

# THE EUROPEAN GREEN DEAL ONE YEAR IN

Background paper to the EEB  
2020 Annual Conference  
9 November 2020



A better future where people and nature thrive together



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



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An International non-profit Association  
Association Internationale sans but lucratif  
EU transparency register number: 06798511314-27

Published November 2020  
Responsible editor: Jeremy Wates  
Text: Patrick ten Brink

European Environmental Bureau (EEB)  
Rue des Deux Eglises 14-16  
1000 Brussels, Belgium  
+32 (0)2 289 1090  
eeb@eeb.org  
[eeb.org](http://eeb.org)

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With the support of the LIFE project of the European Union. This communication reflects the authors' views and does not commit the donors

## The European Green Deal (EGD) One Year In

***The EGD is still a central priority, still more or less on time, despite COVID-19, and still has the potential to be a transformative agenda. Progress to date has been good on biodiversity, chemicals, circular economy, water, and farm to fork. There has been some progress on climate but by far not enough. Developments on agriculture, however, have been downright contradictory to the EGD, and risk undermining the progress on biodiversity and climate. Overall, it is good on objectives, high-level commitments and vision, but weaker when it comes to concrete practice.***

*This paper is a background paper for the EEB's 2020 Annual Conference on 9 November and the EEB's AGM on 10 November 2020. The discussions will raise several additional points on lessons to date and what is needed for the way forward. We invite comments and suggestions on how to help ensure a truly transformative EGD.*

### The EGD – a Transformative Agenda

The [European Green Deal](#) (EGD) was the top priority of Ursula von der Leyen when she faced the European Parliament vote on her candidacy for Commission President and sought to obtain support from Heads of Government across the Member States. The EGD and associated [action plan](#) launched on 11 December 2019 not only defines this Commission, but a convincing EGD delivery is central to its credibility and will define its legacy.

The EGD recognised the need for a transformative agenda as the only way to address the multiple crises – notably the climate and biodiversity crises. However, is it delivering on its promise?

### One Year In – what has been achieved?

With the onset of the COVID-19 crisis, there were pressures from some business interests for the Commission to drop the EGD, to embrace deregulation, and to focus on funding business-as-usual in crisis. The Commission resisted a knee-jerk response to the crisis and recognised that the EGD was a blueprint for the needed recovery. The subsequent Recovery Package also states that the EGD is a core way to build back better, though when it comes to specifics, there is a risk of too much EGD-contradictory funding that needs to be addressed.

The COVID-19 crisis has delayed the launch of a range of initiatives, but this has arguably been relatively minor, and the Commission can be complemented for progressing with its agenda. Moreover, the initiatives launched in the middle of the global pandemic highlighted their important role in preventing future pandemics and help build back better to recover from the crisis.

The EGD and associated commitment to become a carbon-neutral continent has arguably impressed many parts of the world. While no new green deal has yet been launched elsewhere, more and more countries are signing up to climate neutrality.

Progress depends not only on what the Commission proposes, but also how the European Parliament and Member States react, how the EGD is funded, and the level of implementation and enforcement. The situation described in this “One-Year-In” summary can evolve positively or negatively, pending decisions by a range of decisions makers – at EU and Member State level.

### Where has there been palpable progress? 😊

**The EU's Biodiversity Strategy for 2030**, launched on 20 May together with the Farm to Fork Strategy and unanimously endorsed by the environment ministers on 23 October, is an ambitious blueprint to put biodiversity on a path to recovery. 30% of EU's land and sea area are to be under protection, a third of which (including all old growth forests) under strict protection. It further promises a new law setting legally binding restoration targets, it commits to turn 25,000 km of rivers into free-flowing rivers and sets a target of transforming 10% of agricultural land into high-biodiversity landscapes, as well as committing to the full implementation of existing nature, water and marine legislation. However, the current Common Agricultural Policy (CAP) fails to enable and incentivise the implementation of the Strategy; on the contrary, the current CAP contradicts and threatens to undermine the Biodiversity Strategy.

