

EU Sixth Environmental Action Programme

An NGO Response from Candidate Countries

Introduction

The following statement is [based on a document] prepared by NGOs representatives from 11 Accession Countries who met in Brussels on 4th and 6th of March 2001 to discuss the *6th Environmental Action Programme* (the Programme). We propose the following considerations and suggestions as a contribution to the further process of the development of the Programme.

The undersigning NGOs, in general, support the *EEB Proposals to Strengthen the 6th EAP* (please see the text on www.eeb.org in latest publications) with some additional contributions, resulting from our specific situation and experience. Our comments were presented to Ministers of Environment from Candidate Countries and the EU on March 7th, 2001. We would like to contribute further to the process in the future.

This statement is supported and signed by 19 Environmental NGOs from the Accession Countries (as of March 22st, 2001) – see the list below.

General Comments

- We welcome the four identified priority areas in the Programme (Climate Change; Nature and Biodiversity; Environment and Health; Natural Resources and Waste) which are well chosen and presented; however the interconnections between them are neglected which results in an approach of partial solutions, rather than a holistic one.
- Although the Programme recognises the opportunities of the Candidate Countries to make progress towards and economic development that is sustainable, it fails to offer any real actions for this opportunity to be actually seized, and for the whole of EU to accept sustainable development as a challenge to the existing development model.
- We also support the importance given to consensus decision-making and voluntary agreements. It is a good concept, but its potential is overestimated especially owing to its limitations when faced with different cultures and traditions as well as unbalanced capacities within public institutions, civil society and the business sector.
- Whilst the Programme is very specific on the targets for green house gas emissions, reduction of waste and noise exposure, it remains very vague in the rest of the document, mostly specifying only general objectives, rather than specific targets. We propose that even if concrete target values are not specified, at least a methodology should be prescribed on how to arrive at them in the subsequent process of elaborating thematic strategies, legislation, etc. As an example, for resource use and environmental pollution the concepts based on carrying capacity should be applied, with the overall target of reaching the levels defined within the Environmental Space of Europe's environment by the year 2030.
- We support the integration of the concept of delinking economic growth and environmental pressures; however it needs to be further elaborated and defined, with a clear goal of real net reduction, not just slowing down of the increase of resources use and pollution. To establish the success of delinking of economic

growth and environmental pressures requires the development of a new measure which discounts external costs from economic growth.

- It would be a good case of "leading by example" if a strategic environmental assessment was made of the Programme to show its actual expected impact on the environment.

In addition we would like to point out to the following weaknesses of the Programme:

- the Programme fails to offer fresh innovative solutions or instruments, which would have the ability to deal with the existing and emerging environmental problems. Despite the general recognition that the existing approaches of EU environmental policy and legislation, as defined in the 5th Environmental Action Programme, have not proven to be sufficient, the Programme basically proposes nothing new.
- the strategy for integration of environmental policy into other sectors as a prerequisite for sustainable development is not sufficiently elaborated (e.g. setting up cross-sectoral institutions and mechanisms would be required to ensure integration)
- the Programme delegates some major decisions on issues to later stages of the process (via thematic strategies) where we can expect a more limited input from the public and from the candidate countries.
- the lack of timetables for actions leaves the Programme without any sense of priorities, and makes monitoring of their implementation extremely difficult.

Enlargement Aspects

- The fact that the *An enlarged European Union* is placed in the chapter *The EU in the wider world* is a disappointment. Such an approach has already discouraged candidate countries from participation in preparing the new common European Programme for environment, even if some opportunities were offered.
- The Programme does not recognise the environmental policies of candidate countries as an integral part of the overall EU Programme, but treats them under "external relations". There are only two exceptions: agriculture in the Biodiversity chapter and importance of hotspots in the Health and Environment chapter where specific concerns of Candidate Countries are addressed. In both cases the issues are addressed in a superficial and inaccurate way, and no adequate actions are proposed.
- In particular we have concerns about the negative impact of the extension of the Common Agricultural Policy to traditional farmers in Candidate Countries. To avoid this we support the development of a special policy for the Candidate Countries in advance of a major general reform of the CAP which will be attractive for the vast majority of their farmers focused on preventing deterioration of its biodiversity and the impoverishment of rural areas and further chemical exposure and promoting increase of water quality and quantity.
- In this section adoption and implementation of environmental legislation of Candidate Countries is overemphasised as the solution to the problems. Apart from integration of environment into economic sectors no other instruments are proposed. The above approaches should be complemented by stronger economic reforms, with instruments such as the greening of financial policy. This should be done parallel to harmonisation of legislation, and not postponed until accession.

- The Programme offers candidate countries the concept of **sustainable economic development**, based on the principle of delinking economic growth from environmental impact. There are no concrete instruments and practical recommendations to turn it into a realistic model. Without these the concept is left at the level of a remote vision, reduced to cleaner technologies and environmental management.
- It is surprising and disappointing that in the Enlargement section the only two actions proposed are extended dialogue with administrations and co-operation with environmental NGOs and business. This is far from sufficient action to achieve a "sustainable, pleasant and prosperous" future for the Candidate Countries.
- **Transport:** another topic of specific attention in the Enlargement section. Here the Programme is encouraging a shift towards sustainable transport (even if not supported by any concrete actions), while in the main body of the Programme transport is only addressed in the Climate chapter and not elaborated in an adequate way, especially keeping in mind that a 40% increase in greenhouse gasses is predicted for the transport sector in the next 10 years. A much stronger and innovative approach for transport would be required to reach the Kyoto target as well as to reduce the negative health and biodiversity impacts of transport.
- Under the title of **Awareness raising** the Programme is suggesting to raise the awareness of the societies in Candidate Countries about the value of unspoiled landscapes and countryside. Actions for raising the public awareness of the importance of these areas for the ecological stability in the whole of Europe should be applied within the Union as much as in Candidate Countries.
- There is no mention in the Programme of the pre-accession funds which will lead to structural and cohesion funds after the accession of Candidate Countries. We propose that identified as an action there is a critical review of the orientation of these funds in order to ensure a maximum contribution towards sustainable development and to prevent any negative impact on the environment. This includes: active participation of NGOs in decision-making; reorientation of ISPA towards urban public transport systems and the inclusion of smaller scale environment projects; reorientation of SAPARD towards environmental sound and biological forms of agriculture; within PHARE greater emphasis on supporting the pre-conditions for an effective environmental policy, based on able administrations and active NGOs.

