EEB Work Programme & Budget 2013
The EEB is the environmental voice of European citizens, standing for environmental justice, sustainable development and participatory democracy. Our aim is to promote a healthy environment and rich biodiversity throughout the EU and beyond.

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AN INTERNATIONAL NON-PROFIT ASSOCIATION
ASSOCIATION INTERNATIONALE SANS BUT LUCRATIF

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The work programme for 2013, adopted by the EEB General Assembly at its 40th annual meeting on 2 October 2012*, sets out our commitment to continue working on a broad range of issues in the coming year. These include:

- Major thematic areas such as climate change, energy, agriculture, biodiversity, air, water, chemicals, pollution, products, resources and waste;
- Horizontal topics such as sustainable development, implementation and enforcement of environmental law, greening the economy and the Seventh Environmental Action Programme;
- Emerging and/or neglected issues, such as soil, nanotechnology and noise;
- Processes extending beyond the borders of the EU, such as follow up to the Rio+20 Conference, the Mercury Treaty, the Aarhus Convention and the OECD.

At the same time, we will continue to build and strengthen the organisation, including the membership network.

Within the environmental movement, the EEB is well placed to articulate the concerns of the European public over the main environmental challenges facing our region and indeed our planet. For some topics, we have cutting-edge expertise within the EEB staff. For others, we rely on the extensive knowledge within our membership network – knowledge which is applied and further developed within seventeen subject-specific working groups. We also benefit from close collaboration with other specialised NGO networks to ensure that we remain abreast of the latest developments.

While the EEB was established around environmental concerns, we remain committed to promoting the social dimension of sustainable development. This is expressed not least through our active involvement in the Spring Alliance, a collaboration with partners from trade unions and social and development organisations working at European level.

The EEB’s activities in 2012 were made possible through the generous support of the European Commission and various governments and foundations listed on the inside cover, to whom we are deeply grateful. We are hopeful of their continued support in 2013, as well as the support of other donors.

The current economic difficulties faced by Europe have not in any way reduced the importance of determined and coordinated action to protect the environment and promote sustainable development.

INTRODUCTION

The European Environmental Bureau (EEB) aims to promote environmental justice, sustainable development and participatory democracy throughout the European Union and beyond. As the largest environmental association in Europe, we bring together more than 140 environmental organisations from some 30 countries, with a combined membership of 15 million environmentally concerned citizens.

Our Vision

The European Environmental Bureau’s vision is of a world in which:

- All people of present and future generations are able to enjoy a rich, clean and healthy environment, where prosperity and peace are secured for all;
- Responsible societies respect the carrying capacity of the planet and preserve it for future generations, including its rich biodiversity;
- Effective environmental policies and sustainable development have priority over short-term objectives that only serve the current generation or certain sections of society.

* Some factual descriptions in the text were updated since the General Assembly meeting to take account of subsequent developments.
Climate & Energy

Climate

Climate change continues to be one of the biggest threats to humankind. In 2013 the EEB will continue to push for its strategic objectives to limit global temperature to an average 1.5 degree Celsius increase and achieve a cut in emissions of at least 40% by 2020 and at least 95% by 2050. It will also continue to support a push for the necessary measures to achieve this, including a functioning Emission Trading Scheme (ETS) and the mobilising of financial resources to assist the world’s most vulnerable countries to adapt and mitigate.

Activities:
- Continue to closely cooperate with Climate Action Network (CAN) Europe and raise relevant positions in EEB communications to EU decision makers

Energy Efficiency Directive

A significant reduction in the total amount of energy the EU consumes is critical to achieving Europe’s climate objectives as well as to increasing Europe’s energy security. The main instrument that can now deliver on this is the Energy Efficiency Directive that was adopted in 2012. In 2013, the EEB will monitor the implementation of the Directive in Member States and at EU level. We will press the Commission to come up with a review of the Directive proposing a binding target. The EEB will also push for the mobilisation of financial resources in support of energy savings, focussing on buildings.

Activities:
- Monitor implementation of the Energy Efficiency Directive and push for an ambitious outcome of the review process
- Participate in the Coalition for Energy Savings
- Organise one or two working group meetings
- Take part in Intelligent Energy European projects

Ecodesign Directive and Energy Label Regulation

The Ecodesign Directive defines, product by product, legally binding efficiency standards for the energy use of products. After having covered a significant number of products until 2009, implementation slowed down in 2010 and in 2011. In 2012, partially as a result of EEB’s work in the Coolproducts campaign, it picked up again. In 2013 the EEB will continue to lead the Coolproducts campaign work to set high standards for the products with the best savings potential and monitor the revision of existing implementation measures. In parallel, the EEB will follow up the improvement actions suggested by the Commission in 2012, notably the respect of deadlines, market monitoring and market surveillance initiatives and the deployment of the top performer approach. The EEB will also intensify its preparation for a coordinated review of the Ecodesign and Energy labelling Directives aiming at having a new proposal by the Commission before the end of its term in 2014. The scope should be extended in this revision.
Activities:

- Push for a coordinated revision of ecodesign and labelling instruments starting in 2013 and 2014
- Provide solutions to extend the scope of the Directive to relevant non energy related products and resources use requirements
- Lead the Coolproducts Campaign
- Continue to push for ambitious implementation measures under the Ecodesign directive
- Reinforce coalition on new energy labelling and investigate possibility of a multi-criteria label
- Organise two Coolproducts working group meetings.