The **Climate Neutral Europe** commitment, enshrined in the **climate law**, presented by the European Commission on 4 March, and supported through a partial general agreement at the 23 October Environment Council meeting, is an important commitment though the target date of 2050 still falls short of what is needed and what is [readily achievable](#). Since the EU commitment, China, Japan and Korea have also committed to climate neutrality. The battle remains open on whether the climate neutrality target will be binding both at EU and Member State level, what the 2030 target requirement will have to be for achieving climate neutrality, what measures will help implement the vision, the role of science, the involvement of citizens and access to justice.

**The Chemicals Strategy for Sustainability** was finally launched on 14 October and embraces a positive vision to prevent exposure to harmful chemicals, to rapidly phase-out vast amounts of toxic substances that are building up in European homes, workplaces and the environment, and promotes green innovation and safe and sustainable chemicals globally. Some 100,000 substances are used in Europe, 74% of which are hazardous. The Strategy includes many important actions such as the action plans to phase out endocrine disruptors and PFAS, the ever-lasting poison in drinking water, as well as a ban on hazardous chemicals in consumer products.

The **Circular Economy Action Plan** launched 11 March 2020 engages the EU towards making sustainable products the norm and associated value chains truly responsible, from product design and manufacturing to reducing toxicity and cutting waste. It also specifically addresses some of the product groups with the largest environmental footprints, including textiles, electronics, batteries, construction and packaging, and emphasises the need to establish digital product passports. However, without binding EU-wide targets to reduce resources use and related material footprint, it falls short of addressing Europe's over-consumption and matching its own words of respecting planetary boundaries.

### Where was there progress, albeit weaker than needed? 😊

The **Farm to Fork Strategy**, launched on 20 May alongside the EU Biodiversity Strategy for 2030, presents the Commission's ambition and action plan for achieving sustainable food systems in the next decade. While this strategy was unprecedented in scope – covering the entire food chain from production to consumption – and announced welcome new targets and initiatives to make food systems fairer, healthier and greener, it remains to be seen whether it will deliver. Strong concerns stem from the lack of alignment of the Common Agricultural Policy (CAP) as well as the lukewarm, or even hostile, reactions of

Agriculture Ministers and stakeholders. AGRIFISH Council Conclusions adopted on 19 October stressed the aspirational nature of the Strategy and fell short of endorsing its targets.

**Climate targets:** While setting a climate neutrality objective is a step forward, the proposed levels of ambition by 2030 (both the -55% net GHG target proposed by the Commission on 17 September and even the -60% endorsed by the European Parliament on 8 October) are not enough for the EU's contribution to meet the Paris 1.5°C target; this should be at least -65%, in line with scientific findings and climate neutrality must be achieved well before 2050 to avoid the worst consequences of climate change. Fortunately, some Member States are already committing to go beyond -55%.

**Hydrogen strategy:** The hydrogen strategy was launched with a clear state preference for renewable hydrogen but keeps the door open to fossil hydrogen. Besides a lack of transparent governance, the alliance is also suffering from a lack of focus as it does not appear to prioritise the use of such a critical and precious energy sector, which should be targeting industry and long-hauled transport only.

**Methane strategy:** In the EGD, the European Commission declared its intention to put forward an EU Methane Strategy to reduce methane emissions only from the energy sector which represent a relatively small proportion of overall methane emissions in the EU. The Commission's plans have changed in recent months, resulting in its intention to elaborate a methane strategy covering waste, energy and agriculture. Unfortunately, despite agriculture being responsible for more than the 50% of methane emissions in the EU, the Strategy published on 14 October did not include any real action to reduce emissions from this sector. This was a lost opportunity to prove that the European Commission is serious about its commitments and obligations to protect our climate, our environment and our health (methane is also a precursor of air pollution).

**Renovation wave:** While emphasizing the key role of the Renovation Wave for a sound recovery and making announcements on an accelerated renovation rate and future minimum energy performance standards, the Commission communication falls short of adequately addressing the total carbon emissions of buildings, including embodied emissions in materials, and on setting clearer signals that fossil fuel operated and inefficient heating systems have no place anymore in our journey to carbon neutrality. The Strategy also falls short on highlighting the need to also deliver on air pollution reduction objectives (with domestic heating contributing to more than 40% of PM emissions in the EU); it also did not refer to the importance of reducing noise pollution.

