



A European Green Deal and the 8th Environment Action Programme: **EEB working priorities**

*Building on CSO consultation and the EEB's 10 October 2019 workshop on the
European Green Deal and 8EAP*

**Annex: Specific “Asks” for Policy Commitments and Action across
environmental issues**

6 November 2019

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The specific “asks” presented in this document have benefitted from discussion with a range of civil society representatives (EEB members, partners and others). We are grateful for the many suggestions received.

The working recommendations below do not necessarily represent the views of our partners and may evolve in the coming months.

¹ We would like to thank the German Ministry of Environment (BMU) and Umweltbundesamt for financial support (Grant Z6-08610/49 113459) as well as with support from the Life Programme of the European Commission's. The communication reflects the author views and does not commit the donors.

Air quality

European Green Deal Commitment <i>(extracts: from 1. A European Green Deal, unless otherwise referenced)</i>	SDGs & Existing EU Commitment	European Green Deal / 8EAP Specific “Asks” <i>(examples)</i>
<p><i>For the health of our citizens, our children and grandchildren, Europe needs to move towards a zero-pollution ambition. I will put forward a cross-cutting strategy to protect citizens' health from environmental degradation and pollution, addressing air and water quality, hazardous chemicals, industrial emissions, pesticides and endocrine disrupters.</i></p>	<p>SDG3</p> <p>AAQD</p> <p>NEC Directive</p> <p>IED</p>	<p>Clean air for Europe: Achieve zero adverse impact to health and the environment from anthropogenic emissions and deposition and exposure below critical loads and levels</p> <ul style="list-style-type: none"> (a) EU air quality standards are aligned with the World Health Organisation recommendations (and forthcoming 2020/21 new guidelines); (b) Source policies which quickly reduce emissions (e.g. on transport, agriculture, domestic heating); (c) National Emission Ceilings Directive is fully implemented by Member States and enforced by the European Commission; Member States put in place National Air Pollution Control Programmes which go beyond the minimum requirements; a revision of the NECD starts and additional pollutants are covered (mercury, methane, black carbon); (d) The Gothenburg Protocol is revised and it covers methane, black carbon and mercury; (e) A global treaty on air quality standards is agreed within WHO/UNEP; (f) Reformed Industrial Emissions Directive (IED), which covers methane and ammonia (also for cattle); (g) Reformed PRTR (see Industrial Production section); (h) EU and global fossil-fuels phase put by 2030 (see Industrial production section); (i) Full enforcement of participatory rights at national and EU level (see Inclusive Governance section).

Climate Change and Energy

European Green Deal Commitment <i>(extracts: from 1. A European Green Deal, unless otherwise referenced)</i>	SDGs & Existing EU Commitment	European Green Deal / 8EAP Specific “Asks” <i>(examples)</i>
<p>Becoming the world’s first climate-neutral continent is the greatest challenge and opportunity of our times. It involves taking decisive action now. We will need to invest in innovation and research, redesign our economy and update our industrial policy. This will include the first European Climate Law to enshrine the 2050 climate-neutrality target into law.</p> <p>To complement this work, and to ensure our companies can compete on a level playing field, I will introduce a Carbon Border Tax to avoid carbon leakage.</p> <p>I will also review the Energy Taxation Directive.</p> <p>I intend to put forward a strategy for green financing and a Sustainable Europe Investment Plan. As part of this, I will also propose to turn parts of the European Investment Bank into Europe’s climate bank.</p>	<p>SDG7, SDG13</p> <p>>40% GHG emissions cut (cf 1990)</p> <p>>32% renewable energy share</p> <p>>32.5% energy efficiency gains</p>	<p>Fighting climate change and improving energy security :</p> <ul style="list-style-type: none"> a) Reviewed and stronger GHG reduction targets: -65% by 2030; b) EU confirmed commitment of climate neutrality by 2040; c) Review energy efficiency & renewables 2030 targets upwards within the 2019-24 term. 40% EE, 45% RES; d) Setting binding energy performance standards / driving GHG emission prevention and reduction e.g. through BAT standards on decarbonisation through a reformed IED; e) Towards an industry that uses energy from sustainably sourced renewable sources, is energy-efficient and would achieve climate neutrality by 2040; f) Develop an industrialisation strategy that integrates circular economy benefits for climate change, and launch practical measures to implement the strategy, with special focus on the construction sector; g) Accelerate building renovation (e.g. by factor 3) to accelerate energy efficiency – via dedicated funding (EIB) and legislation (e.g. minimum renovation standards); h) Governance and implementation: Ensure that Member States’ National Energy and Climate Plans (NECPs) 2021-2030 are consistent with the EU long-term strategy and that Member States present an exhaustive list of national fossil fuel subsidies and timelines for phasing these out; i) Green finance: Ensure that national and EU public funding for the next budgetary cycle post-2020 excludes all fossil fuels (including gas) and support increased funding for the just and clean transition; j) Green taxation: establish carbon and resource taxation and pricing across the EU, with due border tax measures, and implementing the polluter and user pays principles. In addition, reform subsidies to ensure no Paris incompatible funding of fossil fuels. Reform ETS cutting grandfathered allowances; k) Present a strategy to decarbonise the transport sector by 2050, with a detailed roadmap and new policy proposals to prioritise walking & cycling and public transport, decrease car use and ensure a

		<p>complete shift to zero-emission vehicles by 2035 as well as measures to ensure fair pricing and the uptake of zero emission fuels for aviation and shipping;</p> <p>l) Table a legislative proposal to revise the Non-Financial Reporting Directive to ensure that companies and financial institutions are required to assess and disclose their degree of portfolio alignment with the Paris Agreement, their climate and environment related risks and impacts and the plans to improve them;</p> <p>m) Ensure policy coherence – making biodiversity, land use, coastal and agricultural policies climate friendly and reflect on climate impacts and adaptation in these areas.</p> <p>For finance see also : https://www.finance-watch.org/publication/game-changer-financing-the-european-green-deal/</p>
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Agriculture and land-use