Sustainable Renewables by 2030

Commissioner Oettinger kicked off a debate in 2012 on how the EU’s renewable energy policy should look after 2020, including how new targets should be set for 2030, through a Commission Communication. The EEB will be following this debate in 2013 with a focus on ensuring the environmental sustainability of such a new renewables policy framework.

Activities:

- Take part in CAN’s working group on Renewable Energies
- Liaise with the biodiversity working group and Bio-energy working group on the sustainability aspects

Energy Tax Directive

In 2011, the Commission proposed a number of significant changes to the Energy Tax Directive. Most importantly, they suggested a significant part of future energy tax to be calculated on carbon content. In 2013 the EEB will be monitoring and will seek to influence
this proposal, coordinating NGO input together with Green Budget Europe (GBE).

Activities:
- Advocate on the revision of the energy tax directive in collaboration with GBE
- Organise one or two Environmental Fiscal Reform working group meetings

F-Gas Regulation

In 2012 the Commission published a proposal for a revised F-Gas Regulation which in its current form seeks to contain and manage the use of climate warming gases in products. This revision provides a unique opportunity to introduce a phase out of the use of such gases. Failure to do so would result in the release of significant amounts of non-CO2 climate gases in the atmosphere and fatally undermine the EU’s efforts to achieve its 2050 climate objectives.

Activities:
- Support joint NGO advocacy work on the proposed new F-Gas Regulation
- Identify potential members’ involvement to advocate at national level

Biofuels target and sustainability

Under the Renewable Energy Directive, Member States are also obliged to derive 10% of their transport fuels from renewable sources, provided these are sustainable. The policy in its current form however fails to adequately account for the full emissions caused by biofuels used for meeting this target. After a long delay in proposing a methodology to factor in emissions from Indirect Land Use Changes (ILUC), the Commission tried to unlock the situation in autumn 2012 but while its proposal acknowledged there is an ILUC problem it manifestly fails to address it. In 2013, the EEB will try to ensure that the Commission effectively solves the problem of ILUC emissions and damaging impacts from biofuels by proposing meaningful ILUC factors.

Activities:
- Advocacy work to ensure that the Commission’s proposal to effectively accounts for emissions caused by indirect land use change will be improved by Council and European Parliament
- One meeting with national NGOs working on biofuels

Biomass for energy

Under the Renewable Energy Directive, EU Member States are committed to meeting 20% of their energy use in 2020 from renewable sources. It became increasingly clear that a very large share of this will come from biomass which poses two problems to the climate: first of all, the climate benefits of this are in many cases uncertain, even in a best case scenario and secondly it is slowing down development and investments in other renewables. In 2013, the EEB will push the Commission to propose sustainability criteria for biomass incorporating the carbon debt linked to different pathways and support its adoption during co-decision.

Activities:
- Advocacy work on the Commission’s legal proposals for sustainability standards for biomass
**Nature & Biodiversity**

**Biodiversity strategy**

The loss of biodiversity and the ensuing collapse of ecosystems is one of the biggest threats facing humankind. In 2011, the Commission proposed a new strategy including new targets and measures to tackle this. In 2013 the EEB will work on the follow-up of this strategy to ensure that actions foreseen are in line with the Convention on Biological Diversity Nagoya agreement and carried out effectively and, if necessary, that additional measures are taken.

**Activities:**
- Actively follow the implementation of the biodiversity strategy, in cooperation with our partners in the European Habitats Forum, providing in particular political support for a legal instrument to tackle invasive species
- Convene two meetings of the biodiversity working group

**Natura 2000**

The Natura 2000 network remains the cornerstone of Europe’s efforts to safeguard its biodiversity. With the designation of the network complete on land, the effective conservation and financing of this has become the highest priority. In 2013, the EEB will continue to campaign for the entire network to be put under effective management and for the EU budget to provide adequate financing for this. From 2013, the focus will shift to ensuring that national allocation of EU Funds (Operational Programmes, etc.) will include sufficient funding for biodiversity.

**Activities:**
- Carry out advocacy work in relation to the new EU budget
- Participate actively in the Commission-led activities to oversee and review the establishment of management measures for Natura 2000 through biogeographic seminars and ensure active NGO involvement.
- Start with a pilot project to kick-start management action in countries where progress is lacking
- Produce an update of the EEB 2011 Natura 2000 snapshot report assessing the quality of the plans
- Train EEB members on how to influence the preparation of Operational Programmes and other national allocation programmes

**Green Infrastructure**

The EEB understands this new concept in a broad sense as an interconnected network of natural areas and open spaces that conserves natural ecosystem values and functions, sustains clean air and water, and provides a wide array of benefits to people and wildlife. Under the new Biodiversity Strategy, the Commission will prepare a communication on how such a network should be developed.

**Activities:**
- Participate actively in the preparation of the Commission Communication on Green Infrastructure
→ Advocate in support of funding green infrastructure under the new EU budget
→ Organise an event on Green Infrastructures for NGOs and national government representatives in cooperation with the Commission

Soil Framework Directive

The promise of the first ever legal instrument dedicated to protecting this crucial resource at EU level continues to be blocked at the Council stage. In 2013, the EEB will continue to monitor the situation, support its members who push for a change in key Member States’ positions and prepare for when the work in Council will continue.