**Industrial strategy:** There were a range of positive aspects - climate neutrality and circular economy goals were reaffirmed, as was the 'energy efficiency first' principle. However, the Strategy was weak as it did not communicate clearly how and when industrial transformation should happen, it failed to grasp the urgent need for a transformation, there was little recognition of the potential role of civil society engagement, insufficient clarity on green innovation, and the Strategy held the over-confident assumption that IT technologies will solve it. Finally, the industrial strategy was not framed with the recognition of the planet's limits in mind, nor the implications for levels of consumption and production.

**Emission information (E-PRTR):** The European Commission finally recognised that the current EU Pollutant Release and Transfer Register (E-PRTR) is not fit for purpose to enable tracking progress towards the European Green Deal goals on zero pollution, climate neutrality, biodiversity and a cleaner, more circular economy. However, no formal proposal was provided yet as to the concrete elements so no assessment can be made at this stage. The inception impact assessment is not explicit as to what needs

to be improved. It also fails to fix current gaps highlighted by the EEB under its Industrial plants data viewer (IPDV) project which could be remediated through a revision of the Commission implementing decisions on reporting under the Industrial Emissions Directive (IED)<sup>1</sup>.

The **8<sup>th</sup> Environment Action Programme (8EAP)**, published on 14 October, is, unlike earlier EAPs, mainly a monitoring and assessment tool for the European Green Deal and the SDGs. It reiterates commitments to six thematic objectives, recognises the need for “regenerative growth”, “do no harm”, having a “wellbeing compass”, and “systemic transformation”, and reiterates a 2050 vision to “live well, within the planetary boundaries.” However, it envisages an assessment only for 2029, and no mid-term review, suggesting it will not have an impact unless reformed and is less ambitious than its potential.

**The European Semester integrates the SDGs:** The SDGs are being integrated into the European Semester, showing Member States’ SDG performance mostly through an annex in which Eurostat data on SDG implementation is displayed. While the semester will also be the vehicle for the implementation of the recovery and resilience facility and spending of money that is being made available at EU and national level, the promised integration of the SDGs has not been fully achieved. The country reports only referred to a few SDGs in a rather patchy approach instead of providing a rigorous analysis of which SDGs and targets posed the greatest challenges in each Member State. Attaching SDG indicators in the annex will not enhance SDG implementation in the Member States.

**Better regulation:** The European Green Deal contains a commitment to a green oath to “do no harm” while the Commission also embraces a ‘one-in-one-out’ policy that risks slowing progress on legislation and policy by focusing on reducing business burdens rather than sustainability gains. The ‘do no harm’ commitment is good, but defensive, as it does not seek to proactively promote good regulations. The one-in-one-out approach may even be a threat to sustainability as it focuses on limiting the number of laws in place rather than improving their quality. While we need to put the European Green Deal in action, the one-in-one out may compromise the number of new laws that are necessary to turn it into a reality. Unfortunately, a “sustainable first principle” has not been backed.

**What were the biggest missed opportunities for transformative ambition (i.e., deeply disappointing)?** ☹️

**The Common Agricultural Policy (CAP) reform**, initiated by the previous Commission ‘pre-Green Deal’ has unfortunately not been upgraded to be in line with the new objectives of the Farm to Fork and Biodiversity Strategies or wider European Green Deal ambition. Despite its legal obligation under the EU Treaties to ensure coherence between its policies, the Commission has failed to take action to ensure the post-2020 CAP is aligned with the Green Deal. Instead of stepping in to enhance the environmental ambition of the new CAP, the Agriculture Council and European Parliament adopted their respective positions ahead of trilogues on 21 and 23 October, in which they strongly weakened the environmental baseline, funding and instruments. As a consequence, the next CAP will almost certainly fail to support farmers in the urgently needed transition promised by the Green Deal and Farm to Fork Strategy.

