



**EEB**

European  
Environmental  
Bureau

The background of the lower two-thirds of the page is a photograph of a sunset or sunrise over a large body of water. The sky is filled with dramatic, dark clouds, with a bright glow of light breaking through near the horizon, reflecting on the water's surface. The overall color palette is dominated by blues, greys, and warm oranges from the sun.

**2022**  
**WORK**  
**PROGRAMME**

# EEB WORK PROGRAMME 2022

EUROPE'S LARGEST NETWORK  
OF ENVIRONMENTAL CITIZENS'  
ORGANISATIONS

We bring together over 170 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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Thank you!

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# ABOUT THE EEB

**The European Environmental Bureau (EEB) brings together citizens' groups from across Europe. Our more than 170 members from 36 countries have over 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

The European Environmental Bureau brings together environmental citizens' groups from right 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 170+ 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.

In 2022, we will continue to ratchet up the level of ambition in the rollout of the European Green Deal and to ensure that the hoped-for emergence from the COVID-19 pandemic is focussed on a genuinely green and sustainable recovery.

In line with our [Long-Term Strategy to 2030](#), we will continue to work on a broad range of fronts: climate and energy; biodiversity and agriculture; air, water, chemical and industrial pollution; circular economy, waste and resource efficiency, to mention a few. We will also continue to address horizontal issues such as environmental democracy and justice, better implementation and enforcement, macroeconomic governance and environmental fiscal reform; to support better environmental policies in the EU's neighbourhood countries; and to engage in relevant global and regional processes.

To achieve this, we will 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 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 and support within the network and 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

## European Green Deal

2022 will be the third year and midpoint of the European Green Deal (EGD) and unfortunately a year in which we are likely to still be facing the COVID-19 crisis that has fundamentally challenged Europe and the world. The European Green Deal survived the challenges thrown at it during the crisis, but some of the crisis response solutions weakened the EGD. There is increasing concern that the high-level commitment to an ambitious EGD is waning. It is essential to keep pushing for needed ambitious initiatives and their implementation.

A wide range of legislative files launched by the Commission will be in co-decision in 2022. How transformative they will be is open and will largely depend on how ambitious the Council and Parliament are and on the subsequent negotiations.

Hence EEB engagement with the Commission, Council and Parliament is critically important. Targeted funding, the integration of ambitions into plans and strategies, and implementation in the Member States are also essential.

This section focuses on the EGD measures, and discussion on the Presidencies of the European Council and Commission are presented in the “High-Political Impact” section. EU Funding is presented under “Green Fiscal Reform and Funding”. Policy and implementation aspects are also presented in each thematic section.

## 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;
- 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;
- Monitor, review and communicate on EGD progress - commenting on the level of ambition and shortcomings of key EGD initiatives and suggest improvements, e.g. through a mid-term review - with a view to nudging ambition levels and improving governance to ensure that the EGD is a transformative agenda that catalyses a system change necessary to address the range of existential threats facing EU and the planet;
- Engage in the process of the Conference on the Future of Europe, mostly through the Civil Society Convention on the Future of Europe, ensuring that the process and its outcomes support strong environmental and climate objectives aligned with the EGD;
- Assess if a new horizontal EEB working group, potentially meeting back-to-back with the EEB law group, should be established to work on governance issues, to prepare high-level advocacy e.g. with the Council and to support political debates within the EEB.



## 8th Environment Action Programme

The 8th Environment Action Programme (8EAP), the subject of a Commission proposal published on 14 October 2020, is a key co-decision-based instrument and long-term tool for environmental and climate policy planning until 2030, with a 2050 vision to “live well, within the planetary boundaries.”

Through its important commitment to monitor the proposed thematic objectives, it will be a key monitoring tool for the European Green Deal, as well as the SDGs. However, the 8EAP proposal, while it was welcome and contained a range of important commitments, was too weak to be fully fit for purpose, to meet its objectives and to address the environmental crises.

Through EEB and partner engagement in the Council and Parliament, the 8EAP final agreement obtained in December 2021 committed to a stronger programme – with a commitment to system change, a mid-term review, progress towards a wellbeing economy, subsidy reform, Beyond GDP measurement, and cross-institutional discussion of progress, creating a platform for promoting a strong policy response where progress is insufficient.

### Activities

- Use the 8EAP to promote better transparency and communication on system change, wellbeing economy, regenerative economy, commitment to ending harmful subsidies, and progress with respect to the commitments under European Green Deal and wider environmental and climate commitments;
- Use both the 8EAP commitments and 8EAP monitoring results to advocate for needed ambition and actions to realise the objectives of the 2050 vision to “live well, within the planetary boundaries”.



## Implementation of the 2030 Agenda and SDGs in and by the EU

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 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 2022, pressure from civil society must be maintained and strengthened to give a clear signal to the 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.

### Activities

- Assess the effectiveness of the Commission's chosen SDG implementation approach, promote and monitor the implementation of the 2030 Agenda for Sustainable Development in Europe, with further governance changes if needed, and its integration across all policy areas to ensure enhanced coherence;
- Continue the EEB's leading role in the EU civil society alliance SDG Watch Europe (on its Steering Group and/or in the work strands);
- Encourage EEB membership engagement in national implementation of the SDGs, including through continued updating of the online SDG Toolkit and the Agenda 2030 working group;
- Seek funding 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.

## Better Regulation

The European Commission has embraced a commitment to simplification and burden reduction within its “Better Regulation” agenda that weakened and slowed environmental policy during the Juncker Commission. The “Better Regulation” agenda is still in place under the Von der Leyen Commission and burden reduction and simplification are still explicit ambitions in the Fit-for-Future high-level group. The European Green Deal has so far embraced a more positive approach towards policy and regulation, and the EGD includes a “Green Oath” to do no harm, also manifest as a “do no significant harm” (DNSH) principle in the national recovery and resilience plans.

However, the mission letters sent to each Commissioner when the new Commission took up office, the Better Regulation Communication and the Commission 2022 Work Programme each commit the Commission to a “one-in-one-out” principle aimed at avoiding additional burdens and thus creating regulatory caution in the services, offsetting the EGD ambition.

Formally, the Commission says that there will be no deregulation and the better regulation agenda is about meeting objectives effectively and efficiently. Pressures to minimise new legislation and ambition levels are still very real.

It is therefore essential to promote a positive transformative regulatory agenda where the wider public benefits of policy gain prominence in thinking over the “burden” framing that is still prevalent and misleading - as many requirements within EU law are about responsibilities, which should not be seen as “burdens”, but rather a minimum due effort as part of a licence to operate, and essential in light of the environmental protection obligations of Article 191 of the Treaty on the Functioning of the EU.

### Activities

- Promote a move away from the “burden” focus of “better regulation” towards a positive vision focusing on sustainability first - with public benefits of policy driving ambition and choice of measures, rather than concern for short term costs of assuming responsibilities to avoid pollution and climate change;
- Seek to minimise the risks coming from the Commission’s commitment to the “one-in-one-out” principle by communicating the ethical, environmental, health and political benefits of regulation as well as the lack of good regulation logic in the “one-in-one-out” principle itself;
- Further elaborate on and promote the positive aspects of the Commission’s Better Regulation work, notably the “Do no harm” principle and the “SDGs integration” with law-making;
- Engage in the Fit-for-Future platform to avoid deregulation, and to encourage a forward-looking EGD-compatible Better Regulation process that seeks to promote legislation that more effectively meets its objectives, addresses the environmental and climate challenges and helps future-proof Europe;
- Push for the use of better assessment tools, question framing and scope, analysis frameworks and data to ensure fuller reflection of environmental and health benefits of policy action in assessments and hence address an imbalance unduly focussed on short term economic costs and avoid impact assessments and REFITs drawing biased conclusions;
- Encourage that key interconnections between ecosystems and social systems and environmental and climate feedback loops are factored into assessments, and that environment, climate and health are given fuller attention and representation in analysis and assessment guidelines.

## Greening the European Semester

In 2010, the European Commission launched the European Semester process to help coordinate economic policies across the EU. 'Greening the European Semester' has become part of this process, aiming to ensure that macroeconomic policies are environmentally sustainable. The process has received new political attention in the European Green Deal, with a promise to integrate the Sustainable Development Goals (SDGs) into the Semester.

Furthermore, with the COVID-19 crisis and the recovery package, the National Recovery and Resilience Plans are also being integrated. The Semester remains a macroeconomic policy level forum and a challenge remains, despite progress on climate and circular economy, of integrating environmental concerns into semester. There is a need for further integration of environmental issues given the many interlinkage between environment, society and the economy, and a need to upgrade the semester by better integrating wellbeing.

### Activities

- Capacity permitting, promote the greening of the European Semester - through further integration of environmental concerns and promoting the use of progressive policy instruments at the EU and at Member State levels (e.g. environmental taxes and subsidy reform);
- Encourage "wellbeing" to gain in prominence in the context of the Semester;
- Engage in the Greening European Semester expert group, promoting positive integration of environmental issues, recommendation of policy initiatives, and monitoring and policy commentary on the National Recovery and Resilience Plans that are being integrated into the Semester.





# ENVIRONMENTAL LAW AND JUSTICE

## Strengthening Environmental Integration 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.

In 2022, the Environmental Crime Directive (ECD) is expected to undergo a legislative process for its amendment, following its evaluation and the Commission's legislative proposal for a revised Directive in December 2021. It is imperative that the ECD is amended so that it is effective in combating illegal activities, increasing compliance and improving enforcement, including tackling illegal wildlife trade.

The EU measures to hold legal persons liable for environmental damage has also proved to be unsatisfactory, with widespread criticism of the ineffectiveness of the Environmental Liability Directive (ELD). The Commission launched the evaluation process of the ELD with a call for evidence in December 2021 and is planning a public consultation for Q2 of 2022. The ELD's scope of application will have to be extended as has also been recognized by the European Parliament INI report 2020/2027 by Antonius Manders on the Liability of Companies for Environmental Damage.

There must be more ambition to identify and solve Member State-specific but also systemic issues or poor implementation and enforcement, going into root causes, and involving public administration quality and governance. It is expected that this identification will continue with the Environmental Implementation Review (EIR), 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 EU Institutions, and in particular the European Commission, need to refocus on enforcement across the Member States, in order to underline the importance and legitimacy of the activities of those from civil society who defend the environmental acquis at Member State level. The effective de-prioritisation of enforcement action and the undermining of the Commission's role through sustained periods of under-resourcing have contributed to a narrative where environmental protection is seen as unimportant in the overall context of other economic and social imperatives that need to be enforced. In this context, follow-up on the outcomes from the Commission's public consultation on the rule of law in the Member States will also be essential.

Beyond implementation and enforcement, the EU must strive for greater environmental integration in all policy areas and ensure that there is policy coherence with new initiatives. The recognition of a right to a healthy environment as a fundamental right at national, EU and international levels would establish a solid basis for all decision and policy makers to guarantee this integration and coherence.

On the other hand, there is a need to monitor developments and ambitions towards unfettered economic growth, including to counterbalance the corporate interests behind the so-called 'innovation principle' which risks weakening legal safeguards that protect people and the environment e.g. the precautionary principle and participatory rights.

## Activities

- 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;
- Engage in the legislative process of the Environmental Crime Directive where we will advocate for updated measures and clearer definitions that will improve inspections, enforcement and sanctioning of environmental crimes in all the Member States, and ensure that illegal wildlife trade, among other environmental crimes, is not left out of the scope of the Directive;
- Increase enforcement and accountability by pushing for stronger liability regimes, making sure that the precautionary principle is applied and that polluters pay. If the opportunity arises, we will advocate for the better implementation of the polluter pays principle and addressing the issues of financial securities through a strengthened Environmental Liability Directive, funding permitting, as well as through other relevant developments that can strengthen and complement liability regimes (e.g. see Sustainable Corporate Governance below);
- Monitor the Commission's work on the rule of law in the Member States, including its follow-up on the outcome of the consultation on the topic, with the help of national NGOs and step up the pressure to increase the capacity within Commission services for more systematic follow-up of complaints and more extensive use of the infringements process to deal with breaches of environmental law and for common guidelines for the process of inspections;
- Demand for policy coherence in all new EU initiatives, so that innovation and economic wellbeing does not conflict with environmental interest and legal safeguards. and the need for a deeper environmental integration in all policy fields in line with Article 11 of the Treaty on the Functioning of the European Union;
- Whenever the opportunity arises, call on the recognition of a right to a healthy environment in national, EU and international forums.

## Environmental Democracy and the Aarhus Convention

In March 2017, the EU was found in non-compliance with the Aarhus Convention by the Aarhus Convention Compliance Committee (ACCC) due to the insufficient possibilities for access to justice at the EU level. The EU implements its Convention obligations as they apply to the EU institutions through the Aarhus Regulation which was revised on 6 October 2021.

