

## 2020 Declaration Sustainable EU for all!

Environmental CSOs from Croatia, members of the national network „Zeleni forum“, in cooperation with Croatian CSOs platform for monitoring Croatia's EU Presidency „Forum 2020“ and on the basis of position paper prepared by major European environmental CSOs network „European Environmental bureau – EEB“. The aim is to present our expectations from Croatia's Government Presidency of Council of EU during first half of 2020, in the area of sustainable development and environmental protection. It builds upon the previously developed declarations „Ten Green Tests“, prepared by EEB and Seas at Risk, and Forum 2020s „Civil Society Priorities for the Republic Croatia Presidency of the Council of the European“.

Croatia's presidency comes at a critical moment for addressing existential climate and biodiversity emergency, as a first full EU Presidency after the launch of the European Green Deal communication<sup>1</sup>, and European Parliament adopting resolution “declaring a climate and environmental emergency in Europe and globally”<sup>2</sup>.

Evidence is indisputable that we are facing a climate emergency, existential loss of biodiversity, socially unacceptable risks to health from chemicals and air pollution, and unfathomable levels of plastic pollution in our oceans. Next to existential environmental crises, we are faced with high levels of inequalities, both within the EU and globally, as well as decreasing levels of trust in governments, governance and policy-making.

Citizens and especially young people are demanding that the EU does more to address climate and environmental challenges, and recent Eurobarometer survey<sup>3</sup> shows that: “93% of EU citizens see climate change as a serious problem and 79% see it as a very serious problem, 84% believe that more public financial support should be given to the transition to clean energies, even if it means reducing subsidies to fossil fuels”.

While European environment and climate policies have helped to improve the environment over recent decades, Europe is not making enough progress and the outlook for the environment in the coming decade is not positive, according to the EEAs *‘European environment — state and outlook 2020 (SOER 2020)’*<sup>4</sup> report. The report urges European countries, leaders and policymakers to seize the opportunity and use the next decade to radically scale up and speed up actions to put Europe back on track to meeting its medium and longer-term environmental policy goals and targets to avoid irreversible change and damage.

On 31 October 2019, the Croatian Presidency presented “Priorities of the Croatian Presidency”, and on 27 December 2019 its official six-month programme - ***A Strong Europe in a World of Challenges*** – that embraces four priorities: A Europe that is developing; A Europe that connects; A Europe that protects; and An influential Europe. It recognises that *an ambitious, balanced and sustainable EU Multi-Annual Financial Framework for 2021-2027 is a prerequisite for achieving our goals*. Environmental protection and fighting climate change are among explicit priorities in the programme – from a Green Europe, to a just transition to a low-carbon and circular economy, to conservation and restoration of biodiversity,

<sup>1</sup> [https://ec.europa.eu/info/publications/communication-european-green-deal\\_en](https://ec.europa.eu/info/publications/communication-european-green-deal_en)

<sup>2</sup> <https://www.europarl.europa.eu/news/en/press-room/20191121IPR67110/the-european-parliament-declares-climate-emergency>

<sup>3</sup> [https://ec.europa.eu/clima/sites/clima/files/support/docs/report\\_summary\\_2019\\_en.pdf](https://ec.europa.eu/clima/sites/clima/files/support/docs/report_summary_2019_en.pdf)

<sup>4</sup> <https://www.eea.europa.eu/highlights/soer2020-europes-environment-state-and-outlook-report>

protection of marine and coastal areas, efficient water and waste management, and sustainable tourism. The programme also underlines the importance of the EU being a leading international player and global partner. Furthermore, there is a specific focus on South East Europe, aiming to guarantee progress and stability, and a continued credible and effective enlargement policy.

We therefore look forward to the Croatian Presidency of the EU driving a positive agenda to address the above environmental challenges facing Europe in a quickly changing geopolitical reality at home and globally. In the following chapters we will elaborate more on our opinion how are priorities of sustainable development dealt in a Priorities and a Programme of Croatian Presidency and our suggestions on which topics there should be placed more attention during Presidency.

