



Brussels, 19 February 2008

To: Members and Alternate members of the Environment Committee of the European Parliament

EEB ADVICE ON
Draft report Riitta Myller (PE398.365v01-00)
Mid-term review of the Sixth Community Environment Action Programme
(COM(2007)0225 - (2007/2204(INI)))
Vote 26 February 2008

Dear Member of the European Parliament,

As EEB we support the draft-conclusions of Ms Myller. We are of the opinion they properly reflect both the progress and the weaknesses in the responses of the EU towards the growing environmental problems the EU and the world is facing. Without ignoring the positive steps forwards, we call upon the Environment Committee to concentrate on the weaknesses in order to give guidance to the Commission, the Member States and indeed the EP itself on how to overcome these weaknesses to bring the EU on the road to sustainable development and turn it into a real leader on the global level for this purpose.

With regards to the amendments on the report, the EEB has the following suggestions for your vote:

boxes highlight what EEB considers the most important amendments

- 1 Yes
- 2 Yes
- 3 Yes
- Explanation: all three strengthen the message in the report.
- 4 No [weakens the message]
- 5 Neutral
- 6 Yes [factual correction]
- 7 Neutral [in principle we agree, but we propose it to focus on the FINAL review]
- 8 No [not as it is worded, since consultation with business is already taking place; we support better inclusion of sub-national (regional, local) authorities in consultations, but the amendment does not mention consumers, trade-unions, environmental NGOs.....] -

- 9 No [what is asked is already laid down in the EC-Treaty and Lisbon Treaty; Commission and Member States simply need to deliver their responsibilities]
- 10 No [EEB thinks that Thematic Strategies without legislative instruments proposed have little lasting value],
- 11 Yes
- 12 Neutral [not clear what the other related objectives are]
- 13 Yes [necessary encouragement of the ECHA and preparation for review of REACH]
- 14 No [changes the name of the EAP six years after adoption] –
- 15 Yes
- 16 Yes
- 17 No [16 is better]
- 18 Yes
- 19 Yes [eventhough EEB thinks key issue is reducing the size of the overall waste stream]
- 20 No [not an improvement]
- 21 Yes
- 22 No [removes an important part of Myller's draft: calling upon the Commission to invest more resources in enforcement]
- 23 No [recommendations should not be put on the same level as legislation. Legislation is the only tool for the EU to ensure that its decisions are being implemented.
- 24 Yes
- 25 No [removes a crucial part of the draft-report, warning that better regulation could be abused to weaken the effectiveness of EU environmental policies].
- 26 No [this amendment seriously undermines the need for a level playing field in the EU for economic actors, create a lot of uncertainty of whether EU law has to be applied in any country, makes the role of the Commission as guardian of the Treaty impossible, and goes against the Treaty itself.]
- 27 Yes
- 28 Yes
- 29 No [a strong self-disqualification also of the work the EP has done. The EU legislation might be complex, but that is usually because the issues it has to resolve are complex. Where complexity is exaggerated, it is often due to lobbies seeking exceptions, special arrangements. It is also not proven that in many cases the price is unnecessarily high. Main problem is lack of political will!].
- 30 No [deletes an important enforcement point]
- 31 Neutral
- 32 Yes
- 33 Yes
- 34 Yes
- 35 Yes
- 36 No [removes essential parts of the paragraph, which proposes action to promote ecological tax reform, also on the EU level]
- 37 No [amendment is not an improvement in our view]
- 38 Yes [strengthens the message]
- 39 Neutral
- 40 Yes

- 41 Yes
42 No [is weakening the message]
43 Yes
44 Neutral
45 No [limits the scope of the integration in external policies needed]
46 No [changes the meaning of the para, away from public procurement]
47 No [the Environment Committee should be careful with supporting the better regulation agenda as it puts environmental policies under particular pressure and risks to be abused for deregulation. Instead it should defend further development of EU environmental policies]
- | | |
|----|----------------|
| 48 | No [see above] |
|----|----------------|
- 49 Yes
50 No [is a one-sided call for more interaction with outside actors, does not include environmental organizations, consumers, trade unions etc.]
- | | |
|----|---|
| 51 | Neutral [difficult to oversee the consequences of this amendment as it is formulated] |
|----|---|
- 52 No [aims to delete reference to an important debate on the limits of GDP as indicator for progress, on which EP and Commission held a major conference in November last year]
53 Yes
54 Yes
- | | |
|----|--|
| 55 | No [changing consumption and production patterns is key for sustainable development] |
|----|--|
- 56 Yes
57 No [refers to “conservation farming”, which is not without environmental disadvantages: includes the use of herbicides instead of mechanical removal of weeds]
58 No [removes the idea of an external body making an assessment of the overall impact of the EAP at the end of the period]

Yours sincerely,



John Hontelez
Secretary General
European Environmental Bureau