



EEB

European
Environmental
Bureau

2021

WORK
PROGRAMME



EEB Work Programme 2021

We are Europe's largest network of environmental citizens' organisations. We bring together over 160 civil society organisations from more than 35 European countries. Together, we work for a better future where people and nature thrive together.

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Responsible editor: Jeremy Wates

European Environmental Bureau (EEB)

Rue des Deux Eglises 14-16

1000 Brussels, Belgium

+32 (0)2 289 1090

eeb@eeb.org

eeb.org

meta.eeb.org



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About the EEB

The European Environmental Bureau (EEB) brings together citizens' groups from across Europe. Our 160 members from 36 countries have more than 30 million individual supporters.

Vision

A better future where people and nature thrive together.

The next generation deserves a healthy planet. We believe in a world where equal, just, peaceful and democratic societies can prosper. A world with rich biodiversity and a safe climate. A world where laws and policies promote health and wellbeing while respecting nature. We believe that Europe has a crucial role to play in building this future.

Mission

We are the largest and most inclusive European network of environmental citizens' groups – and the only one that works on such a broad range of issues.

We advocate for progressive policies to create a better environment in the European Union and beyond.

Values

The EEB stands for sustainable development, environmental justice, global equity, transparency and participatory democracy. We promote the principles of prevention, precaution and 'polluter pays'.

Our values:

- **Democracy:** We are a representative and inclusive organisation
- **Fairness:** We are committed to justice, equality and non-discrimination
- **Respect:** We provide an enabling, nurturing work culture that inspires excellence
- **Integrity:** We advocate policies based on science and communicate with honesty
- **Sustainability:** We strive to practice what we preach, applying green principles to our work.



Introduction to our 2021 Work Programme

The European Environmental Bureau brings together environmental citizens' groups from across Europe. As the largest such network in Europe, we articulate the views and concerns of a wide and diverse group of people who care deeply about the natural world and the environment we all share.

Our 160 members from 36 countries boast more than 30 million individual supporters. We are the only European network that works on such a wide range of environmental topics and is open to any genuine environmental citizens' group, whether national or European, to join.

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

2021 will be a crucial year for people and nature in Europe, and around the world. While 2019 ended with hope demanded by young people marching for climate and the environment and presented in the EU in the form of the European Green Deal, the new

decade had hardly started when the Covid-19 pandemic struck, with devastating impacts both on public health and on the economy. After a turbulent 12 months, 2021 will test the resolve of decision makers who declared the need to 'build back better' and supported the EU's Green Recovery package.

This year will be the second of our 10-year [long-term strategy](#), through which we seek to increase our impact on key decision-making processes, consolidate our membership, expand our outreach through ever-improving communications and ensure that our organisational base is fit for purpose.

This work programme sets out, area by area, what we aim to achieve in the coming year to ensure that we – Europe and the EEB – move towards these longer-term goals. It illustrates the EEB's distinctive combination of determined idealism with concrete pragmatism.

While our long-term strategy was drafted before the coronavirus emerged, and elements may need to be revisited, the underlying aim is clear: we are working to build a better future, where people and nature thrive together.



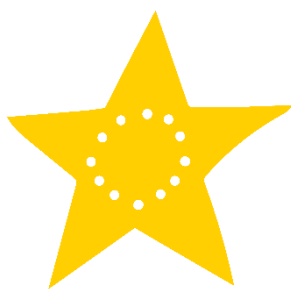
Policy Priorities

The following are the criteria that the EEB applies when deciding on policy priorities:

- High impact on the environment
- Potential to make a difference on policy level
- Achievable with reasonable effort
- Strategic political opportunities and/or commitments
- Public and media concern
- Unique role, niche or gap
- Potential to get funded
- Expertise & support within the network & secretariat

When deciding whether to set up thematic working groups, we consider all of the above as well as the interest of members to engage in a working group.

Where appropriate, the EEB will promote its objectives on a given topic by collaborating with, supporting and/or being advised by one or more of its member organisations which is/are active or specialized on that topic, rather than by recruiting new staff capacity to deliver the work.



European Institutions and Governance

2021 will be the second year of the European Green Deal (EGD) and the first full year after the onset of the COVID-19 coronavirus that fundamentally challenged the EU – from policies, solidarity and cohesion among its Member States, and the outlook for the European project itself, already set back by the departure of the United Kingdom from the European Union.

The [EU Presidency Trio of Germany, Portugal and Slovenia](#) will be known as the trio that had to chart the way out of the COVID-19 crisis. While much was on Germany's shoulders in the second half of 2020, there will continue to be major responsibilities for Portugal and Slovenia, whose Presidency responsibilities are expected to be broadened as key international meetings originally planned to take place during the German Presidency were moved to 2021, including the UN Convention on Biological Diversity (CBD) and UN Framework Convention on Climate Change (UNFCCC) Conferences of the Parties (COPs).

In the early months following the arrival of COVID-19, the policy discussions at the heart of Europe focused on the crisis response, on the launch of proposals for a recovery package and reformed Multi-annual Financial Framework (MFF – in May) and the roll out of European Green Deal policies. In many cases the initiatives launched – the Circular Economy Action Plan II, the Industrial Strategy, the Biodiversity Strategy and the Farm to Fork Strategy – contained specific commitments and made promises for additional work for 2021, for example new legislation such as on biodiversity restoration.

One significant lesson from the pandemic is that the current economic model based on resource over-extraction, incursions into and destruction of wild nature, pollution, and highly interconnected interdependent global supply chains fuelled by debt-leveraged growth has created risks and weakened our economies' and societies' resilience to crises. A growing community see that a return to business as usual is not the solution, and that a resetting of the economic and governance models, a reconsideration of values and cooperation, and a refocus of funding to drive a transformation towards sustainability are needed. Not all share this vision, and 2021 will require civil society to fight for the overall vision, argue for a strong European Green Deal, and advocate for ambition in each of the elements of the EGD and supporting tools to catalyse the needed transition.

For many years, the EU's high-level policy framework has been unduly based on short-term economic considerations and has failed to put sustainable development at the heart of the EU's mission or look beyond gross domestic product (GDP) as the primary indicator of success. It has also failed to address a wide range of negative impacts of European policies and practices around the world such as deforestation or resource depletion.

The adoption of the European Green Deal is an important step in the right direction. There is plenty of evidence (e.g. from OECD) and formal recognition (e.g. in the EU's Environmental Action Programmes as well as the EGD itself) that stricter environmental policy makes economic sense even in the short run, for example by boosting employment and



stimulating innovation. Examples of environment-economy win-win strategies would be the phase out of costly public subsidies to fossil fuels, environmental tax reforms that put a price on emissions and lower taxes on for example employment, and investment in technologies and measures that save the EU and its citizens money and resources, such as renewables and energy efficiency. This will help break the systemic fossil-fuel lock-in and together allow the EU economies to transition to a more sustainable future. There is also a growing recognition that a range of system lock-ins are blocking progress to essential policy commitments and challenges, including the climate emergency and existential threats to nature and humanity as identified by the landmark May 2019 Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) report and the fifth edition of the UN's Global Biodiversity Outlook report that both underlined the link between nature destruction and the emergence of diseases, and underlined that not one of the Aichi Biodiversity Targets for 2020 were met. .

In addition, environmental policy has been weakened not only by a lack of ambition in its formulation, but also by a lack of political will in its implementation. The lack of ambition has been exacerbated by the deregulatory pressures behind the so-called better regulation agenda. There is a clear need to upgrade this perspective and move towards regulation and policies to protect citizens' health and rights and the environment. The implementation deficit also needs urgent attention - to ensure that commitments and objectives are met, that citizens' rights to a quality environment are supported and that the rule of law is respected. Without this, public trust in EU and national institutions will be undermined.

Following her appointment, Commission President von der Leyen affirmed the Commission's collective responsibility for implementation of the UN Sustainable Development Goals (SDGs), imposed on each Commissioner the responsibility for ensuring

the delivery of the SDGs in their respective areas and pledged to refocus the European Semester into an instrument that integrated the SDGs. The European Green Deal has been deemed to be one of the major tools to apply the SDGs in the EU. The new Commission did not commit to come forward with an EU implementation strategy for the SDGs, notwithstanding the Council's reiteration in December 2019 of its earlier call for such a strategy, but presented a staff working document in autumn 2020 on how to coordinate its work on the SDGs. While the new European Commission has not renewed the mandate of the Multi-Stakeholder Platform on the implementation of the SDGs, the Commission President has vowed to lead on the coordination of SDG implementation across the EU.

In 2021, pressure from civil society (and also certain Member States) must be maintained and strengthened in order to give a clear signal to the new Commission and Parliament that the implementation of the 2030 Agenda for Sustainable Development is essential. The COVID-19 crisis has shown up the deep inequalities that persist in the EU, for instance, the additional health risks for those exposed to the worst air pollution. All recovery measures need to be aligned with the 2030 Agenda objectives and sustainable development principles. The implementation of the 2030 Agenda not only provides a unique opportunity for Europe to set out a comprehensive new political framework in the form of a new overarching EU Sustainable Development Strategy with a 2030 time horizon and beyond; it should also be the basis for the discussion on the future of Europe and the long-term compass for all policies and the EU's budget.

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. Of particular importance is the gender-differentiated impact of environmental and sustainability policies and the need to take



gender equality questions into consideration for impactful environmental and climate action. The European Green Deal does not address the issue of gender inequalities and the gendered challenges to achieve a Just Transition. The EEB will explore the links between the EGD and the new Gender Equality Strategy, and advocate for a gender-just European Green Deal.

Finally, there is a risk that having departed from the EU, the UK will opt for a lower regulation pathway than the EU in order to offset the losses that are expected to result from the UK government's decision to stay outside the Single Market and Customs Union. It will therefore be important for the EEB to monitor closely the implementation of the EU-UK Trade and Cooperation Agreement that was provisionally agreed at the end of 2020 and engage as appropriate in order to avert any

negative consequences for environmental policy in the EU or UK.

In all of these areas, as noted in our Long-Term Strategy, the EEB's approach will focus on increasing political will by highlighting the benefits of the policies we advocate and breaking down barriers to action. This should lead to better integration and good governance, manifested in commitments and strategies as well as improved regulation and environmental laws. In addition, wider political support should help improve how citizens' ideas and views are sought and taken on board, improving democratic decision making and legitimacy. Commitments to independence of public authorities from undue influence of vested interests and increased transparency and accountability are essential for wider good governance and decision making. Contradictions between laws should be removed, thus achieving policy coherence.

Activities:

- Engage with the Commission, Parliament and Council to promote an ambitious roll-out of the European Green Deal that is at the heart of the COVID-19 response and ensure that policies are adequate to respond to the critical environmental challenges that Europe faces;
- Engage in high-level advocacy work in support of ambitious implementation of the European Green Deal (2020-2024) and an 8EAP (2021-2030) that is ambitious and progressive, so that these together catalyse a just transition based on sustainable development principles and the international commitments made under the 2030 Agenda;
- Consult civil society and engage with policy makers on how the promises of the European Green Deal can be turned into policy reality and practically implemented – for example, through the EU budget and recovery package, the European Semester and a range of specific policy proposals;
- Insist on the mainstreaming of environmental considerations in the Commission's priorities, as reflected in its political guidelines and work programmes as well as the mandates and responsibilities of Commissioners;
- Represent the interests of the environment by formally contributing to and following public processes that impact the environment, providing expertise and information, giving a voice to nature and monitoring the state of the environment and compliance;
- Promote a move away from the deregulation agenda that has masqueraded as 'better regulation' and seek to minimise the risks coming from the new Commission's commitment to the "one-in-one-out" principle by communicating the ethical, environmental, health and political benefits of regulation;

- Nudge EU presidencies towards broader and more ambitious agendas with the EEB's Ten Green Tests, Memoranda and Presidency assessments, as well as with inputs to Council meetings;
- Engage in the finalisation of the MFF and its implementation so that it serves as a budget that protects the environment, drives the Green Deal transformation and 'does no harm' – addressing the climate emergency and the existential crisis of biodiversity loss, and guided by the principle that public money should deliver public goods;
- Engage in wider EU financing tools, demanding that EU money is spent in line with strict environmental principles and that no further funding is made available to unsustainable projects, and calling for just and effective taxes and pricing.
- Systematically push for increased transparency and accountability of the EU institutions, including the possibility for NGOs to challenge actions through the courts, as part of a broader push for environmental and social justice;
- Strive to secure civil society space by ensuring that environmental rights – to have relevant information, to be part of decision-making that affects the environment and to be able to challenge decisions where they are against the law – are upheld;





- Strengthening implementation by demonstrating good practices and highlighting gaps in implementation so that governments can be held accountable and live up to their responsibilities;
- traceability and sanctioning, and making sure that the precautionary principle is applied and that polluters pay;
- Monitor and as appropriate engage in relevant aspects of the implementation of the EU-UK Trade and Cooperation Agreement;
- Systematically promote and monitor the implementation of the 2030 Agenda for Sustainable Development in Europe and its integration across all policy areas to ensure enhanced coherence;
- Monitor and provide input to the SDG implementation actions by the different Commissioners and the European Parliament and ensure that SDG targets are fully integrated into all EU policies, with appropriate EU indicators, and that policy coherence for sustainable development is secured;
- Advocate for the establishment of a new multi-stakeholder body on the implementation of the SDGs to continue, with an improved mandate, and seek to actively contribute to that body;
- Continue the EEB's leading role in the EU civil society alliance SDG Watch Europe (on its Steering Group and/or active in the work strands);
- Stimulate and facilitate EEB membership engagement in national implementation of the SDGs, including through continued updating of the online SDG Toolkit and the EEB's Agenda 2030 working group;
- Seek opportunities to continue the work initiated through the three-year awareness-raising and policy campaign [Make Europe Sustainable for All](#) on the ambitious implementation of the SDGs by and in Europe;
- Provide analysis of the nexus between gender equality and the objectives of the EGD, and engage the EEB membership in a discussion on a gender-just EGD.



