



EEB

European
Environmental
Bureau



**WORK
PROGRAMME
2019**

**EUROPE'S LARGEST NETWORK
OF ENVIRONMENTAL CITIZENS'
ORGANISATIONS**



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**THE EEB
PROVIDES AN
ENVIRONMENTAL VOICE
FOR EUROPEAN CITIZENS,**
standing for environmental justice,
sustainable development and participatory
democracy. Our aim is to promote a healthy
environment and rich biodiversity throughout the
EU and beyond.

OUR VISION

**THE EUROPEAN ENVIRONMENTAL BUREAU'S VISION IS
OF A WORLD IN WHICH:**

- All people of present and future generations are able to enjoy a rich, clean and healthy environment, where prosperity and peace are secured for all;
- Responsible societies respect the carrying capacity of the planet and preserve it for future generations, including its rich biodiversity;
- Effective environmental policies and sustainable development have priority over short-term objectives that only serve the current generation or certain sections of society.

INTRODUCTION

The European Environmental Bureau aims to promote environmental justice, sustainable development and participatory democracy throughout the European Union and beyond. As the largest environmental citizens' association in Europe, we articulate the views and concerns of a wide and diverse group of environmental organisations, bringing together around 150 environmental organisations from over 30 countries, with a combined membership of some 30 million environmentally concerned citizens.

The EEB is the only umbrella organisation for environmental citizens' organisations that covers such a large number of policy issues and is at the same time open to membership for all NGOs active in the field of the environment in Europe. This makes the EEB a unique and unifying actor for the European environmental movement and gives it a strong voice in EU and international policy processes.

The EEB's key strengths are its broad and diverse membership base, its in-depth expertise on a wide array of environmental and sustainability issues and its committed and qualified staff. For more than four decades, these strengths have enabled the EEB to be an effective force in influencing EU environmental policies and politics.

In its Medium-Term Strategy for 2016-2019, the EEB has set itself the overarching goal of becoming an even more inclusive and effective organisation and identified five areas that need to be addressed in order to achieve this goal. To this end, in 2019 the EEB will address the following areas, elaborated further in this work programme:

- **A STRONG WELL-MOBILISED EEB MEMBERSHIP NETWORK**

The EEB will seek to expand its network to European countries with no members, countries with potential additional members, and to pan-European networks, to become a more comprehensive umbrella organisation for Europe's environmental and sustainability NGOs.

- **SHARP POLITICAL ADVOCACY**

The EEB will remain at the centre of the political debate on environmental issues in the EU and will actively engage where feasible in other fora at global and regional level where environmental policies are being shaped.

- **SOLID ALLIANCES**

The EEB will continue to build cohesion and coordination among environmental organisations working on EU environmental policy through coalitions and networking and to collaborate and seek common ground with non-environmental stakeholders to further promote environmental objectives within the sustainable development agenda.

- **A CLEAR AND POWERFUL VOICE**
Building on the rebranding exercise concluded in 2017, the EEB will continue to work to improve the quality of our communications tools and outputs, which will, in turn, improve the EEB's outreach.
- **A ROBUST ORGANISATIONAL BASE**
The EEB will increase its efforts to establish a stronger, more diverse and more sustainable financial base, maintain a high quality and highly motivated staff and expand staff training and capacity building opportunities.

The EEB's role will be as important as ever in 2019. With a new European Parliament due to be elected in May and a new Commission due to be appointed in the autumn, ensuring that environmental issues are properly addressed in the political debates will be essential. Ahead of the elections, all three EU institutions will be under pressure to conclude negotiations on major outstanding issues.

The debate on the future of the EU can be expected to continue throughout 2019 and to continue to require our attention, in particular to ensure that that future is in line with the 2030 Agenda for Sustainable Development.



OVERARCHING POLICY FRAMEWORK

2019 will be a year of transition for the European Union, with the changeover in the Parliament and Commission marking the start of a new legislative cycle.

This creates both risks and opportunities: risks that the low priority given to environment by the outgoing Commission President will be deepened and consolidated or that there will be an unfavourable shift in the composition of the Parliament; opportunities to establish a more progressive agenda based on sustainability and strong environmental policies. Either way, the EEB will need to be active in seeking the best outcome and vigilant in seeking to avert the worst.

Achieving a timely transition to a sustainable economic model in Europe will require not only increased ambition in relation to specific policy initiatives addressing detailed topics but also a high-level policy framework which is supportive of such a transition. The EU's current high-level policy framework is unduly based on short-term economic considerations and has failed to put sustainable development at the heart of the EU's mission or look beyond gross domestic product (GDP) as the primary indicator of success. There is plenty of evidence (e.g. from OECD) and formal recognition (e.g. 7EAP) that stricter environmental policy makes economic sense even in the short run, for example by boosting employment

and stimulating innovation. Examples of environment-economy win-win strategies would be to phase out costly public subsidies to fossil fuels, to carry out environmental tax reforms that put a price on emissions and lower taxes on e.g. employment and to invest in technologies and measures that save the EU and its citizens money and resources, such as renewables and energy efficiency. This will help break the systemic fossil-fuel lock-in and together allow the EU economies to transition to a more sustainable future.

In addition, environmental policy is weakened not only by a lack of ambition in its formulation, but also by a lack of political will in its implementation. This implementation

deficit needs attention - to ensure commitments and objectives are met, to ensure European citizen's right to a quality environment are supported, and to ensure a Europe where the rule of law is respected.

The 2030 Agenda for Sustainable Development provides the framework and the vision of the Europe we want and should have provided the basis for the review of the Europe 2020 Strategy and a revision of President Juncker's political priorities, but the Commission has failed to grasp this opportunity.

In 2019, the pressure from civil society (and also certain Member States) must be maintained and strengthened in order to give a clear signal to the incoming Commission that continued inaction on this crucial agenda is not acceptable. The two Presidencies of the European Council – Romania and Finland – must be used well in that regard. The Sibiu summit, where the EU heads of government are expected to give a strong signal concerning the future direction of Europe and therefore the priorities of the new Commission, is another important opportunity. The implementation of the 2030 Agenda not only provides a unique opportunity for Europe to set out a comprehensive new political framework in the form of a new EU Sustainable Development Strategy with a 2030 time horizon, but it should also be the basis for the discussion on the future of Europe.

The question as to how this debate will be carried forward by the different institutions – Commission, Parliament and Council, as well as the European Economic and Social Committee (EESC) and Committee of the Regions – and whether this agenda will be linked to the debate on the Future of the European Union without the UK remains open.

What is, however, certain is that the next Multiannual Financial Framework (MFF) will be a first test case of how the EU will be shifting its political priorities and specifically whether there is the political will for a significant increase in the EU budget towards environmental

protection. The Commission's MFF proposal published in May 2018 did not promise a paradigmatic shift in mainstreaming environmental considerations and sustainable development throughout the EU budget, despite positive language on increasing the climate commitments, and a move to a results-based approach for the common agricultural policy (CAP) related spending. The CAP budget element and associated proposal for the reform of the CAP has proven to be the most troubling aspect of the MFF, with concerns that there are insufficient controls to avoid a race to the bottom in environmental protection, that biodiversity risks continuing to be undermined by CAP spending, and that the rules around climate contributions would be too easy and hence weaken the otherwise positive climate ambitions. On the positive side, the LIFE programme's added-value was recognised and a constructive LIFE regulation was negotiated in December 2018, though the quantity of funding allocated to LIFE is likely to be insufficient. Negotiations on the MFF will be intense in 2019. The aim is to have completed negotiations and agreed the MFF in October 2019, during the Finnish Presidency. However, the controversy around the CAP element may mean that more time will be needed.



ACTIVITIES

- Raise the profile of environmental issues in the **European Parliament elections** by engaging with the main political groups to secure cross-party support for ambitious EU environmental policies and, following the elections, seek early engagement with MEPs in key positions in the new Parliament;
- Seek to influence the priorities of **the new Commission**, e.g. through engaging with *Spitzenkandidaten*, the Presidencies and parliamentary hearings for new commissioners;
- Engage in high level advocacy work in support of **a new Sustainable Development Strategy** to become the EU's comprehensive overarching political strategy, in the short term guiding the interpretation of the Juncker political priorities during the final months of the mandate;
- Closely monitor **the Brexit process** and the debate on the future direction of the European Union, and take appropriate measures (e.g. workshops, conferences, publications etc, subject to funding) to counter and/or highlight any negative consequences both at a horizontal level and within specific policy areas for both the UK and EU27;
- Organise the EEB's **2019 Annual Conference** to provide the platform for debate on how to ensure high level political support and buy-in for the environmental agenda for the 2020s, in particular from the incoming Commission and new Parliament.

SDG IMPLEMENTATION AND REVIEW MECHANISMS

The UN General Assembly meeting in September 2015 resulted in the adoption of the 2030 Agenda for Sustainable Development, a global agreement to start implementing Sustainable Development Goals (SDGs) from the beginning of 2016.

The EEB is closely following up the implementation at the EU level and Member State level. It perceives the SDGs as a strong advocacy and campaign tool to advance sustainable development policies while remaining critical of the weaknesses and contradictions in the 2030 Agenda.

In November 2016, the Commission published a Communication on SDG implementation. Regrettably, this only addressed the period up to 2020 and, basing itself on a disturbingly superficial gap analysis, concluded that the EU was already doing well in implementation. As regards what should happen during the period 2020 to 2030, the Commission only pledged to come forward with a 'reflection paper', and even that only in January 2019 towards the end of its mandate. Moreover, a first set of indicators on the SDGs presented by EuroStat in April 2017 was drawn together in a rush without proper stakeholder consultation and missed key indicators on, for instance, the crucial question of whether the EU is able to decrease its resource use in absolute terms

or not. Eurostat's SDG monitoring report published in November 2017 attracted strong criticism from civil society.

In June 2017, the General Affairs Council decided to push the Commission into publishing a report to the UN on SDG implementation in 2019. The Council asked the Commission to work in the meantime on a gap analysis as well as an implementation strategy. In October 2018, the European Council reaffirmed its commitment to the 2030 Agenda and its implementation and reiterated the call for an implementation strategy. The Council has therefore added pressure on the Commission to fulfil these long-standing civil society demands.

Late in 2017, the Commission convened the first meeting of the Multi-Stakeholder Platform (MSP) on the Implementation of the SDGs, in which the EEB Secretary General is a member and the Director of Global Policies and Sustainability serves on the Management Committee. The MSP established various subgroups working on issues such as the EU budget and governance as well as on improvement of the SDG indicators, monitoring and reporting. In October 2018, the MSP published its input to the reflection paper.

In 2019, the EEB will continue to advocate for sustainable development as the overarching objective of Europe's economic, social and sectoral policies, at the same time seeking coherence between the various policies and the strategies that implement them.