European Green Deal Commitment <i>(extracts: from 1. A European Green Deal, unless otherwise referenced)</i>	SDGs & Existing EU Commitment	European Green Deal / 8EAP Specific “Asks” <i>(examples)</i>
<p><i>We must preserve the vital work our farmers do to provide Europeans with nutritious, affordable and safe food. This is only possible if they can make a decent living for their families. We will support our farmers with a new “Farm to Fork Strategy” on sustainable food along the whole value chain.</i></p> <p><i>Our rural areas are home to more than 50% of Europeans. They are the fabric of our society and the heartbeat of our economy. The diversity of landscape, culture and heritage is one of Europe’s most defining and remarkable features. They are a core part of our identity and our economic potential. We will cherish and preserve our rural areas and invest in their future.</i></p>	<p>SDG1, SDG2 + SDGs 3, 8, 12, 13, 14 & 15</p> <p>CAP</p> <p>Nitrates Directive</p> <p>Animal welfare directives</p> <p>Birds and Habitats Directives</p>	<p>A Farm to Fork Strategy to drive a transition to sustainable food systems</p> <p>(a) This is not possible without a greener CAP.</p> <ul style="list-style-type: none"> • Status quo is not an option, yet it is what the current reform is heading towards. • The CAP needs fundamental reform to mainstream agroecological practices, and enable sustainable nutrition for all Europeans. • This needs to be done through EU-level regulations as well as national CAP Strategic Plans. <p>(b) Food systems governance for food systems transition. To achieve the deep and complex changes needed to transition to sustainable food systems, deep changes are required to governance structures and processes.</p> <ul style="list-style-type: none"> • Improved citizens participation in policy-making at all levels of government. • European Commission Vice-President responsible for ensuring the sustainability of our food systems with a mandate to coordinate the efforts of different Directorates. • Shared management of agricultural policy between ENVI and AGRI. <p>(c) Seek full coherence between agriculture, climate, biodiversity, trade, and public health policies, in the context of our international commitments (Paris Agreement, SDGs, Aichi, ...), to avoid trade-offs, inefficiencies, and hidden costs.</p> <p>(d) A clear, joint, long-term vision, translated in SMART targets for all dimensions of sustainability in food systems, for example: Cut GHG emissions from food production by 30% by 2030 & Halve childhood obesity by 2030.</p> <p>See also: This report by IPES-Food on a Common Food Policy which summarises a civil society consultation process of which the EEB was a key partner.</p>

European Green Deal Commitment <i>(extracts: from 1. A European Green Deal, unless otherwise referenced)</i>	SDGs & Existing EU Commitment	European Green Deal / 8EAP Specific “Asks” <i>(examples)</i>
		<p>Protect European soil from soil sealing, pollution and erosion to maintain productivity, climate mitigation and soil biodiversity</p> <ul style="list-style-type: none"> a) Integrate soil considerations into CAP and its implementation; in restoration objectives for biodiversity; in urban planning and investment (where supported by EU funds). b) Strengthen pesticides and fertiliser policies to protect soil quality. c) Develop open method of coordination on soil sealing, urban sprawl and coastal developments to work with Member States.

Biodiversity

European Green Deal Commitment <i>(extracts: from 1. A European Green Deal, unless otherwise referenced)</i>	SDGs & Existing EU Commitment	European Green Deal / 8EAP Specific “Asks” <i>(examples)</i>
<p>As part of the European Green Deal, we will present a Biodiversity Strategy for 2030. <i>Our environment, our natural jewels, our seas and oceans, must be conserved and protected. Europe will work with its global partners to curtail biodiversity loss within the next five years. I want us to lead the world at the 2020 Conference of the Parties to the Convention on Biological Diversity, just as we did at the 2015 Paris Climate Conference.</i></p>	<p>SDG 14, SDG15</p> <p>Birds & Habitats Directives - Good conservation Status of PAs</p> <p>Biodiversity Strategy</p> <p>WFD</p> <p>MSFD</p>	<p>Protecting and restoring biodiversity and ecosystems:</p> <p>Post 2020 BD strategy which commits to:</p> <ul style="list-style-type: none"> (a) The full implementation of EU law (BHD, WFD, MSFD ...). (b) Ambitious nature restoration initiative, focused on large scale, landscape level, restoration of key habitats that can deliver multiple benefits in terms of biodiversity, climate and water (peatlands, coastal wetlands, floodplains, old growth forests, permanent grasslands). This should be based on actual quantitative targets (ha). (c) An ambitious roll out of no take zones at sea to allow recovery of fish stocks, restoration of fully functioning marine ecosystems and create refuge areas for sensitive fauna. (d) Ring fence funding for biodiversity conservation - 15b euros per year from EU budget + leverage national funding. (e) Tackling of EU footprint - reduce the EU overall consumption of agricultural commodities, timber and fish. (f) Pollinators strategy and action plan to address insectagedon. (g) Introduce mandatory pesticide reduction targets for the EU and its member states. <p>Post 2020 global biodiversity framework - EU leadership to agree and implement the global New Deal for Nature and People to finally reverse the curve of biodiversity loss and ecosystem degradation. Commit to:</p> <ul style="list-style-type: none"> a) Target to have zero extinction and ensuring that wildlife populations are stable or increasing. b) Target to have zero loss of natural spaces, ensuring that protected areas are financed and effectively managed across the globe. c) Targets tackling the main sectors responsible for biodiversity and nature loss: agriculture, fishing, forestry, extractives and infrastructure.