The 7th Meeting of the Parties of the Aarhus Convention in October 2021 (MoP-7) recognized that the revised regulation addressed several obstacles to access to justice identified in the ACCC's March 2017 findings and widened the scope for NGOs and individuals to challenge the Commission but the revision failed to address the issue of access to justice in the field of state aid, which was the topic of a more recent ACCC finding of non-compliance by the EU.

The EU regrettably blocked MoP endorsement of this latter finding, undermining its own credibility as a proponent of rule of law, but set out a timeline for addressing the issue before the next MoP.

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.

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 and 2020 Communication 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.

For the time being, the Commission has committed to introducing access to justice provisions in all its new environmental legislative proposals. Access to environmental information and public participation in decision-making are the other two pillars of the Aarhus Convention that need to be safeguarded, strengthened and promoted in the EU and the Member States. Together with access to justice, they form the basis of environmental democracy and are essential to proper environmental governance. With the many new initiatives, policies and laws that form part of the EGD, full access to information and meaningful public participation must be guaranteed throughout the development, adoption and implementation of these.

The COVID-19 pandemic has put environmental governance and democracy to the test, as public authorities have needed to adapt processes while seeking to guarantee access and participatory rights.

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. 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 democratic values and public engagement. The efforts by the Commission to explore how EU legislation can protect activists, NGOs and journalists against Strategic Litigation Against Public Participation (SLAPP) should materialise into a concrete proposal in Q3 of 2022 after the finalisation of a public consultation in Q1 2022.

## Activities

- Test the new Aarhus Regulation and continue to advocate for proper access to justice at EU level, including through maintaining pressure for the EU to come fully into compliance on the state aid issue;
- Strengthen environmental democracy rights in EU legislation, by calling for better access to quality environmental information through the GreenData4All initiative, more meaningful participation in decision-making processes, and the inclusion of access to justice provisions in all new environmental legislative proposals, as per the Commission's 2020 [Communication on improving access to justice in environmental matters in the EU and its Member States](#);
- Service and continue to improve the coordination of NGO input in the Aarhus Convention and its PRTR Protocol processes within the Aarhus ECO Forum;
- Engage in the processes under the Aarhus Convention and its PRTR Protocol, where appropriate, during the new intersessional period, including, but not limited to, the setting up of a Rapid Response Mechanism under the auspices of Article 3(8) of the Convention and ensuring a robust reaction to the harassment of NGOs, including in the particularly egregious case of Belarus;

- Advocate for increased financial support for Aarhus activities, in particular to support the NGO work around the compliance mechanism;
- Following the expected legislative proposal by the Commission on a new anti-SLAPP legislation, engage in the legislative process of this possible new Directive and the likely amendment of Brussels II and Rome I Regulations, so that activists, journalists and civil society organisations have EU-wide safeguards against vexatious claims brought against them;
- 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.

## Global Environmental Justice

Environmental burdens and environmental benefits are not shared equally. At a global level, there is an unequal exchange leading to a global ecological debt, a process whereby environmental and social costs are shifted to the less powerful. Cost shifting and disproportional environmental burden on certain groups also happens within Europe, with environmental discrimination against Roma communities being one stark example.

In 2022, the EEB will continue its work on resisting environmental injustice vis-à-vis Roma communities across Europe and link this work to other environmental justice struggles in the region.

Outside the EU, European policies and practices, including policies linked to the transition to a zero-emission continent, cause significant impacts for marginalised communities, as illustrated by the Environmental Justice Atlas.

We will continue to monitor these impacts, such as environmental degradation, land grabbing or the loss of livelihoods caused by new mining sites or badly designed carbon offsetting projects, on communities in the Global South, paying special attention to Indigenous peoples and peasant communities.

Linked to these activities related to grassroots environmental justice activism and conflicts, the EEB has created an EnvJustAct mailing list for exchanges on environmental justice activism.

### Activities

- Coordinate with other NGOs and provide input to their demands so that environmental concerns and interests are reflected in civil society positions and their advocacy for mandatory horizontal human rights and environmental due diligence obligations on companies in the EU;
- Engage in the legislative process for the introduction of a new Sustainable Corporate Governance Directive, 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, textiles sectors, raw materials (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, we seek to contribute, where we can, 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.

The EU has significant influence outside its borders, most obviously in enlargement and neighbourhood countries and on countries with which it has strong economic ties, 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 the EU drives a positive development of regional and global environmental policies. 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 significant environmental footprint in other parts of the world.

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 and SDGs

The 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 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 2022, the EEB will continue to engage in the global and regional processes shaping decisions on the monitoring and review mechanisms for the 2030 Agenda around the UN High-Level Political Forum (HLPF) and the UNECE Regional Forum for Sustainable Development. The EEB will contribute to global and EU NGO positions and will try to influence the position of the EU in those discussions by providing direct input to it, especially through its leading role in SDG Watch Europe.

### Activities

- Depending on in person meetings and availability of funds, 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;
- Engage with EEB members through the 2030 Agenda working group to encourage members' input into national, regional and global SD processes.

## 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 emerge.

After the upgrade of the UNEP Governing Council to UNEA, involvement of stakeholders in UNEA processes became even more important. UNEA 5.2 is scheduled for February 2022 in Nairobi, back to back with the celebration of UNEP@50.

The EEB will continue to actively engage in the discussions around UNEP's stakeholder engagement modalities. The election of the EEB's Director of Global Policies and Sustainability as one of two regional facilitators for European Major Groups and Stakeholders and well as her role as a co-facilitator of the Major Groups cluster on environment governance will provide a good basis for achieving these goals.

The EEB will not only strive to ensure meaningful civil society participation, capacity building, coordination and dissemination of information for UNEA but also for the process leading to a high-level international conference to celebrate Stockholm+50 in June 2022. The political opportunities around UNEA 5.2 and Stockholm+50 are, amongst others, to reach an agreement to start negotiations for an international plastics treaty, and for the international community to adopt a declaration and roadmap for the reform of international environmental governance.

The initiative to establish a Global Pact for the Environment, spearheaded by France, suffered a setback in March 2019 when governments refrained from recommending that the UN General Assembly initiate negotiations; however, the EEB has joined the coalition for the Global Pact which seeks to bring it back to the agenda at Stockholm+50.

### Activities

- Seek to organise or support capacity-building on the UNEA process and stimulate strategic debates across civil society about lessons learnt and our objectives for UNEA-5 and involve interested EEB members in the discussions;
- Engage in the preparatory process for UNEA 5.2 through participation in the Committee of Permanent Representatives and through the Major Groups and Stakeholder Facilitation Committee;
- Co-organise the Global Major Groups and Stakeholders Forum in February 2022;
- 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;
- Co-facilitate the Major Group's cluster on environmental governance reform;
- Follow and support as far as possible the coalition for the Global Pact for the Environment as well as the global campaigns for the recognition of a human right to a healthy environment and of ecocide as an international crime

## Organisation for Economic Cooperation and Development (OECD)

The OECD plays an important worldwide role in shaping environmental policy, providing a forum for influential debates on topical issues. For a number of years, the EEB has facilitated and coordinated input to OECD environment-related processes from NGOs from throughout the OECD region.

In 2022, the EEB will continue to coordinate the NGOs input into the implementation of the OECD's environmental work programme to ensure that CSOs voice is heard in the multi-country discussions.

### Activities

- Participate in working parties and working groups of the OECD (such as those dealing with chemicals, biodiversity, industrial emissions, climate and circular economy), the Environmental Policy Committee (EPOC), the Green Growth and Sustainability Forum and work linked to the SDGs and Policy Coherence for Sustainable Development (PCSD);
- Coordinate NGOs' input to these meetings;
- Seek to secure better geographical balance in NGO engagement among OECD countries;
- Provide capacity-building on civil society engagement with the OECD.

## UNECE 'Environment for Europe'

In 2022, the EEB will contribute to facilitating 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), in particular the Environment for Europe process.

The 9th Ministerial Conference of the Environment for Europe (EfE) process is now scheduled for October 2022 in Cyprus

### Activities

- Participate in the preparation process of the 9th EfE Ministerial Conference throughout 2022;
- Facilitate NGOs participation in the process including through capacity building;
- Actively engage in the 2022 EfE Ministerial Conference in coordination with EEB members.



# Supporting and Collaborating with Environmental NGOs in Candidate Countries and the Eastern Partnership

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 the accession negotiations with candidate countries in South-East Europe and Turkey, by seeking funding for the continuation of the ENV.net project.

The EEB will continue to explore 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.

## Monitoring the Relationship Between the EU and the UK

The departure of the United Kingdom from the EU brings the risk that 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, potentially cutting corners on environmental protection and having negative influence on the EU's own environmental standards.

### Activities

- Monitor the implementation of and developments around the EU-UK Trade and Cooperation Agreement, in particular as part of the Domestic Advisory Group, including on potentially negative impacts on the environment consequent on Brexit;
- Facilitate exchange of information within the ad-hoc task force of EEB members who are interested in monitoring the relationship between the EU and the UK;

### Activities

- Continue exchange and discussions with members (and partners) from Eastern Europe and the Caucasus to further develop joint plans and possible projects, to improve EEB membership services and to discuss our future engagement with the European ECO Forum;
- Explore funding opportunities to continue the work of the ENV.net project in the Western Balkans, on sector specific projects and advocate towards DG NEAR and DG ENVI to support eNGOs in the region;
- Monitor, as far as possible, the implementation of the European Green Deal and the Green Agenda for the Balkans in the region;
- Implement a project with members and partners in Ukraine if our 2021 funding proposal is successful in order to monitor the environmental impact of the UA-EU free trade area.

It will therefore be important for the EEB to monitor closely the implementation of the EU-UK Trade and Cooperation Agreement (TCA) that has entered into force in 2021 and engage, as appropriate, in the EU Domestic Advisory Group on the TCA in order to avert any negative consequences for environmental policy in the EU or UK.

- Allow for an exchange of experiences between the ad hoc task force and other non-EU EEB members.

## Gender Equality and the Environment

There is a clear lack of integration between gender and environmental issues in EU policies while the importance of gender-differentiated impact of environmental and sustainability policies have been widely researched. From mobility and consumption patterns to the differentiated exposure to chemicals, there is a 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. In 2021, the EEB conducted a pilot project with the publication of a report mapping the gender gaps and opportunities in the European Green Deal with policy recommendations for the EU as well as providing spaces for exchange between the environmental and women's rights movements. In 2022, we will build on this work to keep pushing for gender-just EU environmental policies.

## Activities

- Explore political opportunities to advocate for gender-just environmental policies, building on the findings of the report to policymakers;
- Continue providing spaces for exchange and discussions between the environmental movement and the gender and women's rights movements;
- Depending on further funding, additional research, advocacy and campaigning activities to ensure gender mainstreaming in selected EU environmental policy areas and international environmental policies as well as environmental mainstreaming in gender policies and processes such as the Commission on the Status of Women or CEDAW.



# Population and the Environment

A major driver behind many of the environmental problems 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 to the current level of 7.6 billion. Projections predict an increase to over 11 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 impacts receive little attention from the environmental movement.

This may be due to the very long-time spans before measures to bring down population growth rate take effect, to the fact that some of the measures (e.g. empowerment of women and girls, education, reproductive health, tackling poverty) 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 within the environmental movement.

Of particular interest to the EEB is the question of population policies in the EU, one of the most densely populated regions of the world combined with some of the highest per capita consumption rates. We will also explore the relationship between the EEB's positions on gender equality and economic transition, e.g., how a new economic model can work with a shrinking and ageing population.

## Activities

- Explore further activities building on the EEB's internal workshop on the topic organised in June 2021.





# ECONOMIC TRANSITION

## Mainstreaming Ecological Economy Concepts and Narratives

Our Economic Transition or ET-cluster forms a bridge from science rooted in ecological economics to policymakers, media, civil society and the wider public. Its role is to dive deeper into the human-nature relationship and propose the more systemic changes needed now. While it follows certain policy agendas; it also works on changing the narrative used in politics, by the media and among the population in general.

The ET cluster for example supports the use of “wellbeing economy” and postgrowth debates in the European Parliament, within the Presidencies and with the European Commission.

The cluster produced in-depth reports and shares its expertise with colleagues, members, unions, youth, think tanks, the European Environment Agency and more. We aim for systemic change and take a holistic intersectional approach towards economic transition, one that includes issues such as gender equality and racism.

### Activities

- Co-organise the September 2022 post-growth conference in the European Parliament;
- Work on a better narrative for policymakers; rewrite/unpack findings from the academic degrowth community, doughnut economy, sufficiency strategies to bring the economic system within the limits set by our ecosystems and make these ideas useful for policymaking - on a level beyond the day-to-day political agenda;
- Work on spreading the awareness of the need for a drastic economic transition within civil society by collaborating with both EEB members, other environmental NGOs and partners beyond the environment silo: youth, unions, development organisations and more; this will include a focus on tangible national outcomes such as a government joining the wellbeing economy alliance or introducing postgrowth/degrowth policies in member states;
- Produce and disseminate products made for a general audience that focus on the wider narrative of systemic change (e.g. 25% revolution documentary, pandemic book);
- Use the opportunity of Stockholm+50 to advance policymaking that lives up to the recommendations of the Limits to Growth report and its more recent EEA-produced versions;
- Work in networks (e.g. with WeAll, youth, unions, development organisations etc) to spread our narrative within civil society.