ACTIVITIES

- Actively contribute to the work of the **Multi-Stakeholder Platform** on the implementation of the SDGs;
- Monitor and provide input to the **SDG implementation actions** and ensure that SDG targets are fully integrated into all EU policies and that policy coherence for sustainable development is secured;
- Continue its leading role in the EU civil society alliance **SDG Watch Europe** (on its Steering Group and active in the work strands), in order to monitor and push for the SDG implementation and review mechanisms, carry out awareness-raising on the SDGs, and stimulate and contribute to a debate on a genuine EU sustainable development strategy reflecting our regional obligations for the implementation of the SDGs, considering all goals;
- Track implementation of Commission Vice President Timmermans' **mandate on sustainable development** (governance, civil society participation and coherence) and Commissioner Thyssen's mandate in relation to the development of the EU indicators;
- Stimulate and facilitate EEB **membership engagement** in national implementation of the SDGs, including through continued updating of the online SDG Toolkit and the revitalisation the EEB's Agenda 2030 Working Group;
- Continue the implementation of the three-year (July 2017 – June 2020) **awareness-raising and policy campaign** on the ambitious implementation of the SDGs by and in Europe as the project lead together with 24 project partners in 15 Member States.



MACRO-ECONOMIC QUESTIONS

AND THE TRANSITION TOWARDS A SUSTAINABLE FUTURE

In 2018, the EEB started a new working group on economic transition with two meetings, a first position and various collaborations - in particular for European post-growth conferences.

Two concrete outputs in 2018 were a petition promoted by the EEB through wemove.eu entitled '[Europe, it's time to end the growth dependency](#)' which was signed by more than 200 academics with relevant expertise and supported by almost 90,000 individuals, and the "Vienna Vehicles", a set of key demands coming out of the Austrian Government's "Growth in Transition" conference. In 2019, we aim to build on this and to intensify advocacy work in one or two still to be identified priorities. Based on our first position, we also aim to use the European elections as an opportunity to challenge candidates in order to raise their ambition regarding economic reforms that are needed to transition towards a sustainable future.

The aim of creating a working group within the EEB is to develop a clear position and policy asks related to, amongst others, alternative measurements of well-being and prosperity beyond GDP, the question of how the objective of 'sustainable economic growth' enshrined in e.g. SDG-8 can be reconciled with the necessity to significantly reduce overall resource consumption levels and pollution, the relationship between a growing volume of global trade (also through new trade agreements), that is, the metabolism of the global economy, versus the carrying capacity of the planet, and the relationship between the sustainable development agenda and current negotiations on legally binding rules and regulations on corporate responsibility and accountability.

ACTIVITIES

- Through the **Working Group on Economic Transition**, develop positions and strategies to advocate for policy measures related to economic-environmental aspects of societal transformation;
- Organise **panels and side events** on these issues where appropriate;
- Through the H2020 project **LOCOMOTION** on energy, climate and economic transition, further intensify the work on macro-economic questions.

EVALUATING THE 7EAP PREPARING AN 8EAP

The 7th Environmental Action Programme (7EAP) continues to be a key point of reference in the EEB's efforts to ensure the development and implementation of the EU environmental agenda as a central part of Europe's overarching political strategies.

In 2019, the EEB will continue a debate about its evaluation and early preparations for a new 8th Environmental Action Programme (8EAP) in order to ensure a high degree of political continuity on this topic ahead of the 2019 EP elections and the appointment of a new Commission. The EEB Board and EEB Working Groups will provide input as needed.

ACTIVITIES

- Monitor implementation of the 7EAP and press for early preparations for the 8EAP by developing proposals setting out **a vision of what civil society wants** in an 8EAP and debating these with decision makers.

BETTER REGULATION AND TRADE

With the 2016 UK settlement package annulled by the outcome of the UK referendum on EU membership, the Commission's Better Regulation agenda has lost some of its political momentum and is now mostly driven by the implementation of the Inter-Institutional Agreement on Better Lawmaking.

There is, however, still a risk of a non-level playing field in favour of deregulation as the perception remains that regulation is equivalent to burdens, and better regulation equivalent to alleviating these burdens. More generally, 'Better Regulation' is still seen by too many groups as a way to placate anti-democratic and anti-EU forces, which will require a more coordinated and effective pushback.

In the area of trade, uncertainty will remain about the ratification of the EU-Canada Comprehensive Economic and Trade Agreement (CETA), which is expected to only progress slowly, and whether or not negotiations on the EU-US Transatlantic Trade and Investment Partnership (TTIP) would be revived under the Trump or a post-Trump regime. Meanwhile other trade agreements are under discussion or have been developed, e.g. between the EU and China, the EU and Japan, and the EU and Brazil, which for the most part receive little attention from the environmental NGO community.

ACTIVITIES

- Engage in activities to reframe the "better regulation" debate to one of "regulation to protect citizens", work on reducing risks of deregulation and **seek to promote regulation** that takes on board the long term needs of people and planet;
- Continue to **monitor and counter the impact of the Better Regulation agenda** on environmental policies and pro-actively push for Better Regulation tools to put key policies that threaten the environment under scrutiny, such as on chemicals and CAP;
- Develop **papers** that show the risks posed by 'Better Regulation' for specific topics;
- Develop **recommendations** for reforming and improving EU governance and lawmaking, e.g. by stepping up enforcement measures, and seek support for these ahead of the next EP elections;
- In particular, engage **NGO networks**, including through the EEB Law Group, to highlight needs for improved implementation and solutions so that the rule of law and environmental justice ambitions are dealt with more effectively;
- Explore opportunities to step up our work on the **environmental implications of trade agreements** and provide information and support to EEB members on the topic.

FISCAL REFORM

There is an urgent need for work on fiscal reform at EU and Member State level. In response to the euro crisis, the EU developed in 2011 a new mechanism of stronger economic governance.

This is organised through a “European Semester” in which national budgets and national reform programmes are subject to scrutiny by both the Commission and the Council. Although the recommendations are not binding, they set a benchmark and can provide strong political signals, for example to phase out harmful subsidies and green the tax base.

As regards the post-2020 MFF, a first proposal from the Commission was issued in May 2018. This left much to be desired both in terms of mainstreaming of environmental and sustainability considerations throughout the budget and in terms of dedicated funding to protect the environment. Negotiations are expected to continue at least until the autumn of 2019.

In 2018, the EEB reached agreement with Green Budget Europe (GBE) to integrate the projects and activities of GBE into the EEB’s structures and work programme, with a view to closing down GBE as an independent organisation. This will enable the EEB to step up its work on fiscal reform while providing a vehicle for the good work of GBE to be continued. Initial steps taken in 2018 included agreeing the transfer of two grants supporting a project on MFF and climate to the EEB. The process of fully integrating GBE activities into the EEB and formally closing down GBE is expected to be completed in March 2019.

ACTIVITIES

- Complete the process of **integrating GBE activities** and projects into the EEB structures, support as necessary the orderly closure of GBE and develop capacity within the EEB;
- Continue to **monitor, assess and pursue opportunities for work on fiscal reform** at EU and Member State level to improve economic signals to catalyse sustainability;
- Seek to **influence the MFF negotiations** by reviewing critically the proposals that emerge during the negotiations from the perspective of environment and wider sustainable development goals and encouraging an MFF that respects people and planet.
- Support the **development of civil society capacity to influence climate finance** in national programming and plans for the use of EU funding.

STRENGTHENING ENVIRONMENTAL INTEGRATION AND THE RULE OF LAW

The European Commission should reinforce compliance promotion activities, inspections and enforcement in a wider sense. All three activities are needed, with inspections and strict and coherent enforcement measures being particularly important.

Inclusion of provisions for environmental inspections in specific sectoral laws can improve the situation in some areas but will not lead to a harmonised approach which is important to protect the environment but also for a level playing field for industry. A Compliance Assurance Directive with a strong inspections and surveillance part could make a major contribution.

The Environmental Implementation Review (EIR), a relatively new instrument to improve implementation of the existing EU environmental acquis in the Member States, should identify and solve Member State-specific but also systemic issues, going into root causes, involving public administration quality and other sectors. At the same time, the EIR should not in any way detract from other ways of ensuring the proper

implementation of environmental laws, e.g. infringement proceedings. The EIR also needs to be implemented in a more transparent, participatory manner with close involvement of civil society actors.

The revised Environmental Impact Assessment Directive includes many improvements helping to overcome some of the shortcomings and loopholes in the previous directive and improving public participation to some extent. Now it is important to inform NGOs of the new requirements and their improved rights for information and participation and encourage them to monitor the transposition in their country. Together with the Strategic Environmental Assessment (SEA) Directive, which is currently being evaluated under the REFIT process, it is an important tool for environmental integration.

The EU assessment of the implementation of the Environmental Liability Directive discovered many shortcomings and the recently adopted Action Plan to address those problems should result in better enforcement of the current framework.

ACTIVITIES

- Continue to press for sectoral as well as horizontal initiatives to **ensure effective compliance**;
- Follow the EU work on the **Environmental Implementation Review (EIR)** and help identify and promote solutions to Member State-specific but also systemic implementation and enforcement issues in close cooperation with civil society groups; in this context, help develop CSO capacity on implementation, and respond to the new EIR package – EU Communication and Country Reports - which is expected in April 2019;
- Continue collecting **information on complaints cases** about poor transposition of the EIA and SEA Directives or about breaches in their application and whenever possible, provide support to EEB members having submitted such cases;
- Monitor and provide input and/or **react to the REFIT of the SEA Directive** together with members such as J&E.



ENVIRONMENTAL DEMOCRACY

Despite the EU having become a Party to the Aarhus Convention in 2005, environmental NGOs still have virtually no access to the Court of Justice of the EU to challenge violations of environmental law other than in access to documents cases.

This has been a direct obstacle in other areas of the EEB's work, e.g. where we have attempted to challenge Commission decisions in relation to chemicals or industrial emissions. This lack of effective access to justice at the level of the EU institutions led the Aarhus Convention Compliance Committee to conclude in March 2017 that the EU is not in compliance with the Convention. This has added an important legal argument to the political ones for strengthening the EU Aarhus Regulation which is supposed to apply the Convention to the EU institutions: until the EU does so, it will be in violation of international law.

Regrettably, when the Meeting of the Parties to the Aarhus Convention convened for its sixth session (MoP-6, Budva, Montenegro, September 2017), the EU sought to prevent the MoP endorsing the finding of non-compliance. This would have overturned a longstanding practice whereby every single finding of non-compliance by the Committee has been endorsed by the MoP and would have thereby significantly weakened the compliance mechanism and indeed the Convention itself, thus undermining efforts to improve democratic accountability throughout the wider region of Europe and Central Asia. Fortunately, not a single other Party or stakeholder supported the EU position, which resulted in a stand-off and postponement of the issue to the next MoP in 2021.

The EU must now move swiftly to address the problem at the root of the non-compliance by revising the Aarhus Regulation to improve access to justice at the EU level. Following the Montenegro meeting, growing pressure from Member States eventually taking the form of a formal request by the Council combined

with that from civil society led the Commission to belatedly set in motion a process for considering options to address the issue, including by launching a public consultation on a roadmap in May 2018, but at a slow pace which seems unlikely to see the issue fully resolved before MoP-7. A study commissioned by the Commission to explore options is due to be published in May 2019 but it will fall to the new Commission to come forward with a specific proposal.