***What are your views on the progress on the EGD - What do you find positive steps forward and what do you see as missed opportunities?***

<sup>1</sup> see more information here <https://meta.eeb.org/2020/10/22/industrial-pollution-its-time-to-enter-the-digital-age/>

## What's there still to do to make the EGD a truly transformative agenda?

The first year of the EGD is only the start. Much of the success of the EGD – whether it is truly transformative and helps to address the multiple environmental crises while addressing social concerns will depend on measures launched in 2021, and subsequently on their implementation. Following are some key 'to dos' to make the EGD a success. See also the links in the table in the annex.

**Implementing the Biodiversity Strategy:** Now that the entire Strategy has been endorsed by all Member States, the Commission must follow with timely and ambitious details on the commitments, defining key terms such as 'strict protection', 'old-growth forest' and by proposing legally binding restoration targets<sup>2</sup> in line with the scientific knowledge on the needed steps to put nature on a path to recovery which also contributes to reducing the risks of future pandemics such as COVID-19.<sup>3</sup> Member States must cooperate in this process and start implementing the strategy on the ground. Adequate funding for nature restoration and the broader commitments of the Strategy is required and this must be reflected in all funding instruments, including the MFF (which should set aside at least 10% for biodiversity), recovery instruments as well as a fundamentally reformed CAP. In addition, the European Commission is set to adopt the EU Forest Strategy in 2021; this must consist of measures that seek the right balance and synergies between the need to increase forest protection and restoration efforts to achieve the EU's climate and biodiversity objectives on the one hand, and the different socio-economic interests related to forests, on the other.

**Climate:** Heads of State and Government at the December European Council should support the highest level of ambition possible in setting the new 2030 emissions reduction target, which the EU will submit in 2021 to the UNFCCC global stocktake process under the Paris Agreement knowing that the latest scientific evidence (IPCC 5th Report on Global Warming of 1.5°C) indicates that an effort of at least 65% emissions reduction is needed by 2030 in the European Union. Furthermore, the emissions reduction target should be matched with an equally ambitious effort to increase the energy efficiency target to at least 45% with at least 50% of energy sourced from sustainable renewable energy by 2030. In addition, the promised mobility package - the trans-European transport network (TEN-T), development of post-Euro 6/VI emission standards for cars, vans, lorries and buses, and EU 2021 Rail Corridor Initiative - will be important initiatives to demonstrate ambition on climate change and for air pollution.

**Zero pollution ambition: In the Zero-Pollution Action Plan,** expected in mid-2021, the European Commission should not only refer to existing initiatives (e.g. the revision of the Ambient Air Quality Directives, of the Industrial Emissions Directive and the update of the EQS Directive and Groundwater Directive) but must go beyond what is already expected. Pollution is a very horizontal threat, which deserves a holistic and coherent approach, and new initiatives to ensure that it is properly tackled at source. The guiding principles for the Action Plan must be pollution prevention, a precautionary approach and the polluter-pays principle. In tackling existing pollution, remediation of damages must be required and the large uptake of nature-based solutions must be supported, including restoration. Work also needs to be done to adapt the EU state aid regime to the zero-pollution ambition.

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<sup>2</sup> <https://eeb.org/library/restoring-europes-nature-ngo-position-paper/>

<sup>3</sup> <https://ipbes.net/pandemics>

**Industrial strategy and monitoring progress:** There is a general lack of fitness for purpose, of open access tools to identify risks, opportunities and needs for action and to track progress towards the delivery of EU Green Deal targets. The EU has yet failed to deliver proper benchmarking and reporting tools on environmental performance (e.g. resource consumption, environmental footprints on products etc). These tools will also be needed to benchmark various industrial sectors, or economic actors, against the Sustainable Development Goals and used in the context of defining the taxonomy criteria for various industry sectors. There is an ongoing opportunity through the [EPRT fitness check](#).

The **Recovery and Resilience Facility (RRF) and associated National Recovery and Resilience Plans (RRPs)** will be essential tools to demonstrate commitment to the EGD. They should demonstrate full consistency and coherence with the implementation of other relevant EU environmental protection acquis objectives or performance against relevant Union standards. There should also be clarification of the eligibility criteria / pre-conditions for receiving funding. It is of paramount importance that no money under the RRP goes to support fossil-fuel based projects and activities and that the RRP are aligned with the 'do no harm' principle set in the EU Taxonomy. In addition, the role of civil society must be ensured through a structured dialogue in the process of definition of the National RRP to support quality, legitimacy and alignment with EGD objectives.