# Macroeconomics for Degrowth, Postgrowth and Wellbeing Economy

Another key aspect is translating economic transition demands into concrete policies and to develop a clear position and policy asks related to, amongst others, alternative measurements of well-being and prosperity beyond GDP growth, digitalization, gender and economic justice (the exact topics are still to be defined and depend on policy developments and events such as the crisis). We will further continue advocacy efforts to link the economic transition work to the Recovery and Resilience Facility (RRF) through the National Recovery and Resilience Plans (NRRPs) to ensure Europe is on the way to build back better by striving for system change.

The idea is to also link different positions on various social and environmental aspects closer to the concept of the wellbeing economy, as it is gaining political acceptance on the EU and MS level. The EEB joined the Wellbeing Economy Alliance to collaborate on turning economies into wellbeing economies.

The Wellbeing Governments' group was founded with Iceland, Scotland and New Zealand, during an OECD event with Joseph Stiglitz. Wales and Finland also joined later and the EEB has been working with our Portuguese member ZERO, which led to them having a process with the Portuguese government around wellbeing policies.

In 2022, we will work closely with our members in Austria and France on similar processes there.

One key moment to radically reform to put environmental and social goals at the heart will be the review of the EU economic governance framework. Putting in place a carbon-neutral wellbeing economy will heavily depend on a successful reform of the EU's macroeconomic instruments. The Commission relaunched the consultation on the Economic Governance Framework, amongst others on the Stability and Growth Pact, in October 2021. The EEB will follow a consolidated approach with members and a newly created fiscal coalition to influence this process throughout 2022.

All these activities require a solid scientific basis. 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. We therefore strive to work closely with the academic community by engaging in projects such as the HORIZON 2020 project LOCOMOTION to best inform our policy positions and reports.

## Activities

- Write and disseminate reports, position papers, briefings addressing specific areas related to macroeconomic issues of the economic transition such as digitalization, gender and economic justice, recovery as well as build on previous reports, positions by following up on proposed policy recommendation in advocacy efforts (e.g. briefing on the French mining industry in France and in French Guiana);
- Use relevant public consultations to provide inputs;
- Ensure that we have the solid scientific basis for our activities; work closely with the academic community by engaging in projects such as the HORIZON 2020 project LOCOMOTION; rewrite/unpack findings from the academic degrowth community, doughnut economy, sufficiency strategies to bring the economic system within the limits set by our ecosystems and make these ideas useful for policymaking - on a level beyond the day-to-day political agenda;
- Continue engaging in the review of the EU economic governance framework – the economic transition team will follow this both with members and through a broader “fiscal coalition” throughout 2022; first proposal by the Commission to be expected Q2/Q3 2022
- To provide support (environmental) civil society stakeholders and (environmental) activists to build and strengthen the capacity to advocate on the reform of the EU's Economic Framework and changing the fiscal rules – to work collaboratively to drive disruptive and systemic change;
- To provide an economic transition perspective in our input to the Conference on the Future of Europe, European Semester and Agenda 2030 implementation.



# Making EU Trade Policy a Tool to Service a Wider Economic Transition

The EU continues to negotiate new trade and investment agreements with industrialised countries as well as with developing or emerging markets. The motivations and workings of trade agreements are counter to the rationale of environmental protection and tackling the climate crisis: trade agreements boost global trade volumes and thereby increase the demand for resources and environmental pressures globally.

The trade and sustainable development (TSD) chapters in the EU trade agreements are difficult to enforce and therefore lack teeth and many trade agreements contain ISDS or similar arbitration systems that put investors' rights over the right of a government to protect health, consumer rights and the environment. The role of the Chief Trade Enforcement Officer, established in 2020, is to ensure that trade agreements, including the TSD chapters, are enforced. Yet this solution still needs to prove that it can rebalance the protection of corporate interests and compensate for the lack of legal guarantees to safeguard environmental interests in these agreements.

In February 2021, the Commission published its Communication on the EU's Renewed Trade Policy. While it is a first step in recognising that trade is linked to climate ambition and the achievement of the SDGs, it fails to acknowledge the negative impacts that trade in the pursuit of growth can have on the environment, social justice and the well-being of future generations.

How the EU will reconcile its commitments under the EGD with its trade policy is still unknown, especially regarding a number of highly controversial agreements. For instance, the Energy Charter Treaty, an international investment agreement governing cross-border cooperation in the energy sector, raises various environmental and climate concerns. Moreover, the Mercosur agreement is highly problematic, with little guarantees provided for the environment, in contrast to what the new trade policy allegedly seeks to provide.

New trade negotiations will need to be scrutinized carefully. With the EU's proclamation as an "Open, Sustainable and Assertive" trading partner, we will need to see what change this entails in practice. The way that the EU will position itself with all its strategic partners - the UK, US, the neighbourhood countries, as well as its role in a WTO reform - will put its trade policy to the test and check whether the EU is courageous enough to lead a systemic change where trade is not pursued to merely generate financial and economic wealth.

The EU's longer-term interest in the African continent needs to be based on true cooperation on common challenges, such as securing environmental and social justice, tackling the climate crisis, and halting biodiversity loss, not based on a window-dressed rush for resources.

## Activities

- Engage in initiatives to strengthen the enforcement of TSD chapters;
- Where possible, emphasise the need to revisit our trade models in the context of more sustainable consumption patterns;
- Engage with the Commission's DG Trade on the Sustainable Corporate Governance (see sub-section on Sustainable Corporate Governance and Due Diligence for Environmental Impact under Environmental Law and Justice above) to ensure that the Commission's work on trade is coherent with the SCG so that corporate accountability and circular economy can be integrated into trade policy;
- Continue to advocate for the EU and the Member States to withdraw from the Energy Charter Treaty and, resources permitting, to oppose ratification of trade and investment agreements that lack sufficient environmental safeguards such as the EU-Canada Comprehensive Economic and Trade Agreement (CETA) or the EU-Mercosur Trade Agreement.

# Green Fiscal Reform and Funding

The EU's Multiannual Financial Framework and Recovery Funds agreed in 2021 will start to be disbursed in 2022. To obtain the recovery funds, Member States needed to submit National Recovery and Resilience Plans (NRRPs) that should include both identification of investments and policy reforms, that can include fiscal reform measures.

In addition, a series of fiscal reform measures are integral to the European Green Deal - notably the excise tax directive reform, EU-ETS and Carbon Border Adjustment Mechanism (CBAM). Extended Producer Responsibility (EPR) and the eco-modulation of fees will be an economic instrument which will be further explored, and which could be key, together with the appropriate policy mix, to increase the circularity of economies.

Finally, in order to guide investment towards activities that are sustainable, the EU is in the process of developing a common system of classification of such activities, known as the EU taxonomy.

Within the framework of the Taxonomy Regulation adopted in 2020, the Commission is mandated to draw up through Delegated Acts specific lists of economic activities deemed sustainable in relation to their implications for climate, biodiversity, water, pollution and circular economy (see further references in the relevant sections below).

The first of these Delegated Acts was adopted in June 2021 and a second one is scheduled to be adopted by the Commission in early 2022.

## Activities

- Keep the EEB's Green Budget working group informed on all issues relating to EU Budget and recovery spending, fiscal reform and economic incentives (e.g. Excise Tax Reform, CBAM, carbon taxes) and foster discussions within the group that could lead to advocacy opportunities;
- Continue to advocate for EU funding to be compatible with the objectives of the European Green Deal and wider sustainability, so that it helps to "build back better", and for funding to follow good governance principles, including on transparency – this includes both the MFF and the Recovery Funds under Next Generation EU - notably the National Recovery and Resilience Plans. In 2022, this will focus more on monitoring the Member States' implementation of the Plans (also with respect to participation of civil society stakeholders, e.g. through partnership agreements and operational programmes) and communicating on the strengths and weaknesses of implementation;
- 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 Mechanism);
- Continue work on the development of criteria in relation to the EU Taxonomy ("green investment") and ensure that this will not become a greenwashing exercise;
- Continue exploring Extended Producer Responsibility as an economic incentive and carry out more work on the eco-modulation of fees for a variety of economic sectors.

# Mining and Critical Raw Materials

Since 2008, the EU has created a series of policies to secure access to raw materials through trade with third countries, European sources and secondary use. Since then, the twin energy transition and digital transformation of societies, as well as the pandemic and trade disputes with China and the US, have increased pressures to find additional sources of raw materials.

The twin transitions require massive amounts of raw materials for low-carbon technologies. Many are deemed critical due to their economic importance and supply chain risks. The recent Action Plan on Critical Raw Materials aims to close the resource gap, mostly by putting more emphasis on sourcing in Europe. With the support of the Commission and a “sustainable” mining myth, mining companies are moving fast to secure permits in Europe.

The local population is asked to sacrifice their water, land, and environment in the service of Europe’s digital/green future. As a result of the proliferation of mining projects, communities from Portugal to Serbia and Sweden to Spain are mobilising, creating alliances and resisting in bearing the brunt of the energy transition.

Resistance to mining projects has exploded outside of Europe, as documented in the Atlas of Environmental Justice. Activists and NGOs in Europe are creating solidarity with frontline communities in the Global South and learning from their experiences.

Additionally, across these alliances, the calls for alternative models of development and consumption are strong, with the desire to move Europe away from primary resource extraction and to prioritise secondary material use and resource reduction as a way to relieve pressures on the Global South and European localities.

Because many anti-mining struggles remain local or regional, our efforts are concentrated on bringing these struggles to the highest political level, to continue to create alliances with activists and NGOs on the ground as well as other Brussels-based NGOs working on resource governance, increased due diligence and calling for an absolute reduction of material footprint and advocating for more degrowth-centred initiatives.

## Activities

- Continue to participate in several mining groups of European and Global South activists, scholars, and NGOs to discuss global mining policies;
- Raise awareness among EEB members related to issues around mining projects and associated environmental injustices in their member states and build connections with other local NGOs working on environmental justice issues;
- Highlight in our advocacy and communication activities the links between over-consumption in Europe, the need for resource use reduction (see Circular Economy chapter below) and the implications of resource extraction for the environment and affected communities;
- Develop a more science-based approach to policy asks related to pollution from mining, water and environmental harms;
- Lobby EU institutions and member states to legally recognise local communities’ right to Free Prior and Informed Consent (FPIC), including the Right to Say No to mining projects;
- Connect and widen environmental justice work with other interested parties such as unions or affected communities from (coal) mining areas, in relation to the just transition;
- Look into research on mining waste tailings as an opportunity for revalorization to enhance circular economy, soil remediation and mining waste management.



# NATURE

## Agriculture

### Implementing the Farm to Fork Strategy

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

Our vision for the future of our food systems, based on strong scientific evidence, involves a transformational change of our agricultural systems to agroecology, with drastic reductions in use of agro-chemicals and a shift away from intensive livestock production.

However, farm policy alone has proven to have limited impact. The character of the food system and the nature of food policy are both changing, as citizens and policy makers are more and more environmentally conscious of what they eat, from the way food is produced, marketed and consumed.

#### Activities

- Continue to steer and contribute to civil society collaboration for sustainable food systems through the EU Food Policy Coalition, as a member of the coalition's executive board;

- 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;

- Develop a clear vision and robust recommendations for a transformative Sustainable Food Systems Law, in close collaboration with partners in the EU Food Policy Coalition and with EEB members;

- Develop recommendations on the revision of the Sustainable Use of Pesticides Directive and promote them through effective advocacy to influence the legislative process;

- Advocate for strong policy measures to tackle pollution from agriculture into air, water, and soil, including by developing and disseminating recommendations for the Integrated Nutrients Management Action Plan announced under the Circular Economy Action Plan, Farm to Fork Strategy and Zero Pollution Action Plan.

### Monitoring the Implementation of the Common Agricultural Policy

The EEB has played a significant role, together with BirdLife Europe, Greenpeace and WWF, in exerting pressure on co-legislators throughout the reform process of the CAP.

As the focus shifts to the national planning and implementation processes, coordination with EEB members becomes ever more crucial to push for more environmental and climate ambition in national CAP Strategic Plans.

In 2022, the EEB will continue to work with its members and with EU-level partners to influence the approval process of national CAP Strategic Plans.

## Activities

- Advocate for climate action and environmental protection in national CAP strategic plans through close coordination with EEB members, publications, meetings with the European Commission and press outreach;
- Advocate for a stronger Performance Monitoring and Evaluation Framework of the CAP, notably through the scientific results obtained from the H2020 MEF4CAP project and by monitoring and shaping the transformation of the Farm Accountancy Data Network into a Farm Sustainability Data Network;
- Deliver a detailed assessment of several national CAP Strategic Plans once approved and disseminate the findings through press outreach and a high-level event in Brussels or online with decision makers and key stakeholders.