### GENERAL COMMENTS ON A PRIORITIES AND A PROGRAMME:

Both Priorities and a Programme were adopted without any form of formal national consultations! We would like to remind that Forum 2020<sup>5</sup>, an informal platform for non-governmental organizations gathered on the occasion of the presidency of the Republic of Croatia, has defined the priorities of the civil society perspective and published them in July 2019. Priorities have been defined through several months of consultation process that has been carried out throughout Croatia in cooperation with civil society organizations and all interested citizens and proposed to be included in the official agenda of the Presidency:

1. Democratic Europe of Free and Responsible People. Europe of the Rule of Law and Human Rights. Europe of Free, Independent and Critical Civil Society, Independent Institutions and Independent Media.
2. The European Union, which continues to have a potential for expansion. Europe that stabilizes the Western Balkans.
3. Europe that is committed to the goals of sustainable development within and beyond its borders.
4. The European Union as a Global Peacebuilder.

Member state taking over a Presidency, in order to ensure credibility of its proposals for a joint action on EU level, should take a bold action on their national level first. We welcome an example of Finland, which just before taking over a EU Presidency, adopted an ambitious national target of achieving climate neutrality in 2035! Unfortunately, there is no comparable act on behalf of the Croatian Government. In opposite, on very same Government session on which Programme was adopted, there was a law proposal adopted aiming to „improve“ safety of off-shore oil and gas drilling, as an obvious step toward new initiative to open such activities on Adriatic, despite strong public opposition.

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<sup>5</sup> Forum 2020 brings together more than 20 organizations interested in the presidency process from different areas of activity and different parts of Croatia, and it is coordinated by CROSOL – Croatian Platform for International Citizen Solidarity within the project “Towards an open, fair and sustainable Europe in the world – Presidency Project 2019- 2021” funded by the European Commission.

In the Priorities of the Croatian Presidency, it is disappointing that there is no specific reference to climate or environmental crisis we are facing, or European Green Deal, proclaimed cornerstone of new Commission policy effort to address them. From four priority areas, sustainable development and environmental protection is being dealt with in only one, the first priority „A Europe that develops“ and even in it, a clear priority is given to „deepening of the single market“ and „competitiveness“, as opposed to „policies that will create better working and living conditions, and contribute to protection of the environment and the fight against climate change“. In other three proposed priority areas, dealing with „infrastructural connectivity“, „security“ and with global role of EU and Western Balkan, there is only one reference to the „implementing the UN 2030 Agenda for Sustainable Development goals“ as a part of external action. That is a treatment which policies of sustainable development and environment protection were having in a last century, not in this one!

The Programme of the Croatian Presidency is, in most of the cases, a list of topics, without actual elaboration which are the policy goals of the Presidency on those topics. The prioritization of the topics is a policy elaboration in itself, but, as most of the topics on the EU agenda are mentioned, there is no clear set of goals which Presidency is committed to.

In the whole of the document, which is long around 25 pages, there is just one reference to the civil society and its organizations: *“Inclusion of citizens, dialogue with civil society organisations and transparency of the institutions of the European Union are crucial components in strengthening its democratic legitimacy.”* We believe that is a serious flaw of the Programme and shows a lack of political will or capacity on behalf of the Croatian Presidency to actively contribute to improvement of the involvement of civil society in EU policy making. Not even in a chapter dedicated to **the Conference on the Future of Europe**, role and concrete means of involvement of civil society in its institutional set-up is not elaborated or even mentioned.

We would like to stress what were suggestions by Croatian CSOs from Forum 2020 on the priority area 3.:

### **„A EU committed to the Sustainable Development Goals within and beyond its borders“:**

The issues of climate change, biodiversity conservation and the other sustainable development goals are the foremost political issues of the 21st century. On a global level, it is necessary to declare a climate state of emergency in order to send a strong message and a warning that it is time to raise the alarm and call for action from stakeholders around the world. We are not uninterested observers of the sixth largest mass extinction on the only inhabitable planet we know. Modern civilization, the foundations of which Europe is proud to have contributed to, is not an autodestructive prospect at the end of three billion years of life on Earth, nor is it a cold-blooded killer of the majority of the climate-threatened populations in developing countries. Unlike the inhabitants of many other parts of the world, most of us Europeans today are well-fed and have excess food to share; we are educated, and can reflect on our own existence and get informed about its principles. This gives us a perspective from which we can see the importance of urgent and comprehensive action and unite our efforts to slow down and mitigate climate change and protect and restore biodiversity through the policy of equitable degrowth.