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		<p>Reduce noise’s harmful impacts on human health and biodiversity: Revision of the Environmental Noise Directive.</p> <p>Reduce light’s harmful impacts on biodiversity: Ensure harmful impacts of lighting integrated into infrastructure spending.</p> <p>Ensure sustainable forestry in the EU and adopt a sustainable responsibility globally:</p> <ul style="list-style-type: none"> a) Develop an EU Deforestation strategy that, inter alia, ensures that commodities being placed on the EU market are sustainably produced and not linked to deforestation, ecosystem conversion or violation of human rights – through both voluntary and binding measures. Make use of key EU levers (such as trade deals and FLEGT) to reduce risks of deforestation abroad and EU own direct footprint. b) To address deforestation, the Commission must propose due diligence legislation. c) Use CAP instrument to manage forests and achieve sustainable forest management in the EU. d) Prioritise protection of old growth forests, wilderness (protection and restoration in line with rewilding principles). <p>For forestry and oceans see respectively: https://www.fern.org/fileadmin/uploads/fern/Documents/2019/Green_New_Deal_for_Forests_final.pdf https://seas-at-risk.org/images/pdf/publications/SAR_priorities_to_European_Commission_2019-2024_-_June_2019.pdf</p>

Oceans

European Green Deal Commitment <i>(extracts: from 1. A European Green Deal, unless otherwise referenced)</i>	SDGs & Existing EU Commitment	European Green Deal / 8EAP Specific “Asks” <i>(examples)</i>
<p><i>I want Europe to lead on the issue of single-use plastics. By 2050, there will be more plastic in the ocean than fish. We need to get serious about how we turn the tide. European legislation already applies to the ten most found plastic items on European beaches. I want to open a new front in our fight against plastic waste by tackling micro-plastics.</i></p>	<p>SDG 14</p> <p>Marine Strategy Framework Directive</p>	<p style="text-align: center;">Towards health seas and sustainable oceans</p> <ul style="list-style-type: none"> a) Promote ambitious Member State implementation of the Marine Strategy Framework Directive (Marine Directive) to ensure that important steps are taken towards the goal of Good Environmental Status (GES) by 2020, consider the legal implications of Member States failing to achieve GES by 2020, and protect and enhance the Directive’s level of ambition in case of REFIT in 2023. b) Complete an ecologically coherent network of marine protected areas (MPAs) with effective management measures in place, based on the full implementation of the Marine Directive and the Birds and Habitats Directives, ensuring a ban on all industrial activities in EU MPAs, including bottom-trawling. c) End overfishing of all harvested stocks by 2020 and allow for the recovery of fish stocks while minimising the impact of fishing on the wider marine environment through full and timely implementation of the Common Fisheries Policy (CFP), and protect and enhance the level of ambition in the CFP review. d) Strengthen the policy and regulatory frameworks to fight marine litter pollution, with a focus on minimisation of microplastics and enhanced recyclability of fishing gear. e) Stop promoting deep-sea mining to avoid irreversible biodiversity loss and commit instead to a strategy to significantly reduce the demand for metals, in line with Sustainable Development Goal (SDG) 12. f) Provide leadership at the International Maritime Organization (IMO) to reduce maritime greenhouse gas (GHG) emissions and protect the Arctic from polluting black carbon. g) Be an effective leader in international ocean governance by setting a good example and respecting legal commitments at home. <p>For details, please see: https://seas-at-risk.org/images/pdf/publications/SAR_priorities_to_European_Commission_2019-2024_-_June_2019.pdf</p>

Water

European Green Deal Commitment	SDGs & Existing EU Commitment	European Green Deal / 8EAP Specific “Asks” <i>(examples)</i>
<p><i>For the health of our citizens, our children and grandchildren, Europe needs to move towards a zero-pollution ambition. I will put forward a cross-cutting strategy to protect citizens’ health from environmental degradation and pollution, addressing air and water quality, hazardous chemicals, industrial emissions, pesticides and endocrine disrupters.</i></p>	<p>SDG6</p> <p>WFD: good ecological status of river basis</p> <p>IED implementation</p>	<p>Safeguarding water for all</p> <p>a) The Water Framework Directive is evaluated to be “fit for purpose” and new implementation and enforcement actions are stepped up to address the identified implementation gaps such as inadequate use of economic instruments to achieve sustainable water management. The Green Deal should build upon the crucial next river basin management cycle to reach the 2027 goals of bringing all water bodies in the EU to ecological health (“good ecological status”). Important measures include: river restoration, large scale deployment of nature-based solutions, preventing deterioration from new infrastructure projects (making effective use of SEA and EIA), mitigating negative impacts from existing infrastructure;</p> <p>b) Tackling pollution from substances of emerging concern (e.g. pharmaceuticals, microplastics) through both tackling pollution at source as well as through legal updates of the Environmental Quality Standards (EQS) Directive , Groundwater Directive and Urban Waste Water Treatment (UWWT) Directive;</p> <p>c) A joined-up restoration agenda as part of the Biodiversity Strategy to 2030 and supporting the implementation of the Water Framework and Floods Directives to specifically address collapsing freshwater biodiversity with focus on protecting and restoring rivers, as well as important freshwater ecosystems such as wetlands, dam removal and improving river connectivity for migratory fish;</p> <p>d) Access to water via implementation of the revised Drinking Water Directive and supported by MFF expenditure to improve the level of public water supply in public spaces. This will create an important public good and reduce plastic pollution;</p> <p>e) Improve policy coherence and integration: notably in relation to agriculture, energy and transport policies, to avoid pressures from these sectors (via pesticides, nitrates, thermal pollution, hydromorphological alterations, over-abstraction);</p> <p>f) Implement the nitrates directive to improve water quality and reduce agriculture pressure on ground and surface waters and through these on biodiversity.</p> <p>For recommendations on how to improve the implementation of the EU Water Framework Directive see also: https://eeb.org/library/bringing-life-back-to-europes-waters-the-eu-water-law-in-action/</p>

