



EEB Position paper on the Thematic Strategy on Urban Environment

Comments to the communication from the European Commission on the Thematic Strategy on Urban Environment (COM(2005) 718 final)

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The urban environment is an important policy area as currently 80% of Europe's population lives in urban areas. Cities are where the impact of traffic-generated pollution (air + noise pollution) is felt most strongly. This has serious effects on the quality of life and health of many EU citizens and serious efforts have to be made to reduce the ecological footprint of cities. This Thematic Strategy is too weak to respond to this challenge. In brief, our main points of criticism are:

- The 6EAP objectives will not be met through voluntary measures and guidance only. Poor urban environment performers will have too little incentive to significantly change their urban management and development approach.
- The Commission should propose directives making environmental management plans and systems as well as sustainable urban transport plans mandatory for all cities above 50.000 inhabitants
- These plans should contain binding EU objectives on for example on decreasing CO₂ emissions, ecological footprints and the share of automobiles in the urban transport modal split as well as establishing a clear link to existing EU environmental objectives
- Common indicators as well as reporting of urban environmental information to the public are needed to ensure monitoring and benchmarking between cities

Noise, poor air quality, heavy traffic, neglect of the built environment, poor environmental management and a lack of strategic planning lead to health problems and a lower quality of life in cities. If we want to tackle the major environment-related health problems in Europe, it follows that we have to bring about a marked improvement in the urban environment and quality of life.

1. Strategy does not meet the objectives of the 6EAP

The Sixth Environmental Action Programme recognises the specific importance of cities and urban areas in its main objectives. The aim of the programme is defined as *“contributing to a high level of quality of life and social well being for citizens by providing an environment where the level of pollution does not give rise to harmful effects on human health and the environment and by encouraging a sustainable urban development”* (EC 2002, Art. 2.2). Therefore the urban environment has been chosen as one of the seven priority areas for which the Commission was required to develop a Thematic Strategy.

Furthermore, the 6EAP highlights the importance of integrated approaches to environmental management and has the objective to achieve a better integration of environmental concerns into all other Community policies (EC 2002, Art 1). As the impact assessment to the Strategy outlines, integration of different policies on the

basis of a geographical definition distinguishes the Urban Environment Strategy from the other six Thematic Strategies. They are focussed on an environmental medium (air, soil, marine) or a specific environmental issue (waste, resources, pesticides) (CEC 2005).

Thus the primary intended function of the Thematic Strategy on the Urban Environment is to facilitate the integration of urban environmental policy development and implementation at the geographical level, that of the functional urban area. This should be done with a view to addressing *‘the promotion of Local Agenda 21, the reduction of the link between economic growth and passenger transport demand; the need for an increased share in public transport, rail, inland waterways, walking and cycling modes; the need to tackle rising volumes of traffic and to bring about a significant decoupling of transport growth and GDP growth; the need to promote the use of low emission vehicles in public transports; the consideration of urban environment indicators.’* (Art 7.1 (h)).

By not defining specific (mandatory) measures to promote integration of policy formulation and implementation the Thematic Strategy on the Urban Environment is unlikely to meaningfully contribute to this aim.

Based on the proposed Thematic Strategy on the Urban Environment, urban environmental and development policy will continue to be developed and implemented on a sector basis, which to date has been the prime reason for the deterioration of the urban environment and increasing impacts on the wider environment. The added value/potential benefits of voluntary measures proposed in the Thematic Strategy on the Urban Environment in relation to the status quo (which was judged to be inadequate and the reason for recommending development of a Thematic Strategy in the first place) cannot be guaranteed.

The Aalborg Charter, a voluntary initiative, was signed by thousands of towns and cities in Europe in 1994. It led to a surge in Local Agenda 21 activity, but did not lead to a significant mainstreaming and integration of environmental issues in urban development policies nor to overall improvements in urban environmental quality. The 2004 Aalborg Commitments as a voluntary follow-up initiative to the Aalborg Charter is intended to move European cities from good practice to integrated implementation. Even though several hundred cities and towns have signed the Commitments, more than 1,5 years after the start of the initiative very few signatory cities have in fact undertaken the first step in the process – the baseline assessment. To date voluntary initiatives have proven themselves to be ineffective indicating mandatory EU requirements are required if meaningful improvements in the quality of EU urban areas are to be achieved.

