

EEB Work Programme 2016

EUROPEAN ENVIRONMENTAL BUREAU

EUROPE'S LARGEST FEDERATION OF
ENVIRONMENTAL CITIZENS' ORGANISATIONS

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.



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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 (EEB) 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 bring together more than 150 environmental organisations from over 30 countries, with a combined membership of some 15 million environmentally concerned citizens.

More than four decades since it was founded, the EEB's role has never been more relevant than it is today. Despite mounting evidence of society's failure to reverse the slide towards irreversible climate change, prevent biodiversity loss or face up to the impending resource crisis, environmental issues continue to take low priority in government and corporate decision-making. Global environmental conflicts are on the increase. The economic crisis, instead of being seized on as an opportunity to make the transition to a green and fair economy, has been mistakenly used as an excuse to attempt to weaken environmental protection measures and defend the outdated, polluting, resource-inefficient development paradigm. In its first months after taking up office, the Juncker Commission embraced this outdated agenda with an unprecedented ideological zeal and seemed determined to shut down environmental policy making as far as possible.

Bilateral trade and investment negotiations between the EU and the US are now playing an important role on the political agenda with potentially very significant and mostly negative consequences for the further development of the EU's environment-related policies. Aside from the threats posed by the deal once it is concluded, the actual process of negotiating it is already having a negative influence on policies such as those on tar sands and endocrine-disrupting chemicals.

The EEB work programme for 2016 sets out our commitment to continue working on a broad range of issues in the coming year in order to hold the line on existing policies, secure a good outcome on pending proposals and ultimately turn the rhetoric of a greener and fairer economy into a reality. These include:

- Major thematic areas such as climate change, energy, agriculture, biodiversity, air, water, chemicals, pollution, products, resources and waste;
- Horizontal topics such as sustainable development,

implementation and enforcement of environmental law, policy coherence, greening the economy and the full implementation of the Seventh Environmental Action Programme;

- Emerging and/or neglected issues, such as soil, nanotechnology and noise;
- Processes extending beyond the borders of the EU, such as the 2030 Agenda for Sustainable Development, including the sustainable development goals (SDGs), and the 10-Year Framework of Programmes on Sustainable Consumption and Production (10YFP SCP); the Minamata Treaty on Mercury; the Aarhus Convention; and the OECD's environment-related work.

At the same time, we will continue to build and strengthen the organisation, including the membership network. Following the decision at the 2013 AGM to expand the EEB's geographical scope eastwards and the welcoming of new members into the EEB family from the 'new' countries, we intend to strengthen our activities in those countries, in particular those belonging to the Eastern Partnership.

Within the environmental movement, the EEB is well placed to articulate the concerns of the European public over the main environmental challenges facing our region and indeed our planet. For many topics, we have cutting-edge expertise within the EEB staff, able to engage in the nitty-gritty details. For others, we rely on the extensive knowledge within our membership network – knowledge which is applied and further developed within some twenty subject-specific working groups. We also benefit from close collaboration with other specialised NGO networks to ensure that we remain abreast of the latest developments. In particular on issues such as climate change, marine protection, transport and fiscal reform we will seek to strengthen our cooperation with CAN-Europe, Seas at Risk, Transport & Environment (T&E) and Green Budget Europe.

While the EEB was established around environmental concerns, we remain committed to promoting the social dimension of sustainable development. This is expressed not least through our involvement in the Spring Alliance, a collaboration with partners from trade unions and social and development organisations working at European level, and more recently through working with others to establish “SDG-watch” (working title), a coalition bringing together diverse networks of civil society organizations to work on advocacy around implementation of the SDG agenda.



OVERARCHING POLICY FRAMEWORK

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 GDP as the primary indicator of success.

Juncker Commission

The start of the Juncker Commission was marked by an unprecedented attack on environmental protection driven by pursuit of an outdated growth-and-jobs agenda – through the converting of the dedicated posts of Environment Commissioner and Commissioner for Climate Action into part-time roles; through the complete absence of environment outside of climate change and GMOs in the new political priorities; through the introduction of a filtering system which discourages the issuing of any new legislative initiatives that do not fit with those political priorities; through re-examination of existing legislation under REFIT to see if it can be 'modernised', i.e. better aligned with the growth-and-jobs agenda; and through the withdrawal of certain legislative proposals that were already undergoing co-decision, under the so-called 'political discontinuity' principle, which resulted in the withdrawal of the waste package, one of the most significant environmental proposals to emerge from the Barroso II Commission.

Under this new regime, the development of new environmental policies that seek to improve environmental protection seems unlikely in the next five years and if at all, will only be achieved through strong and sustained public pressure. This is putting a challenge to the EEB's ways of working across all of its priority areas. It will mean first and foremost fending off any roll back of existing standards, with the Fitness Check of the Birds and Habitats Directive being a very high priority. Second, it will mean ensuring that negotiations on proposals that are currently in co-decision, such as on air and the new circular economy package which will again be in co-decision following the controversial withdrawal of the waste package, will be brought to a satisfactory conclusion. Third, it will mean that the rhetorical support for better

implementation and enforcement is translated into concrete measures that really achieve that objective. Finally it will require a stronger cooperation with the grassroots level and a need to move to an agenda-setting role on key issues.

Activities:

- ➔ Maintain and further step up high-level engagement with the EU institutions on the horizontal question of the status of environment within the EU-level decision-making processes, both as the EEB alone and in collaboration with other partners (G10, Spring Alliance, "SDG-watch", topic-based coalitions, etc);
- ➔ Continue to challenge and seek a correction of Juncker's political priorities;
- ➔ Increasing mobilisation at Member State level through the EEB members.

Seventh Environmental Action Plan (7EAP)

In 2016, the EEB will seek the continued rapid implementation of the Seventh Environmental Action Programme (7EAP), especially by ensuring that it receives a central place in the revision of overarching political strategies and priorities, in particular the Europe 2020 Strategy and in the implementation of the Sustainable Development Goals.

Activities:

- ➔ Monitor and push for implementation of the 7EAP

Europe 2020

Europe 2020, the European Union's 10-year growth strategy, has reflected and at the same time influenced the prevailing political thinking around the EU's response to the euro-crisis. While the strategy purports to promote a form of growth which is 'smart, sustainable and inclusive', it does not promote a real transition away from the current unsustainable economic development paradigm. A review of the strategy was launched in 2014, put on ice in 2015 and is expected to continue in 2016. The EEB will continue to contribute to the review process and, once concluded, monitor how the strategy contributes or otherwise to putting Europe on a sustainable development path.

Activities:

- Contribute to the Europe 2020 review process and seek a revision of the strategy to align it with ecological imperatives and other sustainability considerations, in particular those set out in the 7EAP and the 2030 Agenda for Sustainable Development;
- Monitor implementation of Europe 2020 with a view to ensuring policy coherence for sustainable development.

Implementation of the 2030 Agenda for Sustainable Development, including the Sustainable Development Goals, in Europe

In 2016, 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. The UN General Assembly meeting in September 2015 resulted in the historic adoption of the 2030 Agenda for Sustainable Development 'Transforming Our World', through which governments committed to start implementing a set of 17 sustainable development goals (SDGs) and 169 targets from the

beginning of 2016. The EEB will closely follow up on the implementation of the goals at the EU level, collaborating with like-minded stakeholders. To this end, we will actively promote the drafting of an EU Sustainable Development Strategy, which includes a concrete plan of implementation comprehensively covering the SDGs and associated targets. In addition, we will seek to transform the Europe 2020 strategy so that it is compatible with this sustainable development agenda.

Activities:

- Monitor and provide input to the SDG implementation actions;
- Continue to play an active role in setting up "SDG-watch", with the main purpose of monitoring and pushing for the effective and comprehensive implementation at EU and Member State levels;
- Push for a genuine EU sustainable development strategy, including a concrete plan of implementation, reflecting our regional obligations for the implementation of the SDGs;
- Track implementation of Vice President Timmermans' mandate on sustainable development, addressing governance and policy coherence issues;
- Ensure that the SDG targets are fully integrated into EU policies;
- Facilitate EEB membership engagement in national implementation of the SDGs e.g. through providing a 'toolkit'.

Sustainable Consumption and Production (SCP)

In 2012, the 10-Year Framework of Programmes on Sustainable Consumption and Production was adopted in the Rio+20 outcome document 'The Future We Want'. From then on, negotiations and work was undertaken to formulate up to now six programmes on SCP: 1) Sustainable Public Procurement, 2) Consumer Information, 3) Sustainable Tourism, 4) Sustainable Lifestyles and education, 5) Sustainable Buildings

and Construction, 6) Sustainable Food Systems. The EEB is the EU focal point for the NGOs, and is thus actively involved. The main task here is to promote the programmes and seek for cooperation with the programmes and our members (in and outside the EU).

Activities:

- Fulfil the role of EU Focal Point for NGOs for the 10YFP on SCP and alternate for the Global Focal Point;
- Maintain contact with 10YFP secretariat and international board members;
- Investigate possibilities for concrete programmes in the framework of 10YFP on SCP in Europe and the six Eastern Partnership countries.

Fiscal Reform

In 2016, the EEB will continue to monitor and assess opportunities for work on fiscal reform at EU and Member State level, a reformed Emissions Trading System and the roadmap for the phase out of Environmentally Harmful Subsidies, as well as the European Semester. 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.

Activities:

- Continue cooperation with Green Budget Europe in 2016 to improve the content of Country Specific Recommendations prepared under the Semester and to strengthen their implementation, collaborating with interested EEB members from the countries in question as far as possible;
- Support Green Budget Europe in developing new and innovative ways of using market based instruments where appropriate.

