

**PANGEA's contribution to  
DG Environment public consultation:**

The Final Assessment of the 6th Environment Action Programme



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## INTRODUCTION

PANGEA promotes policy development and implementation to encourage sustainable renewable energy activities that mitigate climate change and create enduring environmental, social and economic development in Europe and sub-Saharan Africa. Among PANGEA's main objectives is increased awareness of sustainable renewable energy options in both Europe and sub-Saharan Africa with a focus on reducing carbon emissions, reducing air pollution in households, utilising waste and increasing access to cleaner energy. All these targets fall under the four priorities of the EU's 6<sup>th</sup> Environmental Action Programme (EAP). PANGEA has been following the achievements of the Programme, especially those relating to the Climate Change and the International Perspective.

The 6<sup>th</sup> Environment Action Programme can be congratulated for some positive achievements since its implementation in 2002. From a general point of view, PANGEA believes that the 6<sup>th</sup> EAP was a successful guide for the environment policy agenda at the European level while giving a comprehensive framework to national, regional and local governments in the priority areas as well as strategic approaches for implementation on a local level. The programme definitely stimulated action at local level, an example being the framework for the creation of the Covenant of Mayors.

The 6<sup>th</sup> EAP was also a good driver for pan-European policy in international environmental negotiations and it gave credibility to the strong European position in the global forums. The European Union has been active during the last eight years both having a leading position in the Kyoto Protocol framework and implementing the 2020 Strategy with its target to reduce GHG emissions by 20%.

## PANGEA'S SUGGESTIONS FOR FUTURE POLICY

Although PANGEA identified some positive outcomes related to the 6<sup>th</sup> EAP, it also believes that there is still a lot left to do. A ten-year timeline may be considered too long of a period for the implementation of the legislation as international frameworks and priorities could have changed, as well as the technology that is commercially available.

Regarding climate change priorities, the European Union has been active during the last eight years: it was the leader in international climate negotiations and it implemented the 2020 Strategy with the priority for growing in a sustainable, inclusive and smart way. Specifically, GHG reductions under the Renewable Energy Directive and its target to reduce GHG emissions by 20% well represent the strong European

environmental position internationally. Under the framework of the Renewable Energy Directive, most of the Member States are working hard both on energy efficiency and on increasing renewable energy use in order to achieve those binding targets. Specifically looking at the transport sector, the target was first set at 5,75% by 2010 and then at 10% by 2020. Considering current available commercial technologies, the implementation of this target is going to be achieved using sustainable biofuels blended into fossil fuels. Since the potential for first generation biofuel production in Europe is very low, it is clear that the EU will have to import biofuels from third countries in order to meet those targets. While the EU is working to reduce 10% of its transport emissions, complementary legislation is under development such as mitigating indirect land use change and clarifying biofuels sustainability criteria. Those policy developments could negatively impact imports of biofuels especially from areas of the world where production is sustainable but may not fit into strict European ideals of sustainability. In some African countries, bioenergy (biofuels and biomass) can be produced in a sustainable way due to the availability of land and water and to the climate conditions, allowing for social and economic development—all of which is in line with EU trade and development policy—but RED regulations are impeding investments by creating vague definitions such as ‘degraded’ and ‘highly biodiverse grasslands’ or looking at areas such as carbon stocks too narrowly.

Regarding the priority area related to nature and biodiversity, PANGEA focuses on the use of land and of forests. As the European Commission finalises its upcoming comprehensive study on ILUC, those results should be integrated into the review of the 6<sup>th</sup> EAP as the issues related to ILUC will have major impacts on how and if the EU is able to implement the RED. The opportunities for ILUC-related legislation to create additional regulatory burdens on third country biofuel producers is very high, as well as the remaining clarifications of the RED. The 2009/28/EC directive also decided to identify criteria to define geographic areas with highly biodiverse grassland and to not consider them apt for the cultivation of energy crops. According to PANGEA this definition should be made on a very detailed basis, using recent zoning and relevant data in order to avoid negative impacts on countries that could export biofuels to Europe and use these revenues to develop their local markets.

## **ENVIRONMENT & HEALTH LINKS**

PANGEA believes there is a strong link between environment, health and quality of life, which is especially true when considering women and children’s health and the daily activity of cooking. In developing countries, more than 3 billion people cook with stoves that burn wood, polluting fuels, or charcoal, which have a negative impact on the environment by encouraging deforestation and GHG emissions as well as on the health of women and children who constantly breathe the smoke from these

stoves. A good solution to this problem can be the use of clean cookstoves that burn ethanol without smoke or particle emissions, a technology and application that PANGEA actively promotes. Clean cooking fuels and stoves should definitely be an area of European intervention and the EAP should include this kind of activity in its health priority areas considering that at the international level there are strong concerns about the related issues. The creation of the Global Alliance for Clean Cookstoves (GACC), led by the UN Foundation, and the Partners for Clean Indoor Air (PCIA) proves this new concern. PANGEA is partnering with both organisations to support the spread of this technology in developing countries as well as with its member, Project Gaia Inc. In this regard, PANGEA is also organizing an event on the promotion of Clean Cookstoves in Developing Countries during the European Union Sustainable Energy Week on April 14 in the European Parliament.

## **NATURAL RESOURCE AND WASTE MANAGEMENT**

Finally, regarding the priority focused on sustainable use of natural resources and waste, PANGEA suggests incorporating the use of waste as a resource. Rather than just an environmental burden that must be mitigated, waste from both agricultural and urban sources can be used to produce bioenergy and organic fertiliser. Promoting this sustainable use of waste in developing countries as well as within the EU is a way to encourage sustainable biofuels and bioenergy production for local use —counting as double emissions reduction under the RED—but also for export, improving trade and having a positive impact on the local environment. In this case, the European Union, through the 6<sup>th</sup> Environment Action Programme, should consider activities that promote waste management technology transfer to developing countries as well as investments and policy development.

## **CALL FOR CONSISTENT EU POLICIES**

PANGEA agrees with European efforts to support a strong international commitment addressing global environmental challenges but it is also aware of the immediate necessity for much stronger policy coherence. PANGEA has been following the related policy evolution of areas including Environment, Trade, Agriculture, Energy, Climate Change and Development during the last few years. Through this analysis and the monitoring of the 6<sup>th</sup> EAP objectives, a substantial gap has been identified in the EU policy arena: the lack of consistency in policy integration regarding these inter-related areas. More specifically, deeper attention should be paid to the indirect effects that environmental policies and criteria could have on trade relations with developing countries. Small African producers will be negatively affected by strict European sustainability criteria for biofuels and biomass because they will not be able to export and consequently improve their revenues. PANGEA believes that a balanced compromise could

be the definition of binding criteria only for medium and large-scale producers, to whom a more rigorous respect of environment must be required, but avoid creating additional financial and administrative burdens for small producers. A similar differentiation should be made for all the environmentally-binding requirements for accessing the European market or else small producers from developing countries will be excluded from the EU market. Instead, rather than only a stick, a carrot (incentive) should also be introduced with more outreach and capacity building in these areas to help small producers understand, invest in and benefit from improved environmental practices.

## **CONCLUSION**

Overall PANGEA believes that the four priority areas identified by the Programme were comprehensive enough to consider the wide range of environmental challenges. The 6<sup>th</sup> EAP represented a broad framework for European environmental legislation and it helped to not lose the focus on the environment during the economic crisis and the joining of the new Member States. But trade and development policies must be strongly taken into account when defining our environmental priorities in order to avoid negative effects in other regions of the world, especially developing countries and those in the Africa Caribbean Pacific Group of States.