Environmental Law and Justice

Strengthening environmental integration, implementation and the rule of law

Compliance promotion, inspections and enforcement are repeatedly identified in the Commission's European Green Deal as necessary to realise its commitments, with inspections and coherent enforcement measures being particularly important. They need to be given high priority by the Commission.

Considering the recent Commission Staff Working Document on the Environmental Crimes Directive, there may be an opportunity to broaden the scope of the Directive and to ensure that it is effective in combatting illegal activities and increasing compliance.

If funding permits, we will push for strengthening the Environmental Liability Directive, so that it more effectively implements the polluter pays principle, which will ensure that those responsible for environmental damage are financially liable.

The Environmental Implementation Review (EIR) process will continue to be a focal point for the Commission in its work to improve implementation of environmental law and policy in the Member States. The third cycle of country reports is scheduled to be published in 2021. These must be more ambitious in identifying and solving Member State-specific but also systemic issues, going into root causes, and involving public administration quality and governance, compared to the

reports of 2019. It is hoped that the EIR will be used to strengthen any proposal on the European Semester Process and that it will be used as a tool to increase environmental integration in other policy areas. At the same time, the EIR should not in any way detract from the Commission's duty to enforce the Treaties and bring infringement proceedings. The EIR also needs to be implemented in a more transparent, participatory manner with close involvement of civil society actors.

Harassment of environmental civil society groups and activists appears to have increased in the last few years in Europe. This is a major problem, not only for the work of the EEB and its membership, but for the civil society community as a whole. Movements and actions to undermine and silence NGOs and interest groups are a threat to democracy and the rule of law. The COVID-19 pandemic has already exacerbated the conditions for democratic engagement of NGOs in some Member States, with the argument that recently introduced measures that clamp down on public engagement are necessary to tackle the emergency. All commitments in the EGD that NGOs will advocate for and their right to information, public participation and access to justice will be underpinned by how seriously the Commission and Parliament intend to defend the rule of law.



Activities:

- Continue to press for sectoral as well as horizontal initiatives to ensure effective compliance with environmental law;
- Continue to follow the evolution of the Environmental Implementation Review (EIR) and promote civil society engagement to help identify and promote solutions, in particular systemic implementation and enforcement measures in close cooperation with civil society groups;
- Continue collecting information on complaints cases about poor transposition of environmental legislation or about breaches in its application and whenever possible, provide support to EEB members having submitted such cases and take action where deemed strategic;
- Monitor and provide input and/or react to the assessment of the Environmental Crimes Directive together with the members;
- Monitor the Commission's work on the rule of law in the Member States with the help of national NGOs and maintain the pressure for more systematic follow-up of complaints and more extensive use of the infringements process to deal with breaches of environmental law;
- If funding permits, advocate for the enforcement of the polluter pays principle through a strengthened Environmental Liability Directive.

Environmental democracy

MoP-7 of the Aarhus Convention will be an important event in the environmental democracy calendar in 2021. The EEB will as in the past be available to coordinate the NGO participation in the preparatory process as well as in the MoP itself. Scheduled to take place in October 2021, the MoP will adopt a work programme setting the direction of the Convention for the next four years. It will be held jointly with MoPP-3 of the Convention's Protocol on Pollutant Release and Transfer Registers (PRTR).

In March 2017, the EU was found by the Aarhus Convention Compliance Committee to be in non-compliance with the Convention due to the insufficient possibilities for access to justice at the EU level. A Commission study published in October 2019 confirmed that the most effective way to address the problem and bring the EU into compliance with the Convention was through revising the Aarhus Regulation, the EU legislation that applies the Convention to the EU institutions.

Such a proposal was tabled in October 2020. While the Commission proposal addresses the single biggest obstacle to access to justice in the Regulation (the unwarranted limitation of acts that may be challenged to measures of 'individual scope'), it fails to address other significant obstacles and would not bring the EU into compliance with the Convention without significant strengthening through the co-decision process. Unfortunately, a Council position adopted under the German Presidency at the December Environment Council broadly supported the Commission proposal and failed to address its shortcomings. The subsequent step will be to ensure that the Parliament input to the legislative process and the ensuing trilogue uphold the principle of increasing access to justice, take full account of advice from the Compliance Committee to be issued in early 2021 and strengthen the Commission proposal so that the resulting amendment of the Regulation brings the EU fully into line with the Convention. However, it seems unlikely



that the issue will be fully resolved before the Aarhus Convention MoP-7 in 2021.

There are also problems with access to justice at the Member State level and this has been explicitly recognised as a problem in the EGD. While the Commission's interpretative guidance on access to justice may be useful as an interim measure, a directive to ensure access to justice in environmental matters at the Member State level will ultimately be required and will support better implementation and enforcement of environmental law.

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

have played a key role in defending and ensuring responsible use of the mechanism.

The EU and its Member States have also been resistant to any further progress on revising the Protocol to make PRTRs fit for the following purposes: improved benchmarking and compliance promotion, promotion of the uptake of Best Available Techniques and improved databases on environmental performance footprinting, including for production outputs, and monitoring of progress towards achievement of the SDGs by the concerned industries and governments.

The Espoo Convention on Environmental Impact Assessment in a Transboundary Context also provides a potentially useful framework to promote participatory democracy and strengthen environmental integration in the wider Europe. As with the Aarhus Convention, positions taken by the EU under the Espoo Convention have sometimes been problematic, tending to undermine the compliance mechanism and thereby the effectiveness of the Convention itself. This has underlined the importance of maintaining active NGO engagement in the Espoo Convention processes.

Activities:

- Continue to exercise the rights provided under the Aarhus Convention and its implementing legislation in the EEB's everyday advocacy work wherever needed or useful;
- Press the co-legislators to strengthen the legislative proposal to amend the Aarhus Regulation so as to widen citizens' rights of access to justice in environmental matters, address other deficiencies in the Regulation and bring the EU into compliance with the Convention, as part of a broader attempt to increase the transparency and accountability of the EU institutions;
- Continue to advocate for a directive on access to justice in environmental matters while assessing the effectiveness and making use of the interpretative guidance on access to justice where this can help to achieve progress in the Member States;
- Continue to play a leading role on behalf of the European ECO Forum in the NGO work on the further development and implementation of the Aarhus Convention and its PRTR Protocol, in particular through coordinating NGO input into the forthcoming MoPs and the respective preparatory processes with a view inter alia to supporting and seeking improvements to the effective use of the Convention's compliance mechanism, such as more resources and improved remedies;
- Engage in relevant processes under the Espoo Convention and its Protocol on Strategic Environmental Assessment, also through the EEB members;



- Where appropriate, explore opportunities to promote the Aarhus Convention and Principle 10 of the 1992 Rio Declaration at the global level and in other regions, in particular with regard to the Aarhus Parties' obligation under Article 3(7) to promote the application of the Convention's principles in international environment-related processes and bodies dealing with the environment-related matters.

Environmental Justice

The EEB will continue its active involvement in the Atlas for Environmental Justice - the world's largest database on environmental conflicts - through the EnvJustice project. The Atlas and the network behind it increase the capacities of communities struggling for environmental justice, including indigenous groups. The EEB will continue to be responsible for the communication part of the EnvJustice project at least until the 5-year long project ends on 31 May 2021. Given the growing wealth of cases that are collected in the EJAtlas, the EEB and its members should be encouraged to refer to this tool to disseminate information to their audiences and to use it as a campaign tool. Given that the current project with EJAtlas is coming to an end in May 2021, we will seek opportunities to continue and develop the EEB's engagement around the Atlas focusing on how to translate the cases into policy recommendations.

Related to the EEB's long-term association with the Atlas, the EEB has obtained funding to work on cases of environmental injustice vis-à-vis Roma

communities in Eastern Europe. Following renewed funding for 2021-2023, we will continue to advocate for environmental justice for Roma communities all across the region.

Since 2018, the EEB's has served as an official Goldman Environmental Prize nominator. In 2020, we submitted a nomination for the third time. We engage with our members on this initiative to identify suitable candidates among grassroots activists to nominate for this prestigious \$100,000 award.

At the international level, there is an opportunity for the open-ended working group on the UN Convention on transnational corporations and human rights





obligations to finally tackle some of the structural issues that prevent victims from seeking environmental justice (see Due Diligence). Moreover, it is hoped that Aarhus MoP-7 will decide on setting up a Rapid Response Mechanism that can be activated when anyone exercising their rights under the Convention is threatened or harassed. Preparatory work on what such a Rapid Response Mechanism should look like is already underway; fine-tuning and mobilising support to ensure that it will be an effective mechanism will be crucial in 2021.

Since the murder of investigative journalists and some high-profile court cases in the US, there is now more attention to increasing instances of strategic lawsuits against public participation (SLAPPs) being used against

activists and journalists in the EU too. The Commission is becoming increasingly aware of this phenomenon, with some EEB members also directly threatened by vexatious litigation from companies and public authorities for simply being successful in their campaigns and defending the environment.

Given these different activities related to grassroots environmental justice activism and conflicts, the EEB has an EnvJustAct mailing list for exchanges on environmental justice activism (e.g. for the Environmental Justice Atlas, Goldman Prize, work on Roma, environmental defenders). We consider this to be an EEB working group 'in the making', which can be upgraded as soon as there is enough interest from the membership to collaborate and enough funding.

Activities:

- Carry out (social) media work around the Environmental Justice Atlas and EnvJustice project outcomes;
- Promote the expansion of the collection of cases in the EJAtlas, together with the project partners and EEB members, especially for geographical areas and on issues in which there is little information;
- Selectively engage in highlighting specific cases of environmental injustice, in particular when these cases can strengthen the communication actions for campaigns, and collaborating with groups working on trade and indigenous groups;
- Carry out advocacy work regarding environmental discrimination against Roma communities in Europe, in particular to influence the post-2020 European framework for Roma inclusion and its implementation;
- Undertake Goldman Environmental Prize nomination research work and information exchanges with EEB members on the nomination process;
- Engage with EEB members through an e-mail list on environmental justice activism;
- In cooperation with partners and members in the Aarhus civil society community, coordinate an NGO position on a future Rapid Response Mechanism under the Aarhus Convention to address threats to environmental defenders, including capacity building activities if sufficient funding is available;
- Coordinate with a wide range of civil society groups, academics and journalists on proposals for changing existing legislation and proposing new EU-wide measures that would prevent powerful individual and companies from abusing the legal systems by launching SLAPP suits.



Due Diligence

The United Nations Guiding Principles on Business and Human Rights, adopted in 2011, state that companies have a responsibility to respect human rights, including through 'Human Rights Due Diligence'. Environmental and social risks are understood as being part of any assessment that companies need to carry out for due diligence. General and specific OECD guidance for responsible business conduct include considerations on environmental impacts. A number of EU Member States have in recent years developed national rules regarding due diligence that companies must take, such as the UK Modern Slavery Act, the Dutch Child Labour Due Diligence Act or the French Duty of Vigilance Law. At EU level, there are some sector-specific due diligence requirements, such as those under the Timber Trade Regulation and the Conflict Minerals Regulation, including some general reporting requirements for large public interest companies under the Non-Financial Reporting Directive.

The Commission will develop new EU-wide horizontal legislation which should align with the OECD general and sector-specific due diligence guidance for responsible business conduct. Lessons from existing due diligence-related legislation, particularly from the

Member State and EU rules, will be taken into account to harmonise practices and make sure that there is a level playing field for companies and legal certainty regarding their obligations. Enforcement of this new law and the possibility of redress for victims will be crucial to ensure compliance. There is a need to continue to monitor the Commission's developments on corporate governance, including to counterbalance the corporate interests behind the so-called 'innovation principle' which may weaken the Commission's efforts in this area.

At the same time, the open-ended working group for a UN Convention on transnational corporations and human rights obligations may finally lead to a treaty where international businesses can be held accountable for their human rights and environmental abuses that they cause. The integration of Aarhus Convention principles and the recognition of environmental rights as fundamental rights, can help affected communities get access to justice under this mechanism. This UN Convention would also address some of the disproportionate rights that transnational corporations enjoy in investment treaties and that they can enforce under Investor-State Dispute Settlement (ISDS) mechanisms.

Activities:

- Continue to provide input to NGO demands on the development of an EU horizontal legislative proposal on due diligence requirements on businesses, in particular to ensure that environmental due diligence is reflected in such a proposal and that access to justice to victims is granted and effective;
- Continue to provide knowledge and input to the development of sector-specific due diligence requirements at EU level for e.g. ICT and textiles sectors (see section on circular economy) in a way that these are coordinated with the efforts to develop horizontal due diligence legislation;
- Selectively provide support to alliances pushing for a legally binding UN treaty on transnational corporations and human rights at the open-ended working group, provide input where possible, especially to integrate the Aarhus principles into the process, and push for a strong positive EU mandate for the negotiations.