Better Regulation

Better Regulation was one of the Juncker Commission's political priorities and, apart from putting a disproportionate focus on environmental policies that led to withdrawal of the waste package, it also led to the adoption in 2015 of a set of new rules, procedures and technocratic bodies to implement this agenda. These include the creation of a Regulatory Scrutiny Board, a new REFIT Stakeholder platform to replace the former Stoiber High-Level Group on Administrative Burden Reduction and, most crucially, a proposal for a new Inter Institutional Agreement on Better Lawmaking. The latter was agreed in December 2015 and while an appropriate role for impact assessment during co-decision was secured as well as a deletion of Juncker's political priorities as a basis for joint work programming, it contained a number of dangerous new elements in particular a possibility to set sector-wide regulatory burden reduction targets. In 2016 these new measures can be expected to have an effect and the EEB will need to engage closely to limit the damage of this to the EU's environmental policy agenda. Further pressure for deregulation has come from the UK with its demands for EU reform linked to its forthcoming referendum on EU membership. These include a proposal for a specific EU target for reducing the regulatory burden on business.

Activities:

- Continue to engage in the 'better regulation' debate to prevent it being used as an excuse to press for unwarranted deregulation in the environmental sector, and in particular ensure active engagement in the different fitness checks;
- Highlight the benefits of action at EU level on the environment, including regulatory action, and the dangers of a deregulatory approach, in the context of the political debate generated by the UK demands for EU reform.

EU-US Trade negotiations

In 2013, negotiations for a new bilateral trade deal between the US and the EU kicked off. In 2014, it quickly became one of the most controversial political projects of the EU and the original objective of reaching agreement by the end of 2014 has been pushed back to well into 2016. The EEB

has increased its engagement, focussing in particular on the threats posed by regulatory cooperation and proposals for an investor state dispute settlement (ISDS) mechanism, while at the same time ensuring that controversial proposals on for example regulatory cooperation are not in the meantime introduced unilaterally by the EU through its 'Better Regulation' agenda.

Activities:

- Closely monitor the TTIP negotiations and address these as part of its ongoing work on topics such as REACH as well as on a more horizontal level;
- Oppose any TTIP deal which fails to meet the demands set out in the EEB's 2014 position paper on TTIP;
- Ensure that a similar already concluded deal between the EU and Canada, the Comprehensive Economic and Trade Agreement (CETA), will be rejected by the European Parliament;
- Review and as necessary update the EEB position paper to take account of more recent proposals such as 'ISDS-lite';
- Engage and collaborate with like-minded stakeholders, including legal experts, to share analysis and ensure a well-informed and coordinated approach.

Environment and economy

The present political focus on putting recovery from Europe's economic crisis at the heart of all policies is important, but must be done in a way that secures environmental sustainability as well. Both the Commission and Member States have in recent years carried out several processes that clearly show that stricter environmental policy makes economic sense even in the short run, for example by boosting employment and stimulating innovation. This has been reflected in e.g. the 7EAP as well as in the conclusions from the European Resource Efficiency Platform (EREP). Scientific and other studies increasingly support this view, including reports from the 2007 German and 2009 Swedish Presidencies, from the EREP, as well as from the ongoing New Climate Economy project. The latter has for example pointed out

that air pollution in the 15 countries being the largest emitters of greenhouse gases in the world cause health damage costs amounting to some 4% of GDP annually, about 400 times higher than the expected gains from a TTIP agreement in the best of scenarios so far presented. In the report "A New Growth Path for Europe", it was shown that employment and growth would increase in the EU as a result of more ambitious climate objectives.

Further examples of environment-economy win-win strategies would be to phase out costly public subsidies to fossil fuels and to carry out environmental tax reforms that put a price on emissions and lower taxes on e.g. employment. OECD has repeatedly shown that environmental taxation is good for the overall economy and that it does not threaten the competitiveness of firms.

Continuing European overconsumption is not an option and a transition towards a resource-efficient sustainable economic system, which respects planetary boundaries and the need for Europe to limit its ecological footprint to its fair share, is essential. It is thus crucial to recognize the link between the sustainability of the economy and the health of the environment, and that any economic recovery strategy must take full account of social and environmental considerations.

Activities:

- Communicate these ideas to decision-makers and the public through engaging in the political debate.

CLIMATE AND ENERGY



Climate and energy

The COP 21 in Paris in December 2015 was a historic breakthrough. Of particular importance was the commitment by world leaders not just to seek to keep temperature rise to “well below” 2°C above pre-industrial levels but also to “pursue efforts to limit the temperature increase to 1.5°C”, acknowledging that this is necessary to the very survival of the most vulnerable nations. However, this welcome increase in ambition in the long-term objective is in striking contrast to the weak and vague emissions reduction targets. Fortunately, a review mechanism is put in place, and it will be important that the EU uses this to step up its climate efforts in the near future and to pressurise other countries to do so.

For the European climate and energy policies this demands a renewed push to raise the ambition of the 2030 targets as part of the ongoing governance discussion. This should include a cut in EU emissions of at least 60% by 2030 and at least 95% by 2050, an increase of the energy efficiency target to at least 40% and at least 45% of energy sourced from sustainable renewable energy by 2030. The EEB will also continue to support a push for the necessary measures to achieve this, including an effective Emission Trading Scheme and the mobilising of financial resources to assist the world’s most vulnerable countries to adapt and mitigate.

The EEB will continue to promote a new framework based on three binding, coherent and ambitious targets on greenhouse gas emission reductions, energy savings and the share of renewables in the energy mix and challenge the new Commission to think ‘big’ on this. The EEB will give particular attention to the issue of energy efficiency. In addition the promotion of environmentally sustainable renewable energy will be the EEB’s guiding principle in the expected discussion of the Renewable Energy Package for 2030.

The EEB will work together with other environmental NGOs to ensure that the ambition level of the targets is sufficient to put the EU on a path to reaching its long-term climate goals, bearing in mind that new scientific findings point out a need to revise these upwards, and to call for progressive policies and measures to implement them.

Activities:

- Continue to closely cooperate with Climate Action Network (CAN) Europe and raise relevant positions in EEB communications to EU decision makers;
- Support the national members in the follow-up of COP 21 and promote further cooperation within Eastern European countries on the issue of energy transition;
- Work with other NGOs and national members to influence the 2030 energy and climate governance for the required ambition level for 2030;
- Link the discussion of the Renewable Energy Package with the concepts of energy efficiency, environmentally sustainable renewable energy and the need to phase out environmentally harmful subsidies, while pointing out best-practices and success stories.

Energy Performance of Buildings Directive and Energy Efficiency Directive Review and Implementation

A significant reduction in the total amount of energy the EU consumes is critical to achieving Europe’s climate objectives as well as to increasing Europe’s energy security. Two central instruments, the Energy Performance of Buildings Directive (EPBD) and Energy Efficiency Directive (EED), are set for a review and possible revision in September 2016. Following up on the consultation on the EED that took place in autumn 2015, the EEB will push in 2016 for new and more ambitious legislative instruments as part of a revision or new proposal of the EED. In addition, the review of the EPBD will address the concerns of the EU Heating and Cooling strategy to be published in February 2016. The EEB will prepare advocacy work with its members to push for improved legislation. Furthermore, the EEB

will continue to monitor the implementation of the relevant energy efficiency directives in the Member States and at EU level. The EEB will also push for the mobilisation of financial resources in support of energy savings, focussing on buildings.

Activities:

- Monitor the implementation of the EED and EPBD in the member states with the help of the EEB working group;
- Prepare for a revision of the EED and EPBD, aligned with the 2030 governance work;
- Work with other NGOs to advocate a strong 2030 energy savings target;
- Participate in the Coalition for Energy Savings;
- Organise one or two working group meetings.

Ecodesign Directive and Energy Label Regulation implementation and revision

The Ecodesign and Energy Label Framework Directives act respectively as 'push' and 'pull' instruments to transform the market towards more energy efficient and more environmentally friendly products. They are implemented through measures specific to each product group being regularly revised or newly listed in the Ecodesign work plan.

In 2016, the co-decision on the Energy Labelling Directive should be finalised, if not under Dutch Presidency, under the Slovak one. The Ecodesign Framework Directive will not be revised, but the discussion on the revision of the Energy Labelling Directive should impact its functioning. During the co-decision discussion the EEB will push the NGO priorities identified to unleash further the potential of these instruments, notably the three levers presented [here](#). The implementation of Ecodesign and Energy label policy has been assessed as delivering 45% of our 2020 energy efficiency goal, but is suffering from anti-EU, anti-regulation attacks that endanger the ambition of the revision and its implementation.

In 2016, some existing Ecodesign implementing measures will also be revised, including iconic

product groups such as white goods. In addition, a new Ecodesign work plan for the period 2015-2017 is expected to be finalised, as the decision on its contents has been postponed and now integrated in the circular economy package that will be discussed among the European institutions in 2016. There is both a threat of shrinkage (to match the better regulation rhetoric) and an opportunity (an opening to resource use aspects). Through its involvement as a permanent member of the Consultation Forum for the implementation of Ecodesign and Energy labelling Directives and the Coolproducts campaign, the EEB will seek to secure as much energy savings as possible through the revision of the Energy Labelling Framework Directive, the revision of existing measures and the definition of new measures. A key challenge will be to continue delivering important energy savings while grasping the still untapped potential for resource use optimisation (see product policy). The EEB will hopefully continue to collaborate on energy efficiency related projects under H2020 programme, in the direction of better market surveillance, more empowerment of citizens to save on energy and making best use of digital tools to enhance energy conservation.

Activities:

- Monitor and safeguard the ambition of the revision of the energy labelling instrument;
- Collaborate with ECOS to secure the release and ambition of new measures and 2015/2017 work plan;
- Monitor the revision of existing and new measures to continue the related savings, notably the big savers such as windows, tap and shower heads, and iconic domestic appliances;
- Lead the Coolproducts Campaign and intensify positive communication on the policy to counteract a negative perception exacerbated by anti-European media;
- Participate in two H2020 projects related to energy efficiency;
- Organise two Coolproducts Working Group meetings.

