

EEB Feedback on the 8th Environment Action Programme (8EAP)

The European Environmental Bureau (EEB), Europe's largest network of environmental citizens' organisations with more than 160 members across all Member States, welcomes the Commission proposal for the 8EAP published on 14 October. The 8EAP is a key co-decision instrument and long-term tool for environmental and climate policy planning until 2030, with a 2050 vision to "live well, within the planetary boundaries." It will be the key monitoring tool for the European Green Deal (EGD), as well as the Sustainable Development Goals (SDGs) and will help achieve the goals of EGD, United Nation's 2030 Agenda and its SDGs. Given the high level commitment to sustainability in the EGD, the 8EAP is of a different nature than preceding EAPs. While focusing on monitoring and implementation, it remains a very important tool for European environmental policy.

The EEB welcomes a range of elements in the proposal, including:

1. The aim of the 8th EAP to *accelerate the transition to a **climate-neutral, resource efficient, clean and circular economy in a just and inclusive way*** that helps achieve the SDGs (Article 1);
2. The commitment to the novel objective of "**regenerative growth**" – i.e. to give back to the planet more than we take (Article 2), the commitment to support **resilience** and to protect **present and future generations' wellbeing** (Article 1);
3. The integration of the **SDGs** in both the objectives and the monitoring framework (Article 1 and 4);
4. The encompassing nature of the **6 thematic objectives** – climate mitigation, climate adaptation and resilience, circular economy and regenerative growth model, zero pollution ambition for a toxic-free environment, biodiversity and wider natural capital, and promoting sustainability and tackling environmental and climate pressures related to production and consumption (Article 2);
5. The reiteration of respect for **planetary boundaries** both in the vision and the monitoring – leading to a better set of indicators to be a compass. We welcome the inclusion of the EU consumption footprint, that includes deforestation and forest degradation in third countries (Articles 2 and 4);
6. The additional focus on **implementation** and emphasis on **improved coherence** with **enabling conditions**, including the integrated approach, mainstreaming, green finance, harmful subsidy reform, and a science-based approach (Article 3);
7. Commitment to make full use of **nature-based solutions** (Article 3);
8. Making the "**do no harm**" oath a legal commitment and **adapting the "better regulation" guidelines and tools** to reflect that oath (Article 3);
9. The focus of the monitoring commitment to include "**a systemic transformation**" (Article 4);
10. That the assessment of progress should be in line with "**moving towards using well-being as a compass for policy**" (Article 4);
11. The commitment to a **decentralised, multi-level governance and an integrated approach** that pays careful attention to potential **trade-offs and needs of vulnerable groups**;
12. **The commitment to transparent engagement with non-government actors.**

European Environmental Bureau

Europe's largest network of environmental citizens' organisations

www.eeb.org

Rue des Deux Eglises 14-16

1000 Brussels, Belgium

+32 2 289 10 90

eeb@eeb.org

*International non-profit association
Association internationale sans but lucratif (AISBL)*

EC register for interest representatives:

Identification number: 06798511314-27

BCE identification number: 0415.814.848

RPM Tribunal de l'entreprise francophone de Bruxelles

The importance of each of the above depend on how they are articulated, interpreted and implemented.

We therefore recommend the following to be considered in the legislative debate:

Strengthen the objectives:

1. **Strengthen the “regenerative growth” objective** by making a specific commitment to reduce the excessive ecological footprint of the EU, such as making the EU’s “Overshoot Day” an EU “Regeneration Day” by 2030 to symbolise positive ambition rather than failure to live within the planet’s limits. Ensure it is possible to measure progress on the ground, with regular reporting on whether EU policies and the EU economy are giving back more to the planet than they are taking. Progress on regeneration should look at the aggregate picture for the EU and include insights on contributions to improved resilience. Progress should also feature specific contributions from specific policies such as circular economy, nature restoration, agriculture and soil, fisheries management, forestry management. Finally, the results should be integrated in and discussed at the European Semester and be the focus of country-specific recommendations;
2. **Operationalise the “do no harm” oath** by ensuring it is applied in legislation, in trade deals in light of the EU’s footprint on deforestation and forest degradation in third countries, by adapting the ‘better regulation’ guidelines and tools, and by linking it to the green list of the taxonomy while also promoting a “negative list” (like in the just transition fund) that excludes harmful measures and investments. Furthermore, promote not just the defensive approach of “do no harm” but a more positive one, more in line with “regenerative growth”, i.e. by embracing the “think sustainability first principle” and integrate this in the ‘better regulation’.

