



**Horizon 2020,
Consultation by the European Commission, DG ENV**

Contribution by the Mediterranean Environmental NGO Networks/CDS



- ❖ The CDS/Signatory NGOs welcome the Horizon 2020 initiative to de-pollute the Mediterranean Sea by 2020. Pollution, and in particular its land-based sources, are one of the main problems for Mediterranean ecosystems, degrading their capacity to support human well being and biodiversity. The signatory NGOs welcome the intention of Horizon 2020 to focus political attention on and catalyse the support of financing institutions and programmes for depolluting the Mediterranean, which would be a substantial contribution to sustainable development in the region.



- ❖ NGOs also welcome the participatory approach followed by the European Commission in the development of this initiative and appreciate the opportunity given by DG ENV through the consultation in Barcelona in December 2005 and the present consultation to express further concerns and give input to the Commission Initiative.

General remarks



- ❖ Despite the positive reaction one initially has to the ambitious goals and objectives of Horizon 2020, upon further examination it apparently lacks a solid financial basis and an operational/administrative mechanism. Unless the reader is presented with the reality of Horizon 2020 being an initiative driven by and dependent on *eventual political will* then both the text and the initiative itself will be charged as unrealistic and lacking credibility.



- ❖ We recognize the need to keep the roadmap paper short and focused, however we also think that it is possible with only few additions or changes to make the text clearer, more concise and coherent.



- ❖ NGOs agree with the need to have a well-focused Initiative but are concerned that Horizon 2020 may exhaust all EU efforts towards environmental sustainability in the Mediterranean under its main cooperation frameworks (ENPI). The problems of pollution in urban and coastal areas is only one of the aspects of the overall picture of sustainable development. We believe that preventive measures in terms of **conservation and sustainable management of natural resources (freshwater, soil, biodiversity, energy, forest)** and restoration measures are also needed and we would therefore *welcome clarity* from the European Commission on how these other aspects will be addressed in the context of the environmental strategy for the Mediterranean (due in July 2006) and the ENP Regional Strategy Papers.



- ❖ NGOs strongly support and anticipate this Initiative and the other elements of the environmental strategy to effectively “**build upon previous work on regional cooperation**” as it is stated in the Commission’s initial draft of the Horizon 2020¹.
- ❖ NGOs welcome the **capacity building** component of the Initiative that is a crucial tool to ensure its visibility, sustainable implementation, full participation and ownership. They strongly recommend that the list of beneficiaries of the capacity building activities includes representatives of NGOs and other groups of civil society on an equal footing with national and local administrations.
- ❖ NGOs believe that Horizon 2020 has an important policy component that should be highlighted by adding a **new (fifth) heading on “Policy dialogue”** in the Commission reference paper. This new heading would include part of the text currently under Capacity building measures (5.2). We believe that, for example, the commitments towards the MSSD, the review of implementation of international agreements or the promotion of regional cooperation are part of a larger policy context and not just “capacity building”.
- ❖ Finally, the scope for pollution reduction projects described in the roadmap is too narrowly focused on infrastructure development, completely overlooking the need to address land-based pollution management at the water basin level, and using the opportunities offered by ecosystem services in reducing/abating pollution loads. Reduction of pollutants at source is also insufficiently addressed by the roadmap paper. We suggest that the “Infrastructure Development” chapter is renamed “Pollution Reduction Projects”. We provide more specific recommendations under question 3 below.

1. Is the scope of the timetable sufficiently focused?

- ❖ It is recommended that the timetable focus on the specific steps and activities that will lead to the development, adoption and implementation of the Horizon 2020 initiative and that these steps and activities specify the direct involvement of Mediterranean Partner countries, separating these from the processes that depend on the European Commission and the EU Member States (e.g. calls for proposals on research programmes, adoption of the ENPI regulation by the Council, etc). This should increase ownership of the Initiative by Mediterranean partners and make the timetable more focused.

¹ Commission initial draft, point 5.2, page 6.

2. Is your organization in a position to contribute under any of the pillars addressed by the initiative? If so, can you give details?

- ❖ NGOs are willing to participate in the implementation of the initiative but are concerned about how their participation (and that of civil society at large) will be made possible and not be hampered by frequent constraints (notably in terms of access to information about the list of projects and the project funded by the IFIs and the EIB, but also with regards to the capacity of civil society groups to deal with big projects, etc) that need to be overcome. Furthermore, the EMP/Meda/ENP planning process, particularly in its bilateral/country plans, has so far shown a general lack of participation and integration of environment and development. These processes have been scarcely open to civil society participation/input. The integration of environment administration has also been, in most of the cases, marginal. Horizon 2020 will need a better governance structure and mechanism, which may help improve general ENP governance, in particular concerning transparency, environment integration, civil society participation.
- ❖ NGO and civil society participation could give added value to raising the visibility of this initiative within the region and to the identification of “any significant pollution sources that are not yet being addressed or have been missed”² as well as to identifying the “regional importance” and the “impact of the projects”³. For this, however, the mechanisms for public participation need to be further defined and established. It is worth noting that a major NGO network, with the support of UNEP/MAP-MED/POL, will be responsible for the **regional open-ended collaboration platform** contributing to the effective implementation of the National Action Plans (NAPs) as part of the Strategic Action Programme for the Conservation of Biodiversity (SAP/BIO).
- ❖ Each one of our organizations has a specific environmental focus and expertise that can be used to support the Horizon 2020 initiative, including technical capacity on ecosystem conservation, capacity building and participatory processes, public awareness and education for the environment and sustainability, building partnerships including public and private sectors.

