

With input from discussions at the EEB 2022 Annual Conference

#### WHAT DO YOU THINK? SHARE YOUR INSIGHTS.

This paper benefits from discussions at the EEB 2022 Annual Conference, where breakout sessions explored what went well and less well in the first half of the EGD and what needs to be done to ensure it is a transformative agenda. We would like to thank all those engaged in those discussions.

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# EEB'S MID-TERM ASSESSMENT OF THE EUROPEAN GREEN DEAL (EGD)

Is the EGD the transformative agenda we need and what is still needed to make it fully fit for future?

#### **Key Messages**

#### The EGD roll-out, despite the crises

- The European Green Deal (EGD) was launched as a "man on the moon" moment in 2019 by Commission President Ursula von der Leyen. It promised to deliver a set of deeply transformative policies that would "reconcile the economy with our planet, to reconcile the way we produce, the way we consume, with our planet and to make it work for our people".
- Covid-19 risked derailing the EGD, but instead the EGD became a guiding principle for the economic recovery efforts even if the practice often does not live up to the principle.
- The illegal invasion of Ukraine is being instrumentalised by some powerful interest groups to weaken and postpone the EGD, with attacks on the European Green Deal and especially the Farm to Fork Strategy, delays in bringing out crucial new legislation, and a weakening of environmental safeguards. Yet, the war shows us we need a more, not less ambitious EGD more than ever if we are to become less dependent on fossil fuels, material, price hikes, and foreign regimes.
- The EGD to date includes a range of clearly good commitments that support a transformative agenda, many still progressive but weaker initiatives, and some missed opportunities.
- At the same time, alongside the EGD there are some bad and even harmful developments that fly in the face of it and show that its principles have not been fully mainstreamed.



#### The Assessment - The Good, the Bad and the Missed Opportunities



#### The positive commitments:

- The **Climate Neutral Europe** commitment, enshrined in the **Climate Law**, and the comprehensive Fit for 55 climate and energy package, helped by the **REPowerEU package proposal** (May 2022) **on renewables and energy efficiency**, are steps in the right direction, despite being insufficient to limit global warming to 1.5°C.
- The **Social Climate Fund** (SCF) within the Fit for 55 package (July 2021) is particularly welcome given its focus on the social dimension and helping poorer households in the energy transition.
- **The proposed cars legislation for CO2** (July 2021) commits to an end of sales of the internal combustion engine (ICE) by 2035 and stricter emissions standards.
- **ReFuelEU** is a helpful step towards decarbonising aviation, provided genuinely sustainable feedstocks are used, and the inclusion of shipping in the Emissions Trading System (ETS) is an important broadening of the ETS scope.
- The EU's **Biodiversity Strategy for 2030** (May 2020) contains 100+ actions that, if implemented, will help protect and effectively manage 30% of the EU's land and seas, including 1/3 under strict protection as well as drive ambitious nature restoration agenda across the EU The EU has also committed to play a leading role on biodiversity globally, however, there is a risk of failure at the CBD COP 15.
- The long-awaited Commission proposal for the Nature Restoration Law (June 2022) offers an
  opportunity to reverse the tide of biodiversity loss and tackle the climate crisis at the scale
  needed. However, the proposal needs strengthening on a few key aspects to fully grasp its
  potential and needs to be adopted as quickly as possible without undermining the level of
  ambition that scientists, businesses, civil society, Parliamentarians, and citizens have all called for.
- **The EU's Soil Strategy** (November 2021) contains several important commitments to protect soil as well as a promise from the Commission to put forward a dedicated Soil Health Law by 2023.
- The **Circular Economy Action Plan** (March 2020) with its Sustainable Product Initiative (SPI), the Strategy for Circular and Sustainable Textiles and the overhauled Ecodesign rules aim to make sustainable products the norm.
- The **Zero Pollution Action Plan** (May 2021) contains a commitment to zero pollution ambition, embracing a preventive approach, with targets on air pollution, chemical pesticides, nutrient losses, plastic and waste, stepping up implementation and enforcement of the existing pollution legislation, as well as committing to update water and air quality regulatory standards.