Nevertheless, even in the EU, we have problems ranging from a rising number of people at risk of poverty, energy poverty, inequalities between urban and rural areas where in the latter people lack access to quality services and are poorly connected (lack of transportation means, infrastructure, broadband internet, etc.), and these important challenges must be addressed in tandem and within new policies to mitigate climate change.

### 3.1. Adopting a Comprehensive EU Strategy for Sustainable Development.

In light of the European Commission's Sustainable Development Reflection Paper, we call on current and future EU leaders to adopt a comprehensive EU Strategy for Sustainable Development. On January 30th, 2019, the European Commission published the long-awaited document: "Towards a Sustainable EU by 2030" which outlined three possible scenarios that could guide the European Union in implementing a just environmental, social and economic transition in order to become sustainable by 2030. Three years after the EU adopted the Global Sustainable Development Goals and the Paris Climate Agreement, a critical review of possible ways of implementing them is far behind. The Commission recognizes that much more needs to be done and recognizes that Europe has unsustainable patterns of consumption. It is commendable that the Commission promotes a transition to a viable food system, as well as its stated goal that public policies must not adversely affect sustainable development beyond our borders. Together with other civil society organizations in the EU, we expect the EU to aim for the first scenario outlined in the reflection paper and adopt a Comprehensive Strategy for a Sustainable Europe by 2030, including measures to be proposed in other key areas such as corporate responsibility, fair trade, people-focused investments and overcoming the current obsession with economic growth. Only in this way can we achieve the necessary transition for people and the planet. The Declaration of Sibiu, of May 9th, 2019, in which the heads of EU Member States presented their 10 commitments for the future of Europe, affirms the goals of: 'reducing inequalities between us' and 'helping the most vulnerable in Europe, putting people before politics', yet there is no mention of sustainable development or the Sustainable Development Goals. We expect that during the presidency of the Republic of Croatia, the issue of a comprehensive EU sustainable development strategy will be on the agenda and that commitment to sustainable development will be visible in the Multiannual Financial Framework.

**3.2. The climate is the most important issue** facing European and world politics of this generation, and Europe must be the leader of policies that seek to slow down climate change. In addition to respecting the Paris Accord and recognizing materially-demanding changes for achieving a global carbon neutral and just economy, Europe has a leading global position in keeping climate change below the tipping point. We must do everything we can to reduce greenhouse gas emissions by at least 60% by 2030. In the richest bloc of countries, we can introduce a progressive tax on carbon and non-renewable resources at their source and distribution, tax air transport for redistribution to better and low-budget public transport; as well as provide tax incentives for the use of recycled materials.

If the European Union at the end of the previous decade was able to find the resolve and the financial resources in the amount of one trillion euros to rescue a failing banking sector in order to preserve economic stability; it is immensely more important today to at the very least, find equal resources to mitigate devastating climate change. We do not purport that the necessary transformation will be easy, however for maintaining social stability and ensuring the wellbeing of both ageing and younger generations in the future, there is no alternative to reducing total energy consumption in Europe through economic transformation focused on durability and sharing, facilitating the transition to 100% 'green energy' and the application of agro-ecological practices for production of food that enrich, instead of impoverish soil and forests. It is urgent to adopt the Strategy for a Long-term Reduction of Greenhouse Gas Emissions in the EU. It is also necessary to increase our ambitions and revise existing Sustainable Development Goals by 2030, as well as increasing the share of funds in the next Multiannual Financial Framework for climate change.

**3.3. Green energy.** Due to the need for urgent action, it is necessary to raise the EU's goals and contributions to meeting the Paris Agreement by 2030, as well as the 2030 Sustainable Development Goals, in order to secure an evidence-based and just contribution to keeping the average global temperature rise at 1.5C. There is enough untapped potential for additional renewable energy sources

in Europe whose activation - along with respect for human rights, equitable restrictions on mining exploitation for infrastructure development, as well as community ownership of installed capacity - can drive an industrialized European society without condemning tropical areas to climate genocide. It is necessary to stop the investment of public funds into fossil fuels and fossil infrastructure. Europe has enough financial and human resources and know-how to make a smart turn to green energy. However, this requires both the social and political will to implement a new European pact for sustainability and prosperity in the 21st century, instead of a narrow focus on economic stability and growth – both of which will be devastated by climate change this century anyhow. Hence, it is crucial to achieve consensus and win political support for sustainable policies from the Eastern European countries for policies that will involve citizens and invest in green energy.