Bioenergy

Following years of negotiations, in 2015 a deal was reached that revised EU biofuels legislation (Renewable Energy Directive and Fuel Quality Directive) to address indirect land use change (ILUC) and to cap the share of land-based biofuels counted towards EU targets. This was a strong political signal that there are limits to the role that land-based biofuels can and should play in the fight against climate change. As the legislation on biofuels has just been amended, work on the implementation of the biofuels revision will follow in 2016 and the EEB will be engaging in that work since a lot of important detail will be decided in those acts. The EEB will also continue communicating on what this cap means for the future of renewable energy policy. It will work to ensure that further improvements in biofuels policies are achieved so that there are no more sectoral targets, nor other incentives of any kind for unsustainable first generation biofuels post 2020. In that frame, it will also insist on the need for a strong sustainability framework for advanced biofuels taking into account the EU waste hierarchy and competing needs for biomass both within and outside the energy sector.

In 2016, the Commission is expected to propose a new renewable energy package for the period from 2020 to 2030. This policy package is expected to include a sustainability policy for all bioenergy, including biomass and biofuels. The EEB will push the Commission to make sure it delivers on this process and proposes a truly effective sustainability policy for bioenergy that includes a cap on the share of bioenergy in the renewable energy mix that counts towards the target reflecting the amount which can be produced sustainably, resource efficient use of biomass, full accounting of the net GHG impacts of bioenergy and environmental safeguards for non-climate aspects of biomass use. All these requirements must be based on an energy systems perspective which ensures a full and rapid phase out of all fossil energy.

Activities:

- Engage with the Commission and Member States on implementation of the biofuels/ILUC revision;
- Engage with stakeholders and the Commission on the decarbonisation of transport post 2020 avoiding the mistakes

- made with biofuels policy to date;
- Advocacy work especially towards the Commission to develop a meaningful policy proposal on bioenergy use in the 2030 climate and energy framework;
- Continued cooperation with EEB members through regular exchange in the bioenergy working group and by organising an annual NGO bioenergy meeting with a view to further developing the positions summarised here;
- A public awareness raising campaign to highlight the negative impacts of bioenergy deployment done without safeguards and the limits of sustainable supply of biomass in Europe while recognizing the value of policies stimulating sustainable bioenergy practices;
- Bioenergy newsletters to be sent to members every two weeks.

Energy Infrastructure

As part of the ongoing energy transition, the energy infrastructures in place also need to be adapted. The development of such projects must however be done in a way which minimises the risks to nature and environment, if the EU's environmental obligations and objectives as well as its climate goals are to be fully respected. The EEB collaborates with its national members and other NGOs in the process of energy infrastructure planning and development in the EU, including the identification of energy infrastructure Projects of Common Interest (PCIs).

On 18 November 2015, the second list of PCIs was published and the work for the next, 2016 ten-year network development plan (TYNDP) for gas and electricity started. The common objective is to assure that these projects of priority for the EU to achieve its energy and climate policy objectives are done in a transparent way, ensuring public participation and dialogue among different stakeholders, and fully respecting EU biodiversity and climate goals. This will lead to smaller impacts on nature, better public acceptance, and swift delivery of cleaner energy.

Activities:

- Advocacy work to ensure a more transparent and participatory process of developing and planning of essential energy infrastructure in Europe, including the selection of PCIs, with a view to ensuring that only environmentally acceptable projects which are also in line with EU climate objectives are delivered;
- Actively follow the development of EU-wide TYNDPs and PCI selection, and ensure that the next gas TYNDP does not inflate Europe's gas needs and acknowledges climate commitments.

Unconventional fossil fuels

The current discussion on energy security is used to justify increased use of indigenous energy sources, meaning nuclear, coal and unconventional fossil fuels (including shale gas) across Europe. Yet all these fuels including unconventional fossil fuels come with serious environmental and political risks: environmental e.g. due to the use of chemicals, and political as it has been a major distraction to the prospect of developing a high efficiency, high renewables climate and energy agenda. Despite calls for a binding instrument regulating the conditions for the exploration and exploitation of hydrocarbons using hydraulic fracturing (fracking), in January 2014 the Commission issued a non-binding Recommendation on the topic. While a new legal instrument on unconventional fossil fuels is not expected at the moment, the EEB will push for a review to pave the way to a binding instrument.

Activities:

- For 2016, address shale gas and other unconventional fossil fuels exploration in relevant EU policy and where feasible at Member State level, as well as, subject to availability of funding, monitor developments in relation to 'fracking', keep a watching brief on the implementation of the Recommendation and follow up on the review process.

Nuclear

The EEB has always rejected nuclear power and thus has never seen it as part of the solution to climate change. From the hazards associated with uranium mining through the risk of Fukushima-type accidents to the unsolved problem of radioactive wastes that will remain dangerous for millennia, the nuclear fuel cycle has no place in a civilisation powered by clean, renewable energy. While the outcome of UNFCCC COP-21 has increased pressure to reduce greenhouse gas emissions, it is important that this does not open the door to nuclear expansion.

Activities:

- 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 (the Aarhus/nuclear interface).
- Collaborate with NTW in order to strengthen the European NGO work on nuclear issues.



NATURE AND BIODIVERSITY



Biodiversity Strategy

The EU 2020 Biodiversity Strategy was adopted in 2011 with a view to halting the loss of biodiversity and preventing collapse of ecosystems that provide an array of services that are essential for our well being. The progress towards achieving the targets set out in the Strategy was assessed in 2015 in the context of a mid-term review of the Strategy. Following up on this assessment, the EEB will focus on ensuring that the ambition of the targets is maintained or increased, with additional measures being taken where needed to reach the Biodiversity Strategy and global Aichi targets.

Activities:

- Follow the implementation of different targets of the EU 2020 Biodiversity Strategy, in cooperation with our partners in the European Habitats Forum;
- Advocate for an ambitious implementation of current Strategy actions and adoption of additional measures where necessary for achieving the EU and global biodiversity targets;
- Support ongoing efforts to improve knowledge on ecosystem services (ESS) and steps towards better considering the important benefits provided by healthy, resilient ecosystems to society and the economy in decision-making;
- Carefully follow ESS-related policy developments at EU level with a view to ensuring that the increased focus on ecosystem services and their provision does not undermine traditional approaches to nature conservation based on nature's intrinsic value and does not happen at the expense of biodiversity;
- Support the development and use of nature based solutions, in particular with regard to climate change mitigation and adaptation, while calling for approaches that effectively maximise the benefits of such projects for biodiversity;

- Convene two meetings of the EEB's biodiversity working group.

Natura 2000 evaluation

The Birds and Habitats Directives, with the Natura 2000 network, remain the cornerstone of Europe's efforts to safeguard its biodiversity. The effective management and conservation of the network is of the highest priority for the EU to reach not only its biodiversity targets but also its climate and energy targets. In the first half of 2016, the Commission will present the results of the Fitness Check of the Birds and Habitats Directives. There continues to be a risk that the Commission proposes a revision of the Directives as a result of the Fitness Check and if so, the EEB will have to invest significant resources in mitigating the risks of such a revision process. If the Commission announces primarily other measures to support the implementation of the Nature Directives EEB will identify and support those which can help ensure that the objective of the Directives are met.

Activities:

- Implement a campaign for defending nature and EU nature protection policy in Europe;
- Actively follow the evaluation of the Birds and Habitats Directives and safeguard the ambition of the EU biodiversity regulatory framework.

No net loss initiative

As part of the EU Biodiversity Strategy, the EU is exploring ways to ensure that there is 'no net loss' (NNL) of ecosystems and their services for areas and species not covered by existing EU nature legislation. The Commission's NNL initiative is expected to be published in 2016. This can become a mechanism which locks in biodiversity loss by planning for biodiversity to be sacrificed in one place to restore a supposedly equivalent amount of biodiversity in another place. The

EEB will continue to engage in this debate with the aim to ensure that any new initiatives leading to further harm to biodiversity are avoided and already degraded ecosystems are restored.

Activities:

- Advocate to ensure that the 'No net loss initiative' avoids further degradation and loss of biodiversity and achieves restoration of degraded ecosystems, building on improved integration of biodiversity in policies primarily responsible for biodiversity loss and improved implementation and stringent enforcement of existing EU environment legislation.

Invasive Alien Species

Invasive alien species (IAS) are one of the main drivers of biodiversity loss both in Europe and globally and can cause significant damage also to human health and the economy. In the EU alone, the costs are estimated to be at least €12 billion annually. The adoption of an IAS Regulation in 2014 therefore represented a vital step in addressing this problem in the EU, which is expected to be further exacerbated by climate change, habitat destruction and increased global trade and travel. The Regulation entered into force in January 2015. For it to effectively deliver on its objective of preventing, minimising and mitigating the adverse impacts of invasive alien species on biodiversity, ambitious implementation at both EU and Member State level will be needed. The EEB will follow closely the implementation process, including the development of the list of the IAS of EU concern and Member States' identification of pathways of introduction for those species as well as their establishment and implementation of actions plans (or a set of actions) in order to prevent the introduction and spreading of these species.

Activities:

- Support the IAS Regulation implementation process at the EU level, including by ensuring the adoption of an ambitious list of IAS of EU concern, and providing support for advocacy work for national level implementation in different Member States..

Soil

After the continued opposition of a few Member States to a Soil Framework Directive, the European Commission decided to withdraw its 2006 proposal for a first-ever dedicated legal instrument for protection of soil in the EU. Nevertheless, the 7EAP adopted in 2013 commits Member States to reflect on how soil quality issues could be addressed within a binding legal framework at the EU level. The People 4 Soil civil initiative, supported by the EEB, is aiming at a European level recognition of soil as a common good. The EEB will continue to make the case for a dedicated EU legal instrument for soil protection, not least because of soil's crucial role in storing carbon.

Activities:

- Advocate for the adoption of legal obligations at the EU level for protecting soils, preferably within a dedicated framework;
- Support the People 4 Soil initiative in establishing a European network on soil protection and in raising awareness of soil issues;
- Organise one working group meeting.