- The Chemicals Strategy for Sustainability (October 2020) committed to a future-proof and ambitious plan that has the potential to radically improve health, environmental and economic resilience, and promote a toxic-free environment. It plans + 70 actions, including the EU's Restrictions Roadmap (April 2022) that can potentially restrict up to 12,000 harmful chemicals.
- The revision of the **Environmental Crime Directive** (December 2021) proposes a welcome extension of the list of offences and minimum rules on sanctions. Legislators should seize the opportunity to recognise Ecocide as a crime against humanity and enable a green European Public Prosecutors Office.
- The Directive on Corporate Sustainability Due Diligence proposal (February 2022) with its commitment to corporate due diligence is a big step forward, even if it must be strengthened for climate and environmental impacts to be properly addressed.
- **The Just Transition Regulation** (June 2021) can help communities that are dependent on carbon-intensive activities to diversify the local economy towards sustainable activities and facilitate reskilling of the workforce.
- The **revision of the Aarhus Regulation** (October 2021) which extends possibilities for NGOs to challenge decisions taken by EU institutions that affect the environment.



#### The missed opportunities:

- The **Farm to Fork Strategy** (May 2020) is a welcome first step towards a Common Food Policy and a sustainable farming sector; however, it falls short on promoting a shift towards healthy and sustainable diets.
- **-55 net climate targets:** The Climate Neutrality target is only binding at EU level, contains no phase out date for fossil fuels use, is weak on governance, lacks binding targets for renewable energy and energy efficiency at national level, is weak on the polluter pays principle (ETS review), and missed opportunities on animal numbers, nutrient management and meat consumption.
- **Fit for 55 package** (July 2021): While it is a comprehensive package with many good elements, including maintenance of the Effort Sharing Regulation (ESR) and above mentioned SCF, it is insufficient to push the EU onto a pathway to a 1.5°C limit and has a range of weaker elements, including the limited scope of the aviation ETS proposal, insufficiently stringent 2030 cars and vans CO<sub>2</sub> targets, and lack of access to justice provisions.
- The **Social Climate Fund** (SCF) (July 2021) is not enough to ensure that low-income households are empowered in the transition to carbon neutrality and zero pollution. The SCF needs to be turned into a more permanent instrument and must be combined with measures that tackle the root causes of why people struggle to pay their energy and mobility bills: stronger social

- protection, an end to precarious working conditions and the implementation of minimum wages across the EU.
- The **Adaptation Strategy** (February 2021) recognised the need to speed up adaptation efforts across the EU, including through the faster uptake of nature-based solutions and achieving climate-resilient water management, but failed to set targets and proper governance mechanisms to ensure that the EU becomes climate-resilient by 2050.
- The proposal for the revision of the Energy Performance of Buildings Directive (EPBD)
   (December 2021) is still too focused on energy in use stage and neglecting the potential emissions saving linked to sufficiency and circularity.
- The **Waste Shipment Regulation proposal** (November 2021) is a clear improvement compared to the existing text, but a missed opportunity to phase out plastic waste export outside the EU and to align the law with the Basel Convention for intra-EU plastic waste.
- There was no update on the **Environmental and Outdoor Noise Directives** and only a little and late mention in the 8<sup>th</sup> Environment Action Programme (8EAP).
- The **review of the EU Mercury Regulation:** Consultations started but the scope of the review should be wider and should also consider banning mercury and mercury compounds imports and other mercury-added products, and set emission limit values.
- The **Forest Strategy** (July 2021): while it reiterated important elements from the EU's Biodiversity Strategy and committed the Commission to propose a Law on Forest Monitoring, the overall ambition of the Forest Strategy was watered down following industry pressure.
- The **National Recovery and Resilience Plans** contained very different levels of commitment to climate and sustainability, showed an inconsistent application of the do no significant harm principle and were, with some exceptions, a missed opportunity for policy reform or needed investment in nature.
- The Recovery and Resilience Fund (RRF) and the new budget: Despite some progress on the level of funding for climate and, to a lesser extent, the environment, as well as commitments to do no significant harm, the RRF missed the opportunity to change practices in agriculture, forestry and fishing sectors that drive biodiversity loss.
- **Sustainable finance:** The commitment to create a taxonomy that builds on science offered to be an important catalyst to steer funding, and the technical work has often been good, but the political interventions (see below) have cast a dark shadow on the process.
- The alignment of the **Climate, Energy and Environmental Aid Guidelines** with the EGD has fallen short of expectations, particularly concerning the inclusion of the polluter pays principle as an overarching criterion to assess state aid requests.
- The **Methane Strategy** (October 2020) missed the opportunity to effectively address the EU's biggest source of this GHG and air pollution precursor, the agricultural sector. The Methane Strategy also failed to promote decisive action to cut emissions from the second biggest source in the EU, the waste sector.

