



Brussels, 25 October, 2007

To: The Environment Ministers of EU Member States

Concerning: Progress report on the SDS 2007 [COM (2007) 642 final]

Dear Minister,

In our letter of 2 October, we sent you some clear suggestions for input for the Environment Council meeting of 30 October on the review of the EU SDS (please follow link below). We are disappointed that these suggestions were not taken up in the Commission's Progress report on the SDS 2007 [COM (2007) 642 final] and that the report does not offer any clear direction or messages for debate in the European Council.

We therefore invite you to take the lead and consider our suggestions on the report during your forthcoming EU Environment Council on 30 October and during preparations for the European Council. Below we outline some key messages. In the attached letter you will find more in-depth information.

EEB considers the messages expressed in the Commission's SDS progress report, although based on impressive work by Commission and Member States, extremely disappointing and a missed opportunity to prepare for real European Council discussions. The Commission seems intent on carefully avoiding any clear strong messages or points for debate for the European Council.

The Commission appears to suggest that many issues are being covered, many positive things have happened and that, unfortunately, some objectives will probably not be met on time. We regret the absence of open analysis on why progress is only 'modest' and what the Commission and Member States need to do to overcome the major barriers to real progress.

The Commission's Staff Working Paper is somewhat more open on problems such as the controversies surrounding the sustainability of biofuels (which are increasingly being subsidised by EU countries), or the fact that most Member States have not embarked on policies to improve resource efficiency. On transport, which is a large and fast-growing source of greenhouse gases while most other sectors are decreasing their emissions, there are some mealy-mouthed suggestions for action that Member States can take. There is no sense of urgency about

really reversing this worrying trend with more effective measures, while the Commission's obligation to present an external cost model as the basis for so crucial an instrument as infrastructure charging can only be detected in the Staff Working Paper.

EEB urges the Environment Council to confront the crucial issues that will help ensure real progress by organising high level leadership for the SDS, developing and applying effective economic instruments EU-wide, and setting ambitious and measurable targets related to crucial objectives in the SDS.

Yours sincerely,

A handwritten signature in black ink, consisting of a stylized 'J' followed by a long horizontal line that tapers to the right.

John Hontelez
Secretary General
European Environmental Bureau

Link to attachment: <http://www.eeb.org/activities/General/Environment-Council-30-October-2007-021007.pdf>