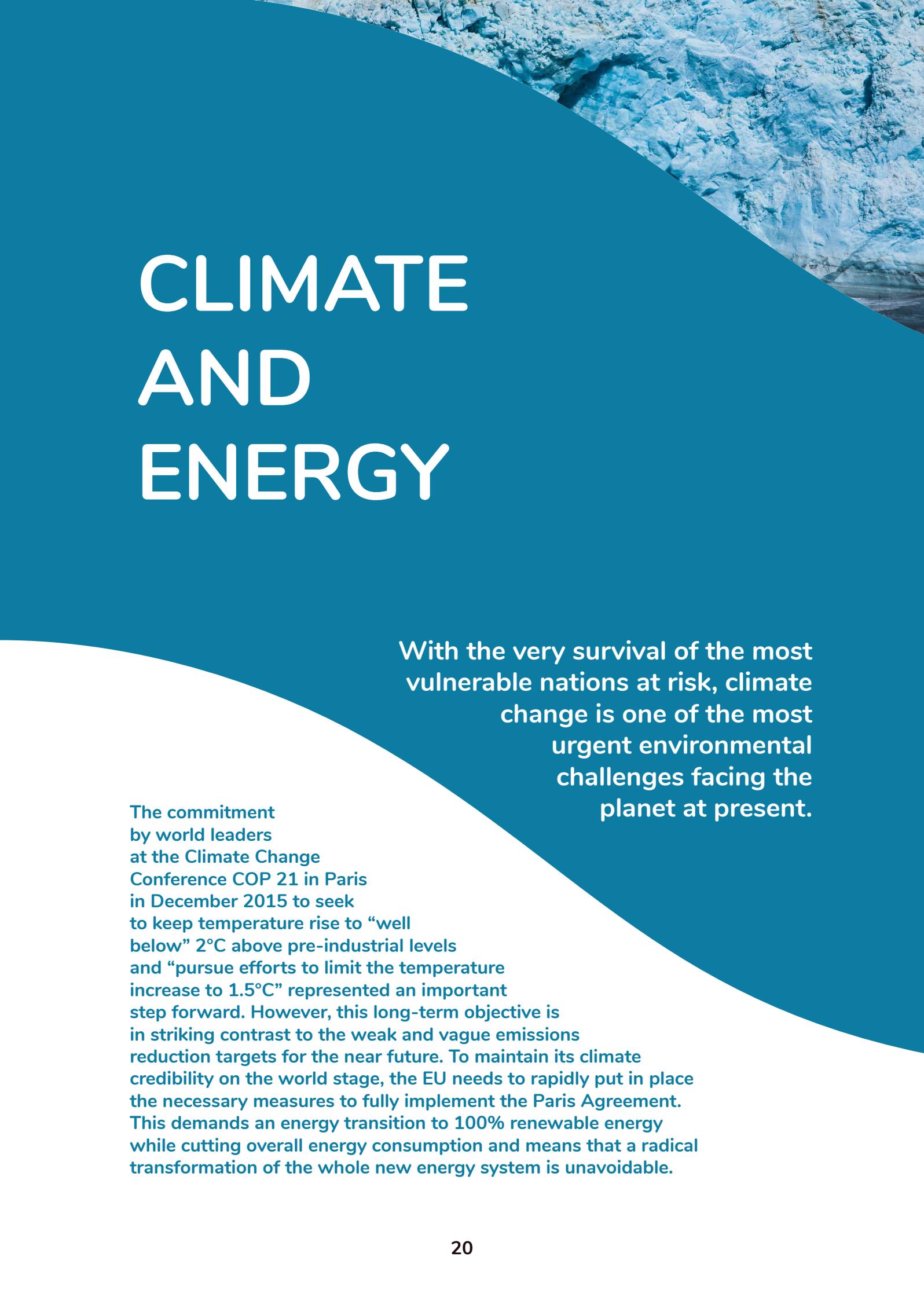
There are also problems with access to justice at the Member State level. In April 2017, the Commission issued interpretative guidance to help Member States apply the access to justice provisions of the Convention. While this may be useful as an interim measure, a directive to ensure access to justice in environmental matters at the Member State level will ultimately be required and will support better implementation and enforcement of environmental law.

The Aarhus Convention and its Protocol on Pollutant Release and Transfer Registers (PRTs) continue to provide an important international legal framework promoting environmental democracy in the EU and the wider UNECE region. However, the hard-won rights provided by the Convention need to be constantly defended by civil society organisations, as many governments fail to comply with the Convention and push back against any strengthening of it or filling of its loopholes. Crucial to the Convention's effectiveness is its participatory compliance mechanism, where the EEB and its partners have played a key role in defending and ensuring responsible use of the mechanism.

ACTIVITIES

- Continue to exercise the rights provided under the **Aarhus Convention** and its implementing legislation in the EEB's everyday advocacy work wherever needed or useful;
- Follow up on the Aarhus MoP-6 outcome by stepping up efforts to advocate for a **progressive legislative proposal revising the Aarhus Regulation** so as to strengthen citizens' rights of access to justice in environmental matters and address other deficiencies in the Regulation, as part of a broader attempt to increase the transparency and accountability of the EU institutions;
- Continue to press for a **directive on access to justice in environmental matters** while assessing the effectiveness and making use of the interpretative guidance on access to justice where this can help to achieve progress;
- Continue to play a leading role on behalf of the **European ECO Forum** in the NGO work on the further development and implementation of the Aarhus Convention and its PRTR Protocol, in particular through coordinating NGO input into the official processes and supporting effective use of the Convention's compliance mechanism, while keeping a watching brief on the Espoo Convention and its Protocol on Strategic Environmental Assessment;
- Where appropriate, explore opportunities to **promote the Aarhus Convention** and Principle 10 of the 1992 Rio Declaration at the global level and in other regions.





CLIMATE AND ENERGY

With the very survival of the most vulnerable nations at risk, climate change is one of the most urgent environmental challenges facing the planet at present.

The commitment by world leaders at the Climate Change Conference COP 21 in Paris in December 2015 to seek to keep temperature rise to “well below” 2°C above pre-industrial levels and “pursue efforts to limit the temperature increase to 1.5°C” represented an important step forward. However, this long-term objective is in striking contrast to the weak and vague emissions reduction targets for the near future. To maintain its climate credibility on the world stage, the EU needs to rapidly put in place the necessary measures to fully implement the Paris Agreement. This demands an energy transition to 100% renewable energy while cutting overall energy consumption and means that a radical transformation of the whole new energy system is unavoidable.

EU CLIMATE ACTION

Facilitating the implementation of the 2030 Clean Energy for all Europeans package and contributing to the newly established process of national energy and climate plans (NECPs), bringing the update of the 2050 roadmap (also known as “long-term low greenhouse gas emissions development strategies”) in line with the objectives of the Paris Agreement and a sound integration of the results of the Intergovernmental Panel on Climate Change (IPCC) special report on 1.5 degrees in all climate processes, will frame the key objectives for 2019.

The full implementation of the Clean Energy for all Europeans package, supported by the NECP process, will enable Europe to go beyond the current level of climate action and should be coupled with an upgrading of the EU’s targets for 2030; specifically, the EU should commit to cut domestic greenhouse gas emissions by at least 60%, improve energy efficiency by at least 40% and boost sustainable renewables to at least 45% by 2030. These targets should be legally binding at EU and Member State level, with a view to bringing the EU towards achieving net zero emissions by 2040.

The EEB will bring together the perspective on renewable energy, including sustainable bioenergy policies, with the significant potential for energy savings and contribute to a joint vision of the EEB and its member organisations on the update of the 2050 roadmap. The lessons taken from this exercise will also contribute to direct advocacy in 2019 around the preparation of revised 2030 climate targets (nationally determined contributions or NDCs) before the UNFCCC COP 26 in 2020.

ACTIVITIES

- Seek to increase the ambition in EU implementation of the **Paris Agreement** through tracking and seeking to influence the above processes, cooperating with CAN Europe where appropriate;
- Contribute to the Commission work on a new long-term strategy with **revised targets for 2050 and 2030**, as well as intermediate targets;
- Engage the **membership**, e.g. through webinars, and facilitate positive discussion at the European Council and the adoption of new NDCs at the Environment Council between the first quarter of 2019 and the first quarter of 2020;
- Press for stronger measures to **mitigate the climate impacts of agriculture** as part of the CAP negotiations;
- Coordinate work in the **working group** on climate and energy, keeping a general overview on the EU implementation of the Paris Agreement with a particular focus on the 2050 decarbonisation roadmap, the potential for energy savings and environmentally sound development of renewable energy including the sustainability of bioenergy, hold one or two meetings during 2019 depending on availability of funding.

EXIT FOSSIL FUELS AND NUCLEAR

As part of its overall goal of achieving a phase-out of all fossil fuels as soon as possible, the EEB will push for phasing out coal and lignite for power production at the latest by 2030, pursuing this objective through advocating against all fossil fuel subsidies and through its work on emission standards for large combustion plants (see section on Industrial Emissions), while at the same time arguing against the use of unconventional fossil fuels.

Increased pressure to reduce greenhouse gas emissions has brought with it a revival of interest in nuclear energy in some countries. Taking into account the hazards associated with uranium mining, the risk of Fukushima-type accidents and the unsolved problem of radioactive wastes that will remain dangerous for millennia, the EEB considers that nuclear power has no place in a sustainable energy future based on clean, renewable sources. Far from being part of the solution to climate change, it is an expensive and potentially dangerous distraction from the energy transition that is needed.

ACTIVITIES

- Strive for an early **phase-out of coal and lignite power plants**, *inter alia* through playing an active role in the Europe Beyond Coal campaign;
- Continue to keep a watching brief on **nuclear issues**, including state aid and transboundary consultation issues, and intervene selectively in the debate, with particular emphasis on transparency and participation issues through continued participation in Nuclear Transparency Watch.

ENERGY SAVINGS

While EU leaders have yet to strengthen the EU 2030 climate targets, it is clear that a significant decrease of our energy consumption is essential for achieving the greenhouse gas emission reductions necessary for the Paris Agreement.

The Energy Efficiency Directive (EED) and the Energy Performance of Buildings Directive (EPBD) are two key measures to achieve energy savings and therefore need effective implementation of the existing legislation and of the new requirements set for 2021 to 2030 and beyond. In parallel, the Ecodesign and Energy Labelling Directives need a continuous and ambitious implementation, notably after the revision of the energy labelling scheme in 2016, and the slowdown of implementation measures in 2016 and 2017.

A final agreement for the EPBD and EED was achieved in 2018, making 2019 an important year for strong implementation. The EEB will continue to participate in the Coalition for Energy Savings (CfES) and follow the issue closely within the EEB network, providing information and gathering intelligence and experience from Member State level. The task in 2019 will be to ensure clear guidance on the national implementation for the new period and support for member organisations and the European Commission to ensure the full implementation of the existing provisions by 2020.