- The reviewed **Industrial Emissions Directive (IED) proposal** (April 2022) is not yet fit for climate protection, performance indicators for making the instrument forward looking are missing and key aspects are left to be resolved later.
- The proposal for an Industrial Emissions Portal Regulation (ex-PRTR) (April 2022) does
  not make best use of available information for e.g. benchmarking and compliance
  promotion, the list of pollutants remains unchanged, and arbitrary and counter-productive
  reporting thresholds are kept.
- Mandatory due diligence obligations under the proposed Corporate Sustainability Due
   Diligence Directive (April 2022) are weak when it comes to assessing adverse
   environmental and climate impacts. The proposal is facing fierce pressure from companies
   who do not want to be held liable and wish to water down the whole proposal, limiting the
   number and type of companies covered by the proposal even further. This risks making the
   proposal even less ambitious.
- Gender mainstreaming: There have been some general commitments to gender
  mainstreaming in all DGs, but the EGD files fail to walk the talk. Many of the new strategies
  and laws put forward within the framework of the EGD are either fully gender-blind or are
  not sufficiently based on gender analysis. Even where gendered differences are
  acknowledged, the policies, as a rule, do not sufficiently address these.
- The EGD is still very much a green growth strategy. Ever more evidence, as elaborated by the latest IPCC report and by the EEA, shows that a beyond growth strategy is both necessary and possible. Some signals of interest in a Beyond GDP dashboard discussion and Treaty discussions exist as seen in the final 8EAP agreement following EP amendments, but there is still a lack of sufficient political commitment from the top.
- The revision of the Sustainable Use of Pesticides legislation (22 June 2022): While the proposal for a Regulation contains legally binding targets at EU level (50% by 2030) and more areas are now covered by a ban in the use of pesticides, the threshold for Member States' targets is too low and does not contain the target of at least 10% of agricultural areas under high-diversity features, nor environmental indicators. It further leaves too much room of manoeuvre to Member States, risking again its inadequate implementation.
- While the Commission has made **some effort to include access to justice in some environmental legislative proposals,** there is lack of systematic integration of access to justice in all sectoral legislation, in particular in the field of climate and the Fit for 55 files.



#### The Bad

- The Common Agricultural Policy will continue funding harmful intensive farming practices
  and will not deliver on the European Green Deal, despite some positive elements such as ecoschemes.
- The inclusions of gas and nuclear in the Taxonomy complementary delegated act (February 2021) and biomass in the climate delegated act (January 2021) have demonstrated that political interests can trump science-based approaches and undermine the confidence in both the taxonomy (despite some positive features in other chapters more reflective of the original positive ambition) and the EGD. EU green leadership was severely damaged as a result of this act of institutional greenwashing by all three EU institutions (despite votes by the EP's ENVI and ECON committees against, overruled by the plenary vote), which puts at risks the credibility and further developments of the EU Sustainable Finance Framework.
- **Better Regulation's** (January 2021) **core commitment to the one-in-one-out** approach is both in itself bad regulatory practice (laws should be decided on their merits) and creates a political signal to slow legislative progress.
- Despite enforcement supposedly being a priority of this Commission, there has not been the
  needed stepping-up of enforcement capacity, funding and action to ensure that old and new
  legislative initiatives are properly implemented on the ground and the European Commission
  performs its Guardian of the Treaty role.
- **False solutions for renewable permitting:** instead of tackling the real barriers to the upscaling of renewables, through the **REPowerEU package** (April 2022), the Commission proposed a roll-back of nature protection legislation, failing to propose synergistic solutions to the intertwined climate and biodiversity crises, and creating a dangerous precedent for undermining fundamental environmental safeguards.
- The **Raw Materials Strategy:** There is a high focus on short-term economic gains of mining for virgin raw materials without fully considering long-term environmental and social impacts. Demand-side solutions to reduce the need for raw materials are not at all considered within the strategy.
- **Institutional Capacity:** The Commission services (especially DG ENV) have been overstretched with the scale of the EGD and staffing levels have not been aligned with the needs of the EGD.
- **Institutional mandates and coherence:** There have not been adequate revisions of mandates and cultures to put the EGD as a top priority across the DGs, leading to some internal brakes on progress.