Global and Regional Policies

Many environmental problems transcend national and continental borders, and some are global in nature, requiring global solutions. Even if the EU were to adopt the best policies and practices for the environment, these would not even adequately protect the environment in Europe, never mind around the world. For this reason, while the primary focus of the EEB's work is Europe and in particular the EU, we also seek to contribute to stronger global and regional policies that protect the environment and promote sustainability. These can in turn then be used to strengthen the EU's policies, as has been the case with multilateral environmental agreements and the 2030 Agenda.

As the largest single market in the world, the EU has significant influence outside its borders – most obviously in enlargement and neighbourhood countries, but also throughout the world and in fora such as the UN and the OECD as well as through bilateral relations with individual countries. The EEB is therefore concerned to ensure that the EU's policies are positive in their impact on other parts of the world and that its influence on global and regional policies is also positive. In reality, the

EU's influence and impact around the world are mixed when it comes to the environment. On the one hand, it has developed some world-leading environmental policies and standards and is often the most pro-environment bloc among the big world powers. On the other, European consumption patterns have a big environmental footprint in other parts of the world.

As well as advocating for EU policies, positions and practices that have a more benign impact on the rest of the world, we will engage directly in selected global or regional fora, to provide a European civil society voice in those processes. When progressive agreements are reached at global or regional level, we will use these as leverage to strengthen the EU's environment-related policies. We will also endeavour to support civil society organisations in the enlargement and neighbourhood countries to help them derive the benefits of EU policies where these are positive for the environment. Finally, we will explore the possibility of selectively engaging with partners in non-European countries where sharing of European experiences (good and bad) can be helpful.

Global 2030 Agenda for Sustainable Development

Global sustainable development processes have shown considerable potential to yield environmental benefits: environmental NGOs have been able to use the SDGs and the 2030 Agenda for their campaign and advocacy work at national level. The engagement of environmental NGOs both at national and international level will be crucial in the 10 years remaining until 2030 during which the UN, the EU and national governments have agreed to

implement this comprehensive agenda on sustainable development.

The EEB worked to facilitate NGOs engagement in the Rio+20 follow-up process and – after the adoption of the 2030 Agenda – the process of monitoring and reviewing the SDGs. We will continue to promote the SDGs in Europe and are actively involved in global coalition-building in order to secure the



environmental dimension in the 2030 Agenda (see European Institutions and Governance). In 2021, the EEB will continue to actively engage in the global and regional processes shaping decisions on the monitoring and review mechanisms for the 2030 Agenda. This will be done at the UN High-Level Political Forum

(HLPF) meetings and the UNECE Regional Forum for Sustainable Development. The EEB will contribute to shaping the global and EU NGO position and will try to influence the position of the EU in those discussions by providing direct input to it.

Activities:

- Participate in and provide input to the HLPF processes at global and regional levels, in the latter case by participating in the UNECE Regional Forum for Sustainable Development;
- Support EEB members and partners in their participation in the regional and global SD process;
- Engage with EEB members through the 2030 Agenda working group to ensure members' input into national, regional and global SD processes, and to encourage the development or updating of National Sustainable Development Strategies;
- Actively engage in the debates around the future development of the stakeholder engagement mechanisms both at the level of the HLPF and of the UNECE Regional Forum on Sustainable Development;
- Monitor and influence EU involvement in those processes, drawing on the EEB's EU policy work;
- Maintain and update a toolkit for EEB members to stimulate engagement in actions implementing the 2030 Agenda for Sustainable Development on the Member State level;
- Work in partnership with relevant umbrella organisations and coalitions in order to further the above objectives and reach out to other sectors in society in order to encourage them to involve the environment in their SDG work.

United Nations Environment Assembly (UNEA)

The UN Environment Assembly (UNEA) is the world's highest decision-making body on environmental matters and more and more NGOs participate in the biennial Assembly. It is important to strengthen civil society's input to and influence on UNEA resolutions to make the Assembly a global forum from where progressive new environmental policies start. After the upgrade of the UNEP Governing Council to UNEA, involvement of stakeholders in UNEA processes became even more important. In 2021, the EEB will engage in the process for UNEA-5, whose first session is scheduled as a virtual meeting for February 2021 (UNEA 5.1), and a second session, with presence in Nairobi, for February 2022 (UNEA

5.2). The EEB will also continue to actively engage in the discussions around UNEP's stakeholder engagement policy following the previous failed attempts to resolve this issue. We will disseminate information to interested EEB members and facilitate advocacy work. The election of the EEB's Director of Global Policies and Sustainability as one of two regional facilitators for European major groups and stakeholders will provide a good basis for achieving these goals. The initiative to establish a Global Pact for the Environment (GPE), spearheaded by France, suffered a setback in March 2019 when governments refrained from recommending that the UN General Assembly initiate negotiations,



though its proponents hope to bring the GPE back on the global agenda in 2022 at the next Earth Summit.

Activities:

- Seek to organise capacity-building on the UNEA process and to initiate a strategic debate within civil society about lessons learnt and our objectives for UNEA-5 (if funding permits) and involve interested EEB members in the discussions;
- Engage in the preparatory process for UNEA 5.1 and 5.2, through participation in the Committee of Permanent Representatives and through the Major Groups and Stakeholder Facilitation Committee, as well as the first, virtual session of UNEA-5 itself in February 2021;
- Co-organise an international consultation during the virtual Global Major Groups and Stakeholders Forum in February 2021;
- Co-organise, with WECF, an international consultation in preparation of UNEA 5.2 in mid-2021;
- Maintain regular exchanges with UNEP (through the Nairobi HQ and the Geneva and Brussels offices);
- Engage in the discussions around the stakeholder engagement process for UNEA;
- If the GPE concept gains traction again, contribute to strong civil society input.

Beyond the European Union borders

The EEB will continue its activities aimed at promoting better environmental policies in the countries neighbouring the EU and strengthening collaboration with NGOs working in those regions. We aim to continue to monitor developments regarding accession negotiations with candidate countries in South-East Europe and Turkey, by implementing a new phase of the ENV.net project and with a project on water management in Turkey and ensuring that Turkish water law is in line with the Water Framework Directive.

The EEB will continue to explore new opportunities to step up its work with our members and other interested NGOs in the countries within the European Neighbourhood

Policy, in particular those belonging to the Eastern Partnership. In 2021, the EEB will explore the possibilities to engage and promote NGO involvement in relevant UNECE processes in addition to those already mentioned above (the Aarhus and Espoo processes and the regional meetings on SDG reviews and HLPF consultations), such as the Environment for Europe process, where appropriate.

We will also engage selectively with partners in other non-European countries or contribute a European NGO perspective to bilateral projects or exchanges between the EU and specific non-EU countries where this can bring clear added value and advance a progressive environmental agenda.



Activities:

- Organise a strategy meeting for members (and partners) from Eastern Europe and the Caucasus to further develop our joint plans and possible projects, to improve EEB membership services for members from these countries and to discuss our future engagement with the European ECO Forum;
- Implement a joint project in Turkey on water;
- Explore funding opportunities to continue the work of the ENV.net project in the Western Balkans and Turkey and advocate towards DG NEAR and DG ENVI to support a regional network of eNGOs;
- Seek funding opportunities in candidate and Eastern Partnership countries together with the EEB members;
- Prepare and support EEB members' participation in the preparatory process for the 2022 Ministerial Conference Environment for Europe, based on availability of funding and level of members' interest.

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 2021, the EEB will continue to coordinate the NGO input into the implementation of the OECD's environmental work programme and ensure the CSO voice is heard in the multi-country discussions.

Activities:

- Participate in several working parties and working groups of the OECD (such as those dealing with chemicals, biodiversity, industrial emissions and circular economy), the Environmental Policy Committee (EPOC), the Green Growth and Sustainability Forum and SDG work;
- Seek to secure good geographical balance in NGO engagement among all OECD countries;
- Provide capacity-building to EEB members and the wider eNGO community about civil society engagement with the OECD (if funding permits).





Population

A major, if not the major, driver behind many of the environmental problems described in this work programme is the continuing growth in human population numbers. These have increased dramatically from just 4 million 12,000 years ago to 1.65 billion in 1900 and from there to the current level of 7.6 billion and are foreseen to continue increasing to 9.8 billion by 2050 and 11.2 billion by 2100. Whether we consider climate change, biodiversity loss or pollution of the oceans, virtually all environmental problems would be easier to solve with fewer people, and most are exacerbated by more people.

Despite the objective importance of human population numbers as a key factor in

determining our impact on the environment, population receives little attention from the environmental movement. This may be due to the very long timespans before measures to reduce the population growth rate take effect, to the fact that some of the measures required (e.g. empowerment of women and girls) lie outside the traditional field of 'environmental' measures, or to the fact that some measures taken to curb population growth raise sensitive political, moral and/or religious questions. Given the threat posed by an ever-growing human population to the balance of life on Earth as well as the quality of life of future human generations, the EEB believes that this topic needs a fuller discussion, first and foremost within the environmental movement.

Activities:

- Hold a workshop for EEB members and other environmental NGOs to exchange information and perspectives and discuss policy options.



Economic Transition

Macro-economic questions and the transition towards a sustainable future

Our efforts to spread evidence-based ideas for deep changes in our economic system has become only more important now that COVID-19 pandemic has triggered the deepest economic crisis in our lifetimes. The shock events of early 2020 also affect the work programme of 2020 and make it hard to predict where our focus will be in 2021.

In the European Parliament, the 2020 follow-up to the 2018_post-growth conference has been postponed to 2021. We were already helping the organisers and now this will be a major event for 2021, much bigger than the first such conference.

After successful one-off events with the Austrian and Finnish Presidencies in their Growth in Transition (2018) and Beyond Growth (2019) conferences, we will strengthen our work with Presidencies through a new funding line and integrate our macro-economic work in this closer collaboration by ensuring that the key messages on the economic transition, including the need to reduce inequality and promote social justice, are reflected in the Presidency Memoranda.

The European Commission launched a review process of the economic governance, which includes for example the Stability and Growth Pact. We are working on giving input to this consultation and will continue to follow the process in 2021.

Our Economic Transition team not only follows certain policy agendas, it also works hard on changing the narrative used in politics, by the

media and among the population in general. In May 2019, we launched a letter signed by 200+ academics in 10 countries and later that year we launched the Decoupling Debunked report, with massive media attention and political interest as a result. In 2020 we prepared two new reports whose policy recommendations we will continue to use with the media, politicians and civil society in 2021. The first was with the federations of trade unions and youth organisations on the role of work in a positive post-growth scenario for the future. The second was with Oxfam on a human economy, as part of the Climate of Change project.

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

Activities:

- Through the working group on economic transition, develop positions and strategies to advocate for policy measures related to economic-environmental aspects of societal transformation;
- Organise conferences, panels and side events on the issues where appropriate and with MEPs, DGs and governments who preside over the Council;
- Use relevant public consultations for providing our inputs;
- Through the H2020 project LOCOMOTION on energy, climate and economic transition (starting 1 June 2019 and running for 4 years), further intensify the work on macro-economic questions;
- Write and publish reports, briefings and articles that make the post-growth narrative concrete for issues such as work and sectors such as textiles and built environment, thereby creating stronger links to the circular economy;
- Work in networks (e.g. with WeAll, youth, unions, development organisations etc) to spread our narrative within civil society.

Trade

In the area of trade and investment, the EU constantly negotiates and agrees on new bilateral agreements including with other highly industrialised countries such as Japan (JEFTA entered in force in early 2019) as well as with developing or emerging markets such as the currently negotiated free-trade agreement with Indonesia. The implications are manifold: trade agreements boost global trade volumes and thereby increase environmental pressures; the sustainable development chapters in the EU trade agreements are legally non-binding and therefore lack teeth; most trade agreements comprise ISDS or similar arbitration systems that put investors' rights over the right of a government to protect health, consumer rights and the environment.

While the future of negotiations on an EU-US Transatlantic Trade and Investment Partnership is uncertain, the EU-Canada Comprehensive Economic and Trade Agreement (CETA) provisionally entered into

force in September 2017, meaning that many aspects of the agreement now apply. National and in some cases regional parliaments are still in the process of considering its ratification which is necessary for it to take full effect with some appearing to be contemplating rejecting CETA. Many concerns remain over the investment arbitration system under CETA, despite the European Court of Justice having confirmed its legality. The Energy Charter Treaty, a legally binding international investment agreement governing cross-border cooperation in the energy sector, raises various environmental concerns. Moreover, new trade negotiations with governments that fail to address issues around sustainable development, deforestation, the loss of biodiversity and/or climate change, such as the United States and Brazil (as part of Mercosur), are highly problematic, with little guarantees provided for the environment, in stark contrast to the rights afforded to investors.

Activities:

- Explore opportunities to step up our work on the environmental implications of trade and investment agreements and provide information and support to EEB members on the topic, including in relation to the ratification or otherwise of CETA and the EU-Mercosur agreement;
- Explore how the EEB and its members can support concerns on corporate accountability and citizens' rights in protecting the environment in the context of new UN treaties under development, and being proposed, and call for the EU to engage proactively and constructively in such initiatives, in a manner consistent with a party to the Aarhus Convention.