Activities:
→ Organise one working group meeting

Common Agricultural Policy (CAP) Reform

The Commission’s proposal for a new CAP, published in Autumn 2011, will need to be approved and adopted by the Council and, for the first time ever in EU history, by the European Parliament. The co-decision process started in 2012 and the Commission proposals faced lots of resistance from both institutions. In 2013, the EEB will work on making sure the Parliament and the Council do not water down the Commission’s proposals as regards the greening and will continue to push for an improved greening of both the first pillar direct payments to farmers as well as for a significant increase of funding for targeted environmental measures under the second pillar.

Activities:
→ Carry out advocacy work on the legal proposals for the new CAP
→ Serve as vice-chair of the Commission’s Advisory Committee on Rural Development and chair within the working group on environment within the Advisory Group on Rural Development
→ Organise two meetings of the working group, linked to conference and site visits in cooperation with EEB partners
→ Subject to resources, monitor the European Innovation Partnership for Agriculture

Genetically Modified Organisms (GMOs)

The debate on GMOs at an EU level is focussing on the authorisation procedures by which both Commission and Member States may allow for cultivation of GM crops. In 2012, the EEB will continue to push for a comprehensive EU system of authorisation which prevents environmental damage and the contamination of conventional and organic farming. This work will be led by the Slovenian Institute for Sustainable Development.

Common Fisheries Policy (CFP) Reform

With over 80% of assessed fish stocks in the EU deemed as overfished, the new CFP, which will be in force for another 10 years, may well be a last chance to safeguard Europe’s fish stocks and secure a sustainable future for Europe’s fisheries. The EEB will continue in 2013 to cooperate with Seas at Risk and the wider NGO coalition it is part of.
INDUSTRY AND HEALTH

Chemicals and REACH

Five years after entry into force of the REACH regulation (Registration, Evaluation, Authorisation and Restriction of Chemical substances), progress in implementation is slow and only 4 restrictions have been included in annex XVII and not a single authorisation request has been submitted yet. At the same time, the first review of REACH foreseen by 1 June 2012, has been postponed by the European Commission. In 2013 the EEB will continue to be closely involved in REACH implementation and will step up its efforts to use the legal opportunities to close significant gaps under REACH in relation to Endocrine Disrupting Chemicals (EDCs), in particular to exclude the “adequate control route” for these chemicals in the REACH text. Since there is no safe exposure level for EDCs, there is no way for them to be adequately controlled. The focus will be to achieve the substitution of chemicals of concern by 2020 by any means, to tackle cocktail effects and nano materials, and to address transparency issues as well as delivering on information generation on chemicals through REACH to be used for other EU policy frameworks (e.g. Ecolabel, Ecodesign etc).

Activities:

- Represent environmental interests in the European Chemicals Agency (ECHA) Committees and its Management Board
- Participate actively in REACH implementation focussing on achieving the substitution of Substances of Very High Concern (SVHC) by 2020, and tackling cocktail effects and nano materials
- Organise one or two working group meetings

Mercury

In 2013, negotiations under the auspices of the United Nations Environment Programme (UNEP) on a new international treaty on mercury will be coming to a decisive stage since the text has to be finalised in January 2013. Then, interim funding and other important transitional arrangements governing treaty implementation activities for the next few years must be sorted out in preparation for the diplomatic conference scheduled for the summer of 2013. The EEB will continue to lead the Zero Mercury Campaign to ensure an effective representation of NGOs in these negotiations. At the EU level, in 2013, the EEB will continue pushing for the implementation of remaining actions under the 2005 strategy and for the adoption of new measures, which in turn should help push up the ambition level of the international treaty negotiations and otherwise facilitate treaty implementation.

Activities:

- Coordinate and lead NGO input into the treaty negotiations and diplomatic conference
- Organise NGO preparatory meetings before official negotiations
- Support international projects, mainly in developing countries, in the run-up to negotiations and in preparation for the implementation of the treaty in the interim period
- Carry out advocacy work in support of EU level measures to phase out mercury from different sectors, including the revision of the regulation on mercury export ban and storage, and in the development of Best Available Techniques reference documents under the Industrial Emissions Directive where relevant
### Nanotechnology

Despite having been asked by the Parliament to do so, the Commission continues to take little action to start regulating the use of nanomaterials. The first initiative undertaken has been the recommendation for a definition of the term "nanomaterial" which is then to be used in various pieces of legislation. This definition will now need to be adapted on a case-by-case basis.

Following the adoption of the recommended definition, legislation that will ensure the environmental and health safety of their use across their entire life cycle will need to be proposed. This is likely to have consequences for a large amount of existing legal instruments that deal with various product groups.

The Commission’s communication on the 2nd regulatory review on nanomaterials presented by the end of the year, has failed to commit to proper EU regulation in spite of clear deficiencies underlined by the European Parliament in reviews of existing legislation on related areas.

Perhaps the most relevant existing policy for regulating nano is REACH since this instrument has been set up to deal with the safe use of substances. In its current form however, REACH has no provisions and instruments that are relevant to nanomaterials.

In 2013, the EEB will continue with the intensification of its work on nano started in 2012 and campaign for the National nano registries and the EEB members 'nano patch', a proposal for EU legislation to address the risks of nanomaterials as adequate regulatory instruments, closely linked to the REACH review.