This Strategy will mean that good urban environment practitioners, as in the past, will continue to improve their performance with the added aid of voluntary support mechanisms, whereas poor urban environment performers will have too little incentive to significantly change their urban management and development approach.

2. Things which need to be improved

2.1 Adopt binding requirements on the urban environment

The Commission should adopt directives containing binding obligations for environmental management plans, sustainable urban transport plans and environmental management systems. It is essential that requirements to this effect are binding in order to have a positive impact on the urban environment. Mandatory requirements are needed to reorient urban development priorities.

Furthermore, the Commission highlighted in the document “Towards a Thematic Strategy on the Urban Environment” that obligatory environmental management

plans would 'help place the largest 500 European cities on a more comparable footing with respect to their environmental initiatives and obligations' (COM(2004)60 p. 11). Evidently this objective will not be achieved at all by making these plans voluntary.

It is worth noting that most objectives in the 6EAP refer to urban transport and the need to tackle transport growth. In the impact assessment 90% of the authorities using sustainable urban transport plans report a reduction in the number of people killed or seriously injured in road accidents, 70% report reductions in the proportion of journeys made by car, 65% report improvements in air quality and 50% report reductions in greenhouse gas emissions (CEC 2005a). Despite these multiple benefits, the Commission has chosen to not propose a directive in this field.

Demand: *Propose EU directives obliging cities to adopt Environmental Management and Transport Plans as well as Environmental Management Systems. It is important that these plans are linked to clear uniform targets for all cities (see point 2.1).*

2.1 Introduce obligatory targets for cities

The Commission highlights that it does not consider appropriate to impose the principle of plans in the absence of a clear, objective standard (CEC 2005a). Therefore the Commission should in clear terms define common EU objectives (decrease CO₂ emissions and ecological footprints, decrease the share of automobiles in the urban transport modal split etc.), which are the same for all cities. The Aalborg Commitments could be used as a source of inspiration and guidance for defining such common EU urban environment policy objectives. Otherwise it cannot be ensured, that best practice is indeed transferred from good to bad performers and that cities do indeed move to a more comparable footing with regard to the urban environment.

Benefits to the quality of the urban environment and to urban transport systems depend largely on the policy goals established. The impact assessment states – without explanation – that new legal obligations containing prescriptive targets (e.g. to specify modal split targets for urban transport systems) would not help solve the challenges cities face, as they would not reflect the diversity of Europe's cities (CEC 2005a). However, the impact assessment also highlights that it is indeed possible to set quality standards for environmental media for example air and water. Likewise it is also possible to set common targets for example concerning urban CO₂ reduction. This would leave it up to cities how to meet these objectives, but could help improve the environmental performance of cities regarding, health, energy and transport. The idea of common objectives for cities was considered useful or very useful by almost all experts replying to the internet consultation on the Strategy (CEC 2005b).

In addition to that it should be an integral component of the plan to list all existing EU and national obligations that apply to the city. The plans should identify how far the city is from reaching these obligations and what steps will be undertaken to reach them. The city should also be required to provide public information about the state of the environment on all issues with EU or national obligations.

Demand: *Introduce common EU objectives for cities for example to decrease CO₂ emissions and individual car use in cities. Furthermore an obligatory baseline assessment with respect to existing EU environmental objectives should be an integral part of these plans.*

2.3 Conditionality of funding

Other funding instruments mentioned in the Strategy such as LIFE, the EU Research Framework Programme are not new and furthermore are granted on the basis of open competition, consequently favouring urban practitioners with a proven record in good practice, and less so cities that have been performing poorly to date.

The only measure in this Strategy which could make a real difference to urban policies, are new opportunities under the Cohesion Fund and Structural Funds to finance environmental projects in cities. Member States must now show that they are serious about improving the urban environment by including such measures in their national reference / guidance documents.