Fiscal Reform and Green Finance

Economic signals, economic instruments and financial flows still overwhelmingly favour incentives and finance that more often undermine sustainability than support it. There remains an urgent need for work on fiscal reform at EU and Member State level to address market failures and provide due incentives and investment consistent with sustainable development.

As regards the post-2020 MFF, currently there are extensive discussions on how it can finance the EGD and the COVID-19 crisis response (as noted above). With negotiations on the MFF and Next Generation EU Recovery Funds now largely complete, the focus in 2021 could usefully go to the “programming stage” of developing the Partnership Agreements, the Operational Programmes and the CAP Strategic Plans, as well as to the connections to the National Energy and Climate Plans (NECPs) and the National Development

Programmes (NDPs) linked to the European Semester. Additional windows of opportunity exist around the reform of economic instruments under the European Green Deal.

In 2019, the EEB reached agreement with Green Budget Europe (GBE) to integrate the projects and activities of GBE into the EEB's structures and work programme, with a view to GBE ceasing to exist as an independent organisation and the EEB being able to step up its work on fiscal reform while providing a vehicle for the good work of GBE to continue. Initial steps taken in 2019 and 2020 included agreeing the transfer of two grants supporting a project on MFF and climate to the EEB. These activities were successfully completed in 2020 and a new grant was obtained to build further on the MFF and Next Generation EU Recovery Funds. The EEB, as a board member of GBE, will support the ongoing effort to formally close GBE.

Activities:

- Complete the process of integrating GBE projects and activities into the EEB structures and fully relaunch the fiscal reform working group as the EEB's Green Budget working group;
- Continue to advocate for EU funding to be compatible with the objectives of the European Green Deal and wider sustainability, and for funding to follow good governance principles, including on transparency – this includes both the MFF and the Recovery Funds under Next Generation EU;

- Subject to funding, support the development of civil society capacity to influence national programming and plans for the use of EU funding to minimise harm and maximise benefit for the environment, including climate;
- Promote green tax reform at EU and Member State levels, focusing on climate change and circular economy in particular, given windows of opportunity in the European Green Deal (revision of the Energy Taxation Directive, EU ETS, Revision of the State Aid Guidelines for Energy & Environment, Carbon Border Adjustment);
- Seek to participate in the European Commission expert group Platform on Sustainable Finance to develop criteria of EU Taxonomy ("green investment").





Nature

Mass extinction of species and climate breakdown are the two main environmental challenges of our modern society that threaten the very existence of civilisation. Yet both challenges are intertwined, each exacerbating the other. In addition, nature degradation is a factor in the emergence and transmission of novel zoonotic diseases such as COVID-19 which have tested public health systems to the limit. Protecting and restoring biodiversity and well-functioning ecosystems is therefore key to boost our resilience and prevent the emergence and spread of future pandemics.

The most comprehensive global assessment of biodiversity and ecosystem services has confirmed that the degradation of nature is continuing at an unprecedented rate both globally and in the EU. Biodiversity loss and the water crisis are among the top risks facing our economy and society according to the World Economic Forum. The main drivers of biodiversity loss are (i) changes in land, water and sea use; (ii) overexploitation; (iii) climate change; (iv) pollution; (v) invasive alien species, and these are complemented by new challenges such as light pollution. For all of these, adequate policy responses are needed. (see section on Light Pollution below in the Health and Environment Chapter).

Our nature supports the EU's economy and jobs, food production, health, resilience and security. It is imperative to achieve an urgent shift in our economy and society towards sustainability, where nature is valued, protected and restored and water is sustainably managed. A substantial body of EU legislation seeks to protect, conserve and enhance nature, to ease the pressures on ecosystems including the freshwater ecosystems. However, these laws have not been properly implemented and suffer from a lack of financing. The European Green Deal must bring a new momentum and urgency behind these policies. In addition, the EU has so far largely failed to include nature in key policies like the Common Agricultural Policy. Adaptation to climate change will be an increasingly important element in nature-related strategies.

The COVID-19 crisis has highlighted how the globally interconnected nature of modern societies and economies, coupled with the tight interactions across different elements of the Earth system, means that failures in individual elements can result in a cascade of failures in social, economic and environmental systems. Continued strong action on climate change and biodiversity loss is needed to avoid the recovery from COVID-19 sowing the seeds for repeated systemic crises in the future.

Protecting and restoring nature

Global efforts have been insufficient to-date to halt the loss of the world's biodiversity. In the EU, the legal instruments such as the Nature Directives as well as EU Strategies and Action Plans have been put in place to protect and restore nature. But protection has been incomplete, restoration has been small-scale, and the implementation and enforcement of legislation has been insufficient. The recently adopted EU Biodiversity Strategy for 2030 is an ambitious and science-based blueprint to address the biodiversity and climate crises over the next 10 years as a fundamental part of the

European Green Deal. It also needs to become a central plank for the truly green and sustainable post COVID-19 recovery.

There are several important commitments in the EU Biodiversity Strategy for 2030 such as a target to protect 30% of the EU's land and sea, including 1/3 of that under strict protection encompassing all old growth forest; a commitment to adopt a new legal instrument to drive nature restoration for biodiversity and climate; adoption of an EU Forest Strategy; and targets to bring nature back on farms and



reduce the use of pesticides and fertilisers in agriculture (also promoted by the Farm to Fork Strategy). They create a number of opportunities to put biodiversity on the path to recovery and ensure uptake of agro-ecological farming that benefits biodiversity. The EEB is currently advocating for the EU Member States and the European Parliament to fully endorse the commitments of the EU Biodiversity Strategy for 2030 and integrate them in sectoral EU policies and budgets such as the Common Agricultural Policy.

Tackling biodiversity loss and restoring ecosystems will require investments including €20 billion/year for Natura 2000 and green infrastructure as well as promoting tax systems and pricing to reflect real environmental costs,

including the cost of biodiversity loss. In addition, the Commission will adopt a delegated act under the Regulation on the establishment of a framework to facilitate sustainable investment (Taxonomy Regulation) to establish a common classification system of economic activities that substantially contribute to the protection and restoration of biodiversity and ecosystems.

In addition, in 2021 the international community is expected to adopt the Global Biodiversity Framework under the Convention on Biological Diversity, creating a momentum for nature protection and restoration similar to the Paris Climate Agreement with its goal of spurring the necessary action on climate change.

Activities:

- Continue to push for the EU to assume a leadership role in the adoption of the Global Biodiversity Framework under the CBD, including by demonstrating ambition on biodiversity at home;
- Support the achievement of key commitments of the EU Biodiversity Strategy for 2030, including on habitats and species under the Nature Directives and on pollinators, and contribute to the establishment of the new EU biodiversity governance framework, *inter alia* via coordination of contributions to the biogeographical processes;
- Shape the European Commission proposal for legally binding restoration targets for biodiversity and climate so that it is based on EEB recommendations;
- Continue to push for improved implementation and enforcement of the EU Nature Directives including on the basis of complaints from the NGOs;
- Contribute to the adoption of the EU Forest Strategy so that it properly addresses priority biodiversity issues;
- Contribute to the work of the European Commission on the taxonomy of sustainable investment for the protection and restoration of biodiversity and ecosystems;
- Engage proactively in EU level action on safeguarding large predators and engaging in protecting migratory species along their fly- or swim-way across Europe;
- Convene at least one meeting of the EEB's biodiversity working group as well as regular virtual meetings to coordinate activities and share experiences among the EEB members;
- Coordinate and synergise the EEB's activities with other NGOs and partners, *inter alia* in the context of the European Habitats Forum and the #Nature Alert Coalition;
- Explore opportunities to work on the Commission's revision of EU Action Plan against Wildlife Trafficking.



Safeguarding freshwater ecosystems and securing water for all

Water is essential for human life and a fundamental resource on which our health and livelihoods, our economy and our wildlife all depend. Freshwater ecosystems in the EU, such as wetlands, lakes, rivers and groundwater aquifers, are the source of water and are experiencing the most significant degradation and loss of biodiversity compared to other ecosystems. The causes for this are various pressures on freshwater ecosystems, including widespread pollution and over-abstraction of water for intensive agriculture, industry and households. In addition, most European rivers, lakes and wetlands have been degraded by changes to water flow and their physical shape due to infrastructure for hydropower production, flood defences and navigation, as well as land drainage for agriculture and urban sprawl. Climate change is further exacerbating these pressures with, for example, more water storage infrastructure planned across the EU to cope with droughts. These pressures often act at the same time and affect the good functioning of ecosystems, contribute to biodiversity loss and threaten the valuable benefits water ecosystems provide to society and the economy.

The EU Water Framework Directive (WFD) and its daughter directives on priority

substances and groundwater are the EU's main legal framework to protect and restore the EU's rivers, lakes, coasts and groundwater aquifers and a key legal framework to address the EU's growing water challenges of pollution including by emerging pollutants and water scarcity. The WFD has led to some important improvements in water status throughout the EU since it was adopted in 2000 but unless efforts are significantly stepped up, the EU is not on track to meet its 2027 deadline to bring its water bodies to ecological health. Currently, only around 40% of surface waters are in good ecological status, while only 38% of surface waters are in good chemical status. The status of groundwater across Europe is generally better: 74% of groundwater water bodies are in good chemical status and 89% are in good quantitative status.





In 2020, on the basis of the fitness check evaluation of the EU water policy, the European Commission signed off the WFD as fit-for-purpose and decided that it does not need amending and that the focus should be on updates of other pieces of legislation such as the Urban Wastewater Treatment Directive and the Priority Substances Directive, whereas in the case of the WFD the focus should be on its better implementation and enforcement. In addition, the European Green Deal offers opportunities to address the identified shortcomings in the WFD implementation through several European Green Deal initiatives, such as the Biodiversity Strategy for 2030 with its commitment to restore 25,000 km of rivers and floodplains, the Farm to Fork

Strategy and the upcoming Zero Pollution Action Plan and the EU Adaptation Strategy (both expected to be adopted in 2021).

The WFD River Basin Management Plans due to be adopted in 2021 are the last chance for the EU Member States to bring our rivers, lakes and wetlands to ecological health by 2027. However, for that to happen EU governments need to protect and restore rivers, increase the uptake of nature-based solutions and make better use of economic instruments such as adequate water pricing and cost recovery from water users as well as restrict the use of exemptions from reaching the environmental objectives of the WFD.

Activities:

- Continue to engage in the #Protectwater campaign to ensure a proper follow up to the fitness check evaluation of the WFD and push for its ambitious implementation with focus on action on water in the European Green Deal, restricted application of exemptions from reaching the WFD objectives, sustainable water management in the context of droughts, and assessment of the River Basin Management Plans;
- Engage in the delivery of the relevant outputs of the Common Implementation Strategy (CIS) for the WFD to ensure ambitious implementation of the 3rd River Basin Management Plans cycle by 2027 with focus on tackling hydro-morphological pressures and diffuse pollution from agriculture, energy generation and lignite mining, better use of economic instruments and uptake of river restoration and nature-based solutions;
- Develop an action to address growing pressures from new hydropower across the EU and beyond and promote river protection and restoration of the free-flowing rivers including through the removal of barriers and restoration of 25,000 km of rivers committed to in the EU Biodiversity Strategy for 2030;
- Carry out advocacy activities in relation to the revision, if proposed, of the Priority Substances Directive, the Groundwater Directive and the Urban Wastewater Treatment Directive;
- Organise at least one meeting of the EEB's water working group as well as regular virtual meetings to coordinate activities and share experiences of the EEB members;
- Coordinate and synergise the EEB's activities with other NGOs and partners, inter alia in the context of the Living Rivers Europe coalition.

Towards a sustainable food and farming system

The EEB strongly believes a radical transformation of our food and farming systems is required to address the critical sustainability challenges facing EU agriculture.

Our vision for the future of agriculture, based on strong scientific evidence, involves a transition to agroecology, with drastic



reductions in agro-chemicals use and a shift away from intensive livestock production.

The current Common Agricultural Policy (CAP) has been widely criticised by civil society and scientists for its failure to address the pressing environmental challenges that agriculture contributes to, and by EU Member States and the farming community alike for its excessive complexity. In June 2018, the Commission published legal proposals for a new CAP, which introduce a 'New Delivery Model'. This involves a shift towards increase subsidiarity in the CAP, with an EU-level framework that is programmed and implemented by Member States through national CAP Strategic Plans. In 2019 and 2020, the proposals were debated at length in the European Parliament and Council of Agriculture Ministers, with significant delays to the reform due to the European elections, slow negotiations on the new EU budget, and the COVID-19 crisis. With co-legislators only finalising their respective positions in late 2020, the trilogues will go on well into 2021. Due to these delays, a transition of at least 2 years between the current and new CAP is

expected, i.e. 2021-2022, which will be a continuation of the current CAP rules.

The EEB has played a significant role, together with BirdLife Europe, Greenpeace and WWF, in the early stages of the reform process. In 2021, the EEB will continue to exert pressure on co-legislators for more environmental and climate ambition, through strong conditionality and adequate budget ringfencing for environmental measures, as well as calling for robust monitoring and accountability mechanisms. In addition, the EEB will work with its members to influence the preparation of national CAP Strategic Plans, and once drafts are submitted to the Commission, the EEB will monitor the approval process.

On a parallel track, the EEB will actively engage with the development of the Clean Air, Water and Soil Action Plan and with initiatives emanating from the new 'Farm to Fork Strategy' which was published in May 2020 under the European Green Deal umbrella.