**Activities:**
- Follow and seek to influence the preparations for the REACH review in relation to nanotechnology
- Insist that the Commission takes additional action to regulate nanotechnology outside the context of the REACH review
- Integrate nanotechnology into the agenda of the two chemicals working group meetings

### Air Quality Directive

The Commission has announced 2013 as the year in which it will make an overhaul of its air policy a priority. This constitutes an important opportunity to tighten up the ambient air quality standards defined in Directive 2008/50/EC and to strengthen the legislation. In preparation of this, the EEB will be actively involved in the stakeholder groups and consultation processes organised by the European Commission.

**Activities:**
- Actively follow the review of the Ambient Air Quality Directive and push for enforcement of existing standards
- Cooperate in the ‘soot free for the climate’ campaign
- Organise one or two working group meetings

### National Emission Ceilings Directive and relevant emission legislation

This Directive sets national emission ceilings (NEC) for a number of pollutants to be achieved by 2010. The policy has been successful insofar as most Member States have complied with most of these ceilings. The Directive was due to be revised in order to set ceilings for 2020 but the proposal has been repeatedly postponed. All 27 Commissioners have now committed to propose the new Directive in 2013 at the latest during the “year of air”. It is very likely that the ceilings will be set for 2025. More action will have to be taken to reduce air pollution at source, from industrial, transport, domestic and agricultural sources. In many of these areas, EU policies are either weak or inexistent.

The EEB will push for the setting of new stricter ceilings as well as establishing ceilings for unregulated pollutants (e.g. particulate matter 2.5).
Activities:
- Actively follow preparations for the new NEC Directive and ensure that the Commission’s proposal is sufficiently ambitious
- Ensure that the Commission proposes new legislation to reduce air pollution at source (from industry, transport, domestic heating, agriculture)
- Start working with the European Parliament and Member States, undertake advocacy work after publication of Commission’s proposals

Environmental Noise Directive

This Directive defines a number of procedures for Member States by which they should reduce noise pollution levels. This Directive is still under review and the Commission is likely to launch a public consultation in which the EEB will participate.

Activities:
- Organise one working group meeting
- Produce a noise newsletter in collaboration with other networks and interested EEB members (subject to co-funding and/or in kind support and/or leadership by a member organisation)
- Participation in public consultation organised by the Commission

Industrial Emissions Directive and Seveso III

Following the adoption of the new Industrial Emissions Directive (IED) in 2010, which regulates major industrial activities, attention now moves back to implementation work. Deadlines for the transposition and coming into effect of critical provisions, such as setting up the environmental inspection framework, and the baseline report on soil and groundwater pollution, will be scheduled for 2013. The EEB will have to increase capacity and involvement in 2013 to actively participate in the transposition and implementation process, in particular at the permitting level. The ‘Sevilla Process’, which sets ambitious standards for environmental performance benchmarks set out in the Best Available Techniques (BAT) Reference Documents, will gain further in political importance. The EEB will follow this process to ensure environmental ambitions are upheld. The EEB will also continue to push for strict enforcement and to challenge derogations from state of the art compliance.

The IED will also undergo a revision in 2013 in relation to emission limits for large combustion plants, the scope of the Directive (inclusion of 20-50 MW large combustion plants, other intensive animal rearing activities), applying BAT to manure spreading, and the possible introduction of binding minimum requirements for certain pollutants or activities. Proposals for this are likely be part of the Air Quality review package.

Implementation of the newly adopted Seveso III Directive will be followed up by EEB members.

Activities:
- Organise technical expert input and monitor actively the Sevilla process
- Support members in enforcement work
- Participate in the upcoming legislative review
- Organise one or two working group meetings
- Send members to the meetings of the competent authorities under the Seveso Directive
WATER

Water Framework Directive

The Water Framework Directive (WFD) will continue to be the EU’s central piece of legislation that aims to ensure that Europe’s waters will be restored by 2015. In 2012, which has been designated as European Year for Water, a discussion about what additional measures will be needed in support of this has started, centering on the Commission’s Blueprint to Safeguard Europe’s Water resources which was published in November 2012.

Activities:

➢ Continue to follow both the official implementation process of the WFD and related policies such as the Floods Directive, as well as NGO initiatives where appropriate
➢ Support members in their complaints about poor implementation
➢ Address conflicts between hydropower developments and water protection requirements
➢ Organise one or two meetings of the water working group

Environmental Quality Standards (EQS) for Priority Hazardous Substances

Under this Directive, the maximum allowed concentration of harmful chemicals in water is regulated for a number of chemicals. The Directive is critical in ensuring that chemicals that are problematic for water protection are adequately regulated under relevant chemicals policy such as REACH. A proposal for its review has been published in 2012 and the co-decision process is likely to continue into 2013. The EEB will actively follow the negotiations on the revised Directive.

Activities:

➢ Advocate in close cooperation with NGO partners on the revised EQS Directive
**RESOURCES, WASTE AND PRODUCTS**

**Resource Efficiency Roadmap**

In the second half of 2011, the Commission published its Resource Efficiency Roadmap which outlines a number of actions to be undertaken in existing policies such as waste, products, water and biodiversity as well as new actions to be integrated into Europe’s emerging system of economic governance, such as phasing out harmful subsidies and greening the tax base. The EEB’s involvement in these different initiatives will be elaborated under the respective headings. The main focus in relation to the actual roadmap in 2013 will continue to be the debate on setting targets and indicators on resource use, especially in relation to the review of the EU 2020 Strategy for which the preparations will start in 2013. In addition to this, the EEB is taking part in a European Resource Efficiency Platform, created in 2012 to gather high level political support for the implementation of the Roadmap.