Chemicals

European Green Deal Commitment <i>(extracts: from 1. A European Green Deal, unless otherwise referenced)</i>	SDGs & Existing EU Commitment	European Green Deal / 8EAP Specific “Asks” <i>(examples)</i>
<p><i>For the health of our citizens, our children and grandchildren, Europe needs to move towards a zero-pollution ambition. I will put forward a cross-cutting strategy to protect citizens’ health from environmental degradation and pollution, addressing air and water quality, hazardous chemicals, industrial emissions, pesticides and endocrine disruptors.</i></p>	<p>SDG 12, SDG3, SDG 6 specifically;</p> <p>However, since chemicals and waste affect almost all aspects of development, are relevant for, and supports the implementation of, many of the SDGs, if not all.</p> <p>Chemicals are also relevant for the achievement of much of the 2030 Agenda for Sustainable Development.</p>	<p>Towards sustainable chemicals and a non-toxic environment</p> <p>The EU needs a zero pollution strategy underpinned by a non-toxic Environment objective, that ensures/includes:</p> <p>a) An overarching chemicals regulatory framework that:</p> <ul style="list-style-type: none"> ○ Is protective of human health and the environment, comprehensive, coherent and consistent with all other relevant policies (e.g. by phasing out SVHCs for all uses/sectors); ○ Is aligned with the hierarchy of Actions in Risk Management that prioritises prevention, elimination and substitution over control measures; ○ Enables transparent, simple, streamlined and cost-efficient actions prioritising protection, in particular of most vulnerable groups and that ensures compliance; ○ Is updated to the latest scientific knowledge and addresses real life exposures; ○ Provides that safety testing of chemicals is carried out by independent laboratories, with the process being paid for by an industry-supplied fund that is managed by an independent public body such as ECHA; ○ Encompasses a specific proposal to ensure that democratic and environmental principles enshrined in the EU Treaty are applied in EU chemicals policy (e.g. transparency in decision making, precautionary principle, polluter pays) and that protective regulatory principles are effectively implemented (‘no data, no market’, substitution principle); ○ Delivers the Non-toxic Environment Strategy as committed under the 7th EAP. <p>b) True implementation and enforcement of REACH and other chemicals laws and propose new mechanisms for improved implementation and enforcement in order to address the implementation deficit.</p> <p>c) Develops an accelerated EU-wide substitution strategy, including through BREFs/IED implementation, that promotes financial incentives for green chemistry, substitution,</p>

	<p>SDG 3, 6, 12, 14</p> <p>EU Mercury Regulation</p> <p>IED</p> <p>Minamata Convention</p>	<p>innovation and clean production and that disincentives for the use of harmful substances that establishes an EU substitution center;</p> <p>d) Updates the current Endocrine Disrupting Chemicals strategy;</p> <p>e) Reforms and strengthens ECHA so as to enable better REACH implementation;</p> <p>f) Ensures that a public information system about substances present in materials, articles, products and waste is in place as well as develop an PRTR-like database of production of SVHCs;</p> <p>g) Come forward with proposals to clean the circular economy by avoiding and eliminating toxic chemicals in the material cycles;</p> <p>h) Enhances EU leadership to promote safer chemicals policies and regulations and a global level.</p> <p style="text-align: center;">Towards Zero Mercury</p> <p>a) Fully phase out mercury use from dentistry, at the latest by 2030;</p> <p>b) Phase out the use of mercury in fluorescent lamps mainly CFLs and LFLs and revise as relevant exemptions under the RoHS, as soon as possible, and not later than 2021;</p> <p>c) Eliminate mercury emissions from large combustion plants;</p> <p>d) Commit to make sure that Member States enforce the current restrictions on mercury concerning its use, trade, disposal, emissions and releases;</p> <p>e) Strong EU leadership towards strengthening the Minamata Convention by broadening the scope of; products and industrial processes, where mercury should be phased out, as well as the scope of sources of emissions, supporting at the same time implementation in developing countries.</p>
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Circular Economy and Waste

European Green Deal Commitment	SDGs & Existing EU Commitment	European Green Deal / 8EAP Specific “Asks” <i>(examples)</i>
<p><i>To help drive the change we need, I will put forward my plan for a future-ready economy, our new industrial strategy.</i></p> <p><i>We will be a world leader in circular economy and clean technologies. We will work to decarbonise energy-intensive industries.</i></p> <p><i>I will propose a New Circular Economy Action Plan focusing on sustainable resource use, especially in resource-intensive and high-impact sectors such as textiles and construction.</i></p> <p><i>I want Europe to lead on the issue of single-use plastics.</i></p>	<p>SDG8, SDG9, SD12</p> <p>Circular Economy Action Plan</p> <p>Waste Framework Directive</p> <p>Product Policy</p> <p>Eco-design Directive</p> <p>IED</p>	<p>Realising Circular Economy transition’s opportunities for the environment, jobs and prosperity means:</p> <p>a) Reducing the overall quantity of resources used in the economy, including setting an EU headline target on virgin resource use reduction by weight per capita with staged objectives until 2030 to unleash further CE actions (e.g. 30-50% by 2030)². This target should possibly be complemented by further indicators such as abiotic resource depletion, or the consumer/consumption footprint work being done by the JRC.³</p> <p>b) Additionally, a staged target on circular material reuse rate could be set to increase the uptake of reused and recycled material compared to the total material use (e.g. 25% by 2025 and 40% by 2030 up from today 12%). This would build on the Circular Economy Monitoring Framework. While the Green Deal can provide a high political statement for formulating the goals, the 8th EAP could reiterate the political engagement and describe in more detail the process, the necessary policy actions and monitoring framework. The targets would allow high levels of ambition for setting material efficiency targets in sectoral policy work including on non-energy related sectors.</p> <p>c) Broadening the circular economy action plan to target the textile, furniture, construction and battery sectors with integrated and comprehensive product policies⁴ including minimum mandatory sustainability design requirements, extended producer responsibility and labelling. By 2025 the EU should ensure at least three sectors are covered by legislation, and by 2030 achieve 30-50% reduction of their associated virgin resource use as well as covering additional sectors by legislation.</p> <p>d) Better aligning policies on decarbonisation and dematerialisation – recognising the close interdependence with climate policies and the unique contribution of CE to reduce greenhouse emissions. This should include establishing tools to account for the emissions embedded in products (e.g. carbon footprinting), which could enable carbon pricing or a carbon border tax.</p> <p>e) Building clean material cycles by phasing out toxic substances through requiring information provision on chemicals and not reducing thresholds for secondary materials.</p>