Finally, the EEB will actively engage to improve climate actions in agriculture.

Activities:

- The EEB will strongly advocate for the integration of the environmental targets stemming from the 'Farm to Fork' and Biodiversity Strategies into the future CAP, namely: reduce the use of chemical and more hazardous pesticides by 50%, reduce nutrient losses by at least 50%, reduce fertilizer use by at least 20%, reduce the sale of antimicrobials for farmed animals and in aquaculture by 50%, have 25% of total farmland used for organic farming by 2030 and at least 10% of agricultural area under high-diversity landscape features.
- Promote the EEB's vision for the future of EU agriculture to EU policymakers (Commission, MEPs, national representations) and relevant stakeholders (farmers, industry, etc);
- Hold meetings with the European Commission, European Parliament and Member States to advocate for climate action and environmental protection in agriculture, focusing on the new CAP, but also looking at other relevant policy and legislative initiatives, including seeking alignment of the future CAP with the Farm to Fork and Biodiversity Strategies;
- With active engagement of the agriculture working group, monitor and seek to influence the preparation of national CAP Strategic Plans, notably how Member States intend to reach the Farm to Fork and Biodiversity Strategies' objectives;
- As and where relevant and possible, support the work of EEB members on key agricultural issues, such as fertilisers, nitrates and pesticides;
- Organise at least one event in Brussels with decision makers and key stakeholders on the future of EU agriculture and agricultural policy;



- Participate in, and steer the work of, the EU Food Policy Coalition, which gathers 40+ organisations working on the environment, health, animal welfare, farming, international development, food workers, etc;
- Hold at least one “physical” agriculture working group meeting and provide regular updates to EEB members on EU policy developments through newsletters and “virtual” meetings.

Marine protection

The EEB through its well-established cooperation with EEB member Seas at Risk (SAR) will continue to advocate for healthy

seas and oceans and include marine protection in its relevant horizontal activities.

Activities:

- Closely collaborate with SAR on the EEB’s work with EU Presidencies;
- Advocate for healthy seas and oceans as appropriate in EEB activities on improving implementation of the EU legislation and the post-2020 biodiversity framework;
- Serve in SAR’s Executive Committee.

Soil

Soil is fundamental to life on Earth, providing the home for about a quarter of all biodiversity and storing twice as much carbon as the atmosphere and three times as much as vegetation, and yet it is being eroded and degraded at an alarming rate. It is therefore time to step up efforts to protect soil fertility, reduce soil erosion and increase soil organic matter. This can be achieved through the adoption of sustainable soil management practices, including through the Common Agricultural Policy, making significant progress on the identification and restoration of contaminated soil sites, restoring degraded soils, defining the conditions for their good

ecological status, introducing restoration objectives, and improving the monitoring of soil quality.

To that end, the Commission will update the current strategy to address soil degradation and preserve land resources in 2021. Soil contamination, prevention and remediation will also be addressed as part of the Zero Pollution Action Plan for air, water and soil, to be adopted by the Commission in 2021. The Common Agricultural Policy will in addition have a key role to play by encouraging farming practices that maintain soil fertility.

Activities:

- Advocate for EU-level action for protecting soils, preferably within a dedicated legally binding framework;
- Track policy developments and coordinate the working group on sustainable soil policy in close collaboration with EEB members implementing relevant EU projects.



Genetically Modified Organisms (GMOs)

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

always applied in any decision-making process on GMOs. The GMO amendment to the Aarhus Convention contains minimum requirements for public participation in decision-making but still requires one further ratification to enter into force and thus have legal effect.

Activities:

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

Light pollution

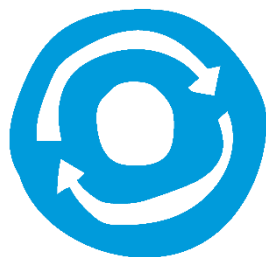
More than 99% of the EU population, and about two-thirds of the world population, live in areas where the night sky is above the threshold for polluted status i.e. the artificial sky brightness is greater than 10 per cent of the natural night sky brightness. Light pollution may have consequences on nocturnal fauna and on human health through affecting the quality of sleep. The spreading of the most cost-effective energy-efficient LED technology with a blue light base may exacerbate the problem, and this has now been acknowledged as an issue by Commission services. Balancing energy conservation and light pollution can be

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

Activities:

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

- Continue the integration of this dimension when assessing relevant future policy options, e.g. in relation to ecodesign, and identify possible solutions to moderate light pollution while taking into account the expected energy and other environmental gains linked to new lighting technologies;
- Circulate relevant materials and where members are available, carry out advocacy work at national and local level to address over-lighting and blue light pollution.



Circular Economy

Circular economy is confirmed as a priority to reinforce the EU economy and create jobs. It has been given a prominent place in the European Green Deal and is promoted through the new Circular Economy Action Plan (CEAP) released in March 2020. At the core of the CEAP is a promise to make sustainable products the norm in EU and accelerate the circular transition in key value chains (electronics, textiles, buildings, batteries and vehicles, packaging, plastics, food and nutrients). As part of this transition, a strong emphasis is placed on waste prevention, increased use of recycled materials and the promotion of new business and consumption patterns. In addition, the circular economy is also an essential lever to deliver on SDG implementation and climate change mitigation and more broadly linked to the industrial strategy, the bio-economy and the chemicals strategy for sustainability. Circular economy strategies are also adopted at national level, as well as regional and municipal levels.

Following the outbreak of the COVID-19 pandemic, the circular economy has been advocated by numerous stakeholders, including some business groups, as a lever for a post-COVID recovery and as a direction to orient stimulus packages.

These developments on circular economy policy reflect the past years of advocacy by the EEB, its members and partners. We now need to grasp the full potential of the actions that will be implemented at EU, national, local and international level to progress our long-term strategy towards an economy in line with the carrying capacity of the planet. We will need to scale up the most successful policies and experiences at local and national levels towards the EU and the rest of the world; and conversely, we need to cascade down the best global and European policies and experiences to the national and local levels.

In that perspective, our work on circular economy will be organised along three directions in 2021:

- Reducing resource use through product policy and waste prevention;
- Promoting new production and consumption models;
- Addressing the interface between circular economy and other environmental dimensions and the SDGs.

This will involve reinforced cooperation internally between EEB clusters and externally with existing and new partners.

Reducing resources use through product policy and waste prevention

Activities:

- Influence the implementation of the new Circular Economy Action Plan, notably the definition of a new sustainable product policy based on the reform of the current Ecodesign framework, including a proper consideration for the hazardous contents of products;
- Pursue the implementation of Ecodesign and Energy label policies on energy products through our Coolproducts campaign, especially to promote repairable and longer lasting ICT;



- Influence the revision of the batteries and ELV directives and challenge their end of pipe perspective to integrate a life cycle approach and design requirements;
- Influence the revision of the construction products directive to embed sustainable performances and information;
- Set sustainable performance criteria for textiles and promote the right policy instruments at EU level (eco-design, EPR, information schemes);
- Influence the definition of essential requirements of packaging to make sure overpackaging is addressed and only reusable and recyclable packaging can be placed on the market;
- Reinforce the policy on plastics, notably to address microplastics;
- Support EEB members in the national implementation of their CE strategies and waste policy;
- Take an active part in the official CE platform at EU level under European Economic and Social Committee (EESC) chair;
- Influence the revision of the Waste shipment regulation to restrict export of hazardous and non-hazardous waste outside EU.

Promote new production and consumption models

Activities:

- Intensify the right to repair campaign as part of the consumer empowerment initiative by the Commission, building notably on ICT cases;
- Promote mandatory green public procurement (GPP) and sustainable corporate procurement;
- Promote the LEVELs framework for sustainable buildings;
- Influence Ecolabel criteria and promote their uptake by industry and citizens and through public procurement;
- Monitor the development of the product environmental footprinting (PEF) for apparel and footwear and explore how to use PEF as a basis for green claims;
- Call for fiscal reform to promote circularity, influence the taxonomy on green finances for circular economy and advocate for economic instruments, such as taxation and modulated fees for producer responsibility schemes reflecting resource consumption and hazardous contents;
- Create and disseminate new messages on sustainable consumption and wellbeing rather than growth to enhance the uptake of CE practices by decision makers, key influencers and citizens;
- Collaborate with progressive fashion industry and pressure wasteful industry to change business models;
- Influence the monitoring framework of the Circular Economy towards absolute reduction of resource use and consumption footprint and alternative indicators to GDP.



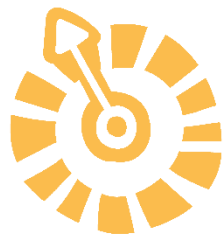
Address the interface between the circular economy and other environmental dimensions and the SDGs

Activities:

- Reinforce the links between CE and climate policy by making the case in all policies for recognising and reducing embodied emissions in our materials;
- Make the case for distributed wealth and reduction of inequalities potential of CE policy, notably in link with fair transition towards a decarbonized economy;
- Continue linking CE and chemicals policy to push for detoxified material cycles in all strategic sectors addressed by the CE action plan;
- Continue to link the EU industrial strategy with CE and explore the possibility to increase circular economy related provisions in industrial emissions standards (BREFs) towards zero pollution;
- Promote CE at international level and link to SDGs achievement to spill over the impacts of EU policy and enrich EU policy with experiences set at global level;
- Intensify collaboration between Agri and CE teams through a specific project (still to be set).

We will organise two integrated CE working groups and ad hoc webinars to exchange with EEB members on all these lines of work.





Climate

The world is facing climate breakdown, and the looming impacts on people, planet and economies require swift action to manage the most urgent environmental challenge facing the planet at present. The importance of the commitment by world leaders in the Paris Agreement to “pursue efforts to limit the temperature increase to 1.5°C” has been confirmed by the scientific findings of the Intergovernmental Panel on Climate Change (IPCC) special report on 1.5°C. Avoiding climate breakdown requires the world to significantly speed up its emissions cuts and put in place the framework to achieve a net-zero economy as soon as possible. Europe’s emission reduction targets for the near future are in striking contrast to this long-term

objective. To maintain its climate credibility on the world stage, the EU needs to commit to a net zero greenhouse gas economy by 2040, adjust the 2030 climate and energy objectives accordingly and rapidly put in place all necessary measures to fully implement the Paris Agreement through the engagement of all its sectors. This demands an energy transition to 100% renewable energy while cutting overall energy demand and consumption and a radical transformation of the whole energy, transport and industrial system. It also requires a system change in agricultural production and consumption, as well as significantly higher ambition and action on land and ecosystem restoration.

Climate action

Active engagement by civil society is essential for a strong implementation of the 2030 Climate and Energy framework including the national energy and climate plans (NECPs). The EEB will continue its ongoing activities in this context and support its members and partners with expertise and advocacy activities.

In the next 20 years, Europe needs to accelerate the transformation towards a net-zero greenhouse gas economy and deliver on its “long-term low greenhouse gas emissions development strategy” that responds to the findings of the IPCC special report on 1.5 degrees. The legal embedding of the net-zero objective for the EU and the final submission of the EU long-term strategy to the UNFCCC were key milestones for 2020. The EU must prioritise action to reduce GHG emissions at source and direct public and private money to achieve this. Since we cannot expect any environmentally safe contribution to mitigation of climate change from climate engineering in the next 20 years, we should not direct our efforts and investments to rely on this option.

A key enabler for accelerated climate action is to direct public and private financial flows, including financial support granted under the Next Generation EU Recovery Plan, towards climate-proofed activities. Efforts to phase out environmentally harmful subsidies and to climate-proof EU and national budgets and push for fiscal reforms with instruments like a revision of the Energy Taxation Directive and effective CO₂ pricing tools will be coordinated with the EEB’s work on fiscal reforms (see section Fiscal Reform and Green Finance). A key venue for this is the mobility sector where the EEB will build on and amplify work by related organisations like Transport and Environment (T&E). Similarly, the Common Agricultural Policy and its incentives need to be improved to mitigate the climate impacts of agriculture.

The EEB will also advocate for climate-proofing of Europe’s energy infrastructure by ensuring that the future gas and electricity systems are compatible with our long-term commitments under the Paris Agreement. Specifically, it will



work with its members and relevant stakeholders to advocate for a Paris-Agreement Compatible Scenario in infrastructure planning and beyond, reflecting the objective of net-zero GHG emissions by 2040. The EEB will use its work on the [PAC project](#) to promote more ambitious climate and energy targets in all sectors, at EU and national level.

The full implementation of the Clean Energy for all Europeans package supported by the NECP process will enable Europe to go beyond the current level of climate action and should be coupled with an upgrading of the EU's targets for 2030, including those related to industry, in the "Fit for 55" legislative package to be adopted by the Commission in June 2021. Specifically, the EU should commit to cut domestic greenhouse gas emissions by at least 65%, improve energy efficiency by at least 45% and boost sustainable renewables to at least 50% by 2030. These targets should be legally binding at EU and Member State level, reflecting the need to bring the EU towards

achieving net-zero greenhouse gas emissions by 2040.

In September 2020, the Commission proposed a revised 2030 GHG net target of "-55%" on 1990 levels. This target was endorsed by the European Council on 11 December 2020 and will be submitted by the EU as its new NDC (nationally determined contribution) to the UNFCCC COP26. The target, despite marking some progress on climate action as announced in the EGD, falls much below what is required by science as the EU's contribution to limit global average temperature rise to 1.5°C by mid-century.