**Activities:**
- Support EEB members in enforcing adequate implementation of the Waste Framework Directive
- Push for prevention targets set at EU level and in national waste prevention programmes
- Organise one working group meeting on waste policy implementation

**Recycling Directives**

Following the release of and debate on the Resource Efficiency Roadmap in 2011 and 2012, in 2013 a first series of policy initiatives will be launched that will need to start translating political commitment into action. These will include a review and update of the so-called ‘recycling directives,’ such as the Packaging and Packaging Waste Directive and a wider preparation for the review of the Waste Framework Directive in 2014.

**Activities:**
- Boost recycling objectives notably for biowaste – with associated separate collection; for plastics and wood packaging; and for batteries both on the quantitative and qualitative aspects
- Organise one working group meeting on the Recycling Directives and Waste Framework Directive review

**Waste Framework Directive**

The adequate implementation of the Waste Framework Directive will continue to be a major concern, especially implementing the waste hierarchy in waste management plans and waste prevention programmes. At the same time, the EEB will need to start early preparations for the review of existing waste targets and adoption of new ones in the 2014 review.

**WEEE Directive transposition**

2013 should be the year to start the transposition at national level of the new Waste Electrical and Electronic Equipment (WEEE) Directive. It will be crucial to support EEB members in their work on transposition to clarify legal uncertainties and grasp opportunities to pioneer innovative proposals not yet legally required, thereby creating good precedents.
Activities:
- Prepare transposition guidance with the Commission
- Prepare key transposition points for members and act as a helpdesk
- Help to build coalitions at national level when relevant
- Dedicate time to WEEE transposition during Waste working group meetings

Ship Dismantling Directive

To align with IMO Hong Kong Convention on large vessels dismantling, the EU, which still lacks adequate facilities, has proposed a new Directive. Sadly this proposal failed to draw lessons learned from existing waste management practices. The EEB will provide strategic advice to the advocacy work of its partner NGO, the Shipbreaking Platform.

Activities:
- Provide support and advice to the Shipbreaking Platform

Sustainable Consumption and Production Action Plan (SCP AP) Review

The SCP AP has failed to deliver on the promise of a dynamic product policy. Its main outcome has been the creation of a number of initiatives such as the Retail Forum and the Sustainable Food Roundtable which have had somewhat limited results. It now seems unlikely that the SCP will be reviewed, instead the Commission will launch a ‘green single market initiative’ under which technical preparatory work will take place mostly in support of upcoming revisions of ecodesign and labelling instruments. The EEB’s activities here will therefore be covered under those sections.

Activities:
- Identify opportunities for regulating beyond the energy in use stage, through specific, generic or information requirements, particularly for IT products and Voluntary Agreement initiatives
- Push for definitions of transversal indicators and measurement systems that would enable the setting of requirements for resources use in products beyond energy requirements, particularly by supporting DG Environment initiatives to develop such methodologies with stakeholders and Member State representatives

Ecodesign Directive

While the focus of the Ecodesign Directive will certainly remain on the energy in use stage in 2013 (see section on Energy & Climate), the EEB will maintain political pressure to address other resources issues and prepare a possible extension of the scope of the Directive.

Activities:
- Coordinate expert input into Ecodesign Directive

Green Public Procurement (GPP)

Currently DG Environment develops criteria for different product groups which Member States can use, on a voluntary basis, when developing their GPP policies. At the same time, a review of the public procurement directive will be well under way in 2012, providing an important opportunity to change procurement rules in favour of green and sustainable products and services.

Activities:
- Coordinate expert input into GPP criteria development

Ecolabel

The EEB has for the last 20 years provided expert input on behalf of environmental NGOs into the development of technical criteria for the EU Ecolabel, working in cooperation with the consumer organisation BEUC.

Activities:
- Coordinate expert input into Ecolabel criteria development

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POLITICAL STRATEGIES

Seventh Environmental Action Programme (7EAP)

Towards the end of 2012, the Commission published its proposal for a 7EAP. This means that in 2013 the EEB will need to invest considerable resources into its advocacy work on this dossier.

Activities:
- Lead on advocacy work on the proposal for a new 7EAP
- Organise a seminar on the 7EAP

Europe 2020

The importance of this economic strategy has been increasing, especially in the debate on the new EU budget but also in determining the EU’s response to the euro-crisis. In 2013, the EEB will continue to closely follow how this strategy is given shape and assess how it will contribute to putting Europe on a sustainable development path.

Activities:
- Promote a meaningful interpretation of the green economy through various channels of communication (conferences, memoranda etc)

Sustainable Development Strategy (SDS)

In 2013, the EEB will continue to advocate for sustainable development as the overarching objective of Europe’s economic, social and sectoral policies. As part of this it will initiate a debate about the future of the EU Sustainable Development Strategy, aiming to get leverage from the Rio+20 Conference.

Activities:
- Organise a seminar on the EU SDS

Green Economy

The concept of the green economy has increasingly entered into political discourse in EU decision-making circles, given added impetus by the Rio+20 Conference. Many elements in the present work programme promote the greening of the economy, and thus it could be said that much of the EEB’s work fits under this heading. However, there is a need to promote in a more horizontal way an interpretation of the concept of green economy that implies a total greening of the entire economy and respects the social dimension of sustainable development.