² Taking as a reference the target set by the Netherlands of 50% by 2030. It could be set as a staged percentage target progressing each year by 2-3% or as t/capita: 12 t/cap in 2025 and 9 t/cap in 2030.

³ https://publications.jrc.ec.europa.eu/repository/bitstream/JRC115570/science_for_policy_brief_rev2_-_online.pdf

⁴ <https://mk0eeborgicuyuctuf7e.kinstacdn.com/wp-content/uploads/2019/07/EEB-submission-for-the-public-consultation-on-EU-product-policy.pdf>

European Green Deal Commitment	SDGs & Existing EU Commitment	European Green Deal / 8EAP Specific “Asks” <i>(examples)</i>
		<p>f) Establishing an EU harmonised product information system⁵ to relay information on environmental performance of products material and chemical contents through the supply chain, thus unleashing material savings opportunities and progressing towards a non-toxic environment. Such system would avoid the multiplication of databases to which industry must provide product information (waste, chemicals, energy efficiency), allowing access through a unified digital platform, reducing industry administrative burden and simplifying market surveillance. Product environmental footprint and carbon footprint could also be integrated in the database.</p> <p>g) Sustaining action on plastics – notably addressing microplastic release from pellets, tires, and microfibers. Supporting waste prevention and reuse in the packaging sector – promoting zero waste, refillable and deposit refund systems</p> <p>h) Make green public procurement the default approach for public authorities and for companies engaged in corporate social responsibility strategy and set binding targets. Green Public procurement policies must go beyond sharing best practices and voluntary criteria. A robust monitoring system of green procurement should be defined at EU level, with associated criteria, to inform the policy and set binding targets instead of weak indicative objectives which were never considered seriously.</p> <p>i) Reinforce the EU Ecolabel policy extending it to more products/services, better liaising to national Type 1 schemes and GPP, and intensifying communication to raise public awareness.</p> <p>j) Confirm PEF as a methodology to support green claims, but not delaying the setting of policy options for priority sectors.</p> <p>k) Establish ambitious and binding waste prevention and reuse targets: A progressive 2030 roadmap following the principles of the EU waste hierarchy should be adopted, including a binding overall waste reduction target and a maximum cap expressed in kg/capita/year of residual waste. This should be complemented by binding targets and measures on the reuse of waste and products.</p> <p>l) Control and limit of global shipment of waste (linked to new amendments of the Basel Convention), setting legal framework for chemical recycling and phasing out incineration.</p>

⁵ Ibid, p. 10

Sustainable Industrial Production

European Green Deal Commitment <i>(extracts: from 1. A European Green Deal, unless otherwise referenced)</i>	SDGs & Existing EU Commitment	European Green Deal / 8EAP Specific “Asks” <i>(examples)</i>
<p><i>To help drive the change we need, I will put forward my plan for a future-ready economy, our new industrial strategy.</i></p>	<p>SDG (sustainable production)</p> <p>IED/BREFs</p> <p>SEVESO III</p> <p>E-PRTR implementation</p>	<p>Industrial activities are moving beyond zero net pollution to restoration of ecosystems and become a solution provider for improved wellbeing and a healthy planet:</p> <ul style="list-style-type: none"> a) Ensure an ambitious overhaul of the EU Industrial Emissions Directive (IED), following the currently on-going evaluation: extend the IED scope to capture new major sources e.g. data centres, extend and update the EU safety net requirements for the most polluting sectors, strengthen the derogation process and the provisions on public access to information and participation in the permitting procedure, update the ‘BREF guidance’ (EC implementing Decision of 10 February 2012), establish stricter governance-related provisions to ensure a transparent, inclusive and balanced process, and develop the necessary drivers so that the IED delivers on the wider circular economy and decarbonisation objectives; b) Strengthen the enforcement of the current IED provisions (especially regarding the most pollution sectors of Large Combustion Plants, Refineries, Iron and Steel production), among others by providing improved access to information and participation in permitting to the public via appropriate IT tools (improved IED Registry/E-PRTR database) and by providing the responsible authorities and inspection bodies with the adequate resources; c) Lead the transition to a truly sustainable industry framework at EU level (via a reformed IED): change the approach of how industrial activities are regulated by setting BAT for best ratio ‘environmental impact of industrial activity’ versus ‘public good/service provided’, in order to promote the industrial activity with the least environmental impact for the provision of a given product/service e.g. for energy production; d) Improve PRTR and integrated databases - Redesigned databases and tools that enable improved monitoring, reporting, benchmarking and compliance promotion e.g. integrated databases of REACH database, industrial production database, Air quality index, Water Quality index with real -time data and enabling improved public participation.