**Economic instrument reform** will also be essential if market signals are to drive a transition to a carbon neutral economy: The Energy Tax Directive revision and the [Carbon Border Adjustment](#) (CBA) are important initiatives here. "The ETD revision and the CBA will be important fiscal tools to complement the review of the climate and energy regulatory framework to step up ambition by 2030. We need stronger price signals to accelerate energy and economy decarbonisation and steer consumer choices towards climate-compatible consumption, while making sure we get the right redistributive policy schemes in place to tackle the social and economic aspects."

**The 8<sup>th</sup> Environmental Action Programme** will face suggestions for amendments by the European Parliament and Council. There is a risk it becomes a relatively weak EGD monitoring and assessment programme. However, there is also potential for it to be significantly more. For that to happen, a 2025 mid-term assessment is needed (currently only a 2029 assessment included), so that progress and lessons on the first Commission EGD can be understood and inform future visions or a following EGD. Furthermore, the progressive concepts noted as broad objectives in the context - "regenerative growth", "wellbeing compass", and "systemic transformation" - should be better articulated and operationalised<sup>4</sup>.

**EU Trade Policy:** The EU's trade policy is supposed to support the EU's ecological transition and help step up sustainable development through its trade agreements, as set out in the EGD. It is, however, unclear how the new role of the Chief Trade Enforcement Officer will help with the implementation and enforcement of the sustainable development chapters of EU trade agreements. The Commission has launched an [informal consultation](#) for a renewed EU Trade Policy, giving the opportunity for the Commission to eventually define how it will enforce the sustainability chapters and how the EU can promote a systemic transformation of global trade that will halt the ecological pressures that the current trade practices pose. Given the impact that the EU has on the global environment through trade, it is crucial that the Commission addresses the policy incoherence of its trade agenda with the EGD.

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<sup>4</sup> See 8EAP section in [EEB's Council Letter](#).



**Due Diligence Legislation:** The Commission has started working on a set of initiatives to improve corporate governance, with a [consultation](#) for a new legislative proposal on sustainable corporate governance expected to come out in 2021. This new legislation should harmonise existing national rules and introduce EU-wide ones on corporate governance mechanisms for long-term decision-making, thereby helping companies to make sustainable choices rather than be influenced by the short-term profits that tend to motivate company decisions. It remains to be seen how this proposal will incorporate or be coupled with mandatory rules on due diligence to ensure that supply chain impacts are assessed by companies, and to ensure that companies can be held accountable for the environmental and human rights impacts in their value chains.

**Economic governance reform:** A new governance framework that promotes an alternative political-economic system is needed. One that is more resilient, just, and explicitly prioritises human (and non-human) well-being over economic growth. The current crisis coinciding with the review of the EU Economic Governance provides a unique opportunity to replace the outdated and harmful Stability and Growth Pact (SGP) by a timely and constructive Sustainability and Wellbeing Pact. We further call for the exemption of green and social investment from the rules of the SGP to ensure a socially just climate transition

**Future of work beyond GDP:** The devastating consequences of the COVID-19 pandemic on the labour market and with that on people's livelihoods and wellbeing raise an important question: how do we get out of this mess? To do so, we must decrease our structural dependence on economic growth and jobs to transition to a positive story about work in a post-COVID economy by debating fundamentals to free ourselves from persistent narratives, reframe policy goals, move beyond GDP and embrace policies for transition. We need a new compass.

## Opportunities and threats to the EGD

The European Green Deal provides an opportunity to promote a transformational agenda that can help address the climate and environment crisis, can support the wellbeing of people in Europe, and be at the heart of a COVID-19 response. It can enable us to build back better, catalysing a move towards sustainability. However, there are multiple risks to this necessary and positive vision.

A first major threat to the EGD - the first wave of the COVID-19 crisis - was reasonably well addressed and the EGD has become core to the recovery effort. However, several other threats to the delivery and success of the EGD remain. Yet, these threats and potential obstacles must be avoided and overcome - the alternative is further and more severe threats to life as we know it and ultimately threats to our very own existence.