## Achieving an Ambitious Legislative Framework for Climate Action in Agriculture

The ongoing revision of the climate and energy framework under the Green Deal raises an opportunity to tackle agricultural emissions.

The revision of the Effort Sharing Regulation (ESR) and the Land Use, Land Use Change and Forestry (LULUCF) Regulation bear the potential to unlock the mitigation potential of the agriculture sector.

In addition, the Commission's Carbon Farming Initiative aims to provide further incentives for land managers to increase carbon sinks.

For that purpose, the Commission will develop a regulatory framework for carbon removals certification, which despite having some positive potential comes with significant risks.

The EEB aims to promote an effective governance for climate action in agriculture and land use leading to significant incentives for transformative change, by developing a holistic vision for the different climate and agricultural policy instruments and by reinforcing partnerships and tuning our voices with civil society at EU and national level.

## Activities

- Develop strong partnerships on the climate-agriculture policy nexus at EU level, notably by steering the work of the EU Food Policy Coalition task force towards the climate and agricultural nexus and actively participating in NGO coalition platforms on the revision of the ESR and LULUCF regulation;
- Promote the EEB's position on the new climate governance for agriculture and related land use in collaboration with EEB members, notably by holding meetings with the European Commission, European Parliament and Member States;
- Develop robust recommendations for the new regulatory framework for carbon removals certification, in close consultation with EEB members, to prevent greenwashing and negative externalities and ensure that policy action on carbon sinks benefits biodiversity and supports the transition to agroecology;
- Promote climate mitigation strategies leading to real emissions reduction or sequestration identified via the H2020 AGRICAPTURE project and define how such initiatives could be supported.

# Biodiversity

## Use the EU Biodiversity Strategy for 2030 and other EGD Initiatives to Tackle Biodiversity Loss

The ongoing loss of biodiversity and degradation of ecosystems not only threatens the economy or increases risks posed by global pandemics but threatens our own survival.

The EU's Biodiversity Strategy for 2030 is a science-based long-term plan to put biodiversity on a path to recovery by 2030. It also serves as EU's contribution to the global plan to bend the curve of the biodiversity loss still to be agreed under the Convention on Biological Diversity. The EU Strategy contains specific commitments such as establishment of a larger EU-wide network of protected areas on land and at sea with strict protection for areas of very high biodiversity and climate value or stepping up EU's action globally against wildlife trafficking.

In addition, several important Strategies adopted in the framework of the European Green Deal include enabling actions in support of nature protection and restoration such as focus on nature-based solutions in the EU Climate Adaptation Strategy or actions to support protection and restoration of forests in the EU Forest Strategy.

In 2022, the European Green Deal and its flagship Strategies with most relevance for biodiversity are expected to move towards reviews of existing legislation as well as adoption of new laws and implementation of actions and commitments, to also support green recovery following the COVID-19 pandemic as well as mobilising the necessary funding with biodiversity recognised as a priority for the Multiannual Financial Framework (EU's budget) for the first time.

Moreover, the European Commission is expected to adopt a delegated act under the Taxonomy Regulation in early 2022 that will establish a common classification system of economic activities that substantially contribute to the protection and restoration of biodiversity and ecosystems and will aim to guide sustainable investment in nature. The Commission circulated a draft to Member States for comment at the end of December 2021.

### Activities

- Continue to advocate for the EU's leadership role on global biodiversity framework and support the update of the EU's Biodiversity Strategy for 2030 (if deemed necessary) to match the global plan to bend the curve of biodiversity loss;
- Push for proper implementation of the EU Biodiversity Strategy for 2030 and use opportunities and reduce threats from the CAP;
- Engage in the delivery of the biodiversity focused actions from the EU Forest Strategy;
- Track the implementation of the EU Climate Adaptation Strategy especially its commitment on nature-based solutions for climate as well as climate resilient water management;
- Follow the work of the European Commission on the taxonomy of sustainable investment for the protection and restoration of biodiversity and ecosystems and undertake advocacy actions if required;
- Provide input to relevant EC consultations regarding wildlife trafficking such as the consultation "Wildlife trade – alignment of EU rules with recent decisions taken under the CITES convention and changes to EU ivory trade rules" and the revision of the "EU Action Plan against Wildlife Trafficking" in collaboration with other EU networks working on this problematic and EEB members.

## Advocate for an Effective Nature Restoration Law

As part of a wider initiative to restore the EU's nature, the European Commission is expected to propose new legislation setting legally binding nature restoration targets in the EU in early 2022. The EEB and partners have been advocating for targeted legislation on nature restoration for a while as an essential component of the EU's Strategy to put biodiversity on a path to recovery by 2030. The need for ecological restoration is also recognised globally with 2021-2031 designated as the UN Decade for Ecosystem Restoration.

In 2022, the EC proposal for a new nature restoration legislation will go through the ordinary legislative procedure in the Council and the European Parliament and even though there is general support for EU-level action on nature restoration, some resistance to more stringent legal requirements can be expected.

This EEB advocacy for impactful nature restoration law will need full engagement of the EEB Members to influence the position of the Council and Parliament during the co-decision process.

### Activities

- Develop and implement an advocacy strategy with the EEB Members and partners to influence the content and adoption of the nature restoration law by the Council and Parliament, if needed working to ensure that the new law does not undermine the existing obligations under the Nature Directives.

## Achieving Better Implementation and Enforcement of the Nature Directives

The 2020 State of Nature report provided the most in-depth assessment of the health of European nature and revealed that, despite some improvements, biodiversity in the EU continued to decline at an unprecedented rate.

Unsustainable agriculture and forestry, urban sprawl and pollution remain the top pressures affecting habitats and species and hampering the implementation of the Nature Directives.

There is a large scope for improving the effectiveness of management within and beyond protected areas. Full implementation and enforcement of existing legal requirements and adherence to established management guidance could provide a major contribution to meeting the EGD and BDS 2030 goal to put the EU's biodiversity on a path to recovery by 2030.

### Activities

- Shape EU level decision enabling proper implementation and enforcement of the Nature Directives as well as securing adequate EU funding;
- Monitor implementation of the Nature Directives and support EEB members to highlight cases of non-compliance.

## Building Alliances and Supporting a Well-Functioning Working Group

As part of a wider initiative to restore the EU's The engagement of the EEB's Biodiversity Working Group in the activities outlined above will remain crucial in 2022 especially when it comes to influencing positions of the Council and European Parliament. The EEB will also continue to collaborate with established alliances and coalitions as well as build new ones.

- Coordinate and synergise the EEB's activities with other NGOs and partners, inter alia in the context of the European Habitats Forum and other coalitions;
- Continue to look for funding opportunities for the EEB's work on biodiversity.

### Activities

- Coordinate the activities of the Biodiversity Working Group and convene at least one meeting of the working group as well as regular virtual meetings to plan activities and share experiences among the EEB members;

## Water

### Strengthening EU Legislation to Reach Zero Pollution in Water

Pollution harms our health and our environment. It is one of the main reasons for the loss of biodiversity and reduces the ability of ecosystems to provide important benefits. The COVID-19 pandemic has made the urge to build a healthier planet for healthy people greater than ever.

The European Green Deal announced that to protect Europe's citizens and ecosystems, the EU needs to move towards a zero pollution, and better prevent and remedy pollution in air, water, and soil.

To address these interlinked challenges, the Commission adopted the action plan "Towards a Zero Pollution Ambition for air, water and soil" that focuses on measures to strengthen implementation and enforcement of existing legislation as well as proposes actions to revise the existing health and environment acquis. In the area of water policy this involves revising the lists of pollutants affecting surface and groundwaters, and their corresponding regulatory standards.

The results of the 2019 Fitness Check evaluation of the water policy found that the WFD was fit-for-purpose however there was a need to update other pieces of legislation such as Environmental Quality Standards (EQS) Directive and Groundwater Directive to ensure the address pollution of emerging concern, such as pharmaceuticals, (micro)plastics and PFAS.

In addition, the evaluation of the Directive concerning Urban Waste Water Treatment (UWWTD) concluded that the Directive can be improved to address today's societal challenges, including climate change, remaining sources of pollution and contaminants of emerging concern as well as the need to contribute to a cleaner and more circular / resource-efficient economy.

In 2022, the European Commission is expected to make proposals for updates of the WFD daughter directives namely the EQS Directive and the Groundwater Directive (GWD) as well as the UWWTD for co-decision with the Council and Parliament.



## Activities

- Contribute to the EEB's cross-cutting work on influencing the set up and implementation of the Zero Pollution Ambition and ensure synergies between water and other policy areas such as industrial pollution are fully utilised (see also Zero Pollution Industry work plan);
- Contribute to the preparatory work by the European Commission on the proposals for updates of the EQS Directive, the Groundwater Directive as well as the Urban Wastewater Treatment Directive and carry out advocacy activities as required;
- Follow up the co-decision process on the proposals for updates of the EQS Directive, the Groundwater Directive as well as the Urban Wastewater Treatment Directive with the Council and Parliament and engage the Water Working Group to influence the positions of the Council and Parliament;
- Push for measures to tackle agricultural water pollution.

## Achieving Better Implementation and Enforcement of the Water Framework Directive

The EU Water Framework Directive (WFD) and its daughter directives on priority substances and groundwater as well as EU Biodiversity Strategy for 2030 with its commitment for the EU to restore 25000 km of free flowing rivers remain the EU's main policy tools to bring EU's rivers, lakes, coasts and groundwater aquifers to ecological health 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 broadly 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 EQS Directive and Groundwater Directive, whereas in the case of the WFD the focus should be on its better implementation and enforcement.

The 3rd generation WFD River Basin Management Plans (RBMPs) are the last chance for the EU Member States to bring our rivers, lakes and wetlands to ecological health by 2027.

## Activities

- Continue to engage in the #Protectwater campaign to push for ambitious implementation of the WFD with focus on the protection and restoration of rivers, limited use of exemptions from reaching its environmental objectives and sustainable water management in the context of droughts;
- Shape EU level decision enabling proper implementation and enforcement of the WFD as well as securing adequate EU funding through active contribution to the WFD CIS process with focus on river restoration, uptake of the nature-based solutions and fully using economic instruments;
- Monitor implementation of the WFD and support EEB members to highlight cases of non-compliance;
- Ensure synergies between water and other policy areas such as industrial pollution are fully utilised such as work on application of the WFD requirements on use of economic instruments and cost recovery to mining (see activities on water-energy nexus in the Industry work plan).

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.

The WFD Common Implementation Strategy continues to provide the platform to exchange on best practice in the WFD implementation as well as provide tools for Member States to step up the WFD implementation and financing.

## Campaigning Against Major Threats to Freshwater Ecosystems

Many EEB Members are campaigning against new damaging projects that are threatening their priority rivers and / or nature areas. For example, 8,700+ new hydropower plants are planned to be built across Europe with a large number of new installations planned in protected areas.

There are also threats to biodiversity and ecosystems from some planned infrastructure projects to improve navigation on several major European rivers such as Danube or Oder.

Even though many of the decisions on the new infrastructure projects are with the national authorities, tracking and influencing EU level decisions on setting priorities or providing EU funding for the damaging projects will remain important throughout 2022.

## Activities

- Support campaigns of EEB members to stop or redirect some hydropower and inland navigation projects where these present major threats to freshwater ecosystems;
- Contribute to the development of the tighter criteria for hydropower under the EU taxonomy of sustainable investment for the protection and restoration of biodiversity and water protection;
- Influence relevant policy frameworks enabling such damaging projects e.g. review of the TENS-T Regulation.

## Building Alliances and Strengthening the Working Group

The engagement of the EEB's Water Working Group in the activities outlined above will remain crucial in 2022 especially when it comes to influencing positions of the Council and European Parliament. The EEB will also continue to collaborate with established alliances and coalitions as well as build new ones.

### Activities

- Coordinate the activities of the Water Working Group and convene at least one meeting of the working group as well as regular virtual meetings to

plan 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 Living Rivers Europe coalition;
- Continue to look for funding opportunities to step up the EEB's work on water protection.

## Seas and Oceans

The marine environment is subject to multiple pressures and impacts from human activities at sea and on land. Pollution, seabed damage, overexploitation, biodiversity loss, ocean warming and acidification are the results. 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 and EU Biodiversity Strategy for 2030 as well as upcoming nature restoration law;
- Serve in SAR's Executive Committee as Treasurer and offer ad hoc advice on finance.

## Soil Protection

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, reaching no net land take, 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 adopted an EU Soil Strategy including a commitment to propose a Soil Health Law by 2023. Soil contamination, prevention and remediation are also addressed in the Zero Pollution Action Plan for air, water and soil. The Common Agricultural Policy has a key role to play by encouraging farming practices that maintain soil fertility.

### Activities

- Collaborate with Legambiente in advocating for an adequate Soil Health Law on protection, restoration and sustainable use of soils;
- Track policy developments and coordinate the working group on sustainable soil policy in close collaboration with EEB members.