Sustainable agriculture

2015 was the first year of implementation of the reformed Common Agricultural Policy (CAP) after years of negotiations. It was also the year during which Member States finalized their decisions on greening implementation and it became clear that most of them had no real intention to green the policy on the ground whatsoever but rather aimed to secure business as usual. This was confirmed in the outcomes of a study commissioned by the EEB to the IEEP analysing nine Member States' choices. By the end of 2015, all of the 118 Rural Development programmes had been approved, where again the lack of environmental ambition became quickly striking. 2015 was also the year of simplification, translated by several Member States as a basis for further dismantling of the bits left from greening.

In addition to challenging these developments, the EEB will in 2016 prepare for the next reform post-2020 and also in the shorter term for the so called mid-term review of the ecological focus areas (EFAs) policy (2017/2018). A

key consideration in that debate is that the willingness to green the policy has completely faded away and that this seriously calls into question the justification for this policy to continue as it is. Engaging with a larger number of key stakeholders than during the previous reform (social, development, health NGOs, consumers, chefs etc.), we will seek to create a momentum in view of the next reform and will call for better linking of food and farming.

The new campaign will also be built on the outcome of an external evaluation of CAP reform post 2013 done by an external expert and funded by the MAVA Foundation. It will commission a study to analyse different policy options (no direct payments, food policy etc.) and on the basis of what future policy is best for people and natural resources it will develop a big campaign in view of 2020. This will be done in parallel with the continuation of the evaluation and monitoring of greening for the gathering of evidence and facts (especially in view of the EFAs revision) on the failure of the reform.

Likewise the EEB will continue strengthening the work of the agri working group in other agri-related topics such as pesticides and endocrine-disrupting chemicals (EDCs), livestock sustainability, air quality or TTIP. The EEB will also organise two working group meetings, one at the beginning of the year linked with a conference on Rural Development and another one later in the year. These meetings will be used to analyse the different policy options and decide on the strategy for the next year and concrete actions on CAP post 2020. We will also continue being strongly involved in the European Network for Rural Development (ENRD) and in the Civil Society dialogue groups. Increased staff capacity will eventually be needed to enable the post 2020 campaign to fully deliver.

Activities:

- Continue monitoring and analysing the implementation of the new CAP especially in comparison with previous programming period (Rural Development) and continue communicating worst cases to DG ENVI;
- Publish a set of factsheets on the truth behind the official numbers when it comes to Rural Development and the environment;
- Continue securing involvement of members in Rural Development programmes (monitoring committees etc.);
- Continue engaging in the ENRD as a member of the steering committee and the general assembly;
- Launch some in depth reflections on what concrete policy is needed when it comes to sustainable food and farming post 2020 (scenario analysis approach), having regard inter alia to the role of agriculture in relation to climate change and call on the Commission to conduct its own in depth fitness check of the Policy;
- Secure a large coalition of stakeholders for the post 2020 campaign (made up of NGOs but also chefs, agroecology scientists etc) through the use of the newly established Sustainable Food and Farming Platform (SFFP);
- Continue the increased collaboration with the air working group on the NEC revision for ammonia and methane in particular;
- Prepare an advocacy plan and a communication plan for the post 2020 campaign for the years ahead based notably on the external evaluation done for the previous one;
- Increase the work and communication on pesticides impacts to health and environment in relation to EDCs in particular (non toxic environment);
- Closely monitor the impacts of TTIP on food and farming and make these impacts better understood and publicly discussed;
- Closely monitor the role given to agriculture in the climate and energy package post 2020 (Land Use, Land Use Change and Forestry; Effort Sharing Decision) and more generally promote the climate-proofing of agriculture and food policies;
- Organise two meetings of the EEB's Agriculture working group, one linked with a conference on Rural Development in early 2016;
- Agriculture newsletter sent every two weeks to members.

Genetically Modified Organisms (GMOs)

The debate on GMOs at an EU level started again in 2014. In 2015 a deal was reached between the Parliament and the Council in second reading on the proposal to allow Member States to introduce/maintain national bans on GMOs.

Activities:

- ➔ In 2016, the EEB will monitor relevant developments and continue to push for a comprehensive EU system of authorisation which prevents environmental damage and the contamination of conventional and organic farming.



INDUSTRY AND HEALTH

REACH Implementation

The continuous development of safer chemicals and acceleration of the pace at which safer alternatives are introduced into the market are needed in order to achieve a sustainable chemical industry and a toxic-free environment. Unfortunately, eight years after the entry into force of the REACH Regulation (Registration, Evaluation, Authorisation and Restriction of Chemical Substances), progress in implementation is slow, especially for restricting hazardous chemicals in the market. Only a few restrictions have been included in REACH annex XVII and the authorisation list of most problematic substances (REACH annex XIV) is still not comprehensive enough. However, industry's backlash on authorisation is succeeding in having the Commission (DG GROW) committed to slow down, further simplify and streamline the authorisation process in order to facilitate companies to easily get permission to manufacture and use substances of very high concern in the EU, against the protection and safer products goals of REACH.

Moreover, the quality of the information provided by industry did not improve (69% of the registration dossiers are still not in compliance) and does not allow European citizens to know the risks associated with the chemical substances to which they are exposed, nor to make informed decisions on safe handling.

The Commission started the supporting studies for the upcoming REACH review. On the one hand, DG GROW is focusing on the costs for industry of the REACH implementation. On the other, DG ENV focuses on the benefits of REACH for health and environment.

In 2016, the EEB will continue to be closely involved in REACH implementation and will advocate for the phase-out and restriction of the most problematic substances in Europe while promoting substitution, as well as step up its efforts to use the legal opportunities to close significant gaps under REACH in relation to endocrine-disrupting chemicals (EDCs), the poor quality of the registration dossiers and the dissemination of information to citizens.

The focus will be to achieve the substitution of chemicals of concern by 2020, to tackle 'cocktail' effects, and to address transparency issues as well as delivering on information generation on chemicals through REACH to be used for other EU policy frameworks (e.g. circular economy, Ecolabel, Ecodesign etc).

Activities:

- Represent environmental interests in the European Chemicals Agency (ECHA) Committees and its Management Board as well as the Competent Authorities' CARACAL meetings;
- Participate actively in REACH implementation, focussing on achieving the substitution of hazardous chemicals, prioritising substances of very high concern (SVHCs) by 2020, ensuring that authorisations are not granted for SVHCs for which feasible alternatives are available in the market, better quality of registration dossiers, dissemination to the public of information on chemical substances to which they are exposed, and tackling cocktail effects;
- Organise one or two meetings of the EEB Chemicals working group.

EU regulation of nano materials

Year after year the Commission continues delaying action to start regulating the use of nanomaterials in the EU. The only initiative undertaken has been an Impact Assessment study to decide whether an EU-wide register of nanomaterials is needed and whether to amend the REACH annexes and guidance. Both processes are however stuck at the Commission premises since 2012.

In its current form however, REACH has no provisions and instruments that effectively cover nanomaterials. In 2015, the EEB will continue with the intensification of its work on nano started in 2012 and campaign for the development of a new nano-regulation, as well as engage in other relevant processes such as the REACH review.

Activities:

- Follow and seek to influence the preparations for the Commission's proposals for amending REACH annexes;
- Ensure that the Commission will develop a nano register at European level, useful for both competent authorities and European citizens;

- Insist that the Commission takes additional action to regulate nanotechnology outside the context of REACH;
- Organise one or two meetings of the EEB nano working group.

Air – Ambient Air Quality

Poor ambient air quality is a major environmental health problem in Europe. In urban areas, over 90% of the population is exposed to levels which are considered dangerous for their health. Many Member States face infringement action because they still fail to comply with existing EU ambient air quality standards. Whereas the quick implementation of current legislation is an absolute priority, the EU should also look into revising its standards to align them with the guidelines set by the World Health Organization (WHO).

Activities:

- Highlight examples of best practices aiming at improving urban air quality, in cooperation with EEB national members;
- Monitor Court of Justice of the European Union and domestic court cases related to breaches of ambient air quality limit values in cooperation with EEB members and legal experts;
- Step up efforts to address air pollution from key sectors such as road transport, shipping, industry, agriculture and domestic heating;
- Organise one or two meetings of the EEB's air working group.

Air - NEC revision

On 18 December 2013, the European Commission adopted a package of proposals to improve air quality in Europe. The centrepiece of the package is a proposal to revise the National Emission Ceilings Directive (NEC). The NEC Directive is the cornerstone of EU air legislation and its revision will set new emission reduction commitments for major air pollutants for 2020, 2025 and 2030. If ambitious enough, the outcome of this process will lead to significant benefits for Europeans' health and environment.

Activities:

- Ensure that the European Parliament and Member States adopt an ambitious new NEC Directive, and to this end, press the Council to accept a health impact reduction outcome which is in line with the Parliament and Commission position, support binding emission reduction commitments for 2025 and limit the number of flexibilities and derogations which make the Directive less effective;
- Communicate the benefits of an ambitious NEC Directive to Member States, the European Parliament and the wider public;
- Inform EEB members about the ongoing decision-making process and ensure their effective representation in Brussels;
- Organise one or two meetings of the EEB's air working group.



Environmental Noise Directive

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 but has not done so. Instead, the European Commission has decided – in the context of “Better Regulation” – to evaluate the Environmental Noise Directive with a view to regulatory fitness. As part of this process, the Commission launched a public consultation running until early 2016.

Activities:

- Monitor, if appropriate, developments on EU noise policies, in particular in relation to the END’s review and fitness check performed by the European Commission;
- Prepare a response to the European Commission’s public consultation on the END fitness check and mobilise NGOs to take part in the consultation.

Mercury at EU level

At the EU level, in 2016, the EEB will continue pushing for rapid EU ratification of the Minamata Convention on mercury, as well as the implementation of remaining actions under the 2005/2010 strategy and for the adoption of new measures, which in turn will facilitate implementation of the new mercury treaty.