There is the **threat of policy incoherence due to vested interests**. We have seen this most directly with the CAP, which risks undermining measures on biodiversity, water quality, air quality and the climate crisis, despite language on climate ambitions. The European Commission has the right and responsibility to withdraw its CAP proposal and table a new one, one that is coherent with the EGD. There are also risks in other areas (e.g. hydrogen strategy being hijacked to support the gas industry), hence vigilance and determination is needed to ensure all policies promote the transformational change needed and that they are not pushed off target by vested interests.

Second, there is the **threat of a credibility gap emerging in EGD policies though a disconnect between the stated vision and measures in practice**. It is arguably easier to agree positive visions, objectives and strategies, than to agree on the nitty gritty requirements of laws, or programmes of where funding goes. It is critical that what is 'on the tin' is reflected by what is 'in the tin' – rather than having an EGD that is undermined by intensive agriculture or by new investments locking in fossil fuels 'in the tin'. Here, urgent action is needed for an EGD that is transformative, that embraces and implements the scientifically needed levels of ambition and that makes a true difference on the ground.

Third, and related to the first two points, there is the threat of **poor implementation and enforcement**, which has been a challenge throughout the history of EU policy. Here, particular efforts will be needed on 'programming' – using the national recovery and resilience plans, the partnership agreements and CAP strategic plans to finance positive change, as well as improved benchmarking and reporting tools. The European Commission must step up its efforts in enforcing environmental legislation, including by allocating more resources, in line with the stated commitment in the EGD – also to avoid the widening of the credibility gap.

The EGD promises a transformative agenda, but it is far from guaranteed that it will succeed. This Commission has made the EGD its top priority – at least in theory. It is essential, not only for the credibility of this Commission, that it now delivers in practice. Yet, the delivery is also a responsibility of the European Parliament and the Council, and ultimately the Member States implementing the EGD initiatives. The current DE-PT-SI trio presidency (and subsequent FR-CZ-SE trio) has an important role to promote progress, as does the EP, voted in on the back of a green wave.

The EGD provides an opportunity for the transformative change that is urgently needed – the change of fundamentally rethinking our relationship with the planet and the ecosystems that form our life support system. A change that provides a just transition to an economy, society and governance system that provides sustainable jobs, prioritises human wellbeing and respects the planet and its limits. The EGD offers a hundred steps in this direction, some big some small. But the path to healthy planet, where we leave more to future generation(s) than we inherited and where people and nature can thrive together, will require these hundred steps to be the right ones and to provide a clear compass for future environmental ambitions.