#### **Summary**

- The EGD has been **good on vision**, **strategies**, **transformative narrative**, **and long-term commitments** and set in motion important legislative reforms that need to be continued.
- It has been **considerably weaker on the pace of actual change and where it concerns actual measures that translate into money and real constraining measures** reflecting considerable efforts by industry and political groupings and other vested interests who want to maintain the status quo to hollow out the measures.
- The weak CAP and the political imposition of biomass, gas and nuclear in the taxonomy for sustainable activities undermine the confidence that the EGD truly is the number one priority of this Commission.
- The EGD has been rightly defended against attacks seeking to undermine it during the Covid-19 crisis. Russia's invasion of Ukraine and resulting supply chain shock and energy crisis should give reason to step up its ambition level.

#### The way forward – what needs to be done to ensure a transformative agenda?

The responsibility is now with the member states in the Council and MEPs in the European Parliament to commit to the legislative proposals above; to defend and strengthen the good elements, address the missed opportunities and tackle the bad elements where possible; and agree in trilogues with the Commission final binding texts.

- Trilogues can improve legislation: the 8<sup>th</sup> Environmental Action Programme (8EAP) was initially a weak monitoring tool at launch (October 2020), but strengthened through Council (midterm assessment, trigger for policy response for weak performance) and particularly EP amendments (2024 review, wellbeing economy, subsidy reform, soil health law promise, noise and light integration, governance, beyond GDP indicators).
- Unfortunately, the Council and Parliament can weaken or block progress. For example, on 8 June, the EP vote against the Carbon Border Adjustment Mechanism (CBAM), the EU-ETS extension and the Social Climate Fund (SCF). Although some MEPs voted against due to last-minute rollback of ambitions, these crucial files need to go back to the EP committees now, risking delaying the whole green transition at a critical geopolitical moment. It is essential that MEPs reflect on how essential these files are to support fossil-fuel independence from Russia, support citizens in the energy transition and tackle the climate crisis. Similarly, the Council under the French Presidency (see box) voted for a narrow vision of CBAM and an SCF with a lower budget (59 billion EUR rather than 72 billion EUR).
- Voters will be watching the MEPs' voting record closely in the coming two years and this will be of significant importance for the June 2024 European elections. For example, citizens were disappointed by the 6 July greenwashing vote of the European Parliament on the gas and nuclear taxonomy while 278 MEPs stood up to veto the Commission's proposal, 328 voted for the inclusion of gas and nuclear as green investments (see <a href="Link to voting record">Link to voting record</a>).

• Civil society across the EU member states will be assessing whether their governments support or oppose transformative legislation that citizens are asking for and whether their governments represent their views and wishes.