The continuous implementation of Ecodesign and Energy Labelling Directives is fully justified in view of the tremendous savings delivered so far (50% of our 2020 efficiency target) and the unique added value of acting at European level on product policy. After the revision of the energy labelling scheme in 2016 and in the context of the definition

of new labelling schemes in 2018, we have a major opportunity to reframe positively these instruments and deliver additional savings linked to the revision of existing measures, the starting of new measures, and unleashing the CO₂ emissions saving potentials linked to resource use conservation through better design of products.

ACTIVITIES

- Engage in advocacy towards the Commission on full **enforcement and good implementation of the EED** in close cooperation with the CfES;
- Engage and support **EEB members** in pushing for a strong implementation of the EED, including through organising a meeting of the EEB Energy Savings working group in early 2019 to build capacity in our membership on this topic;
- Closely follow the **implementation of the EPBD** with other EU NGOs and partners of the CfES working in the building sector;
- Through our **Coolproducts** campaign, step up communication on the benefits of these policies for EU citizens;
- **Ambitious outcomes of revised measures** on white goods, displays, lighting and computers as well as pushing for better testing standards and enforcement;
- Mobilise to address systematically the **durability, reparability and recyclability of products** in the perspective of the whole range of product policy instruments at European level.

ENERGY INFRASTRUCTURE

The preparation for the Ten-Year Network Development Plan (TYNDP) 2020 to be aligned with the requirements of the Paris Agreement will be a key requirement on EU level concerning the future approach to building energy infrastructure.

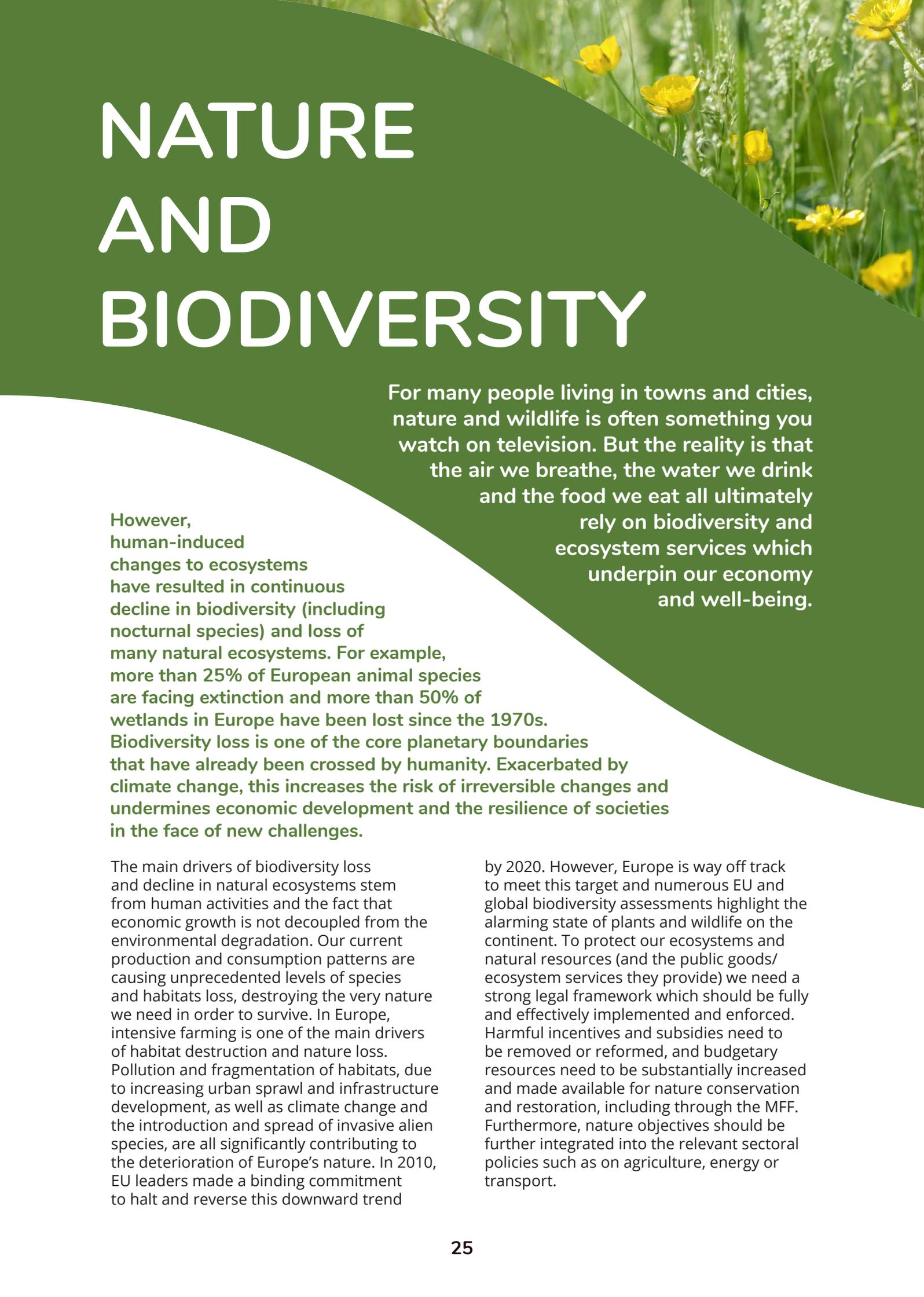
The TYNDP 2020 will for the first time offer a long-term perspective beyond 2040, possibly going up to 2050.

This process offers a window of opportunity for the EEB to ensure that the roll out of energy infrastructures for the energy transition will fully consider the potential of energy savings and renewable energy, while avoiding a lock-in to fossil fuel infrastructure like liquefied natural gas (LNG) terminals and gas pipelines and preventing that it be used as an excuse to weaken provisions for nature conservation, environmental protection and public participation. The EEB is engaging with the European Network of Transmission System Operators for Electricity (ENTSO-E) and other NGOs on this task, and is exploring a closer cooperation with the Renewables Grid Initiative (RGI).

ACTIVITIES

- Follow the **TYNDP process**, constituting the basis for the TEN-E regulation;
- Push for a check of the TYNDP for **consistency with the Paris Agreement**;
- Continue the ad-hoc **working group** on energy infrastructure with EEB members and other partners.





NATURE AND BIODIVERSITY

However, human-induced changes to ecosystems have resulted in continuous decline in biodiversity (including nocturnal species) and loss of many natural ecosystems. For example, more than 25% of European animal species are facing extinction and more than 50% of wetlands in Europe have been lost since the 1970s. Biodiversity loss is one of the core planetary boundaries that have already been crossed by humanity. Exacerbated by climate change, this increases the risk of irreversible changes and undermines economic development and the resilience of societies in the face of new challenges.

The main drivers of biodiversity loss and decline in natural ecosystems stem from human activities and the fact that economic growth is not decoupled from the environmental degradation. Our current production and consumption patterns are causing unprecedented levels of species and habitats loss, destroying the very nature we need in order to survive. In Europe, intensive farming is one of the main drivers of habitat destruction and nature loss. Pollution and fragmentation of habitats, due to increasing urban sprawl and infrastructure development, as well as climate change and the introduction and spread of invasive alien species, are all significantly contributing to the deterioration of Europe's nature. In 2010, EU leaders made a binding commitment to halt and reverse this downward trend

For many people living in towns and cities, nature and wildlife is often something you watch on television. But the reality is that the air we breathe, the water we drink and the food we eat all ultimately rely on biodiversity and ecosystem services which underpin our economy and well-being.

by 2020. However, Europe is way off track to meet this target and numerous EU and global biodiversity assessments highlight the alarming state of plants and wildlife on the continent. To protect our ecosystems and natural resources (and the public goods/ ecosystem services they provide) we need a strong legal framework which should be fully and effectively implemented and enforced. Harmful incentives and subsidies need to be removed or reformed, and budgetary resources need to be substantially increased and made available for nature conservation and restoration, including through the MFF. Furthermore, nature objectives should be further integrated into the relevant sectoral policies such as on agriculture, energy or transport.

IMPLEMENTATION OF THE EU BIODIVERSITY STRATEGY TO 2020

The EU 2020 Biodiversity Strategy was adopted in 2011 with the aim to halt and reverse the loss of biodiversity and ecosystem services.

The Strategy's first target foresees the full implementation of the EU's Birds and Habitats Directives (the so-called Nature Directives) which have underpinned the creation of the Natura 2000 network and remain the cornerstone of Europe's efforts to safeguard its rich biodiversity. The effective implementation and management of the network is of the highest priority for the EU to reach its biodiversity targets. As a result of a thorough evaluation of the Nature Directives in 2016, the European Commission concluded that the Directives are fit for purpose and adopted the Action Plan for Nature, People and the Economy aimed to improve their implementation and boost their contribution towards reaching the EU's biodiversity targets.

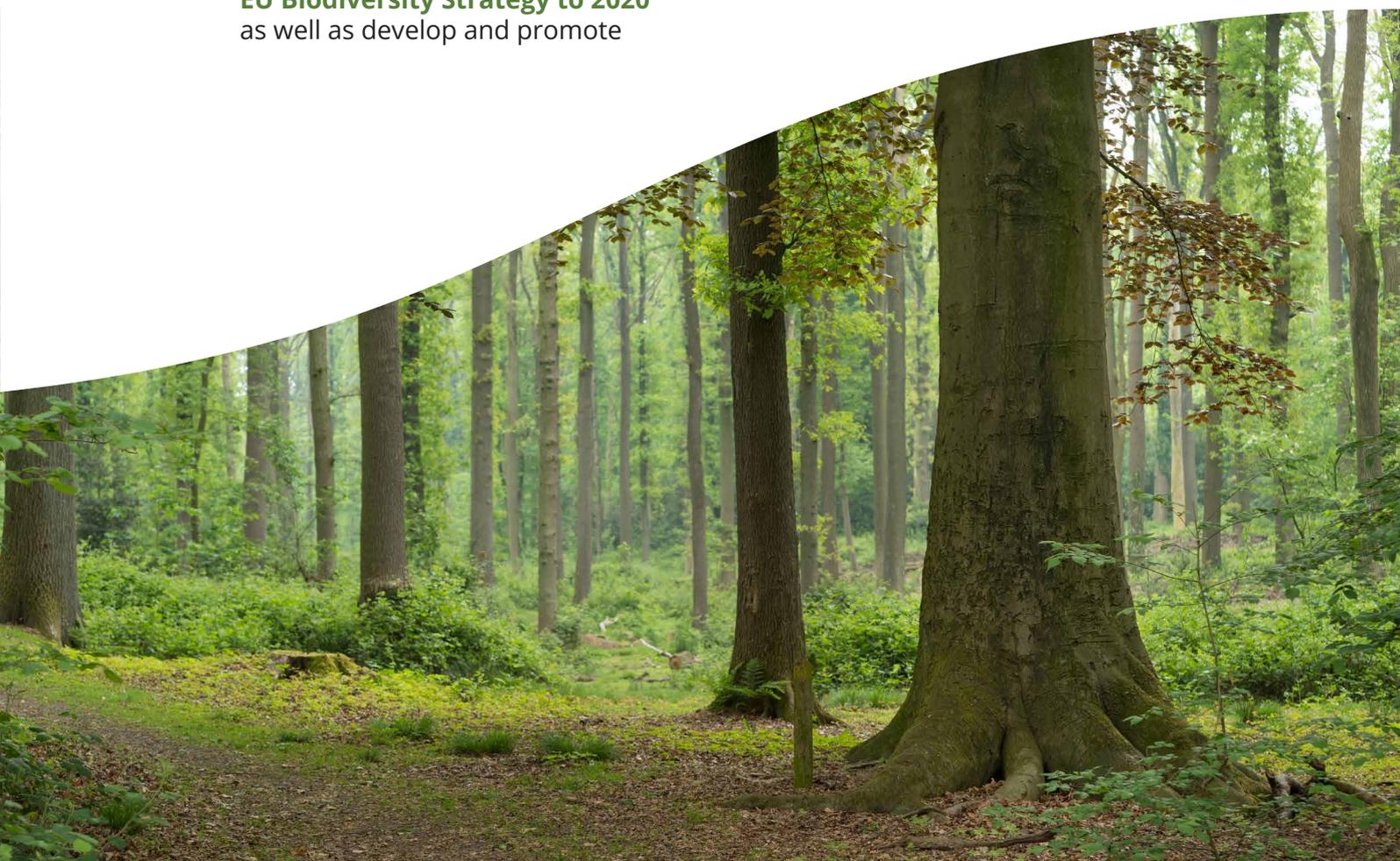
The EEB will continue engaging in the relevant actions foreseen in the Nature Action Plan to ensure that timely progress is made towards achievement of the objectives of the Nature Directives. As regards the other targets of the EU Biodiversity Strategy to 2020, the EEB will in particular push for progress with the strategic restoration of ecosystems and degraded habitats (target 2) by promoting carefully designed green infrastructure approaches and nature-based solutions.