Activities:

- Promote further legal action via the anticipated EU legislative package on mercury and carry out advocacy work supporting EU implementation of the Minamata Convention requirements going beyond minimum demands, including but not limited to:
 - o expanding the scope of the mercury export ban and storage regulation to products which are banned in the EU,

- o adopting measures towards a mercury phase-out in dentistry
- o adopting ambitious Best Available Techniques (BAT) conclusions with Associated emission Levels (AELS) in the new Large Combustion Plant Best Available Techniques Reference Document (BREF), in the Waste Incineration BREF and other BREFs as relevant, and
 - o the inclusion of mercury under the National Emission Ceilings directive;
- Follow up relevant EU work in preparation of the EU’s ratification of the Minamata Treaty, as well as relevant work at Member State level;
- Monitor the implementation of existing mercury legislation to the extent possible.

Minamata Convention on Mercury

The Minamata Convention on Mercury was adopted by world governments in October 2013, in Kumamoto, Japan, under the auspices of the United Nations Environment Programme (UNEP). The treaty has been signed by 128 countries and ratified by 20 (by the end of 2015). In 2016, the EEB will continue to lead the Zero Mercury Working Group (ZMWG) and the Zero Mercury campaign, pushing for early entry into force of the treaty. It will seek to ensure an effective representation of NGOs in the relevant meetings, during the interim period, until the treaty enters into force after 50 countries have ratified it. Furthermore, during the interim period, the EEB via ZMWG will seek to assist NGOs mainly in developing countries to prepare for ratification and implementation of the treaty.

Activities:

- Coordinate and lead NGO input into the intergovernmental processes during the interim period, and preparation for the first Conference of the Parties (COP) meeting, including organisation of NGO preparatory meetings as the process moves forward to

- foster quick EU and developing countries' ratification and eventually effective implementation of the treaty;
- ➔ Coordinate and support NGOs attending the intergovernmental negotiation committee/COP meetings, as well as NGO experts attending UNEP expert groups;
 - ➔ Support international projects, mainly in developing countries, in preparation for the ratification and implementation of the treaty as well as on mercury reduction activities.

Industrial Emissions Directive

Following the adoption of the Industrial Emissions Directive (IED) in 2010, which regulates major industrial activities, attention moved to implementation through permitting. The EEB will increase capacity and involvement in 2016 to actively participate in the implementation of updated BAT standards, in particular at the permitting level. The Sevilla Process, which aims to set ambitious standards for environmental performance benchmarks – so called Best Available Techniques (BAT) Reference Documents (BREFs), has gained in political importance since BAT conclusions are now legally binding under the IED. 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.

The IED will be up for review as regards the potential extension of the minimum binding requirements for certain pollutants or activities – so called European Safety Net, for which the Commission was due to provide a proposal at the latest by 7 January 2016 together with an implementation report. We will push for addressing the polluting sectors and closing gaps on specific pollutants.

The transposition and implementation of the Seveso III Directive will be followed up by EEB members.

Activities:

- ➔ Organise technical expert input, coordinate and provide active NGO involvement in the Sevilla process;
- ➔ Set up and manage a dedicated NGO Sevilla platform (dedicated website);
- ➔ Support members in enforcement work;
- ➔ Subject to funding, work on implementation of BAT conclusions for the Iron and Steel Sector;
- ➔ Be involved in the upcoming legislative review of IED;
- ➔ Organise one or two meetings of the EEB's industry working group.

Classification, Labelling and Packaging Regulation

The Classification, Labelling and Packaging (CLP) Regulation 1272/2008 aligns previous EU legislation with the GHS (Globally Harmonised System of Classification and Labelling of Chemicals), a United Nations system to identify hazardous chemicals and to inform users about these hazards. It also has links to the REACH legislation.

Activities:

- ➔ Keep a watching on developments in relation to the CLP Regulation.

Light pollution

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 per cent of the natural night sky brightness.

Activities:

- ➔ With the support of interested member organisations, make an assessment of the extent and nature of the problem of light pollution, the policy options for addressing it and whether and how the EEB could effectively engage in this topic.

WATER

Water Framework Directive

The Water Framework Directive (WFD) continues to be the EU's central piece of legislation aiming to ensure a comprehensive protection of Europe's waters. Although some progress has been achieved since the adoption of the WFD, the improvements have however been relatively modest and significantly below original expectations. The target of getting all European waters in good condition by 2015 has been missed by far – about half of European surface waters have indeed not reached good ecological status in 2015. The second river basin management plans (RBMPs), which Member States have adopted towards the end of 2015, will have to be implemented in a much more ambitious way than in the first planning period, especially the modifications of water bodies and unsustainable agricultural practices, are to be adequately tackled, and significant improvements in status achieved by the end of the second managing cycle. The EEB will aim to bring the required ambition into the second RBMPs through actively engaging in the WFD implementation processes at the EU level and by supporting members in their advocacy work at national level.

Activities:

- Ensure ambitious implementation of the 2nd RBMPs, including through active participation in activities of the WFD Common Implementation Strategy process;
- Highlight to the Commission inadequate 2nd RBMPs in view of the Commission's assessment of the 2nd RBMPs;
- Actively follow the official implementation process of the WFD as well as NGO initiatives where appropriate;
- Push for hydromorphological pressures, including those from navigation and hydropower developments, and diffuse pollution from agriculture to be adequately addressed;
- Support members in their complaints

about poor implementation and in their work to achieve an ambitious implementation of the 2nd RBMPs;

- Push for synergies between WFD and the Floods Directive (specifically, implementation of the 2nd RBMPs and the 1st Flood Risk Management Plans);
- Help to ensure that the WFD is not watered down and that the non-deterioration principle is applied at project level by Member States;
- Support members in their efforts to secure financial means for the monitoring of the implementation of the 2nd RBMPs;
- Organise two meetings of the EEB's water working group;
- Emphasise the importance of groundwater ecosystems;
- Advocate for a coherent position that privatization in the water sector should not be forced or imposed on any Member States or candidate countries by the European Commission, in line with the Human Right to Water initiative.

Priority Substances Directive

Chemical water quality aspects are primarily regulated by the Directive on priority substances which sets maximum allowed concentrations of harmful chemicals in surface water. The list of substances is regularly reviewed with new substances added or concentrations changed. The current process of identification of substances to be regulated under the Priority Substances Directive started in 2014, with a proposal due to come out in 2017. The EEB will push for a significantly expanded list of regulated substances with stricter standards. At the same time it will aim to ensure that pharmaceuticals damaging for the aquatic environment are properly regulated at the EU level and that chemical combination effects are considered when regulating substances.

Activities:

- Work on chemical aspects of ensuring good water status as a follow up to the 2013 revision of the Priority Substances Directive, including by actively engaging in the process of development of a revised list of priority substances and ensuring that environmental risks from pharmaceuticals are adequately tackled;
- Encourage EEB members to monitor and gather information on pharmaceuticals and other possible additions to the priority substances list.

New instrument on water reuse

The lack of standards for re-used water was identified in the Blueprint to Safeguard Europe's Water Resources as one of the gaps that would potentially require the current framework to be complemented by action of a legislative nature. In cooperation with Member States and stakeholders, the Commission is exploring possible options for an EU-level instrument to encourage water re-use, including a regulation establishing common standards. The proposal is scheduled to be presented in autumn 2016. In case the Commission tables a legislative proposal on water re-use, the EEB plans to actively follow the negotiations. In the meantime the Commission has just presented a first draft of a guidance document on the use of reclaimed water.

Activities:

- Contribute to the development of the guidance document on the use of reclaimed water;
- Push for a legislative instrument on water re-use and carry out advocacy work in case a legislative proposal on water re-use is tabled. .



Marine Protection

With over 80% of assessed fish stocks in the EU deemed as overfished, the newly adopted Common Fisheries Policy (CFP) which will be in force for another 10 years will now need to safeguard Europe's fish stocks and secure a sustainable future for Europe's fisheries. In addition, a number of legal instruments will continue to play an important role in protecting the marine environment, in particular the implementation of the Marine Strategy Framework Directive and the Maritime Spatial Planning Directive adopted in 2014. At the same time, Blue Growth is gaining attention and momentum through the Commission's Blue Growth Strategy which is expected to add to existing pressures on marine resources.

Activities:

- The EEB will continue in 2016 to cooperate with Seas at Risk and the wider NGO coalition it is part of to address these challenges, providing political support where relevant.

Adaptation to climate change

Water is the primary medium through which climate change influences ecosystems and thus societies. Climate change is projected to lead to major changes in yearly and seasonal precipitation and water flow, flooding and coastal erosion risks, snowmelt, sea levels, groundwater availability, water quality, and the distribution of species and ecosystems.

At present, water stress is already high in some areas of Europe and climate change puts extra pressure on water resources with increasing water scarcity and droughts and increasing risk of floods. Therefore water management is expected to play an increasingly central role in adaptation to climate change.

The step-wise and cyclical approach of the river basin management planning process makes it well suited to adaptively manage climate change impacts and long term climate projections should be built in to the design of river basin management plans. RBMPs should clearly indicate how climate change projections are considered in the assessment of pressures and impacts, monitoring programmes and appraisal of measures.



Concerning measures, priority should be given to those ones that are able to retain water in catchments in a natural way, thus reducing water stress and increase resilience. Those natural water retention measures have significant potential in assisting to balance available water resources and demands while taking account of ecosystem needs and to manage flood risk in a way that ensures enhancing the health of ecosystems.

Activities:

- Call for adequate consideration of climate change impacts in the 2nd RBMPs;
- Push for more extensive use of natural water retention measures [and for the generation of synergies with the Floods Directive];
- Create synergies with climate change policies and take advantage of its prominent status.

CIRCULAR ECONOMY, PRODUCT AND WASTE POLICY FOR RESOURCE CONSERVATION



Circular economy and resource conservation

The Resource Efficiency Roadmap was an important element of the Europe 2020 Strategy and resource efficiency is reflected in the 7EAP to integrate environmental sustainability into different EU policies. In 2016 the revision of the Europe 2020 Strategy is expected to continue after having been put on ice in 2015. The new circular economy package will be discussed among the European institutions, potentially addressing also biotic resources, even if a clear focus is expected on abiotic materials. As part of the EEB's effort to use this Europe 2020 strategy revision and circular economy package to give sustainable development an overarching status in EU policy, we will seek to ensure that resource conservation remains high on the political agenda of the next Commission. We will further work on ways to achieve a reduction of resource use in absolute amounts, to tackle the rebound effect.