#### What contributions did the Council make to advancing the European Green Deal?

- Assessment of the French Presidency (January to June 2022)
- Assessment of the Slovenian Presidency (July to December 2021)
- Assessment of the Portuguese Presidency (January to June 2021)
- Assessment of the German Presidency (July to December 2020)
- Assessment of the Croatian Presidency (January to June 2020)

There are still many essential legislative files to come. The Commission needs to stay true to its EGD ambition and launch additional legislative proposals on time to ensure completion in its term of office, including:

- If we are to see success at global conference on biodiversity, it is essential that the EU places much greater priority on the **CBD COP-15 negotiations** and makes reaching a Paris-style agreement on biodiversity its highest political priority. Heads of State who have endorsed the Leaders' Pledge for Nature committing to reverse biodiversity loss by 2030 must now drive forward ambition to secure a transformative agreement in Montreal (5 to 17 December 2022).
- The Ambient Air Quality Directives (AAQD) reform (foreseen for Q3,4 2022) which needs to ensure full compliance with WHO standards by 2030, establish air quality standards for additional pollutants such as black carbon and ammonia, and ensure no regression in the enabling framework.
- The revision of the Urban Wastewater Treatment Directive (UWWTD) (expected Q4 2022 delayed) which should set stricter standards for emerging pollutants such as pharmaceuticals and microplastics, needs to address sewer overflows, and make the UWWTD climate-proof.
- The review of the Environmental Quality Standards Directive (EQSD) and the
  Groundwater Directive (expected Q4 2022 delayed), updating pollutants in surface and
  groundwater, which needs to include substances of emerging concern such as
  pharmaceuticals, PFAS, microplastics and set links to pollution control measures under
  REACH, IED.
- The delivery of the chemicals laws reforms (REACH and the Regulation on the
  classification, labelling and packaging of substances and mixtures (CLP)) under the
  mandate of this Commission, with concrete targets and measures to speed up the
  regulation of hazardous chemicals and reduce the overall amount of chemicals

- manufactured and used. The Commission shall not delay the publication of its proposed reforms beyond the end of 2022 to ensure time for agreement by all institutions by 2024.
- The delivery of the bans on highly hazardous chemicals included in the restrictions roadmap.
- Legislation to put an end to exports of chemicals not allowed for use in the EU.
- The review of the General Block Exemption Regulation (Q3 2022) which should set much clearer limits in order to steer public spending by member states towards projects in line with the EGD goals and prevent any lock-in to fossil fuels and other short-term solutions.
- Ambitious CO<sub>2</sub> standards for trucks, ambitious Euro 7/VII standards, the Regulation on fleets, stricter RFNBO (hydrogen and hydrogen-based fuels) rules and measures for non-CO<sub>2</sub> impacts of aviation.
- A ban by default to export plastic waste outside the EU and a better alignment with Basel Convention within the EU through the **Waste Shipment Regulation**.
- The Raw Materials Act (expected before April 2023) which must come up with strong supply chain responsibility requirements, not weaken environmental regulations and include high standards on public participation.
- **Green data 4 all** (expected Q4 2022) which must modernise access to environmental information, restrict exceptions to the release of data, and include obligations for proactive publication.
- The Environmental Liability Directive revision (expected Q2 2023) which needs to ensure
  that the polluter pays principle is fully implemented, drastically extend its scope of
  application, redefine what constitutes "environmental damage", and ensure that people
  and NGOs have effective access to remedies when they are impacted by environmental
  damage.
- A reform of the EU Economic Governance Framework (expected in Q4 2022) which must be
  consistent with EU agreed social and environmental goals and allow and incentivise spending in a
  just transition.
- The adoption of the **delegated acts setting out criteria for the 4 remaining environmental objectives of the EU taxonomy:** sustainable use and protection of water & marine resources, transition to a circular economy, pollution prevention & control, protection & restoration of biodiversity and ecosystems (expected Q4 2022, but likely delayed). The Commission must heed the recommendations by the Platform for Sustainable Finance ensuring ambitious criteria rewarding truly sustainable activities and not be swayed by political pressures (as it has regrettably been the case for biomass, gas and nuclear in the climate taxonomy).
- The EU needs to take a strong position in the negotiations on a **global agreement on plastic pollution** launched at the United Nations Environment Assembly (UNEA) to demonstrate its commitment to contributing to global stewardship and constructive diplomacy (the ambition is to conclude negotiations by end of 2024).