In addition, the EEB will continue to advocate for agriculture to increase its contribution to maintaining and enhancing biodiversity (target 3A) mainly through the EEB and partners' work on shaping the EU's Common Agricultural Policy (see next section) and will follow the development and implementation of the Invasive Species Regulation (target 5).

There is a growing movement for a New Deal for Nature to be adopted under the Convention on the Biological Diversity (CBD) in 2020 that achieves the needed transformational change and creates "a Paris moment for biodiversity". The development of the post 2020 EU Biodiversity Strategy will be strongly linked to the global discussions under the CBD, since the content and targets of the Global Strategy will influence the EU Strategy and vice versa. The EEB will engage in the review of the EU Biodiversity Strategy and contribute to the development of a post 2020 global biodiversity framework that addresses the challenge of biodiversity and ecosystems loss and ensures that the solutions and benefits nature provides are integrated in systemic, inclusive, and transformative actions to benefit human well-being, the economy and the planet.

ACTIVITIES

- Contribute to the delivery of actions foreseen in the **EC Action Plan for Nature, People and the Economy** building upon feedback and experience from the EEB members in order to boost the implementation and enforcement of the Nature Directives;
- Develop and promote EU level actions that can help achieve significant progress in meeting **EU 2020 biodiversity targets** and tackle drivers of biodiversity loss with focus on biodiversity financing in the MFF, the strategic deployment of restoration and green infrastructure in the EU, ambitious development and implementation of the Invasive Species Regulation and the EU Initiative on Pollinators;
- Provide input and evidence into the **evaluation of the current EU Biodiversity Strategy to 2020** as well as develop and promote concrete policy proposals for an ambitious EU post-2020 biodiversity policy framework reflecting the Global Deal for Nature under the CBD;
- Convene one or two meetings of the **EEB's biodiversity working group** to share the experiences and build capacity of the EEB members to effectively engage in improving compliance with the Nature Directives in their Member States;
- Coordinate and synergise the EEB's activities with other **NGOs and partners**, *inter alia* in the context of the European Habitats Forum.



AN OVERHAUL OF THE CAP POST 2020

A STEP TOWARDS A SUSTAINABLE FOOD AND FARMING SYSTEM FOR EUROPE

Facing a failure of the greening and criticism from civil society that the CAP is broken (a perspective confirmed by EEB-commissioned studies among others) and from the farming community that it is far too complex, the Commission launched reflections on the future of this policy with a public consultation that ran from February until May 2017 and a Communication that was published in November 2017.

These were followed by legislative proposals on the post-2020 MFF and on the CAP in May and June 2018 respectively, triggering the start of extended negotiations between the Parliament and the Council. The election of the new European Parliament and appointment of the new Commission in 2019 will certainly also impact the timeframe of the reform.

The EEB has already played a significant role, together with BirdLife Europe and WWF, in the early stages of the reform process, notably through the Living Land website mobilizing over 600 organisations

and businesses around the consultation and over 250,000 citizens for an e-action. Prior to the issuing of the Commission proposal, the EEB met a wide range of key decision makers (Commissioners, their cabinets et al) to promote ambitious CAP reform. The proposal, while being positive as regards adopting a results-based approach, is very weak in delivery mechanisms. It adopted near full subsidiarity as regards funds use and lacks a proper monitoring, accountability and control system. There are also a range of important governance concerns. In sum, the proposal puts most of the responsibility at the Member State level, and hence risks a race to the bottom, low EU-added value and major risks to Europe's biodiversity and water quality. In 2019, the EEB will continue to argue, in the co-decision process, for more ambition as regards environmental aspects of the reform, as well as monitoring, accountability and safeguard provisions. During the first half of 2019, the EEB will particularly focus on the vote in the relevant Parliament Committees (ENVI & AGRI) and will follow closely the discussion in the AGRIFISH Council. Towards the end of 2019, the new Commission will take office and the EEB will engage with it. The case will also be made that there are opportunities across Member States for a race to the top on environmental practices, given national benefits for biodiversity, water quality and long-term soil productivity.

ACTIVITIES

- Promote the EEB's position on the **future of the CAP** and related MFF debate with relevant stakeholders (farmers, industry, etc), including calling for the new CAP to develop new policy instruments in order to help farmers to transition toward a more sustainable farm system;
- Organise **workshops** with decision makers (also at national level) and key stakeholders on the future of the CAP and the EEB's position;
- Hold **meetings** with decision-makers from the European Commission, European Parliament and Member States to encourage improved safeguards and environmental ambition in CAP co-decision negotiations and eventual national implementation;
- Push for **joint meetings** on the CAP reform between agriculture ministers and environment ministers;
- Participate in the **NGO platforms** which gather around 30 organisations working on the environment but also on health, animal welfare, farming etc;
- Press for greater transparency around data on pesticide residues in food and water, and more generally highlight the **health implications of unsustainable farming practices**;
- Hold one or two **working group meetings** and provide regular updates to EEB members on EU policy developments.

WATER

Water is essential for human life and a fundamental resource on which our health and livelihoods, our economy as well as our wildlife all depend.

Water ecosystems in the EU, such as wetlands, lakes, rivers and groundwater aquifers, are the source of that water, and are experiencing the most significant degradation and loss of biodiversity compared to other ecosystems. The causes for this are various pressures on freshwater ecosystems, including widespread pollution and over-abstraction of water for intensive agriculture, industry and households. In addition, most European rivers, lakes and wetlands have been degraded by changes to water flow and their physical shape due to infrastructure for hydropower production, flood defences and navigation, as well as land drainage for agriculture and urban sprawl. These pressures often act at the same time and affect the good functioning of ecosystems, contribute to biodiversity loss and threaten the valuable benefits water provides to society and the economy.

Freshwater constitutes only about 2% of the water on the planet and competing demands may lead to an estimated 40% global water supply shortage by 2030. Seven years in a row, water crises have been ranked among the top global risks facing businesses and society in the next decade, according to the World Economic Forum.

The EU Water Framework Directive (WFD) and its daughter directives on priority substances and groundwater are the EU's main legislation to protect and restore Europe's rivers, lakes, coasts and groundwater aquifers, and are a key legal framework to address the EU's growing water challenges of pollution including by emerging pollutants and water scarcity. The WFD has led to important improvements in water status throughout the EU since it was adopted in 2000, but its goal to prevent deterioration and bring all water bodies in the EU to ecological health by 2015 has been missed by a long shot. Currently, only around 40% of surface waters are in good ecological status, while only 38% of surface waters are in good chemical status. The status of groundwater across Europe is generally

better:
74% of groundwater water bodies are in good chemical status and 89% are in good quantitative status.

In 2012, the European Commission thoroughly evaluated the WFD and adopted the Blueprint to Safeguard Europe's Water Resources. This put forward actions to improve the implementation of the water legislation during the second cycle of the river basin management planning in the period 2015-2021, to achieve integration of water policy objectives into other sectoral policies and budgets, and to fill the legislative gaps in particular concerning uptake of water re-use. However, the preliminary results from the assessment of the river basin management plans indicate that EU governments continue to widely apply the exemptions from reaching the environmental objectives of the WFD, and need to increase the uptake of nature-based solutions and make better use of economic instruments such as adequate water pricing and cost recovery from water users. In addition, the recast of the Drinking Water Directive is currently ongoing in order to embed the human right to water into EU law as called for by the European Citizens' Initiative.

In preparation for the 3rd river basin management cycle, the European Commission started a fitness check evaluation of the WFD and its daughter directives on priority substances and groundwater as well as the related Floods Directive. There is a significant risk that the WFD's high standards will be weakened if the fitness check evaluation concludes that the WFD needs to be revised following the pressure from several Member States and some vested economic interests. The EEB has teamed up with several other NGOs and will jointly run a European-wide policy campaign to defend the WFD and its daughter directives in 2018-2019 including visible public engagement activities aimed to mobilise European citizens to take part in the public consultation on the WFD review.

ACTIVITIES

- Engage in the **Living Rivers Europe Campaign** to ensure a balanced approach in the fitness check of the WFD and its daughter directives that takes full account of the benefits of full implementation of the legislation and considers the most effective and efficient implementation practices;
- Engage in the delivery of the relevant outputs of the **Common Implementation Strategy (CIS) for the WFD** to ensure ambitious implementation of the 3rd river basin management cycle with a particular focus on tackling hydromorphological pressures, diffuse pollution from agriculture and uptake of river restoration and nature-based solutions;
- Carry out advocacy activities to support the revision of the **Priority Substances Directive**, including by actively engaging in the process of revision of the list of priority substances, as well as push for the ambition of the strategic approach to the pollution of water by pharmaceutical substances to be increased;
- Keep track of the co-decision process on the recast of the **Drinking Water Directive and Water Reuse Regulation** and carry out advocacy activities if required;
- Organise one or two meetings of the **EEB's water working group** and build the capacity of EEB members to effectively engage in improving compliance with the WFD in their Member States.



SOIL

Soil is fundamental to life on Earth, providing the home for about a quarter of all biodiversity and storing twice as much carbon as the atmosphere and three times as much as vegetation, yet it is being eroded and degraded at an alarming rate.