**3.4. Transport.** Transport currently accounts for 27% of total greenhouse gas emissions in the EU and is primarily from air transport, which cannot be overcome without restrictions for fossil fuels. Europe has the oldest and most diverse rail network in the world, and it has the capacity to reconstruct and put into operation low-carbon transport. European banks can also be involved in this process, stimulating Member States to actively engage in the process. The advantage of this type of transport is that it acts as a link across the continent and with other continents (Asia and North Africa) and can facilitate the delivery of a sufficient number of people and goods to all parts of the continent, benefiting the majority of the population, as opposed to air transport which benefits a small number of high-income individuals. With the revitalization of the railways, the contribution to reducing the carbon footprint can also give rise to the imposition of an aviation tax. At the same time, it is necessary to encourage and promote efforts towards affordable electrification of road vehicles in order to enable the transition from fossil fuel-based vehicles to electric vehicles for as great a share of the population as possible, thus over time, building the foundation for the environmentally sustainable industrial branches of the future. Most Europeans live in cities that can substantially reduce their environmental footprint by integrating public transport and cycling, especially in the eastern and southeastern periphery. A united Europe requires a reasonable range of goods and services transported across the continent, however not to the extent and by means that endanger the future of young people, but instead through means that will best use existing technology and organizational knowledge for the sustainability and well-being of all European communities, from the icy North to the heated South.

**3.5. Conservation of biodiversity** must become one of the European Union's political priorities considering the growing threat of plastic pollution, the destruction of habitats and the extinction of many plant and animal species already documented by the scientific community as the sixth mass extinction in the geological history of the planet. As part of the preparations for the European Union to participate in the 15th Conference of Parties to the Convention on Biological Diversity (COP15), to be held in Beijing in October 2020, it is necessary to define a strategy that would lead to the so-called "Parisian momentum" in the field of biodiversity conservation. Strengthening global awareness and political support to preserve biodiversity is crucial for preventing further collapse of the global ecosystem.

Today we are very well aware that we all depend on natural resources, ecosystem function and services and biodiversity for our health, prosperity and well-being. It is crucial to address existing pressures on biodiversity, to strengthen the resilience of ecosystems and enhance ecosystem connectivity so species and ecosystems can adapt to climate change in the future. Healthy, intact ecosystems sequester and store carbon, and can offer a cost-effective defence against a range of climatic hazards such as erosion, flood and drought. They also provide food, clean water, medicine (...), which are all resources that enable local communities to withstand, cope with and recover from disasters. Ecosystem loss or degradation can thus negatively impact many of the world's most climate change-vulnerable communities, who are also some of the poorest. Loss of ecosystem services is a significant barrier to the achievement of the Sustainable Development Goals.

**3.6. Reducing inequalities.** Inequality in today's world is not spontaneous, but the product of the political and economic system in which we live, that is, the policies aimed at deregulation and liberalization of the market. They are not only economic in terms of inequality of income and widespread poverty, but also social, political, gendered and environmental. Within the European Union, there is an increasingly visible difference between the center and the periphery that manifests as unequal levels of political influence and economic stability. Possible solutions to these structural problems lie in the new model of the circular economy, whose functioning and health will not only be measured by profit, growth and financial indicators, but by the overall impact on increasing society's well-being, sustainability and equity towards all its members. Starting today, we can set income tax rates above 80% on excessive management and similar incomes for redistribution to low and middle income families, and reduce VAT on labor-intensive services such as repairs. Ultimately, the role of inequality in European solidarity will be reduced by shifting from efficiency policy to sufficiency policy to ensure a sustainable lifestyle becomes the norm. Through the Presidency of the Council of the EU we expect the Council to consider alternative indicators of development and prosperity that are not based on GDP, but instead on a range of indicators suitable for measuring equitable sustainability in the 21st century.