Horizontal Issues : Sustainable Development, Economic Transitions, Good Governance, The Rule of Law and Environmental Justice

Sustainable Development

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<p><i>I will refocus our European Semester to make sure we stay on track with our Sustainable Development Goals.</i></p>	<p>SDGs for 2030</p>	<p style="text-align: center;">Full Implementation of the 2030 Agenda with the help of the following tools and processes:</p> <ul style="list-style-type: none"> a) Overarching Sustainable Europe 2030 strategy and implementation plan to guide all EU policies and ensure policy coherence for Sustainable Development b) Vice-President with responsibility for 2030 Agenda and SDGs mainstreamed through all DGs (for both the new Commission and subsequent one) c) Transparent and participatory monitoring and reporting of the progress towards SDGs with consultation of civil society on indicators, regular full SDG monitoring reports published by EU with analysis of how EU policies influence, positively or negatively, the achievement of the 2030 Agenda, both domestically and globally (including negative spill-over effects) d) Turn the European Semester into a tool to achieve sustainable development and move away from only economic and financial targets <ul style="list-style-type: none"> • Launch a process to have a high-level reform of the mandate of the European Semester to focus on wider sustainable development - replace <i>The Stability and Growth Pact</i> with a <i>Sustainability and Wellbeing Pact</i>, and • Move focus away from economic and financial targets towards a set of priorities and indicators that reflects SDGs and the European Green Deal - commit to transparent and participatory monitoring and reporting of the progress towards SDGs, with consultation of civil society on indicators, regular full SDG monitoring report published by EU with analysis of how EU policies influence, positively or negatively, the achievement of the 2030 Agenda. • Regular country specific recommendations to promote implementation of SDGs and Green Deal through the Semester.

Inclusive Governance

<p style="text-align: center;">European Green Deal Commitment <i>(extracts: from 1. A European Green Deal, unless otherwise referenced)</i></p>	<p style="text-align: center;">SDGs & Existing EU Commitment</p>	<p style="text-align: center;">European Green Deal / 8EAP Specific “Asks” <i>(examples)</i></p>
<p style="text-align: center;">(Under 6. A new Push for European Democracy) <i>Recognising the concerns of many, I will ensure the highest level of transparency, communication and cooperation with the European Parliament and civil society throughout the process. [...]</i> <i>I want Europeans to build the future of our Union. They should play a leading and active part in setting our priorities and our level of ambition.</i> <i>I want citizens to have their say at a Conference on the Future of Europe, to start in 2020 and run for two years. [...] I also believe we need more transparency throughout the legislative process. I will work together with the European Parliament and the Council to make this happen. Citizens should know who we, as the institutions who serve them, meet and discuss with and what positions we defend in the legislative process.</i></p> <p style="text-align: center;">Under 2. An Economy that Works for People) Only reference in the context of SMEs... reduce “Red Tape” However, in the mission letters: <i>We need to ensure that regulation is targeted, easy to comply with and does not add unnecessary regulatory burdens... ...the Commission will develop a new instrument to deliver on a ‘One In, One Out’ principle. Every legislative proposal creating new burdens should relieve people and businesses of an equivalent existing burden at EU level in the same policy area. We will also work with Member States to ensure that, when transposing EU legislation, they do not add unnecessary administrative burdens.</i></p>	<p>Better Regulation</p>	<p style="text-align: center;">Inclusive governance - prioritising people and planet, engaging with citizens, and regulatory reform for a healthy planet</p> <p>a) Reform for Better regulation ambitions and tools to support regulatory coherence with people and planet (i.e. sustainability principles)</p> <p>b) Increase transparency in the decision-making, in particular in comitology decisions</p> <p style="text-align: center;">Regulations for people and planet to be decided each on its own merits</p> <p>c) Commit to having regulation set, review or withdrawal decisions decided each on their merits and not beholden to overall burden reduction philosophies.</p> <p>See also https://green10.org/wp-content/uploads/2019/09/Green-10-reaction-on- one-in-one-out -principle 13-Sept-2019.pdf</p>

Access to Justice & the Rule of Law, Aarhus & Environmental Defenders

European Green Deal Commitment <i>(extracts: from 1. A European Green Deal, unless otherwise referenced)</i>	SDGs & Existing EU Commitment	European Green Deal / 8EAP Specific “Asks” <i>(examples)</i>
<p>Access to Justice and the Rule of Law</p> <p><i>(Under 4. Protecting our European Way of Life)</i></p> <p><i>I intend to focus on tighter enforcement, using recent judgements of the Court of Justice showing the impact of rule-of-law breaches on EU law as a basis. I stand by the proposal to make the rule of law an integral part of the next Multiannual Financial Framework.</i></p>	<p>SDG 16</p> <p>Aarhus Convention</p>	<p>An environmentally just EU with respect for the rule of law:</p> <p>a) Supports access to information and effective and meaningful public participation on environmental matters (full implementation of the Aarhus Convention in the EU institutions and the Member States;</p> <p>b) Allow for access to justice in environmental matters to ensure that no decision is taken without being subject to the Rule of Law and that no one is above the law, and to ensure that NGOs have standing and can challenge environmental decisions before national and EU courts, by proposing a new Directive on Access to Justice and amending the Aarhus Regulation (see next row);</p> <p>c) Strengthen compliance and enforcement through an inspections directive, a revised environmental crimes directive and fully effective environmental liability directive to increase legality and to ensure that environmental legal principles are adhered to (e.g. precautionary principle and polluter pays principle);</p> <p>d) Commit more resources to legal and technical units doing enforcement, and ensure infringements are the rule rather than the exception when they are necessary;</p> <p>e) Strengthen institutions & the balance of powers.</p>
<p><i>(Under 6. A new push for European democracy): I want Europe to strive for more in nurturing, protecting and strengthening our democracy. [...] The record-high turnout in the 2019 European elections shows the vibrancy of our democracy. We must respond to that call by giving Europeans a stronger role in decision-making. We will go further than ever before to make this happen.</i></p>	<p>SDG 16</p> <p>Aarhus and Espoo Conventions</p> <p>and</p> <p>Aarhus regulation</p>	<p>a) Full ambitious implementation of the Aarhus Convention at EU and Member State level:</p> <p>b) In particular, ensure effective access to justice in environmental matters ensure that NGOs have standing and can challenge environmental decisions before national and EU courts, by proposing:</p> <ul style="list-style-type: none"> • An amendment to the Aarhus Regulation so as to end the situation whereby NGOs have virtually no access to the Court of Justice of the EU other than in access to documents cases, and thereby bring the EU into compliance with the Aarhus Convention; • A new Directive on Access to Justice to ensure remove the obstacles to access to justice at Member State level;