Activities:
- Promote a meaningful interpretation of the green economy through various channels of communication (conferences, memoranda etc)
FINANCIAL INSTRUMENTS

Fiscal Reform

In 2013, the EEB will monitor and assess opportunities for work on fiscal reform at EU level, including inter alia the Market Based Instruments Forum, a new ETS and the roadmap for the phase out of Environmentally Harmful Subsidies.

Economic Governance

In response to the euro-crisis, the EU developed in 2011 a new mechanism of stronger economic governance. This is organised through a “European Semester” in which national budgets and national reform programmes are subject to scrutiny by both the Commission and the Council. The 2011 Semester and the subsequent austerity measures following have been a major source of social unrest but can equally be a potentially powerful new instrument to phase out harmful subsidies and green the tax base. The EEB will explore and promote the possibilities for pursuing environmental objectives through the Semester.

EU Budget

The negotiations on the new EU budget for the period 2014 till 2020 will continue to be high on the political agenda in 2013. The EEB is part of a coalition of environmental groups that work on greening this EU budget with particular focus on the CAP, the LIFE Fund and the contribution that Cohesion Policy could make in financing the EU’s biodiversity.

Activities:

→ Continue to coordinate through the EU budget coalition
HORIZONTAL LEGAL INSTRUMENTS

New enforcement tools including inspections

In March 2012, the Commission issued a Communication on how to improve EU governance for enforcement of EU environmental law which contained some general proposals for new tools such as environmental inspections and better monitoring. The possibility of reviving discussions on the Access to Justice Directive was raised in the Communication, albeit in rather indirect terms. In November 2012, both themes were taken up in the Commission’s proposal for the 7EAP. In 2013, the EEB will continue to advocate for the adoption of such new instruments and once they have been adopted at EU level monitor their transposition and application at national level. The Communication promotes more transparency and sharing of best practice

Activities:
- Follow up on the Communication on implementation and the 7EAP proposal, both with regard to new legal instruments and with regard to better reporting, more transparency and sharing of best practice

Impact Assessment Directives: Environmental Impact Assessment (EIA) / Strategic Environmental Assessment (SEA)

Preparations for a review of these Directives are well advanced, providing an opportunity to extend their scope and sharpen up the procedures. In late 2012, the Commission presented its proposal for the revision of the codified EIA directive.

Activities:
- Follow SEA/EIA cases; if possible draw conclusions for input to the review process; comment on the Commission proposal and continue following the review process

Environmental Liability Directive (ELD)

Although its implementation has been slow and few cases have come off the ground as a result, this directive will soon be up for review again. In 2011 a project was started analysing in a number of Member States whether a link can be made between the quality of the national transposition of the ELD and its application. This will be continued in 2013 and shall be used as a basis for preparation of input to revision of the ELD.

Activities:
- Follow the revision process as closely as possible, prepare proposals for extension of the scope of the ELD
**Environmental Crime Directive (ECD)**

The Environmental Crime Directive requires EU Member States to provide for criminal sanctions for the most serious environmental offences. It was adopted in 2008 and was due to be transposed by the end of 2010, though many Member States violated this deadline.

**Activities:**
- Continue reviewing cases with reference to the Directive to see if they can be used to request inclusion of the type and size of penalties in the ECD

**Administrative Burden and Deregulation**

The High Level Group on Administrative Burden Reduction (Stoiber Group) has been given a new mandate until 2014. This group will continue therefore to pose a risk as an instrument in the hands of the deregulation lobby. The EEB will attempt to find a means of ensuring, in collaboration with other environmental NGOs, that environmental concerns are effectively represented in the Group.

**Standardisation**

A proposal for a new regulation on standardisation published in 2011 significantly strengthens the role of civil society organisations in standard-setting at EU level. In 2013, the EEB will continue to support the European Environmental Citizens’ Organization for Standardization (ECOS) in its advocacy work on this where appropriate.

**Activities:**
- Support ECOS in advocacy work on new standardisation rules

**Concerning all issues under this heading:**

**Activities:**
- Coordinate NGO input into the debates and votes via the EEB law group
- Organise one or two law group meetings
Global and Regional Outreach

Pan-European Outreach (UN Economic Commission for Europe (ECE) / European ECO Forum)

In 2013, the EEB will continue to support the European ECO Forum in maintaining NGO involvement in the Environment for Europe process and other UNECE processes, including through co-chairing the Coordination Board of the European ECO Forum and by providing input to the mid-term review of the Environment for Europe process due in June 2013.

Organisation for Economic Cooperation and Development (OECD)

The OECD plays an important role in shaping environmental policy in developed countries, providing a forum for influential debates on topical issues, e.g. green growth. For a number of years, the EEB has facilitated input to OECD environment-related processes from NGOs from the OECD region. In 2013, the EEB will continue to coordinate the NGO input into the implementation of the OECD’s environmental work programme with a focus on securing a good geographical balance.

Mediterranean Spring

The uprisings in the southern and eastern shores of the Mediterranean are widely perceived as an opportunity for promoting democratic governance structures.

The EEB will explore with relevant governments and stakeholders the possibility of joint activities to support the democratisation process in those countries with respect to environmental matters, potentially leading them to accede to the Aarhus convention.

Enlargement, European Neighbourhood Policy (ENP) and Eastern Partnership

The EEB will explore opportunities to revive its activities aimed at promoting better environmental policies in the neighbouring countries and to strengthen collaboration with NGOs working in those regions. We will monitor developments regarding accession negotiations with candidate countries in South-East Europe and Turkey. We will also closely follow and work with interested NGOs in the countries within the ENP and Eastern Partnership.

