

**Comments on the Consultation on the future “EU 2020” Strategy  
Commission working document COM (2009)647/3**

**on behalf of, Umwelt Management Austria, BirdLife Österreich,  
Naturfreunde Internationale, Umweltdachverband, SOL – Menschen für  
Solidarität, Ökologie und Lebensstil, Umweltberatung Österreich and EU-  
Umweltbüro  
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**Introduction**

The aforementioned Austrian environmental organizations would like to thank the European Commission for giving them the opportunity to comment on the Commission Working Document regarding the future EU 2020 strategy.

We fully agree with the analyses of the European Commission that the actions which will be taken in the next decade will be decisive in shaping the future course of the Union. Indeed, there are a lot of major challenges ahead, which can only be tackled by means of a thorough analysis of their scope and by a clear idea of the measures envisioned to tackle them.

**Definition of Main Aims**

Unfortunately, within the text the main aims are not defined, therefore it is not clear, what exactly the European Commission intends to achieve.

What does the notion “sustainable growth” signify? Does it mean economic growth should not occur if it results in a higher burden on the environment, or is it rather focused on permanent and high economic growth, without considering the possible effects that growth could have on the environment? What kind of growth does the Commission seek to achieve? What kind of resources does the Commission have in mind when they are discussed in the paper? Is Biodiversity included?

Throughout the document the main aims sometimes seem to be in direct conflict with each other and specific words and phrases are repeatedly assigned different meanings.

**Challenges Ahead**

On the first page of the document there is a reference to shaping “*the next generation of public policies in a very different set of circumstances.*” This is indeed true and must be considered the central mission for future strategic planning. The European Union is facing new challenges which cannot be ignored. Unfortunately, the Commission’s

opinion on how to manage these challenges is rather narrow. In order to achieve the aim of “a new sustainable social market economy”, the Commission envisions “*innovation, better use of resources and knowledge.*” (p. 1). However, this alone will clearly not be enough. Better use of less resources should be envisaged.

With this discussion paper the European Commission had the opportunity to boldly state the facts and to initiate a broad public discussion amongst European citizens. Unfortunately, the content of the paper is rather timid. A number of challenges are left out – like the loss of biodiversity, the overextended use of resources or the dependency on oil - nevertheless they will have to be tackled in the future, even though they are not mentioned.

### **Advocating Economic Growth and the Wellbeing of European Citizens**

In the strategy, the European Commission does not even mention its own call for replacing GDP as central indicator for the wealth of a society. GDP assesses only one possible aspect. Therefore it can not be considered a sufficient indicator of people’s well-being. An analysis solely based on GDP cannot distinguish between activities that have a negative or a positive impact on people’s lives.

Lately it has become more and more accepted that a sufficient income is a means, not an end, for a happy and secure life. New indicators assessing sustainable development, such as the Ecological Footprint, have to be taken into account. The ambitious work done by the Commission itself has to be continued. Concrete measures for introducing new indicators have to be taken, especially in the field of Biodiversity which lacks valuable and clear indicators.

As Commissioner Almunia stated in a speech given at the conference “Beyond GDP” in 2007 “*GDP does not take into account the sustainability of production and consumption patterns. While investing in low carbon energy solutions may be essential for the environment and long term sustainability, it may not be the policy option preferred for short term economic growth, as measured by GDP.*”

Also in the 2009 Communication from the European Commission to the Council and the European Parliament on “GDP and beyond – Measuring progress in a changing world” the Commission has approved the need to improve data and indicators to complement GDP and has declared its aim to develop more inclusive indicators that provide a more reliable knowledge base for better public debate and policy-making. The European Union has to start to redefine growth and its indicators.

### **Life Style Changes**

The paper suggests that through new technological innovations and efficient use of resources (p.7) the environmental objectives as part of a sustainable economy could be achieved. Unfortunately this is wrong.

“Conserving energy, natural resources and raw materials” (p.3) will not be sufficient to reach the aim of a sustainable economy. We need a change of lifestyle, which has to be advocated from the top. This change is - considering the time constraint of 10 years - doubtlessly very ambitious. We therefore need laws and regulations at European Union level to help achieve a change of lifestyle of the European citizens.

While the European Union clearly is at the forefront as regards the protection of the environment on a local level, environmental damages which result from life style choices, such as climate change, are still not very well managed.

### **The Commission Document is very Optimistic in Regard to the Contribution of Technology**

In the year of 2000, starting with the Lisbon strategy, the European Union set out to become the most competitive economy in the world. It envisaged a better quality of life for everyone and a better environment through the application of new information technologies. It was believed that a virtual economy, primarily a service economy, would decouple economic growth from resource consumption. This aim has not been achieved.

Unfortunately, the Commission has not learned from its past mistakes and is still promoting technology as the sole means to achieve its environmental goals, now presented as “new, greener technologies” (p.7)

While technology will certainly have a major role in working towards a sustainable economy, innovative technology alone will not be sufficient.

### **Sustainable Development Strategy and the Lisbon Strategy**

In its 2006 review of the Sustainable Development Strategy the European Commission stated that its Strategy for Sustainable Development provides a general framework: *“The EU SDS forms the overall framework within which the Lisbon Strategy, with its renewed focus on growth and jobs, provides the motor of a more dynamic economy....”*

Surprisingly, in the paper the Sustainable Development strategy is not even mentioned. We therefore strongly urge the European Commission to fully integrate the Sustainable Development Strategy into the new EU 2020 strategy.

### **Conclusion**

We are aware that any decision on a future strategy will be taken by Member States and that the European Commission is not in a position to decide on its own. But since the Commission is the voice of all Europeans and supposed to advocate what is good for the European Union, we respectfully urge you to also take all environmental challenges as well as current European legal obligations into consideration when drafting the new communication on the future of the Lisbon Strategy.

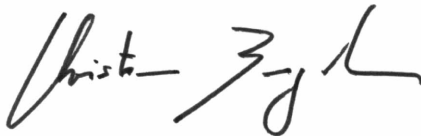
In addition, we fully endorse the comments by the European Environmental Bureau (EEB).



Prof. Dr. Reinhold Christian  
Director  
UMWELT MANAGEMENT AUSTRIA



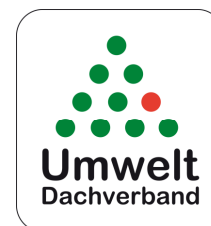
Gerald Pfiffinger  
Director  
BirdLife Österreich



Dr. Christian Baumgartner  
Director  
Naturfreunde Internationale



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Director



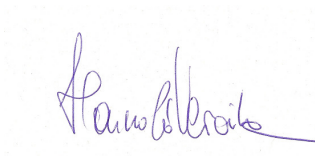
Umweldachverband



Vera Besse  
Chairwoman  
SOL – Menschen für Solidarität, Ökologie und Lebensstil



Melissa Tauber  
Director  
Umweltberatung Österreich



Veronika Haunold  
Head of Department  
EU-Umweltbüro



**For further information or clarifications please contact:**

EU-Umweltbüro  
Alser Straße 21  
1080 Vienna/AUSTRIA  
Phone: +43 664 24 69 027  
[Veronika.haunold@eu-umweltbuero.at](mailto:Veronika.haunold@eu-umweltbuero.at)