## General Affairs Council chapter

It is very disappointing that in its goals related to the work on the Multiannual Financial Framework, Croatian Presidency Programme in this chapter does not even mention any ambition to propose an increase of the funds directed toward climate action or other aspects of sustainable development. Priority given to addressing climate change or sustainable development is very clear in an elaboration of priorities concerning cohesion policy. List of priority goals is as follows (sustainable development not even mentioned): „*The cohesion policy is crucial for reducing economic, social and territorial differences, and for strengthening the competitiveness of the EU and all its regions. Cohesion contributes to the creation of new jobs, investment and economic growth and to the smooth and efficient functioning of the single market. At the same time, it directly affects the quality of life of EU citizens and helps them face new challenges, such as demographic changes, industrial transition and climate change.*“

## Economic and Financial Affairs Council chapter

We welcome references to the increasing financial mobilization for climate action and sustainable development, but considering a level of emergency and danger, they should be more ambitious and more elaborated. In the chapter there are following relevant references:

„*Bearing in mind the role of the financial sector in the transition towards a sustainable economy, the Croatian Presidency will contribute to directing the priorities for this aspect of the Capital Markets Union and thus contribute to the sustainability agenda that will mark the Union's next institutional cycle. Additionally, the tax system should fight activities and introduce higher taxes on products whose adverse effects significantly contribute to climate change.*“

## Transport, Telecommunications and Energy Council chapter

On transport, we welcome a clear objective that „the Croatian Presidency will highlight the importance of a sustainable shipping sector.“, supported by a clear set of planned activities, but we are disappointed by the promotion of IMO strategy goal „to reduce greenhouse gas emissions from ships, and to adopt

the appropriate measures to reduce these emissions by 50% by 2050.“, which is clearly against goals of Paris agreement.

We also welcome that „In the area of land transport, priority will be given to the proposal related to rail passenger rights.“, but it is unacceptable that there is no reference to pollution from road traffic, and no mention of any activity in that respect.

On energy, we can understand a focus on „Promoting the role and potential of European islands in clean energy transition“, but it is disturbing that whole chapter is not even once mentioning either energy efficiency, either renewable energy or any of the technologies for its use or storage! That can not be a coincidence and it is well reflecting realities of Croatian national energy policy.

As a 2020 is in a several EU strategies and documents highlighted as a year in which we should phase out fossil fuel subsidies, it is very disappointing that this topic is also not even mentioned.

## Agriculture and Fisheries Council chapter

We comply with the aim of 'positively impact the development of sustainable agriculture and the quality of life in rural areas', but in order to pursue effective results in both directions, transparent, strong and explicit addresses and binding targets needs to be incorporated in designing the steps towards national plans for CAP implementation.

A European roadmap for phasing-out the direct payment schemes is needed, for a more equitable allocation of public resources supporting family farming and stop land concentration in the hands of a few beneficiaries and industrial farmers.

The principle 'public money for public goods' needs to be translated into a set of rules and result indicators, to effectively enhance the compliance to the European and global (SDGs) sustainability targets: PAC payments must be coupled with the ecosystem and societal services provided, and NOT with the farm area or the volume of production.

Binding requirements needs to be assigned to national implementations of climate and biodiversity schemes, in order to reduce and reverse the impact of farming, and to support extensive and organic agriculture and breeding, particularly in areas with natural limitations.

The Farm to Fork strategy needs to be part of a wide debate, involving CSOs and public health and environmental agencies, supporting a transition to the European sustainable and fair food system.

We support easier implementation of CAP rules for final users and accentuate that the farmers that practice nature and climate friendly agriculture should not be additionally burdened, as they are now with restrictive agri-environment administrative rules. Also, CAP and Member states programmes should put more focus and ease implementation on already existing, but neglected collective approaches in land governance (agricultural commons).

## Environment Council chapter

This chapter is finally highlighting a „climate change, and environmental degradation and loss of biodiversity“ as a problem, but, unfortunately, we are beyond the stage when it was appropriate to describe them as a „some of the greatest challenges of the modern world“. We are facing a urgent existential threat, and EU and Presidency should deal with it accordingly.

It is surprising how low level of attention is dedicated to the European Green Deal, and with not sufficient specific goals.

It is comforting that goal of climate neutrality by 2050 is endorsed, but it would be more appropriate if that was mentioned in Energy and Transport chapters, as well. Climate neutrality is not a goal of environmental chapter, but substantial overall goal which was supposed to be highlighted in a document as a whole.