Assess progress properly and talk about it at the right level to make a difference:

3. **Assess progress convincingly: Complement the proposed 2029 evaluation** (Article 5) **with a mid-term evaluation in 2024** to be able to assess progress on the EGD and inform the programme of the next Commission and an eventual EGD-2;
4. **Ensure that monitoring of “systemic transformation” is a priority** and include the duty to identify and respond to cases of system lock-in that block progress with the European Green Deal as well as the duty to identify solutions, including anti-system lock-in strategies to overcome barriers;
5. The **wellbeing and resilience of Europe’s ecosystems** should also be monitored and promoted as this is our life support system. This includes terrestrial and marine ecosystems;
6. **Build up the indicator set on the “Wellbeing compass”** to ensure that it is fully functional and can guide decision-making and encourage that the benchmark of wellbeing is better integrated and at a higher level in the European Semester;
7. **Strengthen indicators on “policy incoherence”** and other governance failures to be able to better understand and target the key drivers of environmental and climate crises;

European Environmental Bureau

Europe's largest network of environmental citizens' organisations

www.eeb.org

Rue des Deux Eglises 14-16

1000 Brussels, Belgium

+32 2 289 10 90

eeb@eeb.org

*International non-profit association
Association internationale sans but lucratif (AISBL)*

EC register for interest representatives:

Identification number: 06798511314-27

BCE identification number: 0415.814.848

RPM Tribunal de l'entreprise francophone de Bruxelles

8. **Talk about progress at the right levels:** Ensure annual **progress on EGD** implementation is discussed not only in the **European Semester**, but also at **Head of State level at the EUCOs** given the fundamental importance of the EGD to the EU and our common future.

Have a credible response to lack of progress:

9. **Articulate policy response mechanisms** to be **triggered** by insufficient progress and/or monitoring, highlighting particular problems for implementation, especially where these are systemic or constitute lock-ins. It is not enough to simply mention enabling conditions. There needs to be a credible mechanism to ensure the delivery of the 8EAP and the commitments it enshrines. Traditional non-compliance response mechanisms and country-specific recommendations have proven to be insufficient on their own. More fundamental policy response capacity is needed to ensure that the legislative canon (the environmental *acquis*) is fit for purpose, that economic and financial signals drive the EU towards sustainability, and that governance systems facilitate progress;
10. Strengthen the 8EAP text so that **insufficient progress triggers new or reformed legislation, financial incentives and penalties** to ensure the polluter pays and governance changes to guarantee policy coherence and implementation. 'Better regulation' should be reformed to support this by including a sustainability check of legislation, i.e. does it promote progress to objectives of the EGD, 8EAP, and SDGs.

The purpose of the 8EAP monitoring mechanism cannot only be to provide more information on how Europe is doing and highlight problems and blockages without a response. The 8EAP needs to be able to inform and catalyse action every year, forming a driver and basis for a second European Green Deal that takes us to 2030. It needs to enable the transition to an EU that lives within the planetary boundaries, supports **resilience**, and protects **present and future generations' wellbeing**.

European Environmental Bureau

Europe's largest network of environmental citizens' organisations

www.eeb.org

Rue des Deux Eglises 14-16

1000 Brussels, Belgium

+32 2 289 10 90

eeb@eeb.org

*International non-profit association
Association internationale sans but lucratif (AISBL)*

EC register for interest representatives:

Identification number: 06798511314-27

BCE identification number: 0415.814.848

RPM Tribunal de l'entreprise francophone de Bruxelles

EEB Feedback on the 8th Environment Action Programme (8EAP) - short version - as per online submission for 4000 characters