***What do you think is essential to make the EGD the transformative agenda it needs to be?***

Environmental Priority	What has been achieved by the EGD measure?	How good is it?		What is still planned and what does it need to cover to be a success?
Agriculture and Food	<b>Common Agricultural Policy (CAP)</b>	☹️	The post-2020 CAP will largely be a continuation of the current policy, which is failing to address, or in some cases contributing to, the environmental crises (climate, biodiversity, air pollution, water overextraction and pollution, soil loss and degradation), therefore strongly undermining the EGD	The Commission must use all tools at its disposal to ensure the new CAP is aligned with its Green Deal, including withdrawing the 2018 reform proposal and proposing an amended CAP proposal that is compatible with the Green Deal (see <a href="#">joint letter</a> ).
	<a href="#">Farm to fork strategy</a> (20 May 2020)	😊	Very welcome ambition and cross-cutting thinking but undermined by the alarming lack of alignment of the new CAP and the hostile reactions by many farming politicians (Ministers and MEPs) and stakeholders.	The Commission must also implement the actions promised in the Farm to Fork Strategy without delay, including proposing legislation to enshrine its targets into law.
Air pollution	<a href="#">Methane Strategy</a> (14 October 2020)  <a href="#">Renovation Wave</a> (14 October 2020)  <a href="#">Farm to Fork</a> (20 May 2020)	😊	The Methane Strategy was strong on energy emissions, weak on agriculture emissions. No reference was made to the need to also deliver on air pollution (PM emissions) reduction objectives through the Renovation Wave. No reference to the need to avoid biomass burning (responsible for more than 40% of EU PM emissions). No reference in the Farm to Form Strategy to the importance of reducing ammonia and methane emissions specifically, which are both air pollution precursors.	The Zero Pollution Action Plan (ZPAP) must deliver on air quality through specific initiatives to reduce indoor air pollution, the formation of an independent body to regularly inform policy-makers on a timely basis, a clear financial framework which does not finance pollution and a revision of the NEC Directive. Air quality standards must be aligned with the WHO.
Biodiversity	<a href="#">EU Biodiversity Strategy for 2030</a> (20 May 2020)	😊	The Strategy provides an ambitious blueprint with more than 100 actions and commitments to put biodiversity on the path to recovery by 2030, but one that needs funding, implementation and improved CAP to deliver.	Ambitious definitions and details of the commitments including a proposal for a new restoration law from the Commission and timely implementation from the Member States.
Chemicals	<a href="#">Chemicals strategy for sustainability</a> (14 October 2020)	😊	Strong vision for a non-toxic Europe +Inclusion of PFAS group in the recast of the Drinking Water Directive.	Actual legal reform proposals are expected to follow in the coming months and years.
Circular Economy	<a href="#">Circular Economy Action Plan</a> (11 March 2020)	😊	Strong vision for a new economic model and progress on a range of sectors ( <a href="#">for details</a> ).	Sustainable products policy initiative, including a revision of the Ecodesign Directive as well as initiative on Circular electronics.
	<b>Renovation Wave</b>	😊	While providing a positive impetus for building renovation (notably public buildings), it was less strong on air pollution, noise, embedded emissions and fossil fuel	The construction product directive must enshrine climate and emissions targets and make sure that the market for secondary raw material is there.

			phase out.	
<b>Climate &amp; Energy</b>	<a href="#"><u>European climate law</u></a> (4 March 2020)	☺	Setting a climate neutrality target is a significant step forward. However, the emissions reduction trajectory in 2030 and afterwards must be deeper. Climate neutrality should be binding for all Member State and not only EU-wide.	Offshore wind strategy in November 2020 EUCO decision in 11-12 December on the 2030 target.  The package of measures announced in June 2021 to review the 2030 Climate and Energy architecture must align with the needed ambition: ETS, Effort Sharing Regulation, Renewable Energy Directive, Energy Efficiency Directive, Revision of the Energy Taxation Directive, Revision of the State Aid Guidelines for Energy & Environment, <a href="#"><u>Carbon Border Adjustment</u></a> .
	<a href="#"><u>European Climate Pact</u></a> (4 March 2020)		Structuring a multi-stakeholder dialogue and ensuring civil society effective participation fills a current gap in the EU framework	
	<a href="#"><u>2030 Climate Target Plan</u></a> (17 October 2020)		Increasing the EU's 2030 emissions reduction ambition is key to meet the 1.5C target under the Paris Agreement. However, the level of ambition proposed is still too low.	
	<a href="#"><u>EU strategies for energy system integration and hydrogen</u></a> (8 July 2020)		Renewable hydrogen can play a role in decarbonising industry. However, other types of hydrogen are not aligned with climate neutrality and the use of hydrogen must be strictly limited to industry decarbonisation.	
<b>Industrial policy</b>	<a href="#"><u>European Industrial Strategy</u></a> (11 March 2020)	☺	While there were positive aspects (climate neutrality 2050 and circular economy goals reaffirmed, as was the energy efficiency first principle), the Strategy was weak as it did not communicate clearly how and when industrial transformation should happen, it fails to grasp the urgency for a transformation, little recognition of the potential role of civil society engagement, and insufficient clarity on green innovation, and overly confident assumption that IT technologies will solve it. ( <a href="#"><u>see EEB Response</u></a> ).	A roadmap for industrial carbon neutrality with clear sectoral targets and a better integration with the zero pollution strategy is needed. Phase out of fossil fuels is a precondition for carbon neutrality. Furthermore, the integration of the IS with the Biodiversity Strategy is need – the restoration of degraded habitats should be ensured in order to take advantage of natural sinks rather than CCUS (carbon capture use and storage).  The EU PRTR needs a fundamental overhaul so as to enable proper compliance promotion (e.g. BAT uptake) as well as benchmarking of performance of economic actors, including decision makers.  The IED review needs to ensure that industrial activities are carried out in full compatibility with achieving environmental quality standards / acquis and the set 'zero pollution' goals, based on a new