## **Proposals for more ambitious concrete measures during Croatian Presidency in the area of sustainable development and environment protection**

As we previously stressed, we look forward to the Croatian Presidency of the EU driving a positive agenda to address the above environmental challenges facing Europe in a quickly changing geopolitical reality at home and globally. We call upon the Croatian Presidency of the European Union to promote a greener, more sustainable Europe, where humankind's destructive impact on the climate, biodiversity and public health in Europe and beyond is rapidly decreased in line with citizens' expectations and scientific imperatives, through the following measures:

### **1. Launch and implement transformative agendas to catalyse a just transition to a sustainable Europe:**

Request that the European Commission embraces the triple transformative agendas, comprising the European Green Deal (EGD), the 8<sup>th</sup> Environmental Action Programme (8EAP) and the Agenda 2030 and SDGs, and ensure due ambition, coherence and complementarity; and integrate social measures in each, via the Just Transition Initiative, the MFF and other measures to develop a new Social Contract for the future of Europe;

Request the new Commission to immediately start working on a Sustainable Europe 2030 Strategy, to serve as the overarching strategy guiding all EU policies and programmes, with clearly defined EU-wide targets, responsibilities and timelines for the ambitious implementation of the SDGs in and by the EU in line with the recent Council Conclusion of 10 December 2019;

Ensure that the European Budget (MFF) is EGD-compatible and a true climate and sustainability budget; aim for minimum 1% budget for LIFE, ring-fence €15bn for nature protection and restoration, 40% for climate mainstreaming;

Promote progress on environmental legislative coherence in EU Accession and European Neighbourhood Policy Countries, including the Balkans and convergence of standards via diplomacy, technical assistance and funding;

Transform the EU's trade policy agenda to one with sustainable development and an emergency level response commensurate with the biodiversity and climate crises at its heart, and in the short term insist on significant changes to the proposed EU-Mercosur Trade agreement to reflect these priorities prior to any finalisation or ratification of the deal; and ensure that environmental standards are not undermined by the Brexit process.

### **2. Declare a Climate Emergency and Act accordingly**

In the follow up to UNFCCC COP25, secure endorsement of a European Climate Law that commits to net-zero greenhouse gas by 2050 at the latest and preferably by 2040, complemented by a European Climate Pact to get a whole of EU approach; ensure that new 2030 targets are agreed, aiming at a reduction target of 65% by 2030 in time for the COP26 in Glasgow, and help demonstrate EU leadership;



Prioritise efforts to close the gap between the EU's 2030 climate and energy targets (energy efficiency and renewables) and the draft national contributions and to improve the draft national energy and climate plans (NECPs);

Encourage an industrialisation strategy that integrates circular economy measures to support the transition to a net-zero greenhouse gas economy by 2050; use performance-based standards to the fullest extent i.e. the EU BREFs to address GHGs as well overhaul of the Industrial Emissions Directive; Promote a zero-carbon construction sector, notably by calling for an accelerated 3% renovation rate, full decarbonization of heating by 2030 and uptake of carbon neutral construction products;

Negotiate for a truly Paris-compatible MFF and ensure that robust measurement methods for carbon saving allocations from EU spending are integrated into the MFF and remaining legislative acts being negotiated (CAP);

Encourage due ambition for the Energy Tax Directive reform and associated carbon border tax to facilitate progress with GHG mitigating incentives, complemented by subsidy reform, Paris-compatible State Aid Guidelines and Action Plan on Green Financing.

### **3. Recognise the dramatic loss of biodiversity and respond to this existential crisis:**

Lead the preparation of an ambitious EU position on the global biodiversity policy framework post 2020 to be adopted at the CBD COP 15 in Kunming in October 2020 including proposals for strong implementation and accountability mechanisms;

Work closely with the European Commission in adopting a transformative EU Biodiversity Strategy to 2030, including legally binding restoration targets for nature and climate for both land-based and marine ecosystems, ensure 30% protected areas on land and in the ocean which are effectively and equitably managed, with 10% non-intervention/core protected areas, so that the EU shows credible leadership on biodiversity action globally through ambitious action at home;

Follow up on the evaluations of the EU legislation relevant for biodiversity to ensure that they result in significant improvement of the implementation of the EU's nature, water and marine legislation by their respective deadlines as well as improve coherence with other EU policies and mobilise sufficient funding for reaching their objectives;