Activities:

- Follow up the development of circular economy and resource efficiency related initiatives including targets and indicators to assess and influence the success of the EU strategy;
- Participate in high level processes related to circular economy and resource efficiency;
- Participate in the Resource Cap Coalition.

Waste Framework Directive revision

As part of the Waste legislation review, a Commission proposal was released in July 2014 but withdrawn by the new Juncker Commission at the end of that year. In December 2015, a new circular economy package was released, encompassing the revision of waste policy, notably the Waste Framework Directive. The EEB will use

this opportunity to push for stronger recycling targets and the introduction of waste prevention targets and measures, drawing from the experience of its members in implementing the existing Waste Framework Directive. This will also be a major opportunity to link waste and product policy more, as part of an integrated project on delivering a resource-efficient Europe, building on extended producer responsibility schemes and provisions towards eco-design of products.

Activities:

- Advocacy work during the revision of the Waste Framework Directive, notably requiring more ambitious waste prevention and recycling targets with regard to municipal solid waste and industrial and commercial waste;
- Require more harmonized and widely spread economic instruments, notably extended producer responsibility, landfill and incineration taxation and pay-as-you-throw schemes for waste minimisation;
- Include legal provisions addressing more the design stage of non-energy-related products (not yet covered by Ecodesign);
- Prevent hazardous substances being re-injected into the economy;
- Push for a harmonised calculation method for reporting achievements targeting ultimately the output of recycling processes;
- Develop advocacy material and support NGO communities in their national advocacy, notably in Poland and other central and eastern countries;
- Act as a helpdesk on implementation of waste policy;
- Organise two EEB working group meetings;

- Cooperate with Zero Waste Europe and participate in NGO and multi-stakeholder coalition platforms involved in waste management;
- Take part in a H2020 project related to waste;
- Develop further the Make Resources Count campaign.

Revision of the Packaging and Packaging Waste Directives (P&PWD)

The Packaging and Packaging Waste Directives (P&PWD) will be going through the co-decision process in 2016, as part of the circular economy package. This is a policy addressing the whole life cycle of the packaging, and thus enabling to optimise from the design stage. Packaging streams are iconic of the linear throw-away society and their re-orientation towards circular economy models represents a major challenge as well as a major opportunity.

As the design stage of packaging is determined by the formulation of the essential requirements for packaging, the EEB will strive for revising these provisions which have not been updated since 1994. Defending reuse targets and deposit-refund and securing increased recycling ambition, notably for plastic and wood packaging, but also for paper, metal and glass, will be key.

Activities:

- Orient the P&PWD towards circular economy models, notably through the review of the obsolete formulation of the essential requirements and boosting extended producer responsibility;
- Set prevention and reuse targets distinct from recycling targets;
- Advocate for deposit-refund systems integrated to producer responsibility schemes to lever reuse and increase collection rates;
- Boost recycling targets with associated separate collection, notably for plastics and wood packaging;

- Set a coherent recycling definition for all the Directives concerned, including quality criteria and leading to certification of reuse and recycling facilities.

Revision of the Landfill Directive

The Landfill Directive, which dates from 1999 and mainly sets some diversion targets for biodegradable waste, belongs to the package of waste directives which were part of the 2014 waste target review and were withdrawn. In 2016, the co-decision process on the Commission proposal on that review that came out at the end of 2015 will be intensifying. The EEB will push for the existing diversion targets to be transformed into a ban on direct landfilling of recyclable and compostable waste. The key objective is to divert waste from landfill while preventing that the diversion contributes primarily to increased incineration and energy recovery rather than to material recovery.

Activities:

- Advocate for a ban on landfilling of untreated waste, a phase out of recyclables and compostables going to landfill or incineration, and increased use of taxes on landfilling and incineration;
- Promote the use of economic instruments to help to address the implementation gap;
- Run a joint campaign with Zero Waste on waste reduction and zero residual waste to landfill or incineration.

Resources conservation through product policy

One major argument used by the Juncker Commission to justify withdrawing the 2014 waste policy revision proposal and to promise a “more ambitious” circular economy package was the absence in the former of clear action and provision towards product design, the development of markets for secondary raw materials and incentives for new resource-efficient business models. The co-decision process on the new package creates a major opportunity to promote ideas in those

directions, to link more product and waste policy and ensure policy framework conditions supportive of a more resource-saving and circular economy.

Existing instruments such as Ecodesign, Ecolabel and green public procurement (GPP) need to be reinforced to deliver more than today. Initiatives such as Product Environmental Footprinting (PEF) and the Raw Materials Initiative need to be made more operational and adapted to those instruments. In addition, the whole debate on circular economy and the co-decision process that will run full swing in 2016 will provide opportunities to eventually promote a new legal framework for non-energy related products, not yet covered by any specific instruments, and to initiate new schemes and economic incentives for longer lasting, more repairable and recyclable products, as well as increased use of recycled material. Furthermore stronger links should be established between product and chemical policy to prevent the use of hazardous materials and to avoid their re-injection into the economy within recycled material.

Activities:

- Build the case for addressing resource use in Ecodesign policies, building on the EEB study released in 2015;
- Investigate flexible and effective ways for EU product policies to mitigate climate change and other relevant environmental impacts delivering both energy and material savings, accommodating the concerns of frontrunning businesses and triggering innovations;
- Influence the preparation and development of Ecodesign implementing measures, notably for electronics and information and communications technology-related products and for revised measures for white goods;
- Defend an ambitious Ecodesign Work Plan in the context of the circular economy package;
- Push for the development of standardised measurement and rating methods to assess and improve resource use in products under Ecodesign policy;

- Promote the modulation of fees within producer responsibility schemes to encourage design improvements;
- Multiply exchanges with progressive/innovative business to understand their economic models and the framework conditions required to help them become mainstream;
- Support the revision of essential requirements under the packaging Directive;
- Co-facilitate the coalition for durable and repairable goods and organise events on the topic in partnership with service providers, consumers and reuse partners;
- Organise two working group meetings and/ or NGO trainings/year on product policies and resource use and monitor national developments that could pave the way for/inspire European policy;
- Develop further the Make Resources Count campaign;
- Orient the PEF and Raw Materials initiatives to enhance more resources conservation;
- Link with chemical policy and hazardous waste management to further detoxify products and recycled materials.

Ecolabel

The EEB has for more than two decades provided expert input on behalf of environmental NGOs into the development of technical criteria for the EU Ecolabel, working in cooperation with the consumer organisation BEUC, and we will continue to do so in 2016.

Activities:

- Coordinate expert input into Ecolabel criteria development.



Green Public Procurement (GPP)

Currently DG Environment develops criteria for different product groups which Member States can use, on a voluntary basis, when developing their GPP policies. Making sure the criteria are set with sufficient ambition is essential, but the EEB will also use the opportunity to set the GPP policy in the perspective of circular economy, as GPP represent a crucial lever for pulling up the market penetration of resource efficient products and services.

Activities:

- Coordinate expert input into GPP criteria development;
- Advocate for GPP to be more systematically used by local authorities to contribute to the circular economy transition;
- Advocate for more binding GPP, or at least making GPP the default approach for public procurement contracts.

HORIZONTAL LEGAL INSTRUMENTS

Concerning all issues under this heading:

Activities:

- Coordinate via the EEB law group NGO input into the debates and votes
- Organise one or two meetings of the EEB law group
- All the EEB's sectoral working groups will also deal with enforcement issues

Better Enforcement – new tools and complaint handling

In its March 2012 Communication on how to improve enforcement of EU environmental law through better knowledge and responsiveness, the Commission put forward some general proposals for new tools including a concept for a "Structured Implementation and Information Framework" (SIIF) and better monitoring in general. The EEB will advocate for the development of the SIIF, more transparency and better information sharing being an important tool for improving enforcement. The use of EU funding for activities that breach EU law is a particular concern. The EEB Law Group started in 2014 to discuss better information exchange on complaints and the possibility of a more strategic approach to the submission and follow-up of complaints. This will be continued in 2016.

Activities:

- Follow up with regard to initiatives for better reporting, more transparency and sharing of best practice;
- Strengthen cooperation and information exchange on complaints, where appropriate submitting strategic consolidated complaints.

Compliance Assurance (including environmental inspections)

The EEB has for many years asked for a new legal instrument to improve and harmonise the quality of environmental inspections and so strengthen the enforcement of environmental laws, and therefore welcomed a positive reference to this in the 7EAP. Unfortunately the Barroso II Commission failed to issue a legislative proposal, despite the fact that considerable preparatory work was undertaken by DG Environment. The Juncker Commission also did not make much visible progress on the dossier during 2015, but work apparently continued, with the scope of a potential initiative being broadened beyond inspections to encompass compliance assurance in general. This would cover 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. To include 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. All EU institutions underline the importance of better implementation so that the EU's impressive body of environmental law will finally deliver as intended. A Compliance Assurance Directive with a strong inspections and surveillance part could make a major contribution. The 'dieselgate' scandal, having implications that go significantly beyond the specific issue of vehicle testing, has highlighted the need for better enforcement of environmental law in general and has created a new opportunity for making progress in this area.

Activities:

- Continue to press the Commission to issue a legislative proposal on compliance assurance and call on the Presidencies to request it;
- Give input to the Commission during the preparation of the proposal;

- Once a proposal is issued, follow it through the co-decision process to its adoption with a view to ensuring that it will not hamper or weaken inspection provisions already existing in sectoral law;
- Discuss the draft with Commission officials in a special session of the EEB Law Group.

Environmental Impact Assessment

Since its adoption in 1985, the Environmental Impact Assessment (EIA) Directive has been one of the major European instruments for environment and health protection. The revised EIA Directive entered into force in May 2014 even though the adopted text fell well short of what NGOs had originally hoped for. The revised 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.