Follow up to the Rio+20 Conference

The Rio+20 Conference was intended to provide a means through which governments would renew their commitment to sustainable development both in Europe and globally. While the outcome of the Conference has fallen well short of what is needed to reverse current unsustainable trends, it has nonetheless created a number of opportunities for making further progress in advancing the sustainability agenda.

Through selective involvement in the follow-up process, the EEB will seek to maximise the prospects of concrete and meaningful outcomes.
ENVIRONMENTAL DEMOCRACY

Aarhus Convention

In 2013, the EEB will continue to play a leading role in the NGO work in the further development and implementation of the Aarhus Convention by coordinating the European ECO Forum input into the Convention processes and serving as the designated NGO observer on the Convention’s Bureau. This work will also include the Protocol on Pollutant Release and Transfer Registers, as well as the Protocol on Strategic Environmental Assessment to the Espoo Convention. Preparations will start for the next session of the Meeting of Parties to the Aarhus Convention foreseen for 2014. We also aim at having a series of seminars and training sessions for NGOs in South East Europe on the Aarhus Convention and related issues. We will continue our work on the compliance mechanism under the Convention.

EU instruments implementing Aarhus

Work on the EU Directives on access to information and public participation implementing the Aarhus Convention will continue in 2013. The EEB will also increase pressure to lift the blockade in Council on the proposed access to justice directive.

The recast of the access to documents regulation was originally expected to be concluded in 2012 but as the negotiations will now continue into 2013, the EEB will continue to push for a successful outcome and will subsequently follow the application of the new regulation once in place. We will also press for strengthening of the parallel regulation implementing the Aarhus Convention at the level of the EU institutions, including if necessary by supporting legal action contesting the adequacy of the regulation, and will encourage our members to complain about and report back to the EEB on cases of refused access to documents.

With both instruments, the EEB will continue to lobby within the Parliament and Council, advocating for maximum transparency, while at the same time more systematically using the regulations’ provisions in its everyday advocacy work. The EEB will also continue to play an active role in the Advisory Board of the EU Aarhus Centre, which it has chaired since the Centre was established in 2011 by ClientEarth.
ALLIANCE BUILDING

Green 10, Spring Alliance

In 2013, the EEB will continue to be part of strategic political alliances such as the Green 10 and the Spring Alliance. Work with the Spring Alliance will focus on the EU budget and economic governance.

MEMBERSHIP AND ORGANISATIONAL DEVELOPMENT

EEB Secretariat

In 2013, more attention will be given to staff development in the EEB secretariat, both by sharing skills, experience and expertise already existing within the EEB staff and by bringing in professional trainers for specific skills and needs. Systematic and regular feedback mechanisms will be used to ensure maximum take up.

Consolidating the EEB network and working with members

In 2013, the EEB will further invest in the development of its network, the membership base, and in strengthening its working relationship with its members. Capacity building events will continue to play a role but will have a stronger focus on development of practical EU lobbying skills. Four such events are envisaged for 2013 if funding is available, including two pre-Presidency meetings, one in Lithuania and one in Greece.

A more systematic assessment of the needs of national NGOs will be made in order to develop national tailor-made packages which could extend beyond one-off events. The EEB office will continue to provide advice and support to individual members upon request. In 2013, the EEB will launch a pilot scheme for closer member engagement on a specific campaign subject. Methods to help attract more members and make membership as accessible as possible will be further explored. Where feasible and on relevant topics, the EEB staff will participate in and support members’ activities.

The 2013 AGM will take place around late September or early October.

Presenting the EEB’s views to the wider public

In 2013, the EEB will continue to publish its quarterly newsletter Metamorphosis in which it comments on major policy developments, gives updates from the campaigning front and puts members’ activities in the focus.

In addition to this, the EEB will continue to prepare its regular letters to the Environment Council, Ten Tests for the EU Council Presidency and yearly priorities paper.

Last but not least, the EEB will carry out a comprehensive review of its communication strategy during 2013 and update it as necessary.
## Budget 2013

### A. General Costs

<table>
<thead>
<tr>
<th>Activity</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Missions and Representation</td>
<td>35,000</td>
</tr>
<tr>
<td>2. Office Costs</td>
<td>86,115</td>
</tr>
<tr>
<td>3. Office Supplies</td>
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<tr>
<td>4. Communications</td>
<td>48,800</td>
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<tr>
<td>5. Depreciations</td>
<td>40,000</td>
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<tr>
<td>6. Financial costs</td>
<td>5,355</td>
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<tr>
<td>7. Provision</td>
<td>10,000</td>
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</table>

**Sub-Total - A. General Costs**  
295,095

### B. Salary Costs

<table>
<thead>
<tr>
<th>Activity</th>
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</tr>
</thead>
<tbody>
<tr>
<td>1. President’s Secretariat</td>
<td>10,000</td>
</tr>
<tr>
<td>2. Secretary General’s Unit</td>
<td>346,852</td>
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<tr>
<td>3. EU Policy Unit</td>
<td>527,035</td>
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<tr>
<td>4. Information &amp; Communication Unit</td>
<td>191,001</td>
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<tr>
<td>5. Accounting &amp; Support Unit</td>
<td>243,233</td>
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<tr>
<td>6. Special Campaigns</td>
<td>105,688</td>
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<tr>
<td>7. Volunteers and Temporary Staff</td>
<td>5,500</td>
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<tr>
<td>8. Other personnel costs</td>
<td>44,270</td>
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**Sub-Total - B. Salary Costs**  
1,473,579