Ensure that harmful fisheries subsidies, banned by the EU in 2004, are not reintroduced in the next European Maritime and Fisheries Fund in the ongoing trilogue negotiations;

Lead the development of an ambitious Council position on the revision of the Control Regulation to ensure full compliance of the fishing sector with fisheries and nature laws, requiring fully documented and transparent fisheries;

Encourage all Member States to adopt fisheries management measures in their Marine Protected Areas, including by the use of the Article 11 CFP mechanism, and to protect sensitive species against fisheries bycatch under the Technical Measures Regulation, and lead by example by starting the processes for Croatia and other countries around Adriatic; develop Oceans and Aquaculture Action Plan; respect of Maximum Sustainable Yield; zero tolerance to by-catch of species in bad conservation status; seabed-damaging practices reduced to achieve MSFD objectives;

Ensure effective long-term protection measures for the Eastern Baltic Cod in the amended Baltic Multi Annual Plan.

### **4. Initiate a transition towards sustainable food and agriculture**

Ensure that there is a comprehensive discussion of the CAP in both the Environment and Agriculture Council formations, with involvement of environmental and other societal stakeholders;

Mobilise political support for a bold reform of the CAP which ends subsidies harmful to the environment and climate, enables a transition to sustainable agriculture, and strengthens Member States' accountability in the new CAP;

Work closely with the European Commission to develop a transformative Farm to Fork Strategy that drives a transition to sustainable food systems and to engage civil society across the EU in a public debate about the future of the EU's food system;

Ensure that the upcoming Farm to Fork Strategy fully considers the impacts on marine ecosystems of fisheries and aquaculture.

### **5. Safeguard freshwater ecosystems and clean water for all**

Lead the preparation of an ambitious response to the evaluation of the Water Framework Directive (WFD) and related legislation, recognising that the WFD is fit-for-purpose and ensuring that the evaluation results in improved implementation and enforcement of the WFD so that its objectives can be fully met by 2027;

Improve policy coherence and integration of the objectives to protect and enhance the health of freshwater ecosystems into other sectoral policies notably in relation to agriculture, energy, industry, chemicals, and transport policies, to reduce pressures from those sectors (e.g. pesticides, nitrates, thermal pollution, hydromorphological alterations, over-abstraction);

Work with the European Commission to develop a joined-up restoration agenda as part of the EU Biodiversity Strategy to 2030 and supporting the nature-based solutions in the implementation of the Water Framework and Floods Directives to specifically address collapse in freshwater biodiversity;

Work with the European Commission to develop an ambitious Water Action Plan proposed in the European Green Deal that inter alia advances action to tackle pollution from substances of emerging concern (e.g. pharmaceuticals, microplastics) and ensures access to water via the implementation of the revised Drinking Water Directive and supported by MFF expenditure to improve public water supply and wastewater treatment.

### **6. Recognise the health impacts of air pollution and ensure clean air for Europe**

Ensure an ambitious response to the outcome of the Ambient Air Quality Directives fitness check – work to align EU air quality standards to latest WHO guidelines (expected soon), while Member States achieve full implementation of existing legislation (e.g. Ambient Air Quality Directives and National Emission Ceilings Directive);

Ensure that the Commission undertakes a comprehensive review of the Industrial Emissions Directive, delivering improved pollution prevention at source and a re-defined scope to promote the ecological transition of industrial activities<sup>6</sup>; integrate CO<sub>2</sub> and extend scope e.g. cattle and intensive aquaculture; redesign the EU BAT concept to provide the best ratio of environmental impact of an industrial activity for the provision of a given product or service. Priority areas: energy production, water quality and supply, protein production, resource management;

Ensure a comprehensive review and support the revision of the Gothenburg Protocol that leads to it also covering methane, black carbon and mercury emissions;

Adopt an ambitious Council position on agricultural air pollutants during the CAP negotiations, so as to reduce air pollution at the source.