So far missing areas of emphasis include:

- **Oceans:** there is a promise of a Joint Communication setting out an action plan on international ocean governance, yet this will not lead to new legislation within the current legislative period.
- Noise: there is only a promise to assess the status of the problem and where action is needed, despite noise being recognised as the second most important cause of environmental health problems.
- **Light pollution** is only referenced in the 8<sup>th</sup> Environment Action Programme (8EAP) with, so far, no real commitment, despite it being a major driver of biodiversity loss and ecosystem disruption.
- The Common Agricultural Policy (CAP) is formally outside of EGD and only represented partially in the EGD via the Farm to Fork Strategy, which is being challenged. The lack of integration and lacking climate- and biodiversity-mainstreaming into the CAP creates major policy incoherence.
- EU and national level targets to ensure commitment and buy-in are missing for key files, e.g., on EU resource targets, on energy use and energy waste, and at national level on renewables, energy efficiency and pesticides.
- While "food waste" is an invaluable metric and concept to advance policies and actions to help with food availability and food poverty, "wasted energy" should be looked at more closely to help meet energy demand, address fuel poverty, strengthen resilience to price hikes and help put downward pressure on prices.
- **Trade:** the revised trade policy (February 2021) has not practically changed the EU trading patterns, and still needs to demonstrate that it prioritises better and not more trade. While some declarations have been made in the right direction, the EU is still on a clear path to perpetuate unsustainable trade, with no movement on more enforcement of sustainability chapters.
- **Equality:** Walking the talk on gender mainstreaming in proposals so far there is nice talk, but lacking action.

#### To deliver on a transformative EGD, the Commission, Council and Parliament also need to:

- Resist the attacks on the EGD instrumentalising Russia's war in Ukraine and using false
  arguments or proposing false solutions. Notably maintain commitment to the Farm to Fork
  Strategy and do not undermine environmental protections including in the well-intentioned
  REPowerEU and other upcoming initiatives for energy and resource security. Resist also requests
  to delay the needed reforms of the chemicals laws to guarantee citizens and environment health
  and increase the resilience and competitiveness of EU industry.
- Recognise that Russia's war on Ukraine is also an attack on the EU and commit to the EGD
  which is a peace project and essential for our long-term survival. The EGD, if done well, can
  be a transformative catalyst pushing for energy independence and savings, material
  independence, strengthen resilience against price fluctuations.

- **Get the timing right:** launch legislative proposals in time for them to be agreed with Council and Parliament before the end of this Commission's and Parliament's term of office to avoid delaying commitments and creating uncertainty.
- Stop silo thinking and ensure systematic integration and more policy coherence: The institutions should ensure they do not give with one hand and take away with the other, and all the ECGD strategies need to be faithfully translated into legally binding obligations e.g. promote a fully integrated approach on the IED that includes climate measures; ensure the drivers of biodiversity loss are tackled at source in agriculture, forestry and fisheries legislation; ensure air and climate co-benefits are reflected in legislative, policy and investment decisions; and phase out harmful subsidies.
- Accelerate implementation, ensure sufficient funding and strengthen enforcement to ensure old and new legislation leads to the needed change in practice, not just on paper.
- Be aware of and address concerning trends of private interests undermining public goods as seen, for example, in renewed industry push for more mining in Europe, even in protected areas.
- **Be aware of taking the wrong roads and of creating new lock-ins:** e.g. on hydrogen versus electrification; risks of forgetting public transport and active transport; locking in fuel tax cuts when alternatives to fuel and mobility poverty exist; replacing dependency on Russian oil and gas with dependency on other regimes or environmentally unsound alternatives.
- Monitor progress with EGD implementation and the state of the environment and react
  when progress insufficient. The 8<sup>th</sup> Environment Action Programme offers an important
  commitment and framework to measure and discuss progress between the institutions and,
  among other things, asks for legislative action should there be insufficient progress.
- Commit to global responsibility and leadership and engage in diplomacy: The EU has a global responsibility regarding the pollution, climate and biodiversity crises. The way Europeans live and consume has consequences not only in our region, where we increasingly experience extreme weather conditions due to climate change, but on the whole planet. The EU should lead the negotiations of UNFCCC COP 27 and CBD COP 15 by increasing its commitment to a healthy and safe planet for all. Similarly, amongst others, EU commitments are important on not importing forest products leading to deforestation and not allowing the export of harmful substances not allowed on EU markets nor the import of harmful substances not allowed to be produced in the EU.