Specific Proposals and Comments for Priority Areas

Biodiversity should be considered as an integral issue. EU Biodiversity Strategy should be the guide for actions set in the Programme. Biodiversity interlinks with climate change, resource use, all of the different sectors, human health, etc. Biodiversity has to be a key question of enlargement as there are no guarantees at this moment to maintain the heritage in Candidate Countries. The rapid spread of economic schemes is endangering biodiversity owing to the land taken for new greenfields investments. Development schemes are boosted by EU accession funds as well. The current analysis is insufficient to prevent harmful impact on biodiversity. New screening mechanisms are required to select among projects. The EU should reset its support policy having a strong impetus on sustainability!

In **Resource Efficiency and Waste Management**, we propose that a specific reference and actions to support the existing infrastructure for reuse and recycling of materials in Candidate Countries to be preserved and modernised, rather than

abandoned. The existing financial assistance does not apply the hierarchy of waste management strictly enough.

The targets specified for reduction of waste going to final disposal are not ambitious enough for the Central and Eastern European region. A reduction target of 20% by 2010 would not represent a strong enough incentive for taking strong measures upstream, and it would only further remove the concept of a zero-waste society.

In **Environment and Health**, the Programme should introduce actions to ensure food safety and to minimise the risks from unpredictable consequences on public health and the environment from GMOs.

Participation in the process of preparation of the Programme

Starting with the 2nd EC-NGO Dialogue in June 2000 in Szentendre NGOs from Candidate Countries have been involved in the preparation of the 6th Environmental Action Programme through the common NGO position paper and individual NGO inputs. The second opportunity was provided with the meeting organised by EEB and Milieukontakt Oost Europa on March 4 2001 where a common NGO response to the draft Programme was elaborated. Owing to the time limitations this document could not represent a broader NGO opinion from Candidate Countries. Our governments had the possibility to formulate their opinions in the past and we expect that in the future their positions will reflect the positions of NGOs and those of other stakeholders.

We expect that the Commission and the Swedish Presidency will create an opportunity for the NGOs from Candidate Countries to participate in the elaboration of the Sustainable Development Strategy, of which the 6th Environmental Action Programme is an integral part.

It will be very important for NGOs to participate in the monitoring and evaluation of the implementation of the Programme.

Conclusion: Empowering Citizens and Participation

The Aarhus Convention is a major breakthrough in access to information and participation in decision-making. The legal framework alone, however, will not be sufficient, especially in the Candidate Countries where there is no tradition of participatory democracy, and where the capacity of public administration in environmental protection is limited while the civil society is weak and vulnerable.

We propose that the Programme should pay attention to this specific condition, which could threaten the success of the progressive policy concepts of the Programme. Comparing with EU financial support for infrastructure very little is invested into creating capacity for a participatory society where in a consensus based process actors would have equal opportunities. At the moment the business sector, represented in a large share by multinational corporations is far better equipped to dominate in such an approach not only in taking decisions, but also in implementation, with little control from the government and NGOs. We expect the Programme to propose concrete actions in support of building capacities for participation and for empowering citizens in Candidate Countries - before and after accession to the Union.

In the spirit of the Aarhus Convention we request that the European Environment Council and Parliament adopting the document will integrate our comments and proposals as presented in this paper.

List of Environmental NGOs who have prepared and agreed the abovementioned statement (March 4-6th, 2001 in Brussels)

1. **Bulgaria** - Peter **RADEV** - Borrowed Nature Association
2. **Cyprus** - Dafnis **PANAGIDES** – Friends of the Earth
3. **Hungary** - Erzsebet **SCHMUCK** – National Society of Conservationists
4. **Hungary** - Ivan **GUYLAI** – Ecological Institute for Sustainable Development
5. **Latvia** - Janis **ULME** – Environmental Protection Club of Latvia/VAK
6. **Malta** - Hubert **THEUMA** – ECO Malta
7. **Poland** - Krzystof **KAMIENIECKI** – Institute for Sustainable Development
8. **Romania** - Istvan **SIDO** – AIDROM
9. **Slovakia** - Richard **FILCAK** – Friends of the Earth Slovakia
10. **Slovakia** - Milan **CHRENKO** – REC Slovakia
11. **Slovenia** - Vida **OGORELEC WAGNER** – Umanotera

Additional signatories as of March 22st, 2001

CZECH REPUBLIC – Zuzana DRHOVA for Green Circle as an association of 17 Czech NGOs

CZECH REPUBLIC – Eva KRUZIKOVA for Institute for the Environmental Policy

CZECH REPUBLIC – Jiri DLOUHY for Society for Sustainable Living

HUNGARY – Andras LUKACS for the Clean Air Action Group

LITHUANIA – Rimantas BRAZIULIS for Lithuanian Green Movement/Friends of the Earth Lithuania

LITHUANIA – Saulius PIKSRYS for the Atgaja community

POLAND – Jacek BOZEK for the Ecological and Cultural Association “Klub Gaja”

ROMANIA – Petruta MOISI for ECO Counseling Centre Galati

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