The 7th Environmental Action Programme commits Member States to reflect on how soil quality issues could be addressed within a binding legal framework at the EU level. The EEB will continue to make the case for EU level action for soil protection, ideally through a dedicated legally binding instrument, not least because of soil's crucial role in storing carbon.

ACTIVITIES

- Advocate for EU level **action for protecting soils**, preferably within a dedicated legally binding framework;
- Organise one **working group** discussion on sustainable soil policy.

GMOs GENETICALLY MODIFIED ORGANISMS

Given the risks and uncertainties in relation to the implications of the development, use and placing on the market of genetically modified organisms (GMOs), it is crucial that rigid risk assessment criteria and processes are put in place and that strict sustainability criteria are always applied in any decision-making process on GMOs.

The GMO amendment to the Aarhus Convention contains minimum requirements for public participation in decision-making but still requires further ratifications to enter into force and thus have legal effect.

ACTIVITIES

- Monitor relevant developments and continue to support a comprehensive and transparent EU system of authorisation which **prevents environmental damage** and the contamination of conventional and organic farming;
- Push for further ratifications of the **GMO amendment to the Aarhus Convention** so that it enters into force.



INDUSTRY AND HEALTH

The common presence of toxic substances in the air, water and soil around us and in the consumer products that adults and children are exposed to on a daily basis has become increasingly problematic.

Policies and legislation to regulate chemicals and prevent pollution are ever more essential to protect public health and wildlife. It is evident that much remains to be done in these areas. Even substances that are long known to be toxic are not effectively regulated; nor is the precautionary principle effectively applied to the numerous substances that continue to be put in circulation.

CHEMICAL SAFETY

2019 will be a critical year regarding the policy framework for the protection of citizens and the environment from the risks posed by hazardous substances and nanomaterials (NMs) as several highly influential initiatives launched by the Commission will be finalised:

- Early in 2019, the Commission is expected to deliver the results of the non-REACH chemicals legislation REFIT. The actions committed by the European Commission with regard to the REACH review (2018) are expected to be implemented during 2019. Therefore, the resulting proposals for changes in EU chemicals policy and regulatory framework are expected to be presented and developed during 2018 and 2019.
- In 2019, the European Chemicals Agency (ECHA), which is responsible for REACH implementation, will implement a new 5-year work plan that renews ECHA's roles and priorities after the last registration deadline, and should aim to improve the implementation of REACH processes.
- The 7EAP aimed to achieve a non-toxic environment and foresaw the development by 2018 of a strategy to this end that is conducive to innovation and the development of sustainable substitutes. The Commission has postponed the development of this strategy, awaiting the results of the REACH Review and Chemicals REFIT probably by early 2019. The incoming Commission may take over the responsibility of delivering a non-toxic environment strategy under the 7EAP by 2020. An 8EAP discussion may also start

informally in 2019 and formally in 2020 after the 7EAP evaluation is completed and could provide an opportunity to ensure that the obligation to develop a non-toxic environment strategy becomes an early priority of the new Commission in case the current and incoming Commission fail to come forward with one in 2019.

- The presentation and implementation of regulatory options to address the interface of chemical, products and waste legislation is expected by 2019. Crucial discussions will take place regarding the application of the same or different standards to virgin and recycling materials containing toxics as well as information systems on chemicals in products.
- The microplastics restriction proposal under REACH is expected to be submitted by ECHA in early 2019.

Also, the development of criteria for the identification of endocrine disrupting chemicals (EDCs) was finalised in 2017, and the updated EDCs strategy was presented by the Commission in November 2018. Therefore, the 2019 chemicals regulations should begin to apply the criteria and the strategy in order to speed up the phasing out of these substances of high concern.

The overall environmental objectives of the EEB in this area for 2019 are:

- The development of a non-toxic environment strategy in line with the 7EAP goals and, in case this is not completed under the 7EAP, an 8EAP that reiterates the need for early delivery of an ambitious and comprehensive non-toxic environment strategy;
- The timely substitution of hazardous chemicals, especially of substances of very high concern (SVHCs) under REACH;
- The adequate implementation of the REACH processes;

- A more effective ECHA that supports REACH's core objectives and is committed to promoting substitution;
- To ensure that the EU properly and effectively addresses the issue of toxic recycling and develops mandatory harmonized information systems for chemicals in products and wastes;
- To ensure that the EU better protects citizens by restricting hazardous chemicals in consumer products (such as textiles, toys and other products to which children are exposed) and food packaging;
- The adequate implementation of the EDC criteria and strategy;
- To maintain the hazard-based approach in the chemicals' regulations;
- To ensure that nano materials are

addressed appropriately in REACH and to revive the general call for an EU-wide nano register as part of a comprehensive and meaningful set of transparency measures; and

- To promote environmental policies on chemicals in non-EU countries to the extent feasible.

Given the political agenda of the EU, comprising the European Parliament elections and the nomination of new Commissioners, we expect to work more closely with the Council, Member States and MEPs.



ACTIVITIES

- Follow up the publication of the Commission's assessment of the non-REACH chemicals legislation and REACH Review and **push for additional measures** to be taken where needed to ensure the protection of human health and the environment while promoting innovation to safer alternatives;
- Evaluate the effectiveness and benefits of the **nano observatory to be developed by ECHA**, develop policy recommendations for a meaningful EU-wide register for NMs and follow up on the implementation of the REACH annexes amendments;
- Contribute to the development of an **EU Strategy for a non-toxic environment** that ensures the protection of human health and the environment from hazardous substances while supporting innovation; to this end, coordinate the chemicals working group to agree on NGO priorities for the Non Toxic Environment Strategy and make recommendations to the Commission which is the primary target of this work, as well as Member States and MEPs;
- Support and contribute to the **EDC-free coalition** with regard to the EDC criteria and strategy;
- Build **alliances with other stakeholders** such as academia, industry, authorities, etc., in order to collaborate and provide concrete proposals to ensure the proper implementation of REACH and promote substitution and innovation with the Commission, ECHA and Member States;
- Coordinate with NGOs to provide a **common position** and policy options to solve the toxic material cycles problem and information systems on chemicals in products, together with the circular economy programme;
- Follow up and work with relevant NGOs to make **concrete proposals** to tackle chemicals in food packaging together with the circular economy programme;
- Underline the **currently inadequate level of regulation on chemicals**, and the risks from further weak regulation, in the context of the EEB's work on better regulation, underlining the links to health and environmental risks as well as governance shortcomings (i.e. lack of evidence base, contradictions with precautionary and polluter pays principles, and burden of proof issues); this will include chemicals under REACH, the lack of a non-toxic environment strategy and nano-materials;
- Advocate for ambitious EU **restriction of microplastics** under REACH;
- Facilitate the flow of information and the sharing of experiences by convening one or two meetings of the **EEB's chemicals and nano working groups** in 2019 and by regularly updating EEB members engaged in implementing EU chemicals and nano legislation;
- Work on and support our members and alliances with regard to **non-EU/international chemicals control programmes** such as SAICM, UN, OECD, international conventions, etc.

As established by the new National Emission Ceilings (NEC) Directive, Member States have to prepare national plans by 1 April 2019 in order to show how they will comply with the already set emission limits for 2020 and 2030.

This will require the introduction and implementation of new measures to prevent and limit air pollution from energy, industry, transport and agriculture-related sources (e.g. methane and ammonia) which the EEB will closely monitor.

In parallel, while continuing to press for full compliance with existing air pollution laws and to highlight non-compliance, the EEB will continue supporting its members to ensure that legally binding air quality limits set in the Ambient Air Quality Directives are achieved throughout the entire EU and will continue to be involved in the Fitness Check of these Directives which is expected to be completed by the end of 2019.

More importantly, the EEB will advocate for more stringent levels recommended by the World Health Organisation (WHO) to be achieved throughout the EU. This will require new and ambitious international, EU and local action which the EEB will continue pushing for.

ACTIVITIES

- Support EEB members in their involvement in the **implementation of the revised NEC Directive** (in particular through the development of National Air Pollution Control Programmes) as well as the Ambient Air Quality Directives via exchange of best practices, litigation and communications work around non-compliance and infringements processes where the Commission will be pushed to apply the Directives in a more strict and precise way;
- Coordinate and represent NGOs during the **Commission's Fitness Check of the Ambient Air Quality Directives** and its follow-up phase (potential review of relevant legislation);
- Coordinate NGO work addressing **air pollution from agriculture and solid fuel burning** which are key contributors to particulate matter (PM) and ozone levels;
- Support and amplify T&E's work in addressing **air pollution from transport** with a focus on road and shipping;
- Participate in the work of the **UNECE Convention on Long-Range Transboundary Air Pollution (CLRTAP)** when relevant;
- Organise one or two meetings of the **EEB's clean air working group**.

MERCURY

Mercury is a highly toxic metal that is volatile and has global dispersal patterns. It causes damage to the nervous system, may impair the development of the brain and nervous system of the foetus, and can in its organic form accumulate and concentrate in food chains of ecosystems.

Due to its extraordinarily hazardous qualities, the Minamata Convention on Mercury was adopted in October 2013, with the objective to protect human health and the environment from anthropogenic mercury emissions, and entered into force in August 2017, with the first and second sessions of the Conference of the Parties (CoP-1 and CoP-2) taking place in September 2017 and November 2018 respectively.

At EU level a revised EU Mercury regulation was adopted in May 2017, including measures aimed at meeting, and going beyond in some cases, the provisions of the Minamata Convention.

In 2019, the EEB will continue to lead the Zero Mercury Working Group (ZMWG) and the Zero Mercury campaign. It will seek to ensure an effective representation of NGOs in the relevant meetings, including the third Conference of the Parties. The EEB/ ZMWG will continue assisting NGOs mainly in developing countries to prepare for ratification and implementation of the treaty. Furthermore, the EEB will follow, as relevant, issues related to the implementation of the EU mercury regulation.

ACTIVITIES

- Coordinate and lead NGO attendance at and input into the **Minamata Convention processes** (including the Conference of the Parties and UNEP expert groups);
- Support **international projects**, mainly in developing countries, in preparation for the ratification and implementation of the Convention as well as on mercury reduction activities;
- Building capacity of **NGOs in Latin America** with the support of GEF/ UNDP;
- Follow, as relevant, issues related to the implementation of the **EU mercury regulation**.

INDUSTRIAL EMISSIONS

Work on the Industrial Emissions Directive (IED) is aimed at ensuring its ambitious implementation.

In 2019, the EEB will continue its involvement with a view to achieving ambitious standards for environmental performance benchmarks – so called Best Available Techniques (BAT) Reference Documents (BREFs), which have gained in political importance since BAT conclusions are now legally binding under the IED. Key BREFs currently being developed are those concerning textiles, ferrous metals processing and the chemical industry. The EEB will actively coordinate the NGO involvement in this process to ensure that environmental ambitions are improved or at least upheld.