### C. Activities

<table>
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<tr>
<th>Activity</th>
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</thead>
<tbody>
<tr>
<td>1.a. Climate</td>
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<tr>
<td>1.b. Energy Efficiency Directive Implementation</td>
<td>17,800</td>
</tr>
<tr>
<td>1.c. Ecodesign Directive and Energy Label Regulation</td>
<td>41,200</td>
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<tr>
<td>1.d. Sustainable Renewables by 2030</td>
<td>-</td>
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<tr>
<td>1.e. Energy Tax Directive</td>
<td>-</td>
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<tr>
<td>1.f. F-Gas Regulation</td>
<td>11,800</td>
</tr>
<tr>
<td>1.g. Biomass for energy</td>
<td>-</td>
</tr>
<tr>
<td>- Biofuel target and sustainability</td>
<td>-</td>
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<tr>
<td>2.a. Biodiversity strategy</td>
<td>18,500</td>
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<td>- Natura 2000</td>
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<td>- Green Infrastructure</td>
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<td>2.b. Soil Framework Directive</td>
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<td>2.c. Common Agricultural Policy (CAP) Reform</td>
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<td>2.d. Genetically Modified Organisms (GMOs)</td>
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<td>2.e. Common Fisheries Policy CFP) Reform</td>
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<td>3.a. Chemicals / REACH</td>
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<td>3.b. Mercury</td>
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<td>3.c. Nanotechnology</td>
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<td>3.d. Air Quality Directive</td>
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<td>3.e. National Emission Ceilings Directive</td>
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<td>3.f. Environmental Noise Directive</td>
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<td>3.g. Industrial Emissions Directive</td>
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### EEB Work Programme & Budget 2013

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<tr>
<th>4.a.</th>
<th>Water Framework Directive</th>
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<tr>
<td></td>
<td>- Environmental Quality Standards for Priority Hazardous Substances</td>
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<tr>
<td>5.a.</td>
<td>Resource Efficiency Roadmap</td>
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<td>5.b.</td>
<td>Waste Framework Directive</td>
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<td>- Recycling Directives</td>
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<td></td>
<td>- WEEE Directive transposition</td>
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<td></td>
<td>- Ship Recycling Regulation</td>
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<td>5.c.</td>
<td>Sustainable Consumption and Production Action Plan (SCP AP) Review</td>
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<td></td>
<td>- Ecodesign Directive</td>
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<td>5.c.1</td>
<td>Ecolabel</td>
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<td>5.c.2</td>
<td>Green Public Procurement</td>
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<td>6.a.</td>
<td>7th Environmental Action Plan (7EAP)</td>
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<td>6.b.</td>
<td>Europe 2020</td>
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<td>6.c.</td>
<td>Sustainable Development Strategy (SDS)</td>
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<td>7.a.</td>
<td>Fiscal Reform</td>
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<td>7.b.</td>
<td>Economic Governance</td>
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<td>7.c.</td>
<td>EU Budget</td>
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<td>8.a.</td>
<td>Effective Enforcement of EU legislation and policies</td>
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<td>8.b.</td>
<td>New enforcement tools including inspections</td>
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<td>8.c.</td>
<td>Impact Assessment Directives: Environmental Impact Assessment (EIA)/Strategic Environmental Assessment (SEA)</td>
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<td>8.d.</td>
<td>Environmental Liability Directive (ELD)</td>
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<td>8.e.</td>
<td>Environmental Crime Directive (ECD)</td>
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<td>8.f.</td>
<td>Impact Assessment at EU level (Better Regulation)</td>
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<td>8.g.</td>
<td>Standardisation</td>
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<td>9.a.</td>
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<td>9.b.</td>
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<td>9.c.</td>
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<td>9.d.</td>
<td>Mediterranean Spring</td>
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<td>9.e.</td>
<td>Follow up to Rio+20 Conference</td>
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<td>10.a.</td>
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<td>11.</td>
<td>Green 10, Spring Alliance</td>
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<td>12.a.</td>
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<td>12.b.</td>
<td>Consolidating the EEB network and working with members</td>
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<tr>
<td></td>
<td>- Working with the Presidencies</td>
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<td></td>
<td>- Annual General Assembly</td>
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<td>12.c.</td>
<td>Presenting the EEB's views to the wider public</td>
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<tr>
<td>9.b.</td>
<td>- European ECO Forum</td>
<td>-</td>
</tr>
</tbody>
</table>

**Sub-Total - B. Salary Costs** | **627,470**

**D. Allocation to Reserve Fund** | **60,000**

**TOTAL EXPENDITURE** | **2,456,144**
The European Environmental Bureau (EEB) is a federation of over 140 environmental citizens’ organisations based in most EU Member States, most candidate and potential candidate countries as well as in a few neighbouring countries. These organisations range from local and national, to European and international. The EEB’s aim is to protect and improve the environment by influencing EU policy, promoting sustainable development objectives and ensuring that Europe’s citizens can play a part in achieving these goals. The EEB stands for environmental justice and participatory democracy. Our office in Brussels was established in 1974 to provide a focal point for our members to influence, monitor and respond to the EU’s emerging environmental policy.