for both people and wildlife, and the ecosystem services on which a sustainable economy depends. It should also acknowledge that sustainable growth can only be achieved within environmental limits and that clear targets (such as the 2 degree celsius target for limiting climate change) need to be agreed to define these limits. The current concerns over financial, climate, energy and natural resource security must address the common economic and governance features that are at their root. There is an urgent need to re-evaluate the importance of environmental protection in building a more sustainable economy, providing jobs and supporting the well-being of people.

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<sup>1</sup> The Network of European Environment Protection Agencies is an informal grouping bringing together the heads of environment protection agencies and similar bodies across Europe to exchange views and experiences of common interest to organisations involved in the practical implementation of environmental policy.



*A range of measures will be needed to promote a more eco- efficient economy*

The conclusions of the recent Environment Council meeting of 21 October 2009<sup>2</sup> stressed the urgent need to decouple economic growth from environmental degradation to create a more eco-efficient economy. A range of measures such as new market-based instruments, tax reform which takes into account the use of environmental resources, the removal of subsidies that have negative effects on the environment, and more innovative public procurement procedures will be needed. We support the Council conclusions and believe that such measures are fundamental to delivering the goals of the Strategy. It is essential that new policies to implement these measures are evidence- based and supported by targeted research and monitoring programmes.

*The costs of environmental degradation and the economic benefits of environmental resources and services must be properly assessed and accounted for in developing a greener economy and achieving sustainable growth*

Over the last two decades there has been real progress on some aspects of the environment in Europe, such as the improvements that have been made to water quality and in reducing emissions of pollutants from industry. These have undoubtedly brought economic benefits, for example, by attracting investment into previously degraded areas, promoting tourism and averting the costs of poor human health resulting from environmental pollution.

However, a number of serious problems have yet to be solved. Climate change; loss of nature and biodiversity; over-use of natural resources and increasing waste, present challenges of unprecedented scale here in Europe and globally. The costs of failure to address these issues will be high. Moving towards a greener and more sustainable economy will require a much better understanding of the costs (including social costs) of pollution and the degradation of natural capital, and the mechanisms for internalising these costs into market prices. The environmental costs and benefits attached to different economic sectors and activities need to be properly assessed and made more transparent. We believe that this is a key area for further development and should be an integral part of a new EU Environment Action Programme.

The Strategy is heavily focussed on the more efficient use of energy and resources as the key drivers of a green economy. These are clearly important but we believe that it should take a broader view and recognise the economic

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<sup>2</sup> Council conclusions. Towards sustainability: eco-efficient economy in the context of the post 2010 Lisbon Agenda and EU Sustainable Development Strategy. Environment Council Meeting, Luxembourg, 21 October 2009.



importance of protecting the environment as a whole. This should be reflected in taking forward the work on 'GDP and beyond'<sup>3</sup> and the development of indicators which integrate quality of life, welfare and environmental concerns with measures of economic progress.

*Engaging and empowering people and communities will be essential*

We welcome the emphasis given to empowering people in inclusive societies as one of the key priorities in the Strategy. Engaging people and communities in developing the innovation needed to move towards a more sustainable economy and society will be essential. This is not only key to job creation as the Strategy recognises, but will also bring wider opportunities for social integration. We believe that the Strategy should give more attention to how the dynamism and creativity that exists within civil society can be channelled to support its overarching goals and how the necessary capacities and skills can be fostered to achieve this.

*Policy integration needs to reflect existing commitments on sustainable development*

We are pleased to see the need for increased policy coordination and better integration of policy instruments identified as a priority in the Strategy. Integrating the environment and sustainable development into other key areas of economic and social policy is an existing over-arching principle in EU policy, but much more remains to be done. The European Council recently confirmed that sustainable development remains a fundamental objective of the EU under the Lisbon treaty. New proposals that come forward from the Commission arising from this new Strategy should make the appropriate links and ensure compatibility with the goals of the existing EU Sustainability Strategy.

*Environmental regulation is important to Europe's economic future*

Smarter, more coherent environmental regulation can make an important contribution in helping to drive the innovation on which Europe's economic future depends. The Network has carried out a review of the evidence on the links between environmental regulation and competitiveness<sup>4</sup> which concluded that good regulation can help reduce costs for businesses, create markets for goods and services, create and sustain jobs, and protect the natural resources on which businesses and society depend.

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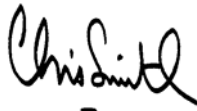
<sup>3</sup> GDP and beyond. Measuring progress in a changing world. Communication from the Commission to the Council and the European Parliament. COM (2009) 433 Final.

<sup>4</sup> The contribution of good environmental regulation to competitiveness. Paper by Network of Heads of European Environment Protection Agencies. November 2005.

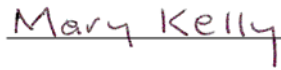


The EU Better Regulation Programme has made some welcome progress in the simplification of existing EU legislation. Better regulation initiatives have been mainly concerned with reducing administrative burdens. We believe there is a need to build on the progress in reducing administrative burdens and provide a greater focus on improving the effectiveness of the delivery of environmental outcomes. The Network has published a Vision for improving the effectiveness of EU environmental legislation<sup>5</sup> which proposes a series of actions to support this approach.

We would welcome the opportunity to discuss these comments and ideas with the Commission and would be happy to provide more supporting information on the issues covered here.



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**Dr. Andrzej Jagusiewicz**  
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<sup>5</sup> Improving the effectiveness of EU environmental regulation – a future vision. Paper by Network of Heads of European Environment Protection Agencies. April 2008.