The EEB will also continue to push for strict enforcement and challenge derogations from state-of-the-art compliance. After the adoption of the revised BREF on large combustion plants (LCPs) in April 2017, a key focus for the upcoming years will be LCPs, in particular coal/lignite-fired ones. The EEB will continue to work with other NGOs on the 'Europe Beyond Coal' campaign with the goal of achieving a European coal phase-out by 2030 at the latest. Support will be provided to achieve ambitious implementation at Member State level, where BAT standards are implemented through General Binding Rules. Other important areas include refineries and iron, steel and cement plants and addressing water pollution from industrial activities (e.g. chemical plants and HAZBREF initiative).

The REFIT process for the IED launched in 2018 will get under way in 2019 and will involve a public consultation where the EEB will provide input.

Improving access to information and public benchmarking of industry will also be in the focus throughout 2019, linked to improved access to information at EU level (E-PRTR and IED Registry) and promoting good practice by Member States.

ACTIVITIES

- Continue to organise technical expert input, coordinate and provide active NGO involvement in the **Sevilla process**;
- Maintain our new dedicated **NGO Sevilla platform** (www.eipie.eu);
- **Support members** in enforcement work and in fighting BAT derogations;
- Subject to funding, work on implementation of **BAT conclusions** for specific sectors (e.g. refineries, iron and steel, cement production) or specific media impacts (e.g. water pollution from industrial activities);
- Engage in the **IED REFIT process**, including by providing input, and mobilising others to provide input, to the public consultation;
- Advocate for improved **access to information**, including through a database on the biggest polluters, public participation in decision-making on industrial activities and an effective liability system reflecting the polluter pays principle;
- Organise one **EEB industry working group** meeting.

LIGHT

More than 99% of the EU population, and about two-thirds of the world population, live in areas where the night sky is above the threshold for polluted status, i.e. the artificial sky brightness is greater than 10% of the natural night sky brightness.

Light pollution may have consequences on nocturnal fauna and on human health through affecting the quality of sleep. The spreading of the most cost-effective energy efficient LED technology with a blue light base may exacerbate the problem, and this has now been acknowledged as an issue by EU Commission services.

Balancing energy conservation and light pollution can be partially dealt with through lighting regulations as set within Ecodesign, Green Public Procurement and Ecolabel policies. However, the issue of 'over' lighting at night needs also to become a matter of concern in relation to the definition of protected areas for biodiversity and for urban policy to tackle excessive outdoor lighting at night. Retaining energy-inefficient technologies on the market cannot be the long-term solution, and efforts should be made to promote existing technologies and approaches that save on energy while minimising light pollution.

With the support of interested member organisations and subject to the availability of funding, the EEB will:

NOISE

The Environmental Noise Directive (END) defines a number of procedures for Member States according to which they should reduce noise pollution levels.

Since the end of a public consultation in 2012, the European Commission has been expected to come up with a proposal for revision of the Directive. The scope of the current Directive only deals with some sources of problematic noise; others also need to be addressed.

ACTIVITIES

- Monitor, if appropriate, developments on **EU noise policies** (END and source policy) in particular if the Commission comes up with a proposal to revise the END;
- Participate in **meetings and events**, and seek alliances with like-minded stakeholders, as appropriate.
- Continue the integration of this dimension when assessing relevant **future policy options**, e.g. in relation to ecodesign, and identify possible solutions to moderate light pollution while taking into account the expected energy and other environmental gains linked to new lighting technologies;
- Circulate relevant materials and where members are available, carry out advocacy work at national and local level to address **over-lighting and blue light pollution**.



CIRCULAR ECONOMY

We shall ensure a continuous implementation of the CE action plan of December 2015 as well as maintaining CE high on the agenda for the next Commission and Parliament as they take up their positions in 2019.

Making CE a route for a more inclusive society in Europe and beyond is another crucial dimension in this transition. In that perspective, we will help retain and share more fairly the value of materials embedded in our goods and services, while aiming at an absolute decrease of our resource consumption per capita. We will further unleash the potentials of product policy in the direction of sustainable sourcing of materials, extended life time, repair and reuse. We will push waste policy implementation towards prevention, reuse and repair priorities, beyond recycling of materials. Detoxifying our material streams is of primary importance to enhance circularity and we will consequently reinforce our links with the chemicals community.

It is also time to intensify the promotion of more sustainable and resource-saving lifestyles to encourage new demands and

Accelerating the transition towards a circular economy (CE) is now recognised by many as a unique way to reduce our environmental footprint while creating a prosperous economy and new jobs.

create a pull mechanism complementing the policy push. Circular practices should be fostered through campaigns calling for more control over products and materials we use, and setting us free from linear, toxic and unsustainable consumption patterns we have been locked in for too long.

EEB will also work to develop a more global perspective and highlight the links to SDG commitments. The CE team will explore opportunities for global outreach on the circular economy and where appropriate engage in projects to spread the benefits of positive aspects of EU policies in economies in other parts of the world, while at the same time gaining further knowledge from those economies.

ACTIVITIES

- Engage in multi-stakeholder **CE platforms** at EU level;
- Facilitate **sharing of information** on CE policies and practices between national members and assist the development of shared projects;
- Liaise with chemicals and biodiversity communities to act towards a **toxic-free environment** and link bio-economy with CE principles;
- Launch **education and awareness campaigns** on sustainable consumption, building on Ecolabel policy and with a specific focus on textiles;
- Create **new opportunities** for CE development at global level with the Global Policies and Sustainability (GPS) team and in different economic sectors (textiles, electronics);
- Continue to **reinforce links** between waste and ecological products campaigners.



WASTE

The EEB's work on waste following the adoption of revised waste laws in 2018 will be to monitor national transposition and related guidelines to be proposed by the Commission.

We will also monitor actions to be performed by the Commission as required by revised waste laws, notably the method to calculate recycling rates, the criteria to modulate EPR fees and the review of the packaging essential requirements. There will be a need to closely cooperate with EEB members to gather intelligence on national transposition methods and formulations and to communicate ongoing Commission initiatives. This should help to consolidate a list of best possible formulations and align national texts around those. This should also be put in the perspective of detecting possible legislative loopholes and implementation gaps, notably linked to unclear EU formulations agreed during the final negotiation stages. We will contribute where needed to waste-related tasks to be performed by the Commission in the aftermath of revised waste policy (e.g. food waste calculation methodology, new calculation for recycling achievements).

The EEB will also monitor the revision of the Batteries Directive which will intensify during 2019, with a Commission proposal to be tabled by 2020. Phasing out toxic technologies and non-rechargeable batteries would be amongst our priorities.

In addition, the EEB will endeavour to engage around circular and zero waste cities, highlighting best experiences of circular cities and providing advice and materials for local campaigners monitoring local/municipal waste management plans.

In the aftermath of the conclusions on the Single Use Plastics file to be adopted in 2019, the EEB will continue to collaborate within the Rethink Plastic Alliance to monitor the first implementation steps of related restrictions and provisions. For national transposition, local waste plans and to influence EU Commission work, the EEB will pay specific attention to the plastic waste streams and micro-plastics pollution, also aiming at pursuing ambitious policy development in line with the EU Plastics Strategy.

ACTIVITIES

- Act as a helpdesk and a best practices centralisation point for our members during the **transposition of the revised EU waste laws**;
- Coordinate with our members and other NGOs to apply **combined pressure** on the governments to ensure an effective and robust enforcement of the existing legislation;
- Influence the revision of the **Batteries Directive** through early collaboration with Commission services and consultants in charge of supporting studies;
- Organise two meetings of the **EEB working group on circular economy** with a specific session on waste policy;
- Contribute to addressing the **plastic waste streams**, including plastic packaging, in coordination with the Rethink Plastic Alliance;
- Engage in the subject of **circular cities** with relevant stakeholders and help members influence their local/municipal waste management plans.

RESOURCE CONSERVATION THROUGH PRODUCT POLICY

The EEB will particularly focus on a set of fundamental initiatives launched by the EU Circular Economy Action Plan (CEAP) of December 2015.

We will monitor the development of a coherent framework for product policy instruments, notably calling for an extension of the ecodesign and energy labelling push-and-pull approach beyond energy-related products. We will continue pushing for more repairable products and seek to influence the setting of horizontal requirements on repair information in the context of the Ecodesign Directive (repair scoring system).

We will follow up on the outcomes of the initiatives concluded in 2018, such as the analysis of policy options to address the interface between product, waste and chemicals policy, and the EU strategy on plastics from a design perspective, complementing the plastic waste angle.

Throughout 2019, the EEB will also continue working on Ecodesign, Green Public Procurement and Ecolabel criteria for specific products and services trying to create more synergies between these instruments, notably on reparability, upgradability and recyclability of products. We will closely follow the possible new strategy on the implementation of the EU Ecolabel Regulation to ensure an increased uptake of the scheme, avoid discontinuation of product group categories with less support from industry and ensure that Ecolabel requirements reflect environmental excellence. We will contribute to the next stage of the Environmental Footprint initiative and advocate for making it a reference methodology to back up green claims, rather than promoting it as a direct instrument for communication to consumers. The EEB will also continue to advocate for an EU-wide harmonized system(s) of information for products, notably with regard to chemical and material contents, in the context of the digitalization of our economy.

ACTIVITIES

- Monitor the development of the aforementioned priorities of the **EU CE Action Plan**;
- Ensure that **product policy instruments** deliver further for resource conservation, human health and the environment (Ecodesign, Energy Labelling, Green Public Procurement, Ecolabel, Product Environmental Footprint);
- Promote the idea of a **European information system** for products in different platforms/fora related to circular and digital economy;
- Organise two meetings of the **EEB Circular Economy working group** with dedicated sessions on product policy;
- As far as possible, extend the **Coolproducts** campaign, now dedicated to Ecodesign and Energy Labelling, to consider more policy instruments and also non-energy-related products.



GLOBAL POLICIES AND SUSTAINABILITY

In general, European environmental organisations are not very engaged in global policies – neither in the 2030 Agenda for Sustainable Development, nor the UNEP/UNEA processes; however, more and more environmental NGOs discover the value of the SDGs and the 2030 Agenda for their campaign and advocacy work at national level. The engagement of environmental NGOs both at national and international level will be crucial in the 11 years remaining until 2030 during which the UN, the EU and governments have agreed to implement this comprehensive agenda on sustainable development. The EEB will continue the process of integrating this agenda into its traditional work and is actively involved in global coalition-building in order to secure the environmental dimension in the 2030 Agenda.

GLOBAL 2030 AGENDA FOR SUSTAINABLE DEVELOPMENT

The EEB was actively engaged as Organising Partner for the Major Group of NGOs in the global sustainable development process that received a new mandate from the Rio+20 conference with the task to facilitate the NGOs to be engaged into the process.

In 2019, the EEB will continue to actively engage in the global and regional processes shaping decisions on the monitoring and review mechanisms. This will be done at the UN High-Level Political Forum (HLPF) meetings and the UNECE Regional Forum for Sustainable Development. The EEB will contribute to shaping the global and EU NGO position and will try to influence the position of the EU in those discussions by providing direct input to it.