# Genetically Modified Organisms

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

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

## Light Pollution

More than 99.5% 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 percent of the natural night sky brightness. Light pollution is a fast-growing problem in the EU, in some countries increasing at a rate of more than 5% per year and being accelerated by the 'rebound effect' of very efficient new LED technology.

The illumination and fragmentation of night habitats has a big impact on biodiversity. Artificial light at night has negative influences on vertebrates, birds, bats, other mammals, sea turtles and aquatic animals.

It also makes a significant contribution to the decline of insects which are important as pollinators and an irreplaceable food source for other animals.

Furthermore, it strongly influences circadian rhythms and causes melatonin disruption in humans (and other animals) which can result in sleep disturbance, diabetes and cardiovascular diseases among others. Promoting energy conservation while avoiding light pollution is to some extent addressed 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.

### Activities

- Collaborate with Test Biotech to monitor relevant developments and advocate for 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.

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

- Advocate for light pollution to be addressed under the EU Biodiversity Strategy for 2030 as well as the Zero Pollution Action Plan, recognising that it poses a threat to biodiversity;
- Continue to push for consideration of light pollution 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;
- Advocate that light pollution be addressed under the Green Taxonomy criteria to contribute to biodiversity objective;
- Further develop policy demands in relation to light pollution, including from residential, commercial and industrial settings, highways and satellites.



# CIRCULAR ECONOMY

A Circular economy is an economy that is regenerative by design, making the best of each input of material or energy that is injected in the economic system to act within the limits of planetary boundaries while aiming to ensure a decent standard of life for all (social minima and environmental maxima).

It builds on adopting a (multi) life cycle(s) approach, designing products, business models and systems to optimise the use of resources and designing waste out of the economic system.

## Resource Conservation through Product Policy and Sustainable Consumption Patterns

Circular products and systems are to be further nailed down as a recovery/build back better solution and the EU should be made accountable for the 2020 Circular Economy Action Plan promises to make sustainable products the norm, with sufficient resources and staff capacity being allocated to fulfil this ambition.

An ambitious legislative proposal on Sustainable Product Initiative (SPI) is needed, encompassing sound principles to make sustainable products the default choice and paving the road for ambitious performance and information requirements to be applied to the following sectors: electronics, textiles, construction products and buildings, furniture and means of transport, as well as intermediary products such as cement, steel and base chemicals.

At the core of the SPI, a reinforced consistency between product policy instruments should be promoted to establish a top performer system continuously transforming the market towards sustainability. To make sustainable products the default choice for all, rather than a deviant choice for only a few, current consumption patterns should not only be challenged through price signals and information schemes, but also through the promotion of new lifestyles, new narratives and new business models, while paying constant attention not to put the burden on individuals and consumers.

To drive such a transition in our production and consumption models, it is essential to set an EU headline resource use/material footprint reduction target, declined at national levels, as exist for climate and as called for by the European Parliament in its report of February 2021.

Indicators and targets for land and water footprints should be included to give a comprehensive picture of total resource use.

The SPI should also start implementing a product passport, building on already legally required information, Ecolabel and green public procurement (GPP) criteria and available footprinting methodologies. The product passport idea is a backbone for accelerating the circular economy and it should prevent the risk of a 'paralysis by analysis' through attempting to consolidate too much information before it starts. Product passports should be established progressively, gathering in a prioritised way circular performances of products such as durability, reusability, reparability and recyclability; chemical and material contents, including recycled contents; footprinting performances, starting with carbon & material footprint; and as they become more legally required, social and environmental due diligence standards.

While revising the Ecodesign Framework Directive as part of the SPI, the EU should more swiftly and effectively implement the existing laws by moving forward the definition of ecodesign and energy labelling regulations for energy using products, notably releasing measures at most advanced stages and/or stalled for too long (e.g. air conditioning, computers, ventilation, smartphones).

## Activities

- Influence the development of SPI towards durability, environmental and social requirements for products placed on the market and the setting up of a product passport scheme;
- Monitor the technical work on GPP and Ecolabels through a renewed Service Contract with the Commission as well as on product environmental footprinting until June 2022 (and beyond subject to the renewal of the related Commission service contract);
- Advocate for mandatory GPP and increased contribution of private procurement for the uptake of sustainable products and Ecolabels, building on a [brief](#) released in December 2021 and identifying policy routes to unleash the potential of private procurement;
- Advocate for an EU target on material footprint reduction including sub-material and sub-sectoral targets and disseminate narratives against imposed over-consumption;
- Expand on established NGO alliances to increase pressure for material footprint reduction directly from member states to EU institutions and include indicators and targets on land and water footprints to give a comprehensive picture of total resource use.
- Influence the progress of the Batteries Directive revision and the preparatory discussion on the revision of End-of-Life Vehicles (ELV) Directive;
- Monitor the development of the Circular Electronics initiative and actively contribute to the Right to repair campaign;
- Monitor the first implementation steps of the textiles strategy, notably promoting the setting of Ecodesign requirements, Labelling and EPR schemes;
- Influence the revision of the Construction Products Regulation;
- Influence the revision of the Energy Performance of Buildings Directive (EPBD) towards the integration of embodied emissions and energy use related emissions along the whole life cycle of the building, and promote the use of the LEVELs framework as a reference instrument to report on the performance of buildings;
- Contribute to the definition of Ecodesign & Energy Labelling measures under the existing Ecodesign framework and continue to coordinate the Coolproducts campaign;
- Influence the first steps of the revision of the Packaging & Packaging Waste Directive towards reusability and recyclability;
- Influence the green claims legislative initiative and the communication on empowering consumers;
- Take an active role in the Rethink Plastic alliance, notably in finances, waste shipment and packaging related groups;
- Set dedicated sessions on product policy and sustainable consumption within CE WGs;
- Take part in multi-stakeholder platforms, notably through the steering group of the EU CE platform, the contribution to the definition of the EU green finances taxonomy and the contribution to the new Bauhaus initiative;
- If resources can be secured, intensify actions and messaging towards shifting to alternative sustainable business models, based on sharing and access as opposed to individual ownership, unleashing the demand side for sustainability, by promoting financial incentives with a distributional effect towards the most vulnerable, restricting advertising, pushing for choice editing requirements for retailers, calling for longer legal guarantees and combining mandatory or third party verified point of sales and online information.

## Minimising Waste

The EU has generated 5.2 tonnes of waste per capita in 2018 and amongst this about 500 kg of Municipal Solid Waste (MSW). This has not reduced significantly, notably in the last reporting period 2016-2018. 48% of MSW is recycled, but out of total waste, including mining and industrial waste, only 38.1%, the rest being landfilled or having the energy recovered.

This remains very far from the CE goal of designing waste out of our economic system, which means preventing waste generation first. While still supporting recycling, it should be made clearer that CE is not primarily about recycling and this should be reflected in how waste management related investments and policy actions are undertaken, notably in national recovery plans.

The CE action plan of March 2020 by the EU Commission, the European Parliament report of February 2021 and the Council conclusions of December 2020 all converge towards prevention.

We now need to enact prevention at EU level through target setting that can be a legal driver to steer public and private investment towards waste-avoiding production and consumption systems. Binding prevention targets should be considered for all key

strategic sectors of the CE action plan and hazardous waste, including for not yet properly addressed commercial and industrial waste.

In addition, new business models and waste-free economic patterns around extending lifetime, repair, reuse, and disassembly of parts which are then reused in new products should be incentivised through fiscal and financial incentives. No support should be made for waste incineration and landfill, as the only objective is to drastically reduce the need for operations dealing with residual waste. In that perspective it could be considered to also set a maximum kg residual waste per capita to be decreased incrementally in the coming decade.

### Activities

- Advocate for waste prevention, including hazardous waste in all EU policies: key strategic sectors (automotive/ batteries, electronics, textiles, building, furniture, packaging, food) and industrial processes (IED revision);
- Monitor the implementation of EU waste laws and support EEB members to secure waste prevention targets at national level (for Municipal Solid Waste), and help to create more precedents for commercial and industrial waste prevention targets;
- Work to phase out disposable solutions, notably in packaging and batteries files;
- Enshrine the prohibition of destruction of unsold goods in the Sustainable Product Policy Initiative (SPPI) and create more national precedents;
- In cooperation with our partners, support the reduction of micro-plastics release and related marine pollution in the main contributing sectors, notably tyres, textiles and packaging;
- Promote economic incentives to reduce waste generation and increase high quality recycling, notably through EPR scheme and reuse models;
- Secure the restriction of waste shipment outside EU and reflect the waste hierarchy for EU shipment (repair/ reuse and recycling to take precedence over energy recovery and energy use);
- Promote Zero Waste narratives notably towards designing waste out of the system, constant reduction of hazardous and residual waste, drastic limitations of disposal operations, notably waste to energy and false recycling solutions perpetuating the overconsumption of resources;
- Organise Waste dedicated sessions during CE WGs;
- Explore and seize opportunities for projects beyond the EU related to waste management and circular economy;
- If launched at EU level, monitor the first development step of End of Waste criteria for plastics, textiles and construction products;
- If resources can be secured, intensify actions at local level, facilitating circular economy solutions in cities.

# Connecting Circular Economy with Climate, Chemicals, Industry, Bio-Economy and Sustainable Development Goals to Foster Systemic Change

The Circular Economy agenda creates the opportunity to bridge with other policy areas, notably Climate, through addressing embodied emissions in our materials and products; Chemicals, to ensure non-toxic material cycles; Industrial policy to reduce the use of virgin material; the Bio-economy to optimise the use of biotic resources and enhance regenerative agriculture, as well as SDGs and trade policy to foster the uptake of resources conservation practices at global level.

Working on nexus projects is a way to unleash new potential for sustainability and partnership, and to expand and adapt CE approaches.

It is now crucial to promote more intensively the Circular Economy at global scale, through continuing to take part in international fora, such as the OECD, World Circular Economy Forum and UNEA, through paying a constant attention to the impacts of EU policy on third countries and through the exploration of applying circular models in countries still relying heavily on resource consumption growth and primary raw material extraction.

While we need to support positive spill-over effects of the EU's experience, we also need to avoid the circular economy appearing to be a new model of economic development imposed by the EU.

Circular economy work also needs to remain critical of greenwashing and truncated solutions perpetuating resource consumption that is incompatible with the carrying capacity of the planet or staying blind on distributional effects of policy measures within countries, within the EU or at global scale. This is the reason why a specific transformative perspective should be constantly advocated, also addressing inequalities and social aspects of production and consumption patterns, thus bridging with narratives conveyed in the post growth/growth independent community and at the EEB through the Economic Transition working group.

## Activities

- Where necessary and relevant, push for the adoption of circular economy practices to decarbonize energy-intensive industry and contribute to the revision of the Industrial Emissions Directive (IED) to require energy efficiency and resource efficiency provisions when setting BREFs;
- Advocate for detoxification of materials and disclosure of chemicals information in products, notably through a product passport system and modulated fees in EPR schemes as well as and improved E-PRTR system and improved IED reporting;
- Monitor the definition of technical criteria within the Green Finances Taxonomy and act as watchdog for the official proposals by the EU Commission to avoid a watering down of the ambition;
- Intensify the development of messages linking CE with wellbeing/post growth narratives, calling for alternative indicators to GDP growth to measure the prosperity of our economy and conveying transformative stories for the EU economy;
- Promote the uptake of CE provisions in EU policy on trade and bilateral trade agreements, trying to secure formulations that could act as precedents for multilateral agreements or WTO reform;
- Explore and engage in fundraising for projects bridging CE and Agriculture to promote regenerative agricultural practices and capacity permitting, contribute to the initiative on a sustainable food system announced for 2023;
- Organise shared sessions with other concerned EEB teams, WGs, members and partners;
- Endeavour to join projects at international level, beyond EU boundaries, adapting circular economy practices to local conditions and raising the profile of the EEB at international level.





# CLIMATE

## Climate Action (Fit for 55 Package)

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) report on 1.5°C.