Activities:

- Continue collecting information on complaints cases about bad transposition of the EIA Directive or about breaches in its application;
- Whenever possible, provide support to EEB members having submitted such cases;

- As mentioned above, encourage strategic complaints;
- Prepare guidance on the changes in the revised EIA Directive and encourage members to follow the transposition into national law;
- Monitor the transposition process which due to the three-year transposition period will in many Member States only start to get under way in 2016;
- Ask for training sessions and guidance documents for those who have to apply the new directive.

Environmental Crime Directive (ECD)

The Environmental Crime Directive requires EU Member States to provide for criminal sanctions for the most serious environmental offences. It was adopted in 2008 and was due to be transposed by the end of 2010, though many Member States failed to meet this deadline.

Activities:

- Collect information on cases on the application of the Environmental Crime Directive, in cooperation with other organizations such as BirdLife which started a project on breaches of the ECD with regard to bird hunting.



GLOBAL POLICIES AND SUSTAINABILITY

The notion of a sustainable Europe, even if it can eventually be achieved, does not make sense within an unsustainable world. The success of efforts to develop stronger EU policies on the environment cannot be viewed in isolation from developments elsewhere in the world. European lifestyles are still built on the account of the people and resources of the Global South. Material and financial flows are going from South to North, which implies an active process of impoverishment and enrichment. One example is resource extraction, with all the environmental and social damage it causes; land-grabbing is another. European solutions must be founded on the principle of global social and environmental justice.

Global environment and sustainable development agenda

Europe has historically been and currently remains responsible for a disproportionately high share of global environmental destruction and resource consumption, thus tackling its own excessive ecological footprint is paramount. However, in addition the EU needs to play a leadership role in the global and inter-regional debates on environment and sustainability, even if its influence on the world stage has diminished. That role needs to be a constructive one, exchanging best practices with developed countries in achieving the transition to sustainable equitable economic models that go beyond GDP as a measure of progress and sharing some of its good practices e.g. in the field of governance.

The defining of the SDGs has provided an opportunity to ensure that environmental considerations feature more prominently in discussions on the development paradigm. The challenge is however to convince the environmental movement to be actively engaged in the promotion and implementation of the SDG agenda.

The EEB is engaged actively at global level as an Organising Partner for the Major Group of NGOs, with the task to bring together all involved environmental, development, human rights and other NGOs and build upon a new development paradigm shift, where wellbeing and recognition of planetary boundaries are key, rather than economic growth. In 2016, the EEB will be actively engaged in the global and inter-regional decisions on the monitoring and review mechanisms. This will be done in the UN High-Level Political Forum (HLPF) meetings, and the UN Economic Commission for Europe (UNECE) regional consultation meetings. The EEB will facilitate the global NGO position, as well as try to influence the position of the EU in those discussions by

providing direct input to them.

The EEB will follow the UNEP and UNECE discussions on the SDG process and in 2016 will facilitate as co-chair of the UNEP Major Groups Facilitating Committee at the HLPF and 2nd UNEA meeting.

Activities:

- Participate in and provide input to the HLPF process, as Organising Partner for the MG of NGOs;
- Participate in the UNECE meetings related to SDGs and coordinate NGO input for UNEA;
- Monitor and influence EU involvement in and provide direct input to UNEP/UNEA-2 and the associated processes; integrate EEB's EU policy work in those processes;
- Subject to funding, update the Atlas of Environmental Justice, a worldwide mapping of ecological conflicts; within the framework of the Environmental Justice Organizations, Liabilities and Trade (EJOLT) project;
- Reach out to other sectors in society in order to encourage them to involve the environment in their SDG work.

Environmental justice in supermarkets

In 2015, the share of supermarket store brand products reached 40 percent of EU food retail sales. The share of store brands is correlated to the concentration level

in (food) retail and has been identified as a key driver in price competition and the further weakening of the position of those producers who were already disadvantaged, especially in developing countries. Unfair trading practices often go unchallenged, because suppliers are afraid, for a good reason, of losing a major customer if they speak out. The forcing of prices below production costs, conditional purchasing agreements, and unjustified (cosmetic) standards (based on appearance) are widespread. The latter is leading to an increase of wasted food and the associated resources (energy, water etc), with obvious environmental implications.

As part of a consortium (DEAR-project), the EEB is a partner in the three-year project 'Supply Cha!nge – make supermarkets fair' to tackle this problem. The project aims to push supermarkets, governments and the EU to support improved labour conditions in the Global South and reduce environmental damage along the supply chains.

Activities:

- Take the lead in the policy work within the Supply Cha!nge project (unfair trade practices, SCP, corporate accountability, ..);
- Take part in the campaigning and dissemination work (website, flyers, photo competition, etc.).

Pan-European outreach (UN Economic Commission for Europe (ECE) / European ECO Forum)

Pan-European processes such as those established under the auspices of UNECE have been an important source of environmental policy and legislation with significant implications for the EU. Examples include the 'Environment for Europe' process and multilateral environmental agreements on air pollution, water, EIA, industrial accidents and environment democracy (Aarhus). In 2016, the EEB will continue the promotion of NGO involvement in the Environment for Europe process and other relevant UNECE processes, especially regarding the input to the preparations for the next Environment for Europe Ministerial conference which

will take place in Batumi, Georgia, in June 2016.

Enlargement, European Neighbourhood Policy (ENP) and Eastern Partnership

The EEB will continue its activities aimed at promoting better environmental policies in the countries neighbouring the EU and strengthening collaboration with and empowerment of NGOs working in those regions. We will continue to monitor developments regarding accession negotiations with candidate countries in South-East Europe and Turkey through our work within the project called ENV.net. We will also step up our work with our members and other interested NGOs in the countries within the ENP and Eastern Partnership, exploring in this context the possibility of raising funds for a workshop.

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 2016, the EEB will continue to coordinate the NGO input into the implementation of the OECD's environmental work programme, making additional efforts to secure good geographical balance to all OECD countries.

Mediterranean

Through its involvement in the Mediterranean Information Office for Environment, Culture and Sustainable Development (MIO-ECSD), the EEB will monitor and selectively engage in Mediterranean activities.

ENVIRONMENTAL DEMOCRACY

Aarhus Convention in the wider Europe and in other regions

In 2016, the EEB will continue to play a leading role in the NGO work on the further development and implementation of the Aarhus Convention by coordinating the European ECO Forum input into the Convention processes, focussing on the outcomes of the Meeting of Parties to the Aarhus Convention (MOP) and the effective use of the Convention's compliance mechanism, and making relevant information (e.g. decisions of courts, findings of the Compliance Committee) widely available. This work will also include the Protocol on Pollutant Release and Transfer Registers, as well as the Protocol on Strategic Environmental Assessment to the Espoo Convention. We will continue our work on the promotion of the Aarhus Convention and Principle 10 of the 1992 Rio Declaration at the global level and in other regions, notably the Latin America and Caribbean (LAC) and Middle East and North Africa (MENA) regions.

Aarhus-related Directives and Regulations – information, participation and justice in the EU

The EEB will continue to advocate for a directive on access to justice, emphasising the role that this could play in supporting better implementation and enforcement of environmental law. We will also engage in the E-PRTR REFIT process.

Following the January 2015 rulings of the European Court of Justice overturning the finding by the General Court that the EU regulation implementing the Aarhus Convention at the level of the EU institutions fails to adequately transpose the requirements of the Convention, the EEB will continue to closely follow the deliberations of the Aarhus Convention Compliance Committee on this issue and the follow-up to its findings, intervening as appropriate. In parallel, we will continue to press for strengthening the regulation. At the same time, we will continue to use the regulation's provisions more systematically in our everyday advocacy work. We will also encourage our members to complain about and report back to the EEB on cases where the regulation is believed to have been violated. More generally, we will push for greater transparency in the EU institutions.



MEMBERSHIP AND ORGANISATIONAL DEVELOPMENT

In 2016, the EEB plans to focus on strengthening its membership network and staff capacity and to further enhance its political effectiveness at the same time as strengthening its communication and outreach activities and establishing a stronger financial base for all of its activities, as described in the following sections.

Consolidating and expanding the EEB network and working with members

In 2016, the EEB will further invest in the development of its membership network and in strengthening its working relationship with its members. Capacity building events with a strong focus on development of practical EU lobbying skills will continue to play a role. Four such events are envisaged for 2016 if funding is available including two Presidency or pre-Presidency meetings, one in the Netherlands and one in Slovakia.

In 2016, the EEB intends to gain better understanding of the needs of its members in the Eastern partnership countries and will seek to involve them more strongly in EEB activities. The EEB office will continue to provide advice and support to individual members upon request. The EEB will encourage close cooperation of Board members with their national members including on members' complaints and the lack of appropriate follow-up. With the support of its Board members it will also encourage more active participation in one or more of the many working groups.

Efforts to attract more members and make membership as accessible as possible will be further explored. Where feasible and on relevant topics, the EEB staff will participate in and support members' activities. Board members will be encouraged to be involved in these efforts.

Political impact

In 2016, the EEB will continue to play a leading role in articulating environmental concerns in the debate on EU policies and countering attempts to erode environmental protection measures. To achieve this, we will continue to

focus on the three principal EU institutions, in particular working closely with Presidencies. During 2016, it will be a priority to continue engaging intensively with the Commission and Parliament. We will continue to work with others in partnerships, coalitions and networks to maximise our impact.

Collaborating and communicating with key stakeholders and the wider public

In 2016, the EEB will continue to be part of strategic political alliances such as the Green 10 and the Spring Alliance, in particular for work on horizontal issues and to influence cross-cutting processes. We will also continue to serve in the steering group of a broad coalition of EU-based networks representing environmental, development, education, trade unions, youth, women and other stakeholders, SDG-watch, to advocate around and follow up the SDG implementation at EU and Member State levels.