ACTIVITIES

- Participate in and provide input to the **HLPF processes** at global and regional levels, in the latter case by participating in the UNECE Regional Forum for Sustainable Development;
- Comment on and engage in discussions around the **EU's 2019 report on SDG implementation** at the HLPF;
- Actively engage in the debates around the future development

of the stakeholder engagement mechanisms both at the level of the **HLPF and of the UNECE Regional Forum on Sustainable Development**, in particular the Regional Consultation Mechanism (RCM) which was presented in 2018 and may first be tested in 2019;

- Monitor and influence **EU involvement** in those processes, drawing on the EEB's EU policy work;
- Maintain and update a **toolkit for EEB members** to stimulate engagement in actions implementing the 2030 Agenda for Sustainable Development on the Member State level;
- Revitalise the **2030 Agenda Working Group** to ensure EEB members' input into the global SD process, and to stimulate EEB members to do the same at Member State level and to encourage the development or updating of National Sustainable Development Strategies;
- Reach out to **other sectors** in society in order to encourage them to involve the environment in their SDG work;
- Promote the **mainstreaming of the SDGs** in all relevant policy fields and at all levels;
- Work with **SDG Watch Europe** and exchange with Action 4 Sustainable Development, a large global coalition focussing on SDG implementation and advocacy, for our work at regional and global level.

UNITED NATIONS ENVIRONMENT ASSEMBLY (UNEA)

After the upgrade of the UNEP Governing Council to UNEA, involvement of stakeholders in UNEA processes has become even more important.

In 2019, the EEB will actively participate in UNEA-4 in March. The EEB will also continue to actively engage in the discussions around UNEP's stakeholder engagement policy following the previous failed attempts to resolve this issue. We will disseminate information to interested EEB members and facilitate advocacy work.

ACTIVITIES

- Participate in **UNEA-4** in March 2019;
- Engage in the discussions around the **stakeholder engagement process** for UNEA;
- Involve interested **EEB members** in the discussions and process.



GLOBAL PACT FOR THE ENVIRONMENT (GPE)

After the French Government launched this initiative, the process to develop a Global Pact for the Environment has been launched by the UN General Assembly.

The EEB will follow this process, engage in discussions on the need for and possible content of such a pact and the associated opportunities and risks, and ensure civil society participation in the process.

ACTIVITIES

- Contribute to a **conference on the Pact** in the European Parliament;
- Seek to stimulate **exchange between ENGOS** during UNEA-4;
- **Follow the process actively** and identify ways of influencing it.

GLOBAL ENVIRONMENTAL JUSTICE

The EEB will continue its active involvement in the Atlas for Environmental Justice - the world's largest database on environmental conflicts - through the EnvJustice project.

The Atlas and the network behind it increase the capacities of communities struggling for environmental justice, connect them to academics, give them cover and outreach potential and make it easier for journalists to find stories on environmental injustice. The EEB will continue to be responsible for the communication part of the project.

The EEB has obtained funding to work on cases of environment injustice vis-a-vis Roma communities in Eastern Europe.

Also new is the EEB's role as an official Goldman Environmental Prize nominator. We took this role in spring 2018 for the first time but aim to make this a permanent yearly task. It involves tapping into the vast network of grassroots environmental justice organisations that we are part of in order to identify suitable candidates among grassroots activists to nominate for this prestigious \$100,000 award.

ACTIVITIES

- Communication, media articles and social media work around the **Environmental Justice Atlas** and EnvJustice project outcomes;
- Selective engagement in highlighting **specific cases** of environmental injustice;
- **Field work in Eastern Europe** on Roma communities and environmental justice;
- **Goldman Environmental Prize** nomination research work;
- Explore viability of and level of interest in **EEB working group** on environmental justice.

BEYOND THE EUROPEAN UNION BORDERS

The EEB will continue its activities aimed at promoting better environmental policies in the countries neighbouring the EU and strengthening collaboration with NGOs working in those regions.

We aim to continue to monitor developments regarding accession negotiations with candidate countries in South-East Europe and Turkey, by implementing a new phase of the ENV.net project and by launching a new project on water management in Turkey and ensuring that Turkish water law is in line with the Water Framework Directive.

The EEB will also explore new opportunities to step up its work with our members and other interested NGOs in the countries within the European Neighbourhood Policy, in particular those belonging to the Eastern Partnership.

In 2019, the EEB will continue to engage and promote NGO involvement in relevant UNECE processes in addition to those already mentioned above (the Aarhus process and the regional meetings on SDG reviews and HLPF consultations), including the Environment for Europe process, where appropriate.

Through its involvement in the Mediterranean Information Office for Environment, Culture and Sustainable Development (MIO-ECSDE), the EEB will seek opportunities to engage in Mediterranean activities.

ACTIVITIES

- Implementation of **joint projects** in the Western Balkans (on waste and energy) and Turkey (on water);
- Seek **funding opportunities** in candidate and Eastern Partnership countries together with the EEB members;
- Carry out surveys with **EEB members from EU neighbourhood countries** and bilateral discussion in order to develop the EEB's strategy with non-EU members in Eastern Europe and the Balkans.

ORGANISATION FOR ECONOMIC COOPERATION AND DEVELOPMENT (OECD)

The OECD plays an important role in shaping environmental policy in developed countries, providing a forum for influential debates on topical issues.

For a number of years, the EEB has facilitated input to OECD environment-related processes from NGOs from throughout the OECD region.

In 2019, the EEB will continue to **coordinate the NGO input into the implementation of the OECD's environmental work programme**, by participating in several working parties and working groups of the OECD (such as those dealing with chemicals, biodiversity, water, soil), the Environmental Policy Committee (EPOC), the Green Growth and Sustainability Forum and SDG work. We are also making additional efforts to secure good geographical balance in NGO engagement among all OECD countries.



AN INCLUSIVE AND EFFECTIVE ORGANISATION

The EEB has set itself the overarching goal of becoming an even more inclusive and more effective organisation and identified five areas that need to be addressed in order to achieve this goal.

A STRONG, WELL MOBILISED EEB MEMBERSHIP NETWORK

The EEB will seek to expand its network to European countries with no members, to countries with potential additional members, and to pan-European networks, to become a more comprehensive umbrella organisation for Europe's environmental and sustainability NGOs.

ACTIVITIES

- Implement the EEB 2018-2019 **membership expansion plan** with targets and indicators;
- Implement a participatory process for drafting and adopting the EEB's post-2019 **Long Term Strategy**;
- Further explore strategies to strengthen **member engagement** in EEB activities, projects and communications and help members to build their capacities.



SHARP POLITICAL ADVOCACY

The EEB has successfully influenced EU policy-making over several decades, bringing the views and concerns of a large constituency of environmentalists into the heart of the EU processes, and the capacity to do so is probably as strong today as ever.

It has achieved this through combining ambitious agenda-setting activities with engaging in ongoing decision-making processes, working on a wide spectrum that ranges from high-level policy frameworks down to detailed technical policy areas. Nevertheless, the EEB still needs to constantly review its approaches, working methods and communication style in the shifting political and institutional landscape. The EP elections will be a priority issue for 2019 and a particular focus for membership engagement.

ACTIVITIES

- Reach out to the main political groups participating in the 2019 EP elections to seek **cross party support** for ambitious EU environmental policies;
- Provide input to the preparation of the **key priorities for the new Commission** and the parliamentary hearings for proposed Commissioners;
- Prepare and publicise EEB priorities for the **Presidency Trio** of Germany, Portugal and Slovenia (mid-2020 to end-2021);
- Prepare and publicise detailed **memoranda** for the incoming Finnish and Croatian Presidencies containing a comprehensive set of demands, summarised in Ten Green Tests, and assessments of the Romanian and Finnish Presidencies' performances;
- Set out **key policy demands** to all EU Environment Ministers prior to each formal meeting of the Environment Council; and upon invitation, participate in the informal meetings of the Environment Council;
- Participate in and bring a **European NGO perspective** to political fora outside the EU that deal with environmental topics, such as UNEP, UNECE and OECD.

SOLID ALLIANCES

The EEB will continue to build cohesion and coordination among environmental organisations working on EU environmental policy through coalitions and networking and continue to collaborate and seek common ground with non-environmental stakeholders to further promote environmental objectives within the sustainable development agenda.

ACTIVITIES

- Continue to play an **active role** within the Green 10; work within single issue coalitions such as on energy savings; and with trades unions and social and development organisations within the framework of configurations such as the European Movement International, EESC, Spring Alliance, SDG-Watch and the Better Regulation Watchdog.

A CLEAR AND POWERFUL VOICE

Communication has been given increasing priority in the EEB in recent years and 2019 will be no exception.

We will continue to work to improve the quality of our communications tools and outputs with particular attention to developing the organisational reach.

ACTIVITIES

- Develop **core messaging** for our policy areas to help make the work of the EEB more accessible to key stakeholder groups and the wider public: this will help to keep our communication work focussed and cement the value of our work with funders and policy makers;
- Continue to focus on **increasing our reach** as an organisation: we will work to develop our newsletter list as well as social media following, with our core channels (eeb.org and meta.eeb.org) being a particular focus;
- Develop a more coordinated approach to **funding proposals** to make sure communications best practice is being rolled out in future projects;
- Continue to build our **news channel META** through creative content, explore developing a petition platform to benefit members and campaign work and look into developing the ability to receive donations online.

A ROBUST ORGANISATIONAL BASE

The EEB will seek to establish a stronger, more diverse and more sustainable financial base, maintain a high quality and highly motivated staff, expand staff training and capacity building opportunities and ensure a supportive work environment.

ACTIVITIES

- Identify and address gaps in **staff capacity**;
- Further develop and implement a **fundraising strategy** to ensure adequate financing of the EEB's activities;
- Hold an annual **staff retreat** to review progress against goals mid-year, monthly **staff meetings** to coordinate, plan and review, monthly coordination unit, policy unit and team **meetings** to oversee operations;
- Further develop **staff training** and capacity building.



BUDGET 2019

General Costs	€
Office Costs	156,175
Office Supplies	84,678
Communications	46,232
Depreciations	108,225
Financial costs	3,800
Unforeseen expenditures	10,000
Sub-Total	409,109

Salary Costs	€
President's Secretariat	10,000
Secretary General's Unit	332,136
EU Policy Unit	1,095,095
GPS Unit	296,020
Information & Communication Unit	448,719
Accounting & Support Unit	482,647
Special Campaigns	209,126
Volunteers and Temporary Staff	36,000
Other personnel costs	76,000
Sub-Total	2,985,743

Activities	€
Overarching Policy Framework	131,841
Climate and Energy	116,367
Nature and Biodiversity	81,572
Industry and Health	273,090
Circular Economy	106,924
Global Policies and Sustainability	412,755
A More Inclusive and Effective Organisation	186,000
Sub-Total	1,308,548

Working Capital	€
Allocation to Working Capital	60,000

Total	€
Total Expenditure	4,763,400



EEB

European
Environmental
Bureau

The EEB is Europe's largest network of environmental citizens' organisations.

We bring together around 150 civil society organisations from more than 30 European countries.

We stand for sustainable development, environmental justice and participatory democracy.

European Environmental Bureau

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