However, for the time being it is completely up to member states whether to use these opportunities. The EU should better steer the spending of EU money - money should be rejected for urban projects, which are in conflict with EU environmental objectives. Funding should only be granted conditionally on making environmental management and transport plans and demonstrating that projects are not in conflict with the objectives in these plans.

Demand: *Make EU funding conditional on implementing environmental management plans. Do not grant EU money for projects, which breach EU environmental directives.*

2.4 Introduce common indicators

The impact assessment highlights that at present there is no systematically available data on the overall quality of the urban Environment and performance of Europe's urban areas (CEC 2005a). The Commission proposes to improve the existing data on urban environment issues without increasing reporting obligations for authorities.

However, the internet consultation revealed that half of local authorities experts only collected the environmental data required by law. The other half collected additional data to monitor the performance of the city. Nearly all cities that collect data to measure the city's environmental progress found the idea of a European common methodology to collect environmental data and indicative objectives provided at the EU level useful or very useful (95%). Cities not collecting such data said that they might collect it if it allowed a comparison with data from other cities (CEC 2005b). This shows that city experts themselves would not object to additional data collection, if there were a European common methodology as well as common EU objectives on the urban environment.

The Thematic Strategy states that the Commission will undertake a further Urban Audit in 2006, based on indicators describing the living conditions in a number of EU cities, covering economic, social and environmental aspects (CEC 2005c). While the urban audit is a useful tool to rank cities also on the basis of their environmental performance, it only covers some 258 cities in Europe and is updated only every five years. The fact that participation in this exercise is voluntary means that only good performers will participate, while cities with bad environmental performance are likely to not be covered by this exercise.

Up to date common urban indicators and datasets are an essential precondition for both benchmarking the environmental performance of cities as well as for monitoring if the plans are on track to meeting their objectives. The planning should be linked to a set of common indicators that should be externally reviewed each second year – in order to reorient the actions plans (transport and environmental management plan) if they do not keep the city's fulfilment of the target on track.

Demand: *Introduce a set of mandatory common indicators to be reported to the EU, the EEA, the national politicians, the city council and the public for each city every second year.*

2.5 Information to the public

According to Art.10 of the Directive on public access to environmental information (2003/4/EC) the Member States had to bring into force laws to grant the distribution of information until 14 February 2005. To comply with this the Thematic Strategy on Urban Environment should include the demand to give detailed, easy to access information, not only on the progress that has been made but also a basic picture of what has to be improved.

Communicating the specific problems of a city could help to draw attention to urban environmental problems. The solutions can be seen as best practice examples for other cities. Repeating unsuccessful approaches could be prevented, which could help local authorities to save money by investing in measures that have a proven track record.

Demand: *The provision of information about cities' environmental problems, barriers and performances should be made mandatory as an integral part of the Strategy. Furthermore, the Commission should play a stronger role in disseminating EU wide best practices in the different environmental management fields, after having undertaken neutral evaluations of measures.*

3. Conclusions

As pointed out in the Strategy on the Urban Environment, an integrated, coordinated effort is needed to improve the quality of life and the environmental performance of cities in Europe. However, this can only be achieved with a combination of mandatory environmental management and transport plans, which contain uniform EU-obligations for all cities as well as clear links to existing EU environmental obligations. Provision of information to the public on urban environmental problems should be an integral part of the Strategy. The plans must be reviewed biannually, compared to a common set of EU indicators to allow for benchmarking, to ensure that they are implemented and contribute to meeting the objectives set out in the 6 EAP.

Sources

CEC 2005a: Commission Staff working document, Annex to the Communication from the Commission to the Council and the European Parliament on Thematic Strategy on the Urban Environment Impact Assessment, COM(2005) 718 final, link here http://europa.eu.int/comm/environment/urban/pdf/sec_2006_16_en.pdf

CEC 2005b: The European City – Improving the Quality of your Environment, Summary of the responses to the public consultation http://europa.eu.int/comm/environment/urban/pdf/sum_responses.pdf

CEC 2005c: Communication from the Commission to the Council and the European Parliament on Thematic Strategy on the Urban Environment, COM(2005) 718 final, http://europa.eu.int/comm/environment/urban/pdf/com_2005_0718_en.pdf.

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