The European Environmental Bureau (EEB) representing more than 160 members across all Member States, welcomes the 8EAP proposal. Given the EGD, the 8EAP is of a different nature than preceding EAPs. It remains a very important tool for European environmental policy. EEB welcomes a range of elements, including:

1. Its aim to *accelerate the transition to a **climate-neutral, resource efficient, clean and circular economy** in a **just and inclusive** way* that helps achieve the SDGs
2. The commitment to the novel objective of “**regenerative growth**”, to support **resilience** and to protect **present and future generations’ wellbeing**
3. The integration of the **SDGs** in both the objectives and the monitoring framework
4. The encompassing nature of the **6 thematic objectives**
5. The reiteration of respect for **planetary boundaries**
6. The additional focus on **implementation** and emphasis on **improved coherence** with **enabling conditions**
7. Commitment to make full use of ***nature-based solutions***
8. Making the “**do no harm**” oath a legal commitment and **adapting the “better regulation” guidelines and tools** to reflect that oath
9. The focus of the monitoring commitment to include “*a **systemic transformation***”
10. That the assessment of progress should be in line with “*moving towards using **well-being as a compass for policy***”
11. The commitment to a **decentralised, multi-level governance and an integrated approach** that pays careful attention to potential **trade-offs and needs of vulnerable groups**
12. **The commitment to transparent engagement with non-government actors**

The importance of each of the above depend on how they are articulated, interpreted and implemented.

We therefore recommend the following to be considered in the legislative debate:

Strengthen the objectives:

1. **Strengthen the “regenerative growth” objective**
2. **Operationalise the “do no harm” oath**

Assess progress properly and talk about it at the right level to make a difference:

3. **Assess progress convincingly: Complement the proposed 2029 evaluation with a mid-term evaluation in 2024** to inform an EGD-2

European Environmental Bureau

Europe's largest network of environmental citizens' organisations

www.eeb.org

Rue des Deux Eglises 14-16

1000 Brussels, Belgium

+32 2 289 10 90

eeb@eeb.org

*International non-profit association
Association internationale sans but lucratif (AISBL)*

EC register for interest representatives:

Identification number: 06798511314-27

BCE identification number: 0415.814.848

RPM Tribunal de l'entreprise francophone de Bruxelles

4. **Ensure that monitoring of “systemic transformation” is a priority** and include the duty to identify and respond to cases of system lock-in that block EGD progress
5. The **wellbeing and resilience of Europe’s ecosystems** should also be monitored and promoted as this is our life support system. This includes terrestrial and marine ecosystems
6. **Build up the indicator set on the “Wellbeing compass”** to guide decision-making and encourage that wellbeing is better integrated and at a higher level in the European Semester
7. **Strengthen indicators on “policy incoherence”** and other governance failures to be able to better understand and target the key drivers of environmental and climate crises
8. **Talk about progress at the right levels:** Ensure that annual **progress on EGD** implementation is discussed not only in the **European Semester** but also at **Head of Government level at the EUCOs** given the fundamental importance of the EGD to the EU and our common future

Have a credible response to lack of progress:

9. **Articulate policy response mechanisms** to be **triggered** by insufficient progress and/or monitoring
10. Strengthen the 8EAP text so that **insufficient progress triggers new or reformed legislation, financial incentives and penalties** to ensure that the polluter pays and that governance changes to guarantee policy coherence and implementation

The purpose of the 8EAP cannot only be to provide information on how Europe is doing and highlight problems and blockages without a response. The 8EAP needs to be able to inform and catalyse action every year, forming a driver and basis for a second European Green Deal that takes us to 2030. It needs to enable the transition to an EU that lives within the planetary boundaries, supports **resilience**, and protects **present and future generations’ wellbeing**.

European Environmental Bureau

Europe's largest network of environmental citizens' organisations

www.eeb.org

Rue des Deux Eglises 14-16

1000 Brussels, Belgium

+32 2 289 10 90

eeb@eeb.org

*International non-profit association
Association internationale sans but lucratif (AISBL)*

EC register for interest representatives:

Identification number: 06798511314-27

BCE identification number: 0415.814.848

RPM Tribunal de l'entreprise francophone de Bruxelles