3. In your opinion are the three priority sectors given in the five-year work programme adopted at Barcelona the correct ones to be addressed? If not, which sectors should be included and which sectors should they replace?

- ❖ The most significant missing sector is agriculture which is the largest contributor to nutrient load, itself identified as one of the most impacting

² Commission initial draft, point 5.1, page 5.

³ Id as note 3

sources of pollution⁴. The best approaches to controlling pollution from agriculture are reduction at source and use of pollution absorption/abatement services provided by water ecosystems, particularly wetlands.

- ❖ The roadmap strategy for pollution reduction seems to be entirely based on infrastructure development. Ensuring the treatment of all urban and industrial waste water discharges is, undoubtedly, a priority. However, achieving a sustainable level in land-based pollution will not be achieved without the adoption of an ecosystem-based approach to the management of pollution, in particular through integrated water resources management at the basin level and conservation and restoration of the pollution reduction services provided by natural ecosystems. This will, in most cases, be a more cost-effective approach to pollution management, producing extended additional benefits in terms of preservation and restoration of a wider set of ecosystem services (refer to the UN Millennium Ecosystem Assessment for an approach to ecosystem services and human well being). The roadmap should therefore reflect the ecosystem approach which underpins the EU Water Framework Directive and the Marine Strategy.
- ❖ The roadmap should clearly indicate that projects addressing the management of pollution loads at ecosystem-water basin level, including conservation and restoration of terrestrial, freshwater and marine ecosystem functions, will be promoted by the Horizon 2020 initiative and considered a key strategic approach to pollution reduction. While the Water Framework Directive, the Marine Strategy and relevant legislation may be the main delivery factor in EU Member States, southern and eastern countries will need Horizon 2020 support and incentive to implement water basin-ecosystem based depollution approaches.
- ❖ Projects should also support, as an effective approach to pollution reduction, the development and implementation of policy measures that apply the Polluter Pays principle, including internalization of pollution costs, payment for environmental services, pollution tradable permits, fiscal incentives, redirection of subsidies to pollution prevention.
- ❖ To ensure that this wider strategic approach to pollution reduction is reflected in the roadmap, we suggest that chapter 5.1 is titled “Pollution Reduction Projects (or Approaches or Strategies)”.

⁴ EAA-UNEP MAP *Priority Issues in the Mediterranean environment*

4. Are there additional organizations to those mentioned in the documents that could positively contribute to Horizon 2020? If so, with what actions?

- ❖ The document seems to cover a wide range of organizations either individually identified or mentioned by category (such as NGOs or research centres). Not much detail is however given at this stage about mechanisms to ensure the involvement and active participation of these groups.

5. Are there additional measures (national or regional) to be included in the timetable that could realistically be agreed on and implemented by partners to contribute to the aims of Horizon 2020?

- ❖ Some key measures are proposed under question 3. In addition, chapter 5.2 Capacity building, could be made more specific and in particular indicate that capacity should also be developed in the following areas: integrated pollution management, water basin management, pollution reduction at source, policy instruments including fiscal, market and regulatory measures, particularly implementing the Polluter Pays Principle and Payment for Environmental Services.
- ❖ In Chapter 5.3 Research, there should be mention of critical areas for research and knowledge building to progress towards sustainable pollution management (besides the areas for research supporting Horizon 2020 indicated in the second paragraph). This could include research on ecosystem services, on ecosystem based management of pollutants, on valuation systems supporting policies and market economies, and other ecological knowledge supporting policy development and decision making.
- ❖ A special mechanism favoring clean technology and depollution technology transfer should be part of the Horizon 2020 initiative.
- ❖ Measures related to the Initiative in existing ENP Action Plans (Morocco, Tunisia, Palestinian Authority, Jordan, Israel), should be included in the timetable. Measures in the Country Strategy Papers and Indicative Programme should also be included at a later stage as well as those agreed on for countries where the Action Plans are in preparation (Lebanon, Egypt) and further in Algeria and Syria. The Neighboring countries should be encouraged to set up clear targets for each of the measures.
- ❖ Similarly, the Initiative-related environmental measures envisaged in the ENP Regional Strategy should also be part of the timetable as soon as the Strategy is adopted.

6. Apart from Commission support programmes what are the other possibilities for financing actions under the initiative?

- ❖ It is quite evident that the ENPI funding will not provide enough money to support this initiative as it has been substantially reduced by the Council's decision on EU Financial Perspectives. As mentioned in the Commission's reference paper, a major part of the funding should come from IFIs, bilateral and other donors. A twinning process to help southern communities adopt cleaner practices and technologies could be considered as well. Additional support to the Horizon 2020 measures, in particular at the national level, could be found through further research of private financing sources and of innovative sources of funding such as financial tools, taxes, etc.

- ❖ We believe that in addition to allocating support for the Horizon 2020 initiative under the ENPI regional environmental programme, the EU should ensure that goals set by Horizon 2020 and its strategic approaches to pollution reduction are effectively integrated in all the EU assistance instruments, including the ENPI country action plans, and the Instrument for Pre-Accession. There is at the moment no guarantee and no obvious mechanism to ensure that the financial support and reform programmes that will be mobilized by these instruments will support the Horizon 2020 objectives and goals. The development of a mechanism for systematic integration of Horizon 2020 in the ENPI and IPA planning instruments should be included in the timetable and a deadline established to ensure delivery of the input.

- ❖ Horizon 2020 should establish a clear link with the GEF Strategic Partnership, which at the moment is not mentioned as a potential co-funding initiative in chapter 7.