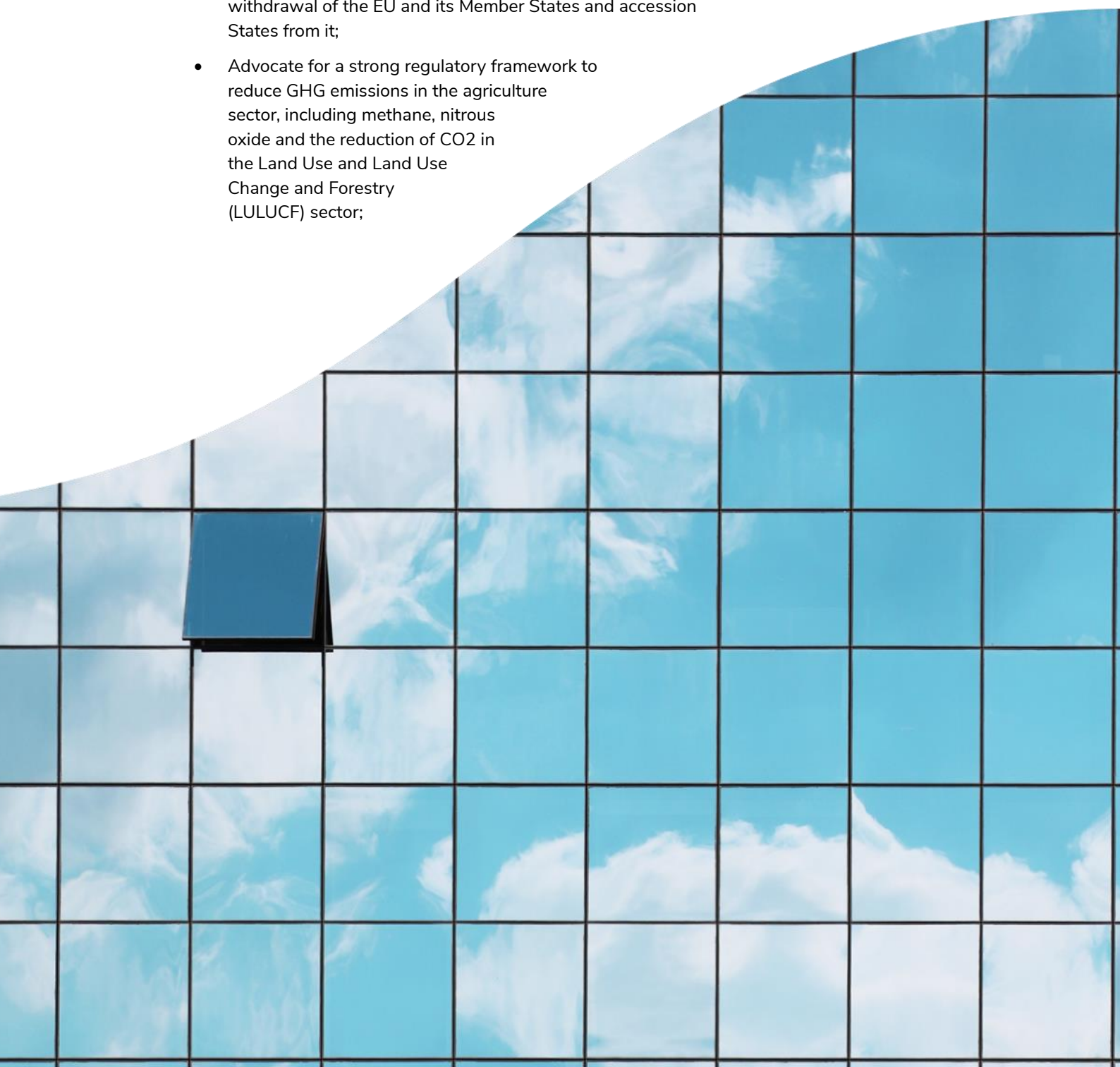
The EEB will further work to step up the overall target ambition of the "Fit for 55" legislative package by calling for high renewable energy and energy efficiency targets while increasing efforts to bring together the perspective on circular economy, renewable energy, energy savings and consumption-based emissions as pillars of increased climate action. This effort will be especially looking into the role of the building sector and its supply chain including energy-intensive industry.

Activities:

- Advocate for a strong EU climate law enshrining the binding climate-neutrality target to be reached at the latest by 2040 and establishing a binding Paris-compatible emissions reduction trajectory in all sectors of the economy, in full coherence with the zero-pollution ambition and an ecologically compatible transition which puts the well-being of people and the planet at its core;
- Advocate for a comprehensive and consistent climate law and policy framework which prevents emissions at source and creates strong synergies with the protection of biodiversity and the use of nature-based solutions, the reduction of materials consumption and the increase of material efficiency through circular economy and with industrial pollution policies reducing impacts on water, soil, air and waste generation;
- Advocate for an increase of the 2030 renewable energy target to at least 50% and of the energy efficiency target to at least 45%, together with the review of all climate related legislation to step up ambition (Emissions Trading Scheme, CO2 performance standards for vehicles, Effort Sharing Regulation, Energy Taxation Directive);
- Advocate for healthy and biodiverse ecosystems to play a crucial role for both the mitigation of and adaptation to climate change;
- Advocate for ambitious follow-up to the EU Industrial Strategy to take the EU towards a climate-neutral industry sector that integrates synergies with the circular economy and zero-pollution goals;



- Press for the introduction of a CO₂ based tax in fuels for transport and heating and the removal of all subsidies to fossil fuels and sector exemptions in the current EU taxation regime, through the revision of the Energy Taxation Directive;
- Advocate for stricter environmental conditionality for granting of State Aid under the Emissions Trading Scheme to avoid incentivizing a fossil fuels-based energy system and to accelerate industry decarbonisation;
- Advocate for the revision of the guidelines on State Aid for Energy and Environment to eliminate all forms of subsidies to fossil fuels currently allowed (i.e. aid for generation adequacy);
- Advocate for the removal of legal barriers for Member States to phase out fossil fuels through bans or other national measures, such measures being necessary to achieve a sufficient reduction in the use of fossil fuels in the coming decades; the Energy Charter Treaty is one of the major obstacles and we advocate for a withdrawal of the EU and its Member States and accession States from it;
- Advocate for a strong regulatory framework to reduce GHG emissions in the agriculture sector, including methane, nitrous oxide and the reduction of CO₂ in the Land Use and Land Use Change and Forestry (LULUCF) sector;





- Press for the introduction of a regulatory framework to reduce emissions in agriculture and stronger measures to mitigate the climate impacts of agriculture as part of the CAP negotiations;
- Link the work on achieving climate neutrality across all sectors of the economy including decarbonisation of energy infrastructure (electricity and gas grids);
- Keep advocating for climate-friendly food and farming practices that support sustainability by also taking biodiversity, water and air quality into account – in the CAP, in the MFF and the associated partnership agreements and rural development programmes;
- Explore possibilities for further linking the work on circular economy, energy savings and climate with a consumer perspective by addressing consumption-based emissions in Europe, and advocate for including embedded emissions in the climate neutrality target;
- Advocate for decarbonisation of heating and cooling systems, exploring the links with product policies and ongoing anti-coal/gas European campaigns;
- Make the Industrial Emissions Directive climate-proof (see section on Health and Environment cluster, IED Refit) and create a consistent approach between the market mechanism under the Emissions Trading Scheme and the IED;
- Engage the membership to press Member States to endorse the increase of the 2030 GHG emissions reduction target in view of the COP26 and to set a national binding climate-neutrality target as soon as possible and no later than the end of 2021;
- Press for an increase in the share of the EU budget for climate to 40% (from the current 25%) under the MFF for 2021-2027 and for better spending targets and strategies to ensure they are in line with Europe's climate commitments, i.e. by 'climate-proofing';
- Advocate for redirecting financial flows towards the transition to a climate-neutral economy by setting the right framework under the EU Taxonomy to stop financing of all fossil fuels and environmentally harmful energy production activities;
- Coordinate work in the working group on climate and energy, holding at least one meeting in 2021;
- Advocate for the strengthening of relevant non-energy-related climate legislation such as the F-Gas Regulation.

Energy savings

The Energy Efficiency Directive (EED) and the Energy Performance of Buildings Directive (EPBD) are two key measures to achieve energy savings. Transposition of both Directives by the Member States will be key to ensure national contributions to the EU's 2030 binding energy efficiency target and to pave the way for an increase of the effort in view of the climate-neutrality target. Policy measures included in the National Energy and Climate Plans under the Governance Regulation must be conducive to this achievement. Policy

measures should be accompanied by adequate dedicated financial tools and resources to promote further energy savings. So far, the NECPs have shown that Member States are still lagging behind on adopting effective measures to step up efforts on energy savings and energy efficiency. In September 2020, the European Commission adopted a Renovation Wave strategy aimed at boosting energy savings and energy efficiency in the building sector. The review of the EED in 2021 in the context of the "Fit for 55" legislative package



will have to strengthen the policy objective to reduce energy demand across the economy by raising the 2030 energy efficiency target to 45% and by ensuring a binding legal framework for Member States to deliver on the EU target.

To ensure a strong transposition of the EED and related legislation and an ambitious EU strategy for addressing energy savings and energy efficiency as a contribution to increased climate action by 2030 and onwards, the EEB will continue to participate in the Coalition for Energy Savings (CfES) and follow the issue closely within the EEB network, providing and gathering information and experience from Member States.

The Ecodesign and Energy labelling Directives will also need a continuous and ambitious

implementation, building on the adoption of the Ecodesign and Energy Labelling package in 2019. This is fully justified by the tremendous savings delivered so far (50% of our 2020 efficiency target) and the unique added value of acting at European level on product policy. After the adoption of 17 ecodesign and labelling measures in the 'Ecodesign package' in 2019, we have a major opportunity to build on the recognition of the merits of these instruments and deliver additional savings linked to the revision of existing measures, the starting of new measures, and unleashing the CO2 emissions saving potentials linked to resource use conservation through better design of products, notably smartphones and ICT.

Activities:

- Raise awareness of CSOs and policy makers on the importance of NECPs to achieve carbon neutrality by 2050 and on which policy measures are needed for ambitious and transformative NECPs;
- Engage in advocacy towards the European Commission and European Parliament on new instruments, full enforcement and good implementation of the EED in close cooperation with the CfES;
- Engage and support EEB members in pushing for a strong implementation of the EED;
- Advocate for an ambitious EU Renovation Wave Strategy fully tapping the potential to contribute to emissions reduction by increasing energy savings and energy efficiency;
- Closely follow the implementation of the EPBD with other EU NGOs and CfES partners working in the building sector;
- Through our Coolproducts campaign, step up communication on the benefits of these policies for EU citizens, targeting smartphones and ICT as iconic products;
- Seek ambitious new or revised measures on heating and cooling products, computers, smartphones and other ICT as well as pushing for better testing standards and enforcement;
- Mobilise to systematically address the durability, reparability and recyclability of products considering the whole range of product policy instruments at European level;
- Seek binding standards on energy efficiency for stationary sources (see Health and Environment Cluster, IED Refit and Europe Beyond Coal campaign-related activities);
- Advocate for the energy efficiency first principle as a condition for funding research and upgrades projects in the industrial sector.



Sustainable energy infrastructure and phase-out of fossil fuels and nuclear

As part of the overall need to transition to 100% renewable energy while cutting overall energy consumption, Europe's energy infrastructure and generation will undergo a massive transformation. To achieve a phase-out of all fossil fuels as soon as possible, the EEB will push for phasing out coal and lignite for power production at the latest by 2030, pursuing this objective through advocating against all fossil fuel subsidies and through its work on emission standards for large combustion plants and water quality related angles (see section on Health and Environment Cluster – Drive for a new industrial revolution), while at the same time contributing to the effort against the use of environmentally harmful unconventional fossil fuels, including those presented as transitional alternatives.

Due to its heavy and long-term environmental impacts, which are not aligned with the “do no harm” principle, the EEB will continue to insist that investment in nuclear power is not considered as a sustainable finance activity under the EU Taxonomy Regulation.

Some countries advocate for a continued use of nuclear energy. Taking into account the hazards associated with uranium mining, the risk of Fukushima-type accidents and the unsolved problem of radioactive waste that will remain dangerous for millennia, the EEB considers that nuclear power has no place in a sustainable energy future based on clean, renewable sources. Far from being part of the solution to climate change, it is an expensive and potentially dangerous distraction from the energy transition that is needed.

Lastly, the quick deployment of hydrogen production, on which there seems to be a large consensus in Europe, should not be an alibi to delay nuclear decommissioning in those Member States which are already heavily dependent on nuclear power. It should neither be an option for those Member States wishing

to invest in new nuclear power plants to decarbonise their energy mix and economy.

The transformation of the energy system to 100% renewable energy and the accelerated phase-out of fossil fuels in mobility and industry requires an adjustment of the existing energy infrastructure including grids, storage and an increased role of decentralised production and prosumers.

The Ten-Year Network Development Plans (TYNDPs) of the European Networks of Transmission System Operators for Electricity (ENTSO-E) and the European Networks of Transmission System Operators for Gas (ENTSO-G) are essential for long-term investment decision in energy infrastructure.