		<ul style="list-style-type: none"> a) Bringing together the environmental, consumer and digital agendas through developing digital technologies that provide consumers with sufficient product information to enable them to make informed environmental choices (e.g. ‘product passports’); b) Support a robust and progressive implementation of the Espoo Convention with a strong implementation and compliance mechanism which acts effectively to protect the public from impacts beyond national borders from both new projects and activities and from extensions to existing operations. c) Increased focus on the rights of citizens to uphold their EU law rights under Article 47 of the EU Charter of Fundamental Rights and the associated inherent rights for effective access to justice as has been highlighted by the EU Court of Justice in certain cases.⁶
<p style="text-align: center;">Environmental Defenders (No explicit mention)</p>	<p style="text-align: center;">SDG 16</p>	<p style="text-align: center;">The EU needs to recognise the struggles that local communities, activists and investigators face when exposing environmental injustices, and needs to protect these individuals for their invaluable action by:</p> <ul style="list-style-type: none"> a) Recognising that harassment of environmental defenders is a human rights problem; b) Introduce anti-SLAPP (strategic litigation against public participation) legislation which includes protection of journalists and activists alike; c) Promote a response mechanism, also at the international level, to tackle instances of harassment, persecution and intimidation of environmental defenders, similar to response mechanisms for human rights defenders.

⁶ E.g. C-243/15 and C-664/15.

Trade and Corporate Accountability

<p><i>I will ensure that every new agreement concluded will have a dedicated sustainable-development chapter and the highest standards of climate, environmental and labour protection, with a zero-tolerance policy on child labour.</i></p>	<p>SDGs 12 and 16</p>	<p>The EU becomes a champion of a new UN Treaty on Business and Human Rights, adopts a European Due Diligence Directive, and integrates sustainability into trade policies and agreements so that they are coherent with the European Green Deal and reflect EU’s global responsibilities.</p> <p>a) The EU should not enter into trade agreements that contain investor-state arbitration mechanisms such as ISDS or ICS which fail to address the concerns of citizens and invariably will undermine the efficacy in practice of EU law and the ambition of its policies and laws. It needs to ensure that sustainability can be implemented and enforced in all its trade agreements. The EU should renegotiate, or if that fails, leave all trade deals with such mechanisms in them. A chapter on climate, environment and labour standards does not stop the harm to people and planet that comes from secretive courts that allow investors to circumvent our legal system to extort states to the tune of billions of euros;</p> <p>b) The sustainable development chapters need binding obligations and control mechanisms. Binding commitments (rules, regulations and enforcement mechanisms) need to be integrated into the sustainability and human rights chapters in trade agreements. The SDGs must become the horizontal benchmark for any mandates and in evaluation reports of trade negotiations and agreements;</p> <p>c) With France’s law on the “duty of vigilance” and other Member States going forward with their national commitments, the EU needs to adopt an overarching Directive on Human Rights and Environmental Due Diligence;</p> <p>d) EU trade agreements should promote the trade of sustainable goods and services and reduce trade flows of unsustainable goods. The EU must account for the environmental harm and climate impacts from import (e.g. by carbon border tax adjustments) and exports, and should reform incentives to decouple food production from international trade chains, shifting towards local or regional agriculture production;</p> <p>e) The Energy Charter Treaty currently stops governments from ending their environmentally harmful subsidies, due to the ISDS mechanism that comes with the ECT. The EU should not try to modernise the ECT, it should leave the ECT, just like Italy did.</p> <p>More details are given in the Annex. See also: Stop ISDS. Rights for People, Rules for Corporations: https://stopisds.org/ and One Treaty to rule them all: https://www.tni.org/en/energy-charter-dirty-secrets</p>
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Green Finance and Economics