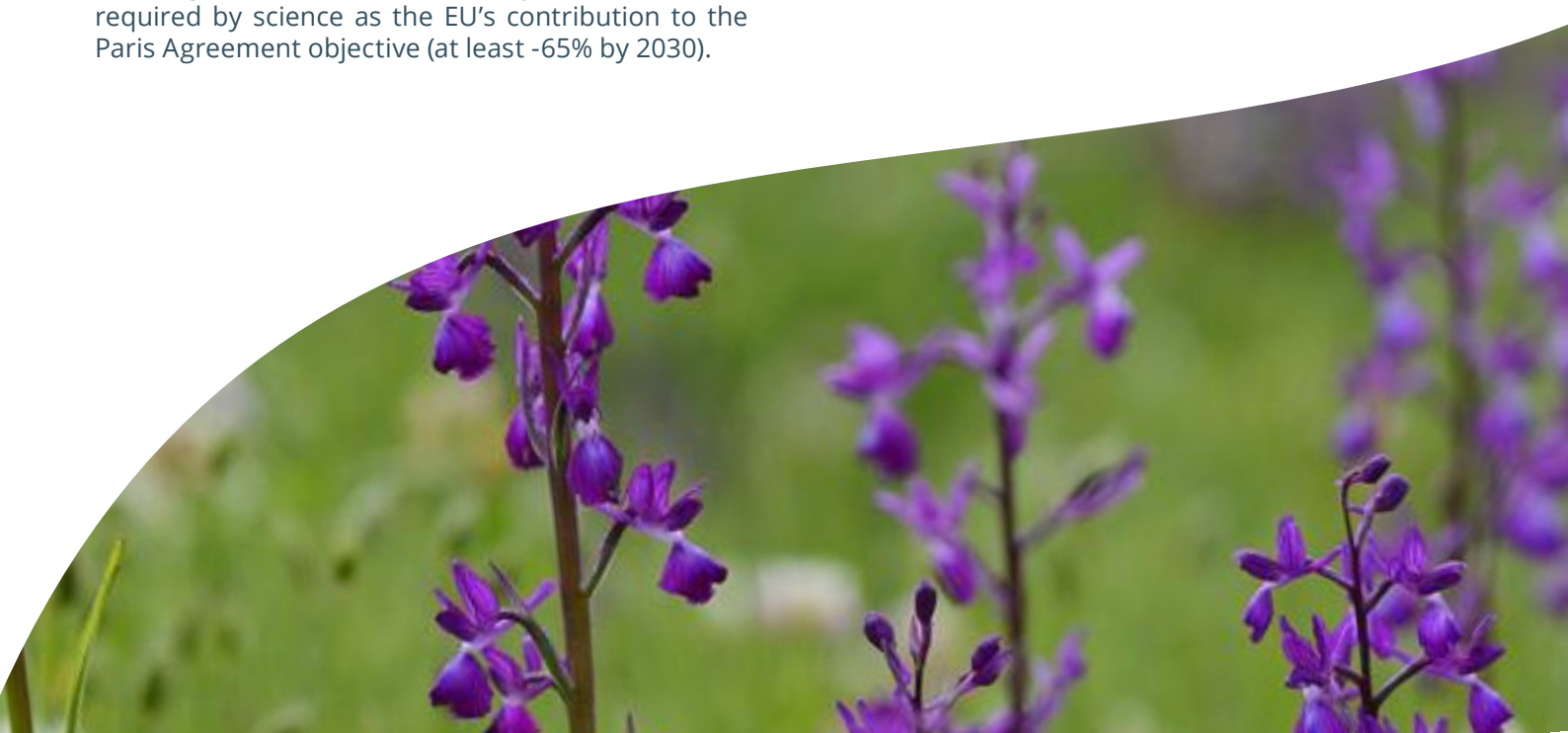
Avoiding climate breakdown requires the world to significantly speed up its emission cuts and put in place the framework to achieve a net-zero economy as soon as possible. In the European Green Deal, the Commission announced that the European Union will become the first climate neutral continent by 2050 and that the EU will have to step up its action by 2030.

In March 2020, the Commission presented a regulation for a European Climate Law to enshrine the 2050 target. In September 2020, the Commission submitted a proposal to raise the EU’s 2030 climate target to “-55% net” emissions reduction on 1990 levels and announced a revision of the current policy and regulatory framework to be tabled in 2021 (Fit for 55 legislative Package).

In December 2020, the European Council endorsed the -55% net target. While the new target is a step forward with regard to the current one (-40%), the fact that it is a “net” target (i.e. it includes sinks), means that effective emission reductions will be in the range of 50 to 52%. This is way below the effort required by science as the EU’s contribution to the Paris Agreement objective (at least -65% by 2030).

The Fit for 55 package was launched in July and December 2021, including different pieces of legislation regulating the ETS, renewable energy, energy efficiency, effort sharing, energy taxation etc. Throughout these files, several flaws prevent the energy and climate legislation to really be in the position to deliver the EU’s targets and to align our economy with the commitments of the Paris Agreement.

The lack of a clear phase-out date for fossil fuels, the open door for the use of fossil hydrogen, the lack of teeth in addressing embedded emission in buildings, the missing national targets in energy efficiency, the narrow scope of the proposed carbon border adjustment mechanism (CBAM) and the over-reliance on carbon sinks among other things might undermine emission reductions. Further to this, other important climate-related files will be released in 2022, such as the revision of the F-gas regulation which will be a key part of the European effort to curb climate emissions.



## Activities

- Advocate for a 2030 emission reduction target (not including sinks) which is aligned with science (at least -65%) and will allow the EU to reach climate neutrality at the latest by 2040, 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 revised 2030 policy framework which prevents emissions at source and creates strong synergies with the protection of biodiversity and the use of nature-based solutions, notably through the Sustainable Carbon cycles policy, the reduction of material consumption and particularly the reduction of pressure on natural forests 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 the introduction of carbon pricing either via the extension of the ETS-2 or via the other Fit for 55 files, both 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;
- 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, also through the Energy Performance of Buildings Directive and with an improved Carbon Border Adjustment Mechanism;
- Advocate for decarbonisation of heating and cooling systems through non-emitting technologies such as heat pumps, district heating and solar thermal, exploring the links with product policies and ongoing European anti-coal/gas campaigns;
- 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, and particularly gas and nuclear;
- Advocate for the strengthening of relevant non-energy-related climate legislation such as the F-Gas Regulation, by working on a progressive stance both in the European Parliament and in the Member States;
- Advocate for phasing out all financial support to gas and fossil hydrogen infrastructure and technologies.

## Energy Savings

The Energy Efficiency Directive (EED) and the EPBD are two key measures to achieve energy savings. Both these Directives have been revised in the Fit for 55 Package but with major flaws. Targets both at EU and national level are not ambitious enough and a ban on fossil fuels in heating and cooling has not been introduced.

Therefore, there is an important window of opportunity in 2022 to step up efforts on energy savings and advocate for a stronger and wider uptake

of the “Energy Efficiency First” principle across all economic activities, with special focus on buildings, and to exclude fossil energy from renovations. A higher 2030 binding energy efficiency target (45%) is needed to reap the benefits of energy savings and drive decarbonisation of the buildings sector and only the European Parliament will be able to deliver this.

In October 2020, the Commission presented the Renovation Wave, a measure announcing the refurbishment of 35 million buildings in Europe that aims at doubling the renovation rate in the EU. The measure unfortunately does not target embedded emissions, anticipated to become the first source of climate concern as the energy supply gets decarbonised.

It also fails to introduce a concrete roadmap to phase out fossil fuels from the energy use in EU buildings. This was complemented by the EPBD revision launched on 15 December 2021.

In June 2021, the Commission presented a proposal to revise the regulation on the energy label and categorisation of heating appliances such as gas boilers and heat pumps.

This revision aims at aligning this very relevant tool with the new 2030 climate and energy targets. It favours the use of heat pumps and solar thermal over hydrogen in buildings and proposes to consign fossil boilers to G and F classes. Once approved by the Parliament and the Council, the measure could also play a decisive role in the elimination of harmful subsidies in national schemes and paving the way to a quick phase out.

Unfortunately, the twin ecodesign/energy labelling regulations do not feature a date for the phase out of fossil heating. Another relevant provision to support is the one preventing savings from fossil fuel technologies to be counted towards the national energy savings target.

## Activities

- Advocate for a 45% energy efficiency binding target by 2030 in the revision of the Energy Efficiency Directive to introduce binding annual savings for Member States;
- Advocate to maintain the measures for the uptake of the Energy Efficiency First principle in the EED and improve them (public procurement, finance, expertise and skills, energy services companies);
- Advocate to improve the EED to fully grasp all positive environmental impacts of EE, such as air quality improvements;
- Closely follow the revision of the EPBD with other EU NGOs and Coalition for Energy Saving partners working in the building sector and aim at including embedded emissions and at phasing out fossil fuels from heating;
- Through our Coolproducts campaign, step up communication on the benefits of these policies for EU citizens, targeting heating and cooling technologies, smartphones and ICT as iconic products;
- Promote the approval of 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 (EBC) campaign-related activities);
- Advocate for the energy efficiency first principle as a condition for funding research and upgrades projects in the industrial sector in the context of the Industrial Forum, EED, and IED;
- Mainstream the multidimensional advantages of energy efficiency in the EEB narrative and advocate for policies that can fully grasp that potential.

# 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 (LCPs) and water quality related angles (see section on Health and Environment Cluster – Zero Pollution Industry – 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 in the taxonomy and infrastructural plans.

Regrettably, a draft delegated act circulated by the Commission to Member States at the end of December 2021 envisages both nuclear and gas being included in the taxonomy.

Some countries advocate for a continued use of nuclear energy. Due to its heavy and long-term environmental impacts, which are not aligned with the “do no significant harm” (DNSH) 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.

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. Nor should it 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 need to prioritise decentralised, non-emitting, community-led renewable production should be reflected both in legislative texts and in financing policies and in this sense the discussion around the revision of the Renewable Energy Directive will be a key moment to set the correct framework for the quick uptake of renewables in Europe.

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 decisions 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), including when labelled as sustainable in the taxonomy, 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 – also see activities on water-energy nexus in the Industry work plan;
- Advocate for fossil fuel phase-out by stopping all forms of fossil fuel subsidies;
- Continue to monitor nuclear power issues, including state aid and transboundary consultation issues, and intervene selectively in the debate, with particular emphasis on transparency and participation aspects through continued participation in Nuclear Transparency Watch and increased engagement in relevant processes under the Espoo Convention and in relation to the taxonomy;
- Prevent the use of hydrogen as an argument to promote expansion or delay decommissioning of nuclear and oil and gas infrastructure;
- Follow the TYNDP 2022 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 levels;
- Subject to funding, engage with stakeholders and members on the grid issue in a long-term perspective in coherence with the Paris Agreement;
- 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; Advocate for a general European policy of support to empower citizens who wish to switch to renewable energy so that no one is left behind;
- Raise awareness in the energy community about the new clean technologies that can enable the switch to renewable heating already now and hence advocate for ambition in decarbonisation of heating in the ESR.

## Cut Emissions from Non-Energy related Industry Sectors such as Refrigerants

In 2022, the European Commission is expected to present a revision of Regulation 517/2014 on fluorinated greenhouse gases (F-gases). These chemicals are used in insulation foams and refrigerants and are a key element of decarbonisation of industry and buildings, as all technologies of heating and cooling involve their use.

This legislation is possibly one of the most relevant climate files in the world and has set a precedent that led to an international agreement in Kigali to phase down F-gases worldwide.

However, the implementation of the regulation has led to a number of problems, from windfall profits for multinationals to fuelling illegal trade of gas and has not led to a decrease in the use of these gases in line with the sought ambition.

The Commission must deliver a revision of the Regulation that aligns this policy with the European climate goals and promotes alternative, natural solutions.

### Activities

- Raise awareness on the relevance of the file in the European Parliament and Permanent Representations;
- Raise awareness among the decision makers around the new sustainable cold technologies based on natural (low global warming potential) refrigerants;
- Advocate for the promotion of the use of natural refrigerants in refrigeration and cooling in the revised regulation;
- Advocate for better management and governance of the file at EU level and coordinated customs actions to prevent illegal trade;
- Promote recovery and recycling of the existing stock of gas to prevent harmful venting;
- Strengthen membership engagement on this topic and, depending on members' capacity, promote action at national level to influence national positions.





# HEALTH AND ENVIRONMENT

We are facing a pollution crisis. Pollution contaminates our bodies, our food and the environment. It has been linked to adverse health effects such as cancer, infertility, developmental delay and obesity, amplifies climate impacts and accelerates the loss of biodiversity. The EU is well placed to accelerate regulatory action and provide global leadership in fighting pollution.

## Chemical Safety

### Ensure a Strong Implementation of the EU Chemicals Strategy for Sustainability

In 2022, the implementation of the Chemicals Strategy for Sustainability (CSS) and policy commitments will remain decisive to truly transform chemicals policy and regulations in the EU. The CSS has a broad outreach and will impact the EEB's work on chemicals in various areas, such as protecting health and the environment, cleaning the circular economy, improving product policy and strengthening the legal framework.

The EEB will work to ensure that the EU meets its toxic-free environment goal, as part of the Zero Pollution Ambition.

#### Activities

- Engage and work closely with our members, together with our broad network of civil society organisations, institutions, academics and frontrunning companies to demonstrate support to an ambitious implementation of the CSS; in 2022, the EEB will have a number of joint projects with its members directly involved as well as two projects that aim at NGO capacity building;
- Advocate at institutional level to achieve a highly ambitious implementation of the CSS;

- Improve the regulation of the most harmful chemicals, notably by aiming at simplifying and speeding up the processes for banning chemicals and strengthening the legal framework; promoting safe and sustainable by design chemicals; and addressing key problematic properties and groups of chemicals;
- Working towards a clean circular economy, product safety as committed under the CSS by increasing the transparency on chemicals contained in products (including thanks to digital tools), tackling the most problematic materials, preventing toxic recycling and regulating chemicals in plastics notably under product policy initiatives;
- Reinforce and mainstream the narrative around the consequences of chemical pollution and the need to adopt protective laws so that chemical safety is a priority for citizens and decision makers.