In 2016, the EEB will continue to publish its quarterly newsletter Metamorphosis in which it comments on major policy developments, gives updates from the campaigning front and puts members' activities in the focus. Metamorphosis is distributed digitally to more than 2,000 subscribers and in a printed version to some 700 subscribers. The EEB Global Policies and Sustainability Unit will also continue to publish its monthly newsletter The Switch, which goes out to 2,000 subscribers worldwide. In addition, the EEB will continue to use a variety of social media channels to publicise its activities, including Facebook, Twitter, LinkedIn, Youtube and Flickr.

The EEB will seek to strengthen links with EEB member

organisations' press officers or other staff responsible for communications to exchange information on good practices and build skills and capacity in this area.

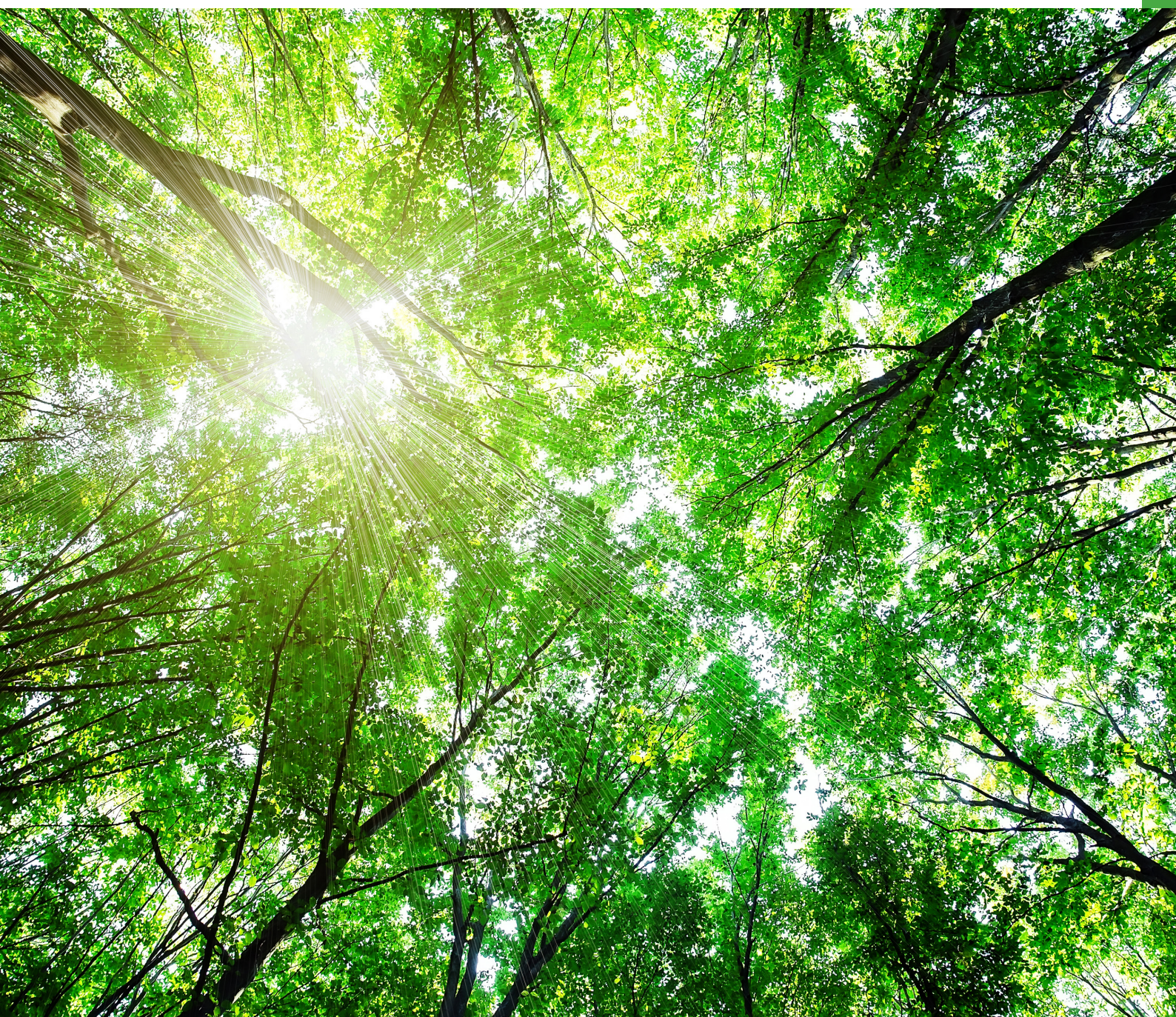
Finally, the EEB will renew efforts to strengthen its profile by refreshing its visual identity and publications and developing its internal and external communication tools.

Financial consolidation

In 2016, the EEB will seek to build on the financial successes of recent years and continue to explore new sources of funding, with a particular focus on deepening partnerships with foundations.

Staff

Staff numbers have grown significantly over the past three years, in response to both needs and opportunities. Some further but more limited expansion is envisaged for 2016, subject to the availability of funding, both to address certain important policy areas or horizontal tasks and to continue the process of organizational strengthening. Aside from quantitative development, staff capacity will be enhanced qualitatively by sharing skills, experience and expertise already existing within the EEB staff, and by bringing in professional trainers for specific skills and needs.



BUDGET 2016

A. General Costs	
1. Missions and representation	52,500
2. Office costs	135,446
3. Office supplies	92,166
4. Communications	52,040
5. Depreciations	66,000
6. Financial costs	6,300
7. Provision	10,000
Sub-Total - A. - General Costs	414,452
B. Salary Costs	
1. President's Secretariat	10,000
2. Secretary General's Unit	317,773
3. EU Policy Unit	933,507
4. Global Policies and Sustainability Unit	208,853
5. Information & Communications Unit	287,099
6. Accounting & Support Unit	316,579
7. Special Campaigns	136,139
8. Volunteers and Temporary Staff	24,000
9. Other personnel costs	53,241
10. Additional personnel costs if 2% salary's increase from March	23,405
11. Reduction of the personnel costs link with the forecast's ONSS decrease of 5%	- 88,884
Sub-Total - B. - Salary Costs	2,221,712
C. Activities	
1.a. 7th Environmental Action Plan (7EAP)	1,000
1.b. Europe 2020	1,000
1.c. SDS / Implementation of SDGs	5,000
1.d. Sustainable Consumption and Production (SCP)	1,000
1.e. Fiscal Reform	5,500
1.f. Better Regulation	1,000
1.g. EU-US Trade negotiations	-
2.a. Climate and energy	16,500
2.b. Energy Performance of Buildings Directive and Efficiency Directive Review and Implementation	5,500
2.c. Ecodesign Directive and Energy Label Regulation implementation and revision	21,800
2.d. Biofuels	3,000
2.e. Energy Infrastructure	-
2.f. Unconventional fossil fuels	-
2.g. Nuclear	1,000
3.a. Biodiversity Strategy	39,900
3.b. Natura 2000 evaluation	-
3.c. No net loss initiative	-
3.d. Invasive Alien Species	-
3.e. Soil	6,500
3.f. Sustainable agriculture	30,844
3.g. Genetically Modified Organisms (GMOs)	-

4.a. REACH Implementation	60,150
4.b. EU regulation of nano materials	10,700
4.c. Air - Ambient Air Quality	-
4.d. Air - NEC revision	23,036
4.e. Air - Medium Scale Combustion plant	-
4.f. Environmental Noise Directive	6,500
4.g. Mercury at EU level	-
4.h. Mercury 'Minamata' Treaty Implementation	151,581
4.i. Industrial Emissions Directive	82,682
5.a. Water Framework Directive	12,000
5.b. Priority Substances Directive	-
5.c. New instrument on water reuse	-
5.d. Marine Protection	-
6.a. Circular economy and resource conservation	42,500
6.b. Waste Framework Directive revision	39,000
6.c. Revision of the Packaging and Packaging Waste Directives (P&PWD)	-
6.d. Revision of the Landfill Directive	-
6.e. Resources conservation through product policy	21,800
6.f. Ecolabel	7,192
6.g. Green Public Procurement	1,000
7.a. Effective Enforcement of EU legislation and policies	11,000
7.b. Better Enforcement-New tools and complaints handling	-
7.c. Compliance Assurance (including environmental inspections)	-
7.d. Environmental Impact Assessment (EIA)	-
7.e. Environmental Liability Directive (ELD)	-
7.f. Environmental Crime Directive (ECD)	-
8.a. Global environment and sustainable development agenda	24,880
8.b. Environmental justice in supermarkets	24,725
8.c. Pan-European outreach (UN Economic Commission for Europe (ECE) / European ECO Forum)	-
8.d. Enlargement, European Neighbourhood Policy (ENP) and Eastern Partnership	24,542
8.e. Organisation for Economic Cooperation and Development (OECD)	7,000
8.f. Mediterranean	-
9.a. Aarhus Directives and Regulation – information, participation and justice in the EU	-
9.b. Aarhus Convention in the wider Europe	56,371
10.a. Consolidating and expanding the EEB network and working with members	12,000
- Working with the Presidencies	-
- Annual General Assembly	60,000
10.b. Political impact	-
10.c. Stakeholder partnerships	2,000
10.d. Communicating with key stakeholders and the wider public	21,500
10.e. Financial consolidation	-
10.f. Staff	10,000
Sub-Total - C.	851,703

D. Allocation to Working Capital	60,000
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TOTAL EXPENDITURE	3,547,867
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The **European Environmental Bureau (EEB)** is a federation of more than 150 environmental citizens' organisations based in most EU Member States, most candidate and potential candidate countries as well as in a few neighbouring countries. These organisations range from local and national, to European and international. The EEB's aim is to protect and improve the environment by influencing EU policy, promoting sustainable development objectives and ensuring that Europe's citizens can play a part in achieving these goals. The EEB stands for environmental justice and participatory democracy. Our office in Brussels was established in 1974 to provide a focal point for our members to influence, monitor and respond to the EU's emerging environmental policy.

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