



European Union Network for  
the Implementation and Enforcement  
of Environmental Law

## **Response from IMPEL to the Commission's consultation on the future EU 2020 Strategy**

IMPEL, the European Union Network for the Implementation and Enforcement of Environmental Law, is an international non-profit association of the environmental authorities of the EU Member States, acceding and candidate countries of the European Union and EEA countries. The Network's objective is to create the necessary impetus in the European Community to make progress on ensuring a more effective application of environmental legislation. The core of the IMPEL activities concerns awareness raising, capacity building and exchange of information and experiences on implementation, enforcement and international enforcement collaboration as well as promoting and supporting the practicability and enforceability of European environmental legislation.

IMPEL welcomes this opportunity to comment on the Commission's working document on the future 'EU 2020' strategy. We support the strategy and the need to create a smarter, greener, more resource-efficient economy that achieves sustainable growth. We believe, however, that it is also important to emphasise the importance of the proper implementation and enforcement of environmental protection measures to ensure that a clean and healthy environment supports a competitive economy. We consider that the IMPEL network is well placed to help ensure the implementation and enforcement of environmental law across the EU, and indeed that it has already done much towards achieving that objective. The document states that "The EU 2020 vision will need the active support of stakeholders such as the social partners and civil society." IMPEL is a good example of such a stakeholder.

Over recent decades there have been substantial improvements to the environment in Europe, not least in reducing pollutants from industry. This has helped to bring about economic benefits, such as in improvements to human health and attracting investment into previously degraded areas. But much remains to be done, for example to tackle over-use of natural resources and increasing waste. The Strategy focuses heavily on the more efficient uses of energy and resources as part of the key of a green economy. IMPEL

is committed to address legislation in this field and will carry out a project in 2010 on energy efficiency requirements for industry.

We would certainly agree that environmental regulation is important to Europe's economic future. At the same time we need smarter and more coherent environmental regulation that can make an important contribution in helping to drive the innovation on which Europe's economic future depends. The EU Better Regulation Programme has already made some good progress in improving EU legislation. The Better Regulation initiatives have been mainly concerned with reducing administrative burdens. There is now a need to broaden the scope and provide a greater emphasis on achieving better environmental outcomes given limited resources.

A major aspect of IMPEL is its role in helping to achieve the proper implementation and enforcement of European environmental law across the EU. It does this by identifying and sharing good practices in the implementation of legislation and contributing to the practicability and enforceability of that legislation so that it can be fully applied in all the Member States. The proper implementation of high quality legislation plays an important role in achieving the level playing field which is necessary for the convergence and integration identified in the document and thus help recognise more explicitly the interdependence of the EU.

Brussels, January 2010

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Information on the IMPEL Network is available through its websites currently at <http://ec.europa.eu/environment/impel/> and [www.impelfs.eu](http://www.impelfs.eu) and shortly at: [www.impel.eu/](http://www.impel.eu/)