### **7. Promote safe chemicals and a toxic-free environment**

Ensure that under the European Green Deal, the Sustainable Chemicals strategy planned for release in 2020 is ambitious and leads to a toxic-free environment as soon as possible; deliver Council Conclusions that press the Commission to present an overarching and long term strategy based on

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<sup>6</sup> which incorporates the suggestions of the EEB provided to the IED Roadmap evaluation

<http://eipie.eu/storage/files/EEB%20draft%20input%20to%20IED%20Evaluation%20FINALv2.pdf>

more and urgent actions to prevent pollution across sectors, legislation and strategies, in particular circular economy and farm to fork as well as strengthening existing legislation to prevent exposure, speed up the phase out and substitution of chemicals of concern by safe and sustainable alternatives while avoiding regrettable substitution by e.g. promoting restrictions of families of chemicals such as PFAS, phthalates, bisphenols, etc.;

Call on the Commission to set concrete measures to clean the circular economy and avoid toxic recycling as well as develop a public information system to ensure full transparency on substances present in materials, articles, products and waste;

Ensure that democratic and environmental principles are fully applied and enforced in EU chemicals policy (e.g. transparency in decision making, 'no data, no market', precautionary principle, polluter-pays principle and substitution principle) and is aligned with the hierarchy of actions in risk management that prioritises exposure prevention, elimination and substitution over control measures. Support ratification by more countries of the Minamata Convention on Mercury and ensure its full implementation in the EU.

### **8. Realise the circular economy promise for the environment, jobs and the economy**

Support the setting of an ambitious CE 2.0 action plan, in line with Council conclusions of October 2019, including a resource use reduction headline target and waste prevention binding objectives for municipal and commercial waste generation, addressing notably food waste, as well as plastic and microplastics waste;

Push for the development of a comprehensive and extensive product policy, including ecodesign type requirements, extended producer responsibility, sustainable public & private procurement and the setting of reliable sustainable information schemes, to be immediately deployed on priority sectors: textiles, construction, furniture and batteries;

Bridge further the circular economy with climate and low carbon policy by requiring the implementation of systematic carbon footprinting for products and materials placed on the EU market, starting with batteries and materials out of energy intensive industry, and promote a consumption-based approach for carbon emissions accounting that also covers products imported into the EU;

Push for swift development and implementation of an EU product information system – potentially as a database of digital product factsheets- to track substances of concern and material contents of products, durability, reparability and circular performances, as well as the environmental profile of goods placed on the EU market;

Push the EU to set GPP as the default approach for public authorities and corporate social responsibility with an associated monitoring system and ensure a more effective roll-out of Ecolabel across products and services, with an effective communication plan.

### **9. Make EU laws and regulations protect citizens' health, rights and the planet**

Ensure that the incoming Commission's proposal to amend the Aarhus Regulation is produced as soon as possible and fully addresses the EU's non-compliance with the Aarhus Convention;

Engage with the Commission and the European Parliament on the reflection process for strengthening the Rule of Law in the European Union;

Ensure that all discussions on innovation do not undermine one of the cornerstones of EU law which is the precautionary principle;

Corporate accountability and due diligence: promote work on new legislation which would put in place due diligence requirements on EU businesses in a way that would oblige them to address and mitigate any potential human rights violations and environmental harm in their value chains;

Implementation and enforcement: Support a revamp of the Environmental Implementation Review (EIR) that will prompt Member States to take urgent action on the priority areas identified through the EIR process;

Overhaul of reporting requirements to strengthen enforcement and performance benchmarking of economic actors (e.g. IED Registry / PRTR): establishment of EU wide centralized and powerful database allowing better benchmarking of real-time environmental performance of economic actors and better use of information for other purposes such as identification of pollution prevention methods, enabling progress tracking towards SDG achievement, diffuse emissions from products, with proper consultation of end-users.

#### **10. Put wellbeing and social and environmental justice at the heart of EU policy**

Encourage policy and governance reform so that wellbeing and sustainability take a central role in all policymaking, e.g. in ‘better regulation’ processes and tools and in integrating wellbeing and SDGs into the European Semester;

Reform the European Semester to help it drive the social, environmental and economic transformation in the long-term – and integrate 2030 Agenda and the European Green Deal at all levels (from indicators to priorities). It should also evolve to take on board the Council Conclusions on the “Economy of Wellbeing”<sup>7</sup> - to include an economy of wellbeing perspective horizontally in Union policies and to put people and their wellbeing at the centre of policy design. This will support the Treaties and the Charter of Fundamental Rights of the European Union.

<sup>7</sup> <https://data.consilium.europa.eu/doc/document/ST-13171-2019-INIT/en/pdf>