Dear Margot,

I am writing to you concerning the Commission Communication - Towards a Thematic Strategy on the Sustainable Use of Natural Resources (COM (2003) 572). Normally we would have drawn up a separate report on this Communication but this has not proved possible in the exceptionally busy period at the end of the current legislature. I am taking this opportunity, therefore, after having consulted my committee on the contents of this letter, to send you some initial comments on this proposal.

In general terms I welcome the Commission Communication as a first step towards the "Thematic Strategy on the Sustainable Use of Natural Resources" that was called for in the Sixth Environmental Action Programme. It sets out basic ideas as to how the EU should target its efforts to reduce the environmental impacts of resource use and seeks to determine the resources, whether renewable or non-renewable, with the greatest potential for environmental improvement, thereby enabling economies to use resources more efficiently.

I do, however, have a couple of specific concerns about the Communication.

Firstly I am concerned how it will fit together with two other closely related initiatives flowing from The Sixth Environmental Action Program:

- A Strategy on Prevention and Recycling of Waste
- An Integrated Product Policy (IPP)

The Common thread in these three initiatives is producer responsibility and life-cycle thinking. It seems clear though, that the Strategy on Resources will set the overall theme for these three initiatives - environmental effects of all resources. It may, therefore, be seen as the base of a pyramid of environmental policies, the top of the pyramid being concern for human health and bio-diversity. At the heart of the Strategy is the objective of decoupling consumption from economic growth and encouraging advances in innovation. There currently is no mechanism to relate policy-choices to the overall aim of decoupling economic growth from the environmental impacts of resource use. The Strategy aims at giving decision-makers the means to make these assessments.

As the Strategy can be seen as setting the theme for the other initiatives mentioned, we need to assess cautiously its compatibility in the scope of a cohesive structure and framework
Secondly there is one serious omission in the Commission's analysis, namely that the Communication does not mention Eco-system services. Such services are anything from the absorptive capacity for various residue materials like CO2 - sinks, the cleaning of air and water through vegetation, the pollination of plants through insects and birds, the build up of top soil and flood control through vegetation cover (primarily forests). None of these aspects are referred to. This is serious, as these are the vital organs of Nature.

In addition to these I have a number of other specific comments:

- The Resource Strategy should give guidance to environmental and other sectorial policies affecting resource use, with clear targets and timetables, and proposing the removal or reform of policies or subsidies that work counter resource efficiency.

- It should be aimed at both the sustainable use and management of both material flows and the biotic resources, such as biodiversity, fertility, ecosystem’s kidney functions and biological stocks and paying attention to preventing overexploitation and depletion of biotic recourses such as biodiversity, fertile soil and forests inside and outside the EU.

- It should define priority resources - for example the top twenty resources which pose the biggest problems, to be revised every five years - and develop targets and propose effective instruments to reach these targets.

- It should also give guidance to a general improvement of resource efficiency of a factor 4 to 10 over the long term, as promoted by the EU (notably at the Rio +5 summit in 1997).

- It should give a strong impulse to our global responsibility to develop sustainable production and consumption patterns, aiming at better fulfilling needs and services in an innovative way, with lower and more sustainable use of resources.

- Decision-makers need assessments of the trade-offs between policy choices and their relation to the overall aim of decoupling growth from impacts.

- A framework is needed to use the resources in a sustainable way while achieving the Lisbon objectives. The Strategy is to build on existing policies where resources use and economic and social development should be promoted in a mutually supportive way.

- All stakeholders need time to adjust. Policies must give clear and long-term objectives for the planning of investment and innovation.

I would ask you to bear these comments in mind in the preparation of the subsequent thematic strategy, and look forward to a further dialogue with you on these important issues.

Yours sincerely,

Caroline JACKSON