				benchmarking approach set to lowest ratio of 'environmental impact of activities versus public good/service provided' (see more details on specific media sub-targets <a href="#">here</a> ).
<b>Water</b>	<b>No dedicated Green Deal initiative on water but specific actions in other EGD initiatives.</b>	☹️	<p>Water related commitments have been put forward in the EU Biodiversity Strategy e.g. commitment to restore rivers and in the Farm to Fork Strategy, e.g. target to reduce pesticides and fertilisers.</p> <p>Some commitments are positive even if they could have been more ambitious, but they certainly need funding, the implementation in particular of the WFD and an improved CAP to deliver.</p>	The <b>Zero Pollution Action Plan</b> needs to build upon updates of the EQS and groundwater directives but also propose ambitious action to bring our rivers, lakes and wetlands to ecological health
<b>Noise</b>	<b>No dedicated initiative in the European Green Deal</b>	n/a	<p>The Renovation Wave did not refer to the need to also include noise pollution.</p> <p>The ZPAP roadmap, published on 1 October, did include noise pollution as one of the media on which the Plan will deliver.</p>	The revision of the Environmental Noise Directive should be announced in the ZPAP, which should be aligned with the WHO Environmental Noise Guidelines for the European Region. There are also growing arguments that the ZPAP address light pollution.
<b>Horizontal</b>				
<b>Better Regulation</b>	<b>Green Oath: Do no Harm</b>	😊	The Green Oath to do no harm, while a “defensive” one, is important, but must be operationalised.	The do-no-harm oath needs to be systematically integrated into policy recommendations in year 2 of the EGD, as well as in Better Regulation, the Fit-for-Future platform and the Taxonomy.
	<b>One-in-One-out</b>	☹️	The One-in-One-out “principle” is poor – it risks limiting needed regulation.	The One-in-One-Out should be downgraded into simply a statement of not wishing unnecessary burden.
<b><a href="#">8<sup>th</sup> Environmental Action Programme</a></b>		☹️	It commits to monitoring and assessing the EGD but offers a potentially weak monitoring and assessment framework on the EGD, undermined by a lack of mid-term review. But with positive vision.	A 2025 mid-term assessment is needed to ensure lessons from the first Commission EGD and to influence a potential EGD-2. Also, a range of the innovative concepts - “regenerative economy”, “wellbeing compass” and “systemic transformation”

				need to be strengthened and operationalised.
<b>Sustainable Development Goals, SDGs</b>		☺	Implementation of the SDGs has been part of the Mission Letters to all Commissioners but features less strongly in the EGD. The monitoring of the SDGs has been integrated into the European Semester.	The SDGs need to be fully integrated and reflected in all EGD 2021 initiatives.
<b>Funding</b>	<b>European Green Deal Investment Plan &amp; Just Transition Mechanism, Public Sector Loan Facility (14 January 2020)</b>	☺	The presence of conditionalities to access the fund is undermined by loopholes allowing the funding of fossil gas projects, as well as orienting the fund towards big companies instead of communities.	Trilogue ongoing. Fossil gas loopholes should be scrapped.
	<b>Recovery and Resilience Facility</b>		The European Green Deal is recognised as at the core of the Recovery Package and the Commission has proposed that 37% be allocated to the EGD, while the European Parliament proposed 40%. The EP's Econ Budget vote will take place on the 9 November (see <a href="#">META</a> about the recovery).	The negotiations are underway on the RRF and countries are developing proposed National Recovery and Resilience Plans (NRRPs) that will need to be agreed with the Commission for eventual disbursement of funds. The RRF and NRRPs will need to demonstrate full consistency and coherence with the EGD, EU standards and legislation. No money should go to fossil-fuel based projects and RRFs should respect the “do no harm” principle set in the EU Taxonomy. Furthermore, civil society should be engaged in structured dialogue to help define the National RRFs to support quality, legitimacy and alignment with EGD objectives.