The preparation for the TYNDP 2022 to be aligned with the requirements of the Paris Agreement will be a key requirement on the EU level concerning the future approach to building energy infrastructure. The TYNDP 2022 will for the first time offer a long-term perspective going up to 2050. The revised EU Regulation on guidelines for trans-European energy infrastructure adopted by the Commission on 15 December 2020 will play an important role in transforming the European energy system, both on the supply and the demand side, to increase climate action.

The EEB and its members will have an opportunity to ensure that the roll-out of energy infrastructures for the energy transition will fully consider the potential of energy savings, renewable energy and local solutions while avoiding a lock-in into unsustainable solutions and fossil fuel infrastructure like liquefied natural gas (LNG) terminals and gas pipelines (both for methane or fossil-based hydrogen) and to prevent that it is used as an excuse to weaken provisions for nature conservation, environmental protection and public participation.



Activities:

- Strive for an early phase-out of coal and lignite power plants (before 2030), inter alia through playing an active role in the Europe Beyond Coal campaign and through improved framework conditions (see section Health and Environment Cluster– Drive for a new industrial revolution, IED REFIT and Europe Beyond Coal campaign-specific activities), and preventing the switching to other fossil fuels;
- Continue to keep a watching brief on nuclear issues, including state aid and transboundary consultation issues, and intervene selectively in the debate, with particular emphasis on transparency and participation issues through continued participation in Nuclear Transparency Watch and increased engagement in relevant processes under the Espoo Convention;
- Prevent the use of hydrogen as an argument to promote expansion or delay decommissioning of nuclear and oil & gas infrastructure;
- Subject to funding, follow the TYNDP process, constituting the basis for the TEN-E regulation, and push for a check of the TYNDP for consistency with the Paris Agreement;
- Advocate for targeted use of renewables-based hydrogen and for a coherent allocation of investments in the needed infrastructures both at national and transnational level;
- Engage with stakeholders and members on the grid issue in a long-term perspective.



Health and Environment

In 2019, the flagship European Green Deal recognised that the threat of pollution on human health and the environment must be addressed to “conserve and enhance the EU's natural capital, and protect the health and well-being of citizens from environment-related risks”. Given the presence of toxic substances in the air, water and soil around us and in the consumer products that adults and children are exposed to on a daily basis, unsustainable modes of industrial production not yet fully reflecting best achievable performance standards and the levels of air pollution which continue to affect people's health and the environment, EU policies and legislation need a fresh start to deliver the ambition promised in the European Green Deal, together with increased efforts to ensure implementation and timely enforcement of the existing legislation.

The European Commission announced the publication of a Zero Pollution Action Plan covering water, air and soil for 2021. The EEB will endeavour to make the EU zero-pollution ambition a very concrete goal. The Zero Pollution Action Plan is expected to include the follow-up actions to address implementation gaps identified by the recently concluded fitness check evaluations of the Ambient Air Quality Directives, the Industrial Emissions Directive and the Water Framework Directive and is expected to be fully coherent with the Chemicals Strategy for Sustainability.

The Plan should be seen as a tool to both promote implementation of existing legislation,

also improving monitoring, and to launch new legislative and policy initiatives to cut pollution at source while ensuring policy coherence. It is also fundamental that the European Green Deal's other instruments contribute to the zero-pollution ambition. The EU now has a chance to ensure that laws and policies regulating chemicals and pollution apply to all relevant sectors, products, materials, processes and services in the EU market, including imported ones, while driving ambition at international level.

Chemical safety

2021 should bring some important results of the implementation of the European Green Deal in relation to its Zero Pollution Ambition for a toxic-free environment tackling air, water, soil and consumer product policies. After promising ambition in these different policy areas, the Commission will now be scrutinised for the follow-up measures such as the implementation of the Chemicals Strategy for Sustainability, the preparation of a Zero Pollution Action Plan for water, air and soil and a revision of measures to address pollution from large industrial installations. Given the incidence of the COVID-19 crisis, deadlines are expected to be subject to delays of a few months, but the Zero Pollution Action Plan and proposals for revision of the Industrial Emissions Directive are expected to be published by the end of 2021.

The general environmental objectives of the EEB in this area for 2021 are:

- Ambitious implementation of the Chemicals Strategy for Sustainability for a toxic-free environment to further the zero-pollution ambition, as part of the European Green Deal, that incorporates concrete, overarching and ambitious chemicals policy actions to strengthen the protection of health and the environment; this overarching objective will



substantially feed into the following objectives;

- Chemical safety and sustainability are mainstreamed in the political agenda, including as part of the recovery plans after the COVID-19 crisis;
- Institutional commitment to an EU substitution strategy that promotes the timely substitution of hazardous chemicals, especially of substances of very high concern (SVHCs) under REACH as well as within the BREF and IED framework (see section on Pollution Prevention and Control – Stationary sources);
- Increased transparency in decision making, enforcement and non-compliance, particularly in light of the Chemicals Strategy for Sustainability context;
- Improved implementation of REACH processes, core objectives and principles as well as strong enforcement of the Regulation; implementation of actions outlined in the results of the 2017 REACH Review; and setting the scene for a system change 2022 REACH Review to ensure that this core chemicals regulation fully meets its goal of guaranteeing a high level of protection of health and the environment against the risks posed by hazardous chemicals;
- Ensure that the EU properly and effectively addresses the issue of toxic recycling as part of the interface between the Circular Economy Action Plan and the Chemicals Strategy for Sustainability;
- Ensure that the EU maintains a leading role in raising political ambition in addressing the international chemicals and waste agenda, not only through SAICM negotiations but other measures, such as promotion of global regulation of SVHCs;
- Commitment by the EU to mandatory harmonized information systems for chemicals in products and waste as well as replication of AskREACH App for consumer information on SVHCs in products in other countries;
- Ensure that nano materials are addressed appropriately in REACH, particularly in the context of the entry into force of the requirement in the REACH Annexes to register nanomaterials by January 2020.

Activities:

- Contribute to the implementation of the EU Chemicals Strategy for Sustainability that delivers on a toxic-free environment and sets out concrete actions to prevent human and environmental exposure to hazardous chemicals of current and future generations, including by phasing-out hazardous substances. The strategy must also concretely address substances of concern, including endocrine disrupting chemicals (EDCs) and PFASs;
- Build alliances with other stakeholders such as academia, industry and public authorities in order to collaborate and provide concrete proposals to ensure the proper implementation of REACH, information systems and/or promote substitution and the precautionary principle;
- Advocate for the development of EU financial instruments to support substitution and safer alternatives and products;
- Advocate for ambitious EU restrictions of spotlighted chemicals such as PFAS under REACH as well as for textiles production (Textiles BREF) and improved authorisation processes;



- Coordinate with NGOs and other stakeholders to provide a common position and policy options to solve the toxic material cycles problem, information systems on chemicals in products, use of hazardous substances in industrial activities as well as the replication of the AskREACH app to provide citizens with information on harmful chemicals in consumer products;
- Evaluate the effectiveness and benefits of the nano observatory to be developed by ECHA and develop policy recommendations for a meaningful EU-wide register for nanomaterials, subject to availability of funding;
- Support and contribute to the EDC-free coalition and the Rethink Plastic Alliance;
- Convene one or two meetings of the EEB's chemicals working group in 2021 and regularly update EEB members engaged in implementing EU chemicals and (subject to funding) nano legislation;
- Continue to work and support our members and alliances in the Beyond 2020 Strategic Approach to International Chemicals Management (SAICM) taking into account the postponement of the Fifth International Conference on Chemicals Management to July 2021, as well as on non-EU/international chemicals control programmes under the UN, OECD, international conventions, etc. where feasible.

Mercury

Mercury is a highly toxic metal that is volatile and has global dispersal patterns. It causes damage to the nervous system, may impair the development of the brain and nervous system of the foetus, and can in its organic form accumulate and concentrate in food chains of ecosystems. Due to its extraordinarily hazardous qualities, the Minamata Convention on Mercury was adopted in October 2013, with the objective to protect human health and the environment from anthropogenic mercury emissions. It entered into force in August 2017, with the first, second and third sessions of the Conference of the Parties (CoPs-1, 2 and 3) taking place in September 2017, November 2018 and November 2019 respectively. 125 countries have currently ratified the Treaty (as of December 2020). COP-4 is expected to take place from 1 to 5 November 2021 in Bali, Indonesia.

At EU level, a revised EU Mercury regulation was adopted in May 2017, including measures aimed at meeting, and going beyond in some

cases, the provisions of the Minamata Convention. The exemptions process under the Restriction of Hazardous Substances (RoHS) directive has been greatly delayed. A decision is awaited since 2016, currently allowing the use of mercury added fluorescent lamps to be put on the market. A feasibility study on the phase out of mercury from dentistry was published in 2020 and legislation is awaited in 2022.

In 2021, the EEB will continue to lead the Zero Mercury Working Group (ZMWG) and the Zero Mercury campaign. It will seek to ensure an effective representation of NGOs in the relevant meetings. The EEB/ZMWG will continue assisting NGOs mainly in developing countries to prepare for ratification, implementation and enforcement of the treaty. Furthermore, the EEB will follow, as relevant, issues related to the implementation of the EU mercury regulation and relevant policies such as the RoHS and the BAT/BEP standards (see 'Drive a new industrial revolution' section).



Activities:

- Coordinate and lead NGO attendance at and input towards strengthening the Minamata Convention (including intersessional work, COP4 and UNEP expert groups, as relevant);
- Develop capacity within NGOs as well as developing country governments also by supporting international projects, assisting the implementation and enforcement of the Convention with main focus on phasing out mercury added products, including continuation of the work under the skin lightening cream campaign;
- Follow, as relevant, issues related to the implementation of the EU mercury regulation and other relevant legislation (e.g. phasing out mercury from lamps (RoHS), and dental amalgam as well as strict BAT standards enforcement on coal combustion and its phase out).

Air quality

The National Emission Ceilings (NEC) Directive required Member States to prepare national plans by 1 April 2019 in order to show how they were going to comply with the already set emission reduction targets for 2020 and 2030. This required the introduction and implementation of new measures to prevent and limit air pollution from energy, industry, transport, domestic and agriculture-related sources, which the EEB will closely monitor.

In parallel, while continuing to press for full compliance with existing air pollution laws and to highlight non-compliance, the EEB will continue supporting its members to ensure that legally binding air quality limits set in the

Ambient Air Quality Directives are achieved throughout the entire EU and will contribute to the follow-up phase of the Fitness Check of these Directives, which should result in the revision of the air quality standards (to align them with the latest WHO recommendations), as announced in the European Commission's Communication on a European Green Deal.

The EEB will also monitor and contribute to the development of the already announced Zero Pollution Action Plan.

This will require new and ambitious international, EU and local action, which the EEB will continue pushing for.

Activities:

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



A new industrial revolution

In 2021 the EEB will work to transform the EU's Industrial Emissions Directive (IED) to become the new zero-pollution industrial production regulation while also improving its implementation. A fitness check has been initiated and impact assessment work is ongoing. The main features we advocate for are to redesign the Best Available Techniques (BAT) concept to provide the best ratio of environmental impact of an industrial activity and for the provision of a given product or service, to be based on technical feasible performance, putting prevention over control and full integration of all environmental media objectives (decarbonisation is currently missing due to the EU-ETS Directive limitations). The focus will also be on tightening and extending the EU binding minimal requirements (EU 'Safety net') for preventing impacts from the most polluting industries (energy intensive activities, in particular coal/lignite combustion).

In 2021, we will continue our involvement in the 'Sevilla Process' contributing to the so-called Best Available Techniques (BAT) Reference Documents (BREFs), which contain binding environmental standards for European industrial facilities. Key BREFs are currently being developed on textiles, ferrous metals processing, ceramics, smitheries and foundries, and air pollution from the chemical industry with potential review of the inorganic chemicals production (e.g. fertilisers). Other BREFs such as for slaughterhouses are of lower priority given lack of dedicated resources

and limited scope. The EEB will actively engage and 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 that allow exemptions to the usual rules. We will continue to take part in the Europe Beyond Coal campaign with the goal of achieving a European coal phase-out by 2030 at the latest. The EEB is co-convener of the Plant by Plant and Mines working group and stepped up its role on the water-energy and mines nexus. Water quality will therefore be another media angle in addition to air quality, with a focus on exploiting vulnerabilities to stop lignite mining.

Other important areas on implementation work include refineries, iron and steel, cement plants and addressing water pollution from industrial activities (e.g. chemical plants and the HAZBREF initiative).

Improving access to information and public benchmarking of industry will also be in focus throughout 2021, linked to improved access to information at the regional level, subject to further capacity, through the UNECE PRTR Protocol review, EU level (E-PRTR review and IED Registry) and at Member State level. The EEB will build on its own in-house database work such as the Industrial Plant Data Viewer (IPDV) <http://eipie.eu/projects/ipdv>, currently addressing large combustion plants.