# Strengthen REACH with a View to Banning the Most Hazardous Chemicals from Consumer Products by 2030

The CSS announced a revision of crucial chemicals regulations such as [REACH](#) and [CLP](#). This is an opportunity to substantially improve the emblematic EU chemicals framework and to reflect the state of the science (on ecotoxicology, endocrinology, etc.) to improve health and environmental protection globally.

The EEB will work to uphold the ambition of the CSS and to deliver a ban on all the most hazardous chemicals from consumer products and articles by 2030 through a revised REACH which extends the generic approach to risk management and regulates substances in groups rather than one by one. The EEB will continue to monitor and influence REACH's implementation, but with lower priority.

To fully improve the requirements needed for enhancing human health and environmental protection under REACH Regulation, an additional focus area under CLP is also needed.

In parallel, the REACH Review, corresponding to the obligation, every five years, to conduct a review to monitor progress in the achievement of REACH's objectives, will also be launched in 2022, although a lighter version of this exercise is foreseen due to REACH Revision.

The EEB will deliver solid policy positions to influence the REACH and CLP legislative revisions, for a more effective regulatory framework and a strengthened legal coherence.

## Activities

- Shape the REACH revision and prepare for the legislative work, in particular to achieve a ban on the most hazardous chemicals from products and articles by 2030 by extending the generic approach to risk management and regulating groups of chemicals;
- Strengthen REACH implementation, notably by monitoring ECHA's adherence to key environmental principles (transparency, precautionary principle, substitution, polluter pays, burden of proof etc.);
- Influence the CLP Regulation Revision to address pressing environmental health concerns and reflect the state of science - by, inter alia, expanding the scope of the legislation to cover more hazardous properties;
- Ensure the implementation of the "zero tolerance to non-compliance" approach provided under the CSS; improve REACH compliance by ensuring the revocation of market access for substances with incomplete data sets and applying compliance checks to all substances;
- Under the REACH Revision, make proposals to address the systemic shortcomings and improve the effectiveness of REACH's emblematic procedures (for instance, REACH Authorisation and Restriction processes, adoption of a Mixture Assessment Factor and enhanced information requirements in the registration process);
- Monitor and influence chemicals under REACH: from polymers registration to several restrictions such as intentional microplastics, substances apprehended under the Restriction roadmap (e.g. PVC; flame retardants), PFAS, to REACH's list of substances of very high concern, etc.



# Mercury

## Ensure an Active, Healthy and Sustainable Zero Mercury Working Group

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.

In 2022, the EEB will continue to lead the Zero Mercury Working Group (ZMWG) and the Zero Mercury campaign. ZMWG strives for zero supply, demand, and emissions of mercury from all anthropogenic sources, with the goal of reducing mercury in the global environment to a minimum.

### Activities

- Ensure coordination of the ZMWG to support the activities below, including meetings, fundraising, expanding membership and communication (internal and external) that inter alia addresses mercury as a human rights issue and the disproportionate impacts on women and children where feasible;
- Raise awareness through the relevant activities as below.

## Strengthening the Minamata Convention

Mercury is a highly toxic metal that is volatile and has 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. 137 countries have currently ratified the Treaty (as of December 2021). The first segment of COP-4 took place from 1 to 5 November 2021, virtually, from Indonesia. The second segment of COP4 is foreseen to take place from 21 to 25 March 2022 in Bali, Indonesia.

In 2022, we will continue the efforts to strengthen the Minamata Convention by, among other things, phasing out more mercury added products and processes; developing clear mercury waste management requirements and release guidance; and effectiveness evaluation.

Relevant EU legislation would need to be strengthened to ensure more chances to push the global debate.

### Activities

- Prepare a well-balanced NGO team attending regional meetings, intersessional work, and the COP;
- Develop and provide consensus-based positions;
- NGOs are engaged in intersessional working groups and regional meetings;
- Communicate our views towards meeting our objectives.

## Following the Implementation of the EU Mercury Regulation, including the Phasing out of Mercury in Dentistry at EU level

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 was awaited since 2016, with mercury-added fluorescent lamps in the meantime continuing to be put on the market. Following sustained pressure from the EEB and others, in December 2021 the Commission finally acted towards phasing out the use of mercury in key types of lamps.

A feasibility study on the phase out of mercury from dentistry was published in 2020 and legislation is awaited in 2022. The public consultation in preparation of the review of the EU Mercury regulation has already started. The work at EU level will be feeding directly in the global work.

The mercury team will further be involved in the discussions related to the Zero Pollution Action Plan and the Chemicals Strategy for Sustainability, among others.

### Activities

- Follow up the process on the adopted RoHS delegated acts by the Commission, concerning the phasing out of mercury from some major lamp categories and towards entirely phasing out mercury from lighting;
- Provide input to the review of the EU Mercury regulation, including but not limited to phasing out mercury from dentistry, regulating emissions from crematoria, phasing out more mercury-added products and aligning the provisions with those of the Minamata Convention;
- Ensure strict BAT standards enforcement on coal combustion and its phase out (see below section on Zero Pollution Industry);
- Advocate for a Digital Services Act that holds e-platforms that sell illegal and dangerous chemicals and products containing them accountable and ensure that failure to comply with those results in meaningful consequences.

# Building the Capacity of Developing Countries' NGOs and Governments to Implement and Enforce the Minamata Convention

The EEB/ZMWG will continue its global campaign assisting NGOs mainly in developing countries to prepare for ratification, implementation and enforcement of the Minamata Convention. We will be building on and expanding earlier successful work towards assisting in phasing out mercury added products and reducing the use of mercury in Artisanal Small Scale Gold mining in more countries, using our previously developed tools.

The work will further expand in relation to the phase out of mercury added skin-lightening products, as this is the most difficult to control mercury-added product. Compliance with this requirement presents a challenge for Parties, as the sale of skin-lightening products is a fast growing multi-billion-dollar industry, spurred on by increased online sales during the pandemic.

This is compounded by online sales that are difficult to curtail due to liability exemptions and the need to overcome national and World Trade Organization (WTO) impediments allowing illegal practices to continue unabated.

Extensive testing by ZMWG in 2018, 2019 and 2021 confirms that local markets and also internet platforms worldwide are selling high mercury skin-lighteners. As a result, there is a need for Parties to raise consumer awareness and take more aggressive steps (i.e. rules and regulations) to police sales of illegal cosmetics over the internet and reform the liability regime of online platforms.

## Zero Pollution Industry

### Ensuring that the Industrial Emissions Directive (IED) is Fit for Purpose and Aligned with the European Green Deal

In 2022, 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, a Targeted Stakeholder Survey has been finalised and impact assessment work is ongoing. A Commission proposal is expected by the first quarter of 2022.

Further, Convention ratification by 137 countries provides a unique opportunity for governments, both individually and collectively, to begin working collaboratively to curtail and eventually eliminate such illegal internet sales.

#### Activities

- Develop capacity within NGOs as well as developing country governments, including by supporting international projects, assisting the implementation and enforcement of the Convention with the main focus on phasing out mercury-added products and contributing to the development of the National Action Plans for reducing mercury use in Artisanal and Small-Scale Gold Mining (ASGM);
- Build on the ongoing global campaign towards phasing out mercury from skin-lightening products, with a focus on controlling illegal manufacturing and trade broadly and via internet sales, promote reforms of the liability of online platforms, and also assist NGOs in supporting governments to implement and enforce restrictions related to skin creams.

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).

A new shift of attention will be on pushing for a combined approach with the ETS Directive so as to achieve a faster decarbonisation of industry and improved cost-internalization/recovery. The industry team will therefore also engage in related policy files such as the Zero Pollution Action Plan (ZPAP), EU-ETS Directive, the review of EU State aid policy rules by the Commission and national cases involving remediation issues and subsidies to unprofitable coal operations, as well as advocating for a review of the Environmental Liability Directive, resources permitting.

The EEB will deepen involvement in media related files such as water, e.g. the Environmental Quality Standards (EQS) Directive review and Urban Waste Water Treatment Directive (UWWTD) review. Other important areas of industry work include refineries, iron and steel, cement plants and addressing wider water pollution from industrial activities (e.g. chemical plants and improved interface with chemicals policy, strengthening links between IED, CLP and REACH).

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 and ensure a just transition, with a shift of attention on EU policy files driving wider decarbonisation. Improving water quality in addition to air quality, with a focus on exploiting vulnerabilities to stop lignite mining will remain another focus for 2022 and beyond.

The EU Pollutant Release and Transfer Register (PRTR) will be subject for a review in 2022 and possibly in the co-decision phase. We see a deep need for the EU to use the benefits of the digital age to achieve improved environmental benchmarking and compliance promotion.

The EEB has advocated for changes in relation to reporting on industrial activities since its launch of the 2017 'Burning the Evidence' Report, which has been reviewed also in light of the in-house database (Industrial plant data viewer <https://eipie.eu/projects/ipdv/>) built up by the EEB for addressing the reporting deficit at EU level. The review at EU level directly links to the ongoing review of the parent UNECE Kiev Protocol on PRTRs, in which the EEB has been engaged to some degree and was appointed in October 2021 to represent the European ECO Forum as the designated observer in the Protocol's Bureau.

While the main focus will be on co-decision regarding the IED and E-PRTR review processes, the EEB will continue to push for strict enforcement of BAT Conclusions and on aspects that will be of EU added value (novel BAT uptakes, deeper industry transformation, main pollution sources or new aspects linked to the zero-pollution ambition).

We will also aim to support more global level BAT uptakes, e.g. through engaging in the OECD global BAT group. We will continue our involvement in the 'Sevilla Process' contributing to the so-called Best Available Techniques (BAT) Reference Documents (BREFs).

## Activities

Due to the cross-cutting nature of the industrial Emissions Directive Framework and industrial production work, some of the activities also touch on other thematic EEB cluster areas. (e.g. circular economy, decarbonisation/ climate and energy, water quality, toxic-free environment, air quality, SDGs, governance and Aarhus). Industry policy objectives of common relevance to other clusters include those related to circular economy, decarbonisation / climate and energy, water quality, toxic-free environment, air quality and other relevant SDGs as well as governance and Aarhus matters. Actions are therefore split across specific thematic areas.

- Engage in the IED REFIT process, including by providing input, and mobilising others to provide input;
- Advocate for improved reporting and data availability;
- 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);

- 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;
- 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 (RESET project), pushing for bringing energy efficiency and GHG performance factors through the IED review, relevant industry initiatives such as 'green steel';
- Reinforce the link with water quality work (e.g. through the UWWTD review, EQS Directive 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;
- Work hand in hand with the Air Quality Team so as to reinforce the link with pollution prevention at source of air pollution, including GHGs, and tackling methane from agriculture and coal mining;
- Addressing EU's largest source of mercury emissions to air through improved pollution prevention and control (e.g. strict BAT requirements on coal/lignite combustion through the Minamata Regulation review).
- Reinforce the links with circular economy by setting dedicated BAT standards on those aspects; continue engagement on the relevant OECD projects, possible BREF on circular economy;
- Continue linking industrial production with the substitution of hazardous substances and achieving of relevant environmental quality standards by tackling new emerging pollutants;
- Work hand in hand with Chemicals Team on REACH restrictions on PFAS (per- and polyfluorinated substances or "forever chemicals");
- Implementation of the adopted Seveso III Directive will be followed by EEB member(s) as well as participation in the meetings of the Seveso Expert Group of the European Commission. A strengthened Seveso III Directive will be explored through the activities relating to the review of the Industrial Emissions Directive and Zero Pollution Action Plan;
- Ensure that opportunities in relation to industry policy are fully exploited when engaging in the policy design of the Zero Pollution Action Plan;
- Improve internalisation of external costs of production methods e.g. air pollution and engage in EU state aid reform and iconic national cases involving coal and defining the Taxonomy criteria, in particular relating to pollution prevention and control;
- Improve governance within the Sevilla process (improved transparency, NGO empowerment, accountability of decision-making process), this activity relates to call for reviewing the Commission expert groups rules in particular;

- Improve internalisation of external costs of production methods e.g. air pollution and engage in EU state aid reform and iconic national cases involving coal and defining the Taxonomy criteria, in particular relating to pollution prevention and control;
- Improve governance within the Sevilla process (improved transparency, NGO empowerment, accountability of decision-making process), this activity relates to call for reviewing the Commission expert groups rules in particular;

## Phasing out Coal/lignite Combustion and Mining by 2030 and Ensuring a Coal-to-Clean Transition

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 and a coal-to-clean and just transition. The EEB also advocates for moving away from gas at the latest by 2035 and to achieve a deeper decarbonisation of energy intensive industries, beyond coal.

