

17 April 2002

Introduction.

The CdS welcomes the opportunity provided by the European Commission to comment on the 1st regional interim report on SMAP and appreciates the comprehensiveness of the report and the timeliness of such a review. We also take this opportunity to reiterate our support for the innovative approach adopted to facilitate civil society participation in the development and implementation of SMAP. This participatory approach needs to be further developed and matured, but even in its current condition it can be held up as an example to imitate in other fields and sectors of the Euro-Mediterranean Partnership.

The limitations of SMAP.

Having said this, the CdS disagrees with the European Commission position that “SMAP constitutes the environmental component of the EMP”. While recognising the usefulness of SMAP as a financial instrument to implement projects that enhance the environment, we clearly do not see the SMAP instrument as capable of integrating environmental concerns in the sectoral policies of the EMP, let alone provide the framework for achieving sustainable development in the Mediterranean basin. SMAP neither has the scope, political mandate nor financial backing to address these fundamental challenges. The CdS believes that EMP needs an environmental institution just as the EU and NAFTA have, whose role is to facilitate EuroMed partners development towards an environmentally sustainable partnership. Without underestimating the institutional and operational difficulties, the CdS believes that a scheme with an enriched role of MAP and a reformed and reinforced MCSD could provide the appropriate framework. A body of the type of the MCSD is needed to monitor and implement a sustainability strategy, coordinate environmental programmes and policies and ensure that sustainability concerns are well integrated into all Euro-Med policy initiatives.

SMAP Correspondents.

Establishing official channels for exchanging information, consultation and co-ordination of actions through the establishment of the SMAP Correspondents Network has proved to be laborious and unfruitful to date. Despite the good will of the European Commission, the effectiveness of this network will always be limited as long as Mediterranean partner countries do not devote the necessary resources to implement the mandate of their respective national SMAP correspondent. The CdS wishes to call on Mediterranean partner countries to make a stronger commitment to the correspondents network by appointing more senior civil servants to this position and giving them the instruments to achieve their tasks more effectively. The efficiency of the Commission proposal for support of the work of SMAP correspondents through financing national institutes is doubted.

Enhancing the role of NGOs.

At the same time, environmental NGOs from the region have repeatedly shown their commitment and support for SMAP in its five years of existence. Despite, financial and human resource restraints, the Comité de Suivi has fully implicated itself in the evolution of this instrument. However, the CdS and the Mediterranean environmental movement in general could and should have an even greater role in ensuring the success

of the objectives of SMAP. The NGO movement in partnership with SMAP correspondents, has an important role to play in increasing the visibility of SMAP, in enhancing the quality and number of NGO project proposals and in contributing to the work of National Correspondents. As way of example, firstly, in the regular Seminars for Journalists and NGOs on the Euro-Med Partnership, NGOs from the region should be invited as speakers at these meetings to give the NGO experience and viewpoint. Secondly, training foreseen for interested partners to improve the design of projects should be open to Mediterranean NGOs. The CdS therefore calls on the European Commission to provide the financial means for the environmental NGO community to carry out these tasks and to ensure the continued participation and a more in-depth dialogue from the NGO community.

Reporting and Information exchange.

While it is true that SMAP provides for the establishment of a regular reporting system. The yearly Reports on implementation by each SMAP correspondent have to date proved to be unsatisfactory. It is hoped that the progressive implantation of a uniform reporting methodology will make the reports more coherent and comparable. The CdS calls on all SMAP correspondents to make their annual and interim reports available to interested national environmental NGOs other Correspondents and members of the CdS in advance of Correspondents meetings as this will improve the quality and fruitfulness of discussion at the annual meetings.

The CdS believes that information exchange between SMAP Correspondents meetings can be substantially improved. The Commission should aim to produce quarterly electronic SMAP updates and post more comprehensive information on the SMAP web site, while ensuring concerned parties are alerted as and when new information is posted. In order to increase bilateral and multilateral discussion, information sharing and cross fertilization of ideas, all parties should consider participating in a transparent and open ended SMAP internet forum, along the lines of the ongoing Mediterranean Delta Fora.

Environmental Integration in NIPs and RIPs.

The incorporation of SMAP initiatives at the national level within National Indicative Programmes and at regional level through specific Calls for Proposals has been negligible to date. Newly approved NIPs for 2002-2004 have devoted more finances to environmental actions. However, it is clear that the environment in partner countries continues to be treated in isolation rather than horizontally and therefore in an integrated way, as it must be if partners are to move their societies towards sustainable development. This is almost certainly the result of the weakness of the Environmental ministries in partner countries. Ways and means to strengthen these ministries need to be identified. Programs for increasing the capacity of partner nations to enforce high environmental standards need to be put in place, in accordance with nations' obligations under various international environmental agreements. Furthermore, the European Commission and European partners should use their considerable leverage to ensure the integrated environmental component of NIPs and RIPs is comprehensive. On the other hand the Commission should considerably revise and improve its project selection procedure.

Association Agreements and the Strategic Impact Assessment.

Mediterranean Association agreements are typically weak in their environmental clauses. This can be rectified by carrying out an environmental review of these

agreements and making the necessary changes to them. Without this review, the environmental integration in other sectors of the EMP will continue to be illusory and inadequate. The results of the long awaited Sustainable Impact Assessment of the MFTZ will in our opinion confirm the need for reform of the environmental component of Mediterranean Association agreements.

A EuroMed Sustainable development strategy.

The CdS commends the European Commission for proposing to the Valencia Conference of the Euro-Med Foreign Ministers to launch a Mediterranean Strategy for Environmental Integration. The CdS calls on all SMAP correspondents to recommend to their respective foreign ministers full support for this positive initiative. Any such strategy requires the highest level support from EuroMed partners for its successful implementation. The CdS would take this opportunity to indicate that the strategy adopted must incorporate the following guidelines:

- Objectives should include decoupling natural resource use from economic development, employing reduce, reuse and recycle strategies. Policy coherence and integration of efficiency and sufficiency principles would be at the heart of the strategy.
- The strategy needs to target sustainable patterns of consumption and production, including sustainable strategies for tourism, transportation, efficient use of water resources and the promotion of renewable energy use. Finally, the difficult issue of agriculture cannot be ignored.
- Targets and indicators must be applied for the use of water, land, energy, material flows and biodiversity. The strategy would need to include specific targets, milestones and indicators by which progress will be assessed.

The strategy requires high level leadership and ministerial commitment and the active involvement of parliamentarians and civil society.

The implementation of the strategy needs to be led by the highest level decision making body of the EUMP, and regular reporting mechanisms on environmental integration and resource efficiency be put in place.

END