Activities:

- Continue to organise technical expert input, coordinate and provide active NGO involvement in the Sevilla process;
- Maintain our new dedicated NGO Sevilla platform of information about industrial production (www.eipie.eu);
- Support members in enforcement work and proper implementation of industrial standards;



- Subject to funding, work on implementation for specific sectors (e.g. refineries, iron and steel, cement production) or specific media impacts (e.g. water pollution from industrial activities);
- Engage in the IED REFIT process, including by providing input, and mobilising others to provide input¹;
- Advocate for a powerful EU level database allowing for better benchmarking of real-time environmental information, including through building an in-house database on the biggest polluters, thereby strengthening public participation in decision-making on industrial activities, engage to that end within the UNECE PRTR Protocol review (subject to additional staff capacity and membership involvement);
- Provide for an effective liability system and cost internalisations, reflecting the polluter pays principle;
- Where relevant and subject to staff capacities, engage in global and regional level work linked to the above activities e.g. OECD and UNECE;
- Organise one EEB industry working group meeting and one larger stakeholder event on the IED Review.





Interface of industry policy objectives with circular economy, decarbonisation, water quality, toxic-free environment and air quality and other relevant SDGs (for main priorities of cross-cutting nature see [here](#)):

- Ensure that opportunities in relation to industry policy are fully exploited when engaging in the policy design of the Zero Pollution Action Plan;
- Reinforce the links between industry and climate policy by setting dedicated BAT standards on those aspects in ongoing BREFs; NGO version of Energy Generation BREF, pushing for bringing energy efficiency and GHG performance factors through the IED review, relevant industry initiatives such as 'green steel' (subject to funding – see Climate section for other links);
- Reinforce the links with circular economy by setting dedicated BAT standards on those aspects; continue engagement on the relevant OECD projects (e.g. BAT for value chains), possible BREF on CE;
- Continue linking industrial production with substitution of hazardous substances and achieving of relevant environmental quality standards by tackling new emerging pollutants;
- Reinforce the link with water quality work (UWWTP-D review, setting of water toxicity standards, upstream pollution prevention standards via BREFs, water-energy-mines nexus work and engagement on Significant Water Management Issues (SWMI) and 3rd phase of river basin management plans preparation);
- Continue link with pollution prevention at source of air pollution, including GHGs and tackling methane from agriculture and coal mining;
- Improve internalisation of external costs of production methods e.g. air pollution and engage in EU state aid reform and defining the Taxonomy criteria, in particular relating to pollution prevention and control;
- Provide for improved tools for compliance promotion, monitoring and benchmarking on industrial performance.

Europe Beyond Coal campaign²

- Continue co-convening role of the Plant-By Plant and Mines WG of the EBC and support implementation of the set action plan;
- Continue leading on the Water-Energy Nexus working group with the following 2021 priorities: highlighting the water availability issues linked to thermal power-based energy production and lignite mining, visualise and highlight the non-implementation of the cost recovery principle under the Water Framework Directive, advocate for changes notably through SMWI and 3rd RBMP reviews;
- Provide technical and policy support to LCP BREF implementation and support litigation work, provide assistance to EU-level and national coal phase out work;
- Support groups in the Western Balkans to implement the relevant EU environmental protection acquis;
- Advocate for fossil fuel phase out and the internalisation of damage costs through the Energy Taxation Directive review, stronger and more comprehensive standards within the Energy Efficiency Directive review;

² The activities are only extracts of the not yet approved Action Plan of Europe Beyond Coal on the Plant by Plant and Mines-Water WG.



- Enable EU centralised performance benchmarking on water use footprinting due to energy generation (through [IPDV database](#)), strengthen liability schemes and highlight other environmental damages linked to mining.

Noise

The Environmental Noise Directive (END) defines a number of procedures for Member States according to which they should reduce noise pollution levels. Since the end of a public consultation in 2012, the European Commission has been expected to come up

with a proposal for revision of the Directive. The scope of the current Directive only deals with some sources of problematic noise; others also need to be addressed, e.g. noise pollution related to environmentally impacting activities.

Activities:

- Monitor the main developments on EU noise policies (END and source policy), in particular if the Commission comes up with a proposal to revise the END;
- Advocate for the zero-pollution ambition under the European Green Deal to extend to tackling noise pollution;
- Convene a noise working group meeting or webinar, subject to political opportunity and availability of funding;
- Participate in meetings and events, and seek alliances with like-minded stakeholders, as appropriate.



Communications and political advocacy

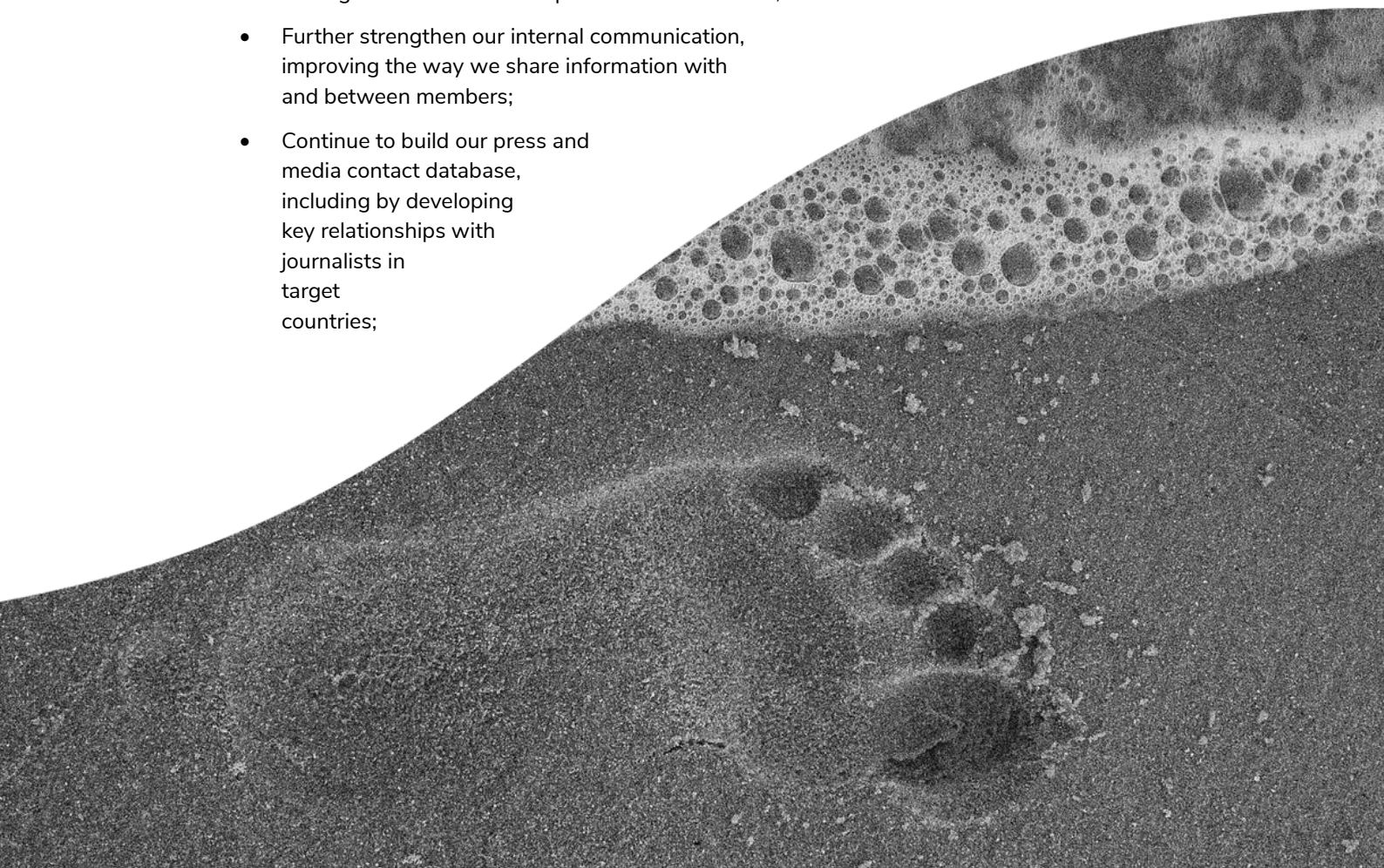
Communications: Share, shape, spark

2021 will be the second year of our two-year communications strategy: 'Share, Shape, Spark'. To achieve our vision of a better future where people and nature thrive together, we pursue our objective of making agreeing with us "seem obvious and be easy". To make action more desirable – or 'obvious' - we will continue to promote the benefits of change. To make action easier, we will continue to break down barriers to action, by speaking to our audiences in a language they will respond to.

We will continue to deliver headline-grabbing stories to major European and international press while striving to improve the overall quality of our work across a diverse range of tools. We will continue to follow the 'five Ps' principle to build a distinctive voice which is passionate, principled, professional, positive and personal.

Activities:

- Continue to focus on increasing our reach to core audiences: we will work to further develop our newsletter list as well as our social media following, with our core channels (eeb.org and META.eeb.org) being a particular focus;
- Further develop and implement communication strategies tailored to our key work areas and conduct a mid-term review of our overarching and social media strategies to assess their impact and effectiveness;
- Further strengthen our internal communication, improving the way we share information with and between members;
- Continue to build our press and media contact database, including by developing key relationships with journalists in target countries;



- Begin to explore options for a new website to combine eeb.org and META.eeb.org into a single hub and start to implement the recommendations of a review of our current websites conducted during 2020;
- Implement a series of regular trainings to build the capacity of our staff and members to deliver effective communications;
- Significantly improve the quantity and quality of video content shared on our social media channels.

High political impact

The EEB has successfully influenced EU policymaking over several decades, bringing the views and concerns of a large constituency of environmentalists into the heart of the EU processes, and our capacity to do so is probably stronger today than ever before. We have achieved this through combining ambitious agenda-setting activities with engaging in ongoing decision-making processes, working on a wide spectrum that ranges from high-level policy frameworks down to detailed technical policy areas. Nevertheless, the EEB still needs to constantly review its approaches, working methods and

communication style in the shifting political and institutional landscape.

Building alliances has been an important part of how the EEB works. We will continue to build cohesion and coordination among environmental organisations working on EU environmental policy through coalitions and networking and continue to collaborate and seek common ground with non-environmental stakeholders to further promote environmental objectives within a broader sustainable development agenda.

Activities:

- Prepare and publicise detailed memoranda for the incoming Slovenian and French EU Presidencies containing a comprehensive set of demands, summarised in Ten Green Tests, and publish assessments of the German and Portuguese Presidencies' performances;
- Set out key policy demands to all EU Environment Ministers prior to each formal meeting of the Environment Council; and upon invitation, participate in the informal meetings of the Environment Council;
- Prepare and publicise EEB priorities for the Commission Work Programme for 2022;
- Prepare and publicise EEB priorities for the Presidency Trio comprising France, Czech Republic and Sweden (2022-23);
- Participate in and bring a European NGO perspective to political fora outside the EU that deal with environmental topics, such as UNEP, UNECE and OECD;
- Continue to play an active role within the Green 10, including through chairing it during the first half of 2021; work within single issue coalitions such as on energy savings; and with trades unions and social and development organisations within the framework of configurations such as the European Movement International, EESC and SDG-Watch Europe.



Membership, partnerships and events

An empowered and consolidated membership

In 2021, the EEB will enter a phase of consolidation and focus on continued organic growth of the membership with the aim of becoming an even more comprehensive umbrella organisation for Europe's environmental NGOs.

Activities:

- Evaluate the EEB 2018-2020 membership expansion plan;
- Consolidate the network by making sure that the membership services and capacity building offer remains relevant and empowers members (old and new) in their advocacy work;
- Continue to do research on and test different tools, software and formats to be able to offer engaging virtual meetings and events;
- Further explore the interest in and funding opportunities for setting up a) an exchange scheme for EEB staff and members, b) advocacy training projects;
- Organise the 2021 Annual Conference in France in collaboration with France Nature Environnement.





Staff, organisation and governance

A solid organisational base and living Long-Term Strategy

Activities:

- Reflect on lessons learned from COVID-19 lockdown period and adapt EEB office guidelines, staff wellbeing measures, routines for events etc. accordingly;
- Continue the review of the organisation's governance structure to ensure that it remains fit for purpose to deliver on the LTS over the coming decade;
- Put in place in new project management and financial reporting tools to ensure coherence and improve coordination;
- Further develop and implement the EEB's fundraising strategy to ensure adequate financing of the EEB's activities;
- Further develop staff training opportunities and our wellbeing/benefits package where feasible.





2021 Budget

General costs	€
Office Costs	195 000
Office Supplies	106 240
Communications	45 000
Depreciations	150 000
Financial costs	3 800
Unforeseen expenditures	10 000
Sub-total	510 040

Salary costs	€
President's Secretariat	10 000
Secretary General's Unit	321 005
EU Policy Unit	1 687 362
GPS Unit	400 601
Information and Communication Unit	795 989
Accounting and Support Unit	618 473
Special Campaigns	369 286
Volunteers and Temporary Staff	24 000
Other personnel costs	72 460
Sub-total	4 299 176



Activities	€
Overarching policy framework	27 250
Environmental Law and Justice	62 500
Global and Regional Policies	139 934
Economic Transition	48 500
Nature	104 200
Circular Economy	391 000
Climate	120 504
Health and Environment	338 000
Communications and Political Advocacy	34 000
Membership, Partnerships and Events	184 000
Staff, Organisation and Governance	55 000
Sub-total	1 504 888

Working Capital	€
Allocation to Working Capital	60 000

Total	€
Total Expenditure	6 374 104



EEB
European
Environmental
Bureau

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A better future where people and nature thrive together