Within the IED review, the shift of attention will therefore be in relation to other fossil fuels (e.g. fossil gas) and energy intensive industries in general. In view of the restructured Europe Beyond Coal campaign, the EEB will start to co-convene the working group dealing with EU policy, while continuing to lead the water-energy and mines nexus work.

Water quality will therefore be another media angle in addition to air quality, with a focus on exploiting vulnerabilities to stop lignite mining. This work strand will therefore play a role in related policy files linked to the polluter pays principle, public subsidies and liabilities or other avenues that address pollution prevention at the source such as through the review of the EU Mercury Regulation and strict national implementation of pollution prevention and control standards.

Moreover, the EEB will play an active role to steer the Just Transition process concerning steelmaking and chemicals issues.

### Activities

- Strive for a phase-out of coal and lignite power plants and mines before 2030, inter alia through playing an active role in the Europe Beyond Coal campaign and through improved framework conditions;
- Play co-convening role in the EU Policy WG of the EBC campaign and support drafting and implementation of the action plan; campaign around iconic fights on the ground and a coal-to-clean transition and contribute to making the voice of local communities heard in Brussels;
- Participate in the Just Transition Working Groups set up by DG REGIO on steel making and chemicals issues;
- Continue leading on the Water-Energy Nexus working group with the following 2022 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, and 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 and national level coal phase-out work;
- Support BAT uptake on mercury emissions prevention / reduction via an improved Mercury Regulation;

- Advocate for fossil fuel phase-out and the internalisation of damage costs through effective liability systems and cost internalisation, reflecting the polluter pays principle (e.g. advocating for review of the Environmental Liability Directive);
- Preventing public subsidies that artificially prolong lignite burning and mining, e.g. through State aid or a distorted use of EU funds.

## Improving Transparency on Pollution from Industrial Activities and on Industry Performance

Improving access to information and public benchmarking of industry will also be in focus throughout 2022, 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 improved 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 \(IPDV\)](#), currently addressing large combustion plants.

### Activities

- Coordinate NGO input to the E-PRTR review and its revision, advocating for deeper changes so as to enable proper environmental performance benchmarking, compliance promotion and data integration (see link with products passport, circular economy section);

- Via the IED review, related Commission implementing rules and E-PRTR review or other avenues (8th EAP, UNECE), advocate for a powerful EU level database allowing for better benchmarking of real-time environmental information, thereby strengthening public participation in decision-making on industrial activities and improved compliance promotion and monitoring;

- Engage within the UNECE PRTR Protocol review and represent the European ECO Forum as an observer on the Protocol Bureau;

- Subject to resources, extend the EEB [IPDV database](#) to integrate water relevant aspects and highlight other environmental damage linked to mining and other possible industry sectors.

## Participating in Best Available Technique Reference (BREF) Review Processes for More Ambitious and Science-Based Standards

The EEB will continue our involvement in the 'Sevilla Process' contributing to the review of 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 ceramics, smitheries and foundries, the (Common) Waste Gas Treatment systems from chemical industry (WGC) are subject to vote in 2022, as is the BREF on Ferrous Metals Processing (FMP), and in 2022 we expect a kick start of the review of the merged BREF on inorganic chemicals production (e.g. fertilisers/ammonia). Other BREFs such as for slaughterhouses (SA BREF) are of lower priority given lack of dedicated resources and limited scope.

Where resources are available, 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 further prioritise enhancing its own in-house Energy Generation (RESET) BREF project, subject to further funding. 2022 activities may cover phase II aspects (support schemes assessment, assessment on energy services level with socio-economic impact assessments, where feasible).

## Activities

- Continue to organise technical expert input, coordinate and provide active NGO involvement in the Sevilla process;
- Engage in key ongoing BREF reviews, as well as BREF reviews upcoming for 2022 e.g. LVIC BREF (large volume inorganic chemicals production) revision;
- Maintain our new dedicated NGO Sevilla platform of information about industrial production (<https://www.eipie.eu/>);
- Subject to availability of resources, support members in enforcement work and proper implementation of BAT-C industrial standards.

## Air Quality

### Strengthening the EU Ambient Air Quality Legislation

Air pollution is the biggest environmental risk factor for health in the EU. Members of the public, especially in urban areas, continue to be exposed to levels of pollution which are higher than the values indicated in the 2005 World Health Organisation (WHO) guidelines and the 2021 revised WHO guidelines.

Following the Fitness Check of the Ambient Air Quality Directives (AAQDs) and the publication of the revised WHO guidelines in September 2021, in the second half of 2022, the European Commission will table a proposal for revised Ambient Air Quality Directives.

## Activities

- Contribute to the process leading to the tabling of the European Commission's proposal through e.g. public consultations, stakeholder questionnaire, bilateral meetings, media actions;
- Coordinate and represent NGOs during the Ambient Air Quality Directives' revision process;
- Engage in the Zero Pollution Stakeholder Platform to promote ambition for zero pollution;
- Support EEB members in their involvement in the implementation of the existing 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;
- Organise one Clean Air Working Group meeting.



## Advocating for the Reduction of Pollution at Source, in particular from Agriculture and Heating

Acting to reduce pollution at source is a key priority. Dedicated instruments (legislative and policies) should be put in place to prevent pollution. Agriculture and domestic heating are the two sectors which have reduced their pollution the least in the last decades, and which are repeatedly identified, by the European Commission and the European Environment Agency, as those for which more efforts are needed.

### Activities

- 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.

## Reducing National Emissions through Effective National Air Pollution Control Programmes

Member States agreed on the National Emission Reduction Targets identified by the National Emission Ceilings Directive. The way in which these targets for 2020 and 2030 will be achieved is defined by the National Air Pollution Control Programmes (NAPCPs), which Member States were requested to present by 1 April 2019 and to update at least every 4 years - if not considered insufficient and therefore triggering an earlier revision.

### Activities

- Monitor the implementation of NAPCPs, supporting EEB members in their involvement in the implementation of the revised NEC Directive 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;

- Support EEB members in the revision of their National Air Pollution Control Programmes;
- Organise one Clean Air Working Group meeting.

## Reviewing and Revising the Gothenburg Protocol to Drive International Action to Reduce Air Pollution

The Gothenburg Protocol is the international mirror instrument of the National Emission Ceilings Directive. The review of the 2012 Protocol will be finalised in December 2022. The EEB will actively participate in this process, advocating for a decision to revise the Protocol as the outcome of the review. A revised Protocol should include reduction targets for methane, black carbon and mercury emissions.

### Activities

- Participate in relevant activities under the UNECE Convention on Long-Range Transboundary Air Pollution (CLRTAP).

## Implementing the Air Commitments in the Zero-Pollution Action Plan

With the Zero Pollution Action Plan, the European Commission has announced initiatives (legislative and policy) which will contribute to reducing air pollution too. In particular, on monitoring, access to information and pollution prevention.

## Noise

### Implementing the Noise Commitments in the Zero-Pollution Action Plan

With the Zero Pollution Action Plan published May 2021, the European Commission announced a number of initiatives (legislative and policy) which will contribute to reducing noise pollution.

### Strengthening the Environmental Noise Directive

The Environmental Noise Directive (END) has demonstrated its limits in delivering effective noise pollution reduction – in particular due to the lack of binding noise reduction targets in it. Through ZPAP, the Commission has committed to consider whether there is a need to set noise reduction targets in the Directive.

#### Activities

- Contribute to the implementation of the air pollution related aspects of the Zero Pollution Action Plan.

#### Activities

- Contribute to the implementation of the noise pollution related aspects of the Zero Pollution Action Plan.

#### Activities

- Monitor the main developments on EU noise policies (END and source policy) and advocate for an ambitious new END during the possible revision process;
- 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

With the growth of the organisation, the role of communications has also evolved. A more targeted approach to communications is needed if our messages are to reach the audiences we are addressing.

### Activities

- Formalise processes to ensure that communications needs across the organisation are met, in line with available resources;
- Define clear communications objectives for horizontal and thematic work areas;
- Build a deeper understanding of communications and its relevance across the organisation;
- Continue producing high-quality content for the META news channel, external news outlets and social media;
- Allocate resources to ensure that our content is disseminated, using the relevant digital marketing tools available;
- Develop our communications products in line with the need to reach specific audiences;
- Foster positive relationships with media stakeholders to ensure the uptake of our messages.

## High Political Impact

The EEB has successfully influenced EU policy making over several decades, bringing the views and concerns of a large constituency of environmentalists into the heart of the EU processes, and 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.

We have different threads to our focus – engaging with the EU institutions: the Presidencies of the Council of the European Union, the European Commission, European Parliament and other agencies, as well as engaging in international organisations and fora such as UNEP, UNECE and OECD.

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 Czech and Swedish EU Presidencies containing a comprehensive set of demands, summarised in Ten Green Tests, and publish assessments of the Slovenian and French Presidencies' performances;
- Promote the EEB Memorandum for the French, Czech and Swedish Presidency Trio containing the EEB's "dozen demands";
- Set out key policy demands to all EU Environment Ministers prior to each formal meeting of the Environment Council and where relevant and time permitting, other Council formations; and upon invitation, participate in the informal meetings of the Environment Council;
- Prepare and publicise EEB priorities for the Commission Work Programme for 2023;
- 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;
- Prepare first reflections on a strategy for ensuring that environmental issues feature prominently in the 2024 European Parliament elections;
- Continue to play an active role in high level panels, platforms and expert groups to ensure that civil society perspectives and concerns are heard;
- Continue to play an active role within the Green 10 and 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, the European Economic and Social Committee and SDG-Watch Europe.





# MEMBERSHIP, PARTNERSHIPS AND EVENTS

## An Empowered and Consolidated Membership

In 2022, the EEB will continue to focus on organic growth of its membership and strive to become an even more comprehensive umbrella organisation for Europe's environmental NGOs.

### Activities

- Reach out to potential members to explore interest in joining, with a special focus on organisations from countries or regions where the EEB is currently underrepresented or not yet represented as well as European networks;
- 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;
- Draft and adopt a membership fee and benefit package for 2023-2027 that is attractive and sustainable for current and potential members;
- Work together with the membership to explore ways to stimulate more joint projects and strengthen the fundraising capacity within the network;
- Pay special attention on how to support the involvement of EEB members based in non-EU countries in our activities, explore options for capacity building and strive to raise funds to hire an Eastern Partnership Officer;
- Organise the Annual Conference in Brussels combined with an engaging Annual General Meeting in spring 2022;
- Continue to work closely with our [partners](#) and in different coalitions with other stakeholders;
- Organise [Working Group](#) meetings and other types of events that ensure the same level of interaction for participants attending in person and remotely;
- Explore new event partnerships and funding models.





# STAFF, ORGANISATION AND GOVERNANCE

In 2022, the EEB will continue to implement its Long-Term Strategy for 2020-2030 (LTS) and pursue efforts to ensure that the operational base is fit for purpose. The organisation has grown substantially in recent years and managing this growth in a sustainable way will remain an important priority in 2022.

## Activities

- Continue the review of the organisation's governance structure and take the necessary decisions at the 2022 AGM to ensure that it remains fit for purpose to deliver on the LTS over the coming decade;
- Reflect on lessons learned from the COVID-19 lockdown period and adapt EEB office guidelines, staff wellbeing measures, routines for events etc. accordingly;
- Continue the roll-out of new project management and financial reporting tools to ensure coherence and improve coordination;
- Implement the EEB's fundraising strategy for 2022-2024 to ensure adequate financing of the EEB's activities;
- Further develop staff training opportunities and our wellbeing/benefits package where feasible.



# BUDGET

General Costs	€
Office Costs	202 600
Office Supplies	120 850
Communications	49 920
Depreciations	165 000
Financial costs	3 950
Unforeseen expenditures	10 000
<b>Sub-Total</b>	<b>552 320</b>

Salary Costs	€
President's Secretariat	10 000
Secretary General's Unit	245 879
EU Policy Unit	2 402 589
GPS Unit	610 349
Information & Communication Unit	884 371
Accounting & Support Unit	851 475
Volunteers and Temporary Staff	24 000
Other personnel costs	94 220
<b>Sub-Total</b>	<b>5 122 884</b>

<b>Activities</b>	<b>€</b>
Overarching Policy Framework	34 750
Environmental Law and Justice	64 500
Global and Regional Policies	142 934
Economic Transition	51 000
Nature	106 200
Circular Economy	392 000
Climate	170 504
Health and Environment	337 000
Communications and political advocacy	34 000
Membership, partnerships and events	134 000
Staff, organisation and governance	55 000
<b>Sub-Total</b>	<b>1 521 888</b>

<b>Working Capital</b>	<b>€</b>
Allocation to the reserves	60 000

## Total

<b>Total Expenditure</b>	<b>€</b>
Allocation to the reserves	7 257 091





**EEB**

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Environmental  
Bureau