European Green Deal Commitment <i>(extracts: from 1. A European Green Deal, unless otherwise referenced)</i>	SDGs & Existing EU Commitment	European Green Deal / 8EAP Specific “Asks” <i>(examples)</i>
<p>(Under 1. A European Green Deal) <i>I intend to put forward a strategy for green financing and a Sustainable Europe Investment Plan. As part of this, I will also propose to turn parts of the European Investment Bank into Europe’s climate bank. [...]</i></p> <p>(Under 2..An economy that works for people) <i>I will make use of the clauses in the Treaties that allow proposals on taxation to be adopted by co-decision and decided by qualified majority voting in the Council. This will make us more efficient and better able to act fast when needed.</i></p>	<p>MFF</p> <p>Green Finance initiative</p> <p>Commitments to subsidy reform</p> <p>Member State led green taxes the norm</p>	<p>An EU budget that respects people and planet:</p> <p>a) Commit to a “Green-Deal-coherent” EU multi-annual budget, that supports public goods, invests in resilient ecosystems, respects planetary boundaries and promotes European cohesion and social wellbeing. It should prioritise that public money flow to common goods and public services, integrate sustainability principles, and fund binding reviews of budget lines and programmes. Public investment should be facilitated by making use of the flexibility mechanism of the European Semester, while the green taxonomy can leverage needed private investments;</p> <p>b) Commit to a net zero carbon budget and coherence with Paris and 1.5 degrees – a 40% climate and environment spending target, via ringfencing; blacklisting of Paris-incompatible investments and measures that lock in future emissions; conditionality, improve real results-based monitoring and allocations;</p> <p>c) Coherence with biodiversity objectives - funding for biodiversity (land based and marine) and conditions for agricultural practice to ensure respect for the rule of law and biodiversity. €15 bn per year for biodiversity. Reform CAP;</p> <p>d) Increase funding for Life – to 1% of the budget, to build on the added value of the Life programme and ensure sufficient funding for agencies that will take on additional tasks related to the EDG: EEA, ECHA, EFSA;</p> <p>e) Link MFF funding to the rule of law – to make use of the MFF as a lever for good governance.</p> <p>Green finance for sustainability:</p> <p>a) Green Public Procurement (GPP) application the norm + assess and reform the norm;</p> <p>b) Operational taxonomy on sustainable finance that guides financial flows to encourage a transition to ethical, sustainable investment;</p> <p>c) A climate and BD friendly EIB: ensure political guidance to the EIB reorientates towards full Paris compatibility and sustainability (include infrastructures, building restoration);</p>

<p>(Under 6. A new push for European democracy) <i>We need to move towards full co-decision power for the European Parliament and away from unanimity for climate, energy, social and taxation policies.</i></p>		<p>d) Reformed State Aid guidelines that exclude Paris-incompatible funding and facilitate climate mitigation support/ Beyond the MFF: see the joint briefing https://www.finance-watch.org/wp-content/uploads/2019/09/Financing-the-European-Green-Deal_Sept2019_03.pdf Also Policy brief on MFF and climate: https://eeb.org/.../163/priorities-policies-procedure/100235/mff-climate-policy-brief.pdf</p> <p style="text-align: center;">Economic incentives:</p> <p>a) Prioritise progress on carbon taxes across the EU and border tax adjustments: aim for an EU carbon tax (via the Energy Tax Directive reform), aim to move to Qualified Majority Voting for this carbon tax (using the “passerelle” clause), or use enhanced cooperation mechanism for coalition of the willing nations. Target rate of €100 per tonne of carbon by 2030 to incentivise transformative change, with ramping up of rates (€50/tC by 2025), revenue recycling, and measures for a just transition;</p> <p>b) Kerosene taxes to make shipping and flying greener: commit to a decarbonising fuel package, spearheaded by an ambitious kerosene tax;</p> <p>c) Continue the reform of the EU-ETS: reduce the share of free auctions to zero over time; pursue greater auctioning (committing to 100% auctioning, and encourage targeting revenue uses for Paris compatible funding); tighten the allocations to be in line with the higher ambitions, by withdrawing allocations for future periods (i.e. faster than the planned withdrawal rate of 2.2% per year from 2021) and develop a floor pricing system to protect the price incentives from too much variation, and raise that price over time;</p> <p>d) In parallel, commit to harmful subsidies reporting across Member States and launch an open method of coordination process to reduce national harmful subsidies, complemented by “harmful subsidies” reform at EU level - e.g. within MFF, remove Excise tax exemptions for aviation, fisheries, agriculture. Also make use of the reform of the State Aid guidelines to rule out environmentally harmful subsidies;</p> <p>e) Socially progressive taxes: tax systems should be designed with a sufficient redistributive effect (in the design and/or use of revenues) to protect disadvantaged groups and reduce the risk of social protests similar to the <i>gilets jaunes</i>;</p> <p>f) Review biodiversity incentives and financing to promote good management status of protected area, green infrastructure and restoration and encourage payments for ecosystem services;</p> <p>g) Promote economic incentives for circular economy : including extended producer responsibility (EPR) with fee modulation;</p> <p>h) Proportionate and dissuasive fees and fines to encourage compliance with EU law/</p> <p>See also: Destination Climate Neutrality. https://eeb.org/library/destination-climate-neutrality/</p>
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Post-growth macroeconomics

European Green Deal Commitment (extracts: from 1. A European Green Deal, unless otherwise referenced)	SDGs & Existing EU Commitment	European Green Deal / 8EAP Specific “Asks” (examples)
No explicit reference	SDG8, SDG 13, SDG 14, SDG15 Paris Agreement, Good conservation Status of PAs	<p><u>Evidence</u> shows that decoupling of economic growth and environmental harm is not supported by the evidence. Therefore, there is an urgent need for <u>planned post-growth policymaking</u></p> <p>a) The Stability and Growth Pact (SGP) becomes a Sustainability and Wellbeing Pact (SWP). This allows to replace the indicator of economic growth with other headline indicators, such as life satisfaction, equality, health, quality of jobs, material footprint, the state of nature and absolute human-produced greenhouse gas emissions. As a first step, use the flexibility mechanism to exempt climate expenditure from the 3% GDP debt ceiling;</p> <p>b) The EU translation of the 2030 Agenda does not include growth as a target (SDG 8.1) but keeps social and environmental targets. Like in New Zealand, Wellbeing overtakes GDP as the main indicator of progress. The European Semester should also evolve to take on board the Council Conclusions on the “Economy of Wellbeing”⁷ - 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;</p> <p>c) It is obligatory to include wellbeing and sustainability considerations at the very beginning of drafting legislation e.g. by changing the better regulation guidelines so that the respective DGs responsible for these topics have to be involved in the drafting process.</p>

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