#### Will the EGD be the EU's person on the moon moment?

- Without stepping up on ambition that heeds science and citizens' calls for action, the EGD initiative will not have enough force to "reach the moon".
- Without resisting business and political ideological lobbying pressures to hollow-out the content of many initiatives until only good titles and aspirations remain, the EGD risks staying within the gravitational pull of the status quo, even though the current norm has proven inadequate.
- Without using the right compass, the EGD will not reach its declared destination: the compass needs to target a post-fossil fuel system change, a circular economy revolution, a true commitment to zero pollution without harmful chemicals in our products, and a commitment to a regenerative wellbeing economy. Youth voices, ethics and science can provide the compass.
- Without addressing the policy dissonance between EGD aspirations and the CAP, aspects of the taxonomy, and the Energy Charter Treaty, and without seizing all opportunities for policy coherence and ensuring all commit to the same destination, there is a risk that too many pilots fight over the controls and the EGD target destination is missed.
- The next two years are critical to ensure the transformative agenda that we need, that the science has underlined as essential, that civil society has repeatedly asked for, that is our global responsibility and that youth deserves. Whether the EGD does become a person on the moon moment also depends on how member states commit to the mission via the Council positions and implementation, and whether the European Parliament boosts ambition levels to respond to the needs of citizens they represent.
- The European Commission deserves credit for having created the EGD and launched a
  potentially historic process. It cannot be allowed to be a stalled or failed mission. Too
  much is at stake.

#### Annex:

# For more information on EEB's specific asks for a transformative agenda

The following links to EEB position papers and further information are based upon the <u>EEB's 10 Green</u> <u>Tests for the Czech Presidency</u>.

#### 1 Ensuring energy security while addressing the climate emergency

More information: EEB's main asks for the Fit for 55 Package- A package fit for the planet and fair to society · Building a Paris Agreement Compatible (PAC) energy scenario and associated policy brief · META article on COP26 · EEB's views on a Carbon Border Adjustment · EEB and others letter on the Gas Package · EEB reply to the public consultation on state aid General Block Exemption Regulation · EEB and others letter on energy labelling for space heaters · EEB letter on Carbon Farming in the Sustainable Carbon Cycles Communication · EEB letter to energy ministers for 2 December Energy Council meeting · EEB letter on Ensuring ETS and IED consistency within upcoming "Fit for 55" Package · EEB reply to the public consultation questionnaire on the review of Renewable Energy Directive (RED II) · EEB-Hydrogen-Position-Paper · EEB Burnable Carbon: What is still burnable in a circular cascading low carbon economy · No more new hydropower in Europe: a Manifesto · Fossil Gas Phase Out Manifesto · EEB input to the EU Environment Council Meeting, Brussels 20 December 2021 · Joint NGO letter on the Sustainable Carbon Cycles Communication · Joint NGO letter on the Effort Sharing Regulation / Climate Action Regulation for Europe · Press Release: Second FitFor55 Package is a Christmas gift to fossil industry, NGOs say · Joint letter (EEB/NTW) calling for reviewed stress tests after the attacks on Ukrainian nuclear power plants · EEB Policy Brief on Nature-Positive Renewables – Building on the Paris Agreement Compatible (PAC) energy scenario

#### 2. Reverse the dramatic loss of biodiversity and invest in the resilience of our ecosystems

More information: Restoring Europe's nature – NGO position paper • EU restoration targets for rivers and freshwater ecosystems – NGO position • The Final Sprint for Europe's Rivers • Blue Manifesto – The Roadmap to a healthy Ocean. 2020 progress assessment • Common Fisheries Policy: Mission not yet accomplished • EU Biodiversity Strategy Shadow Action Plan to conserve fisheries resources and protect marine ecosystems • Planning offshore renewable energy with nature in mind • Benefits quickly outweigh costs of banning bottom trawling from Marine Protected Areas • At a crossroads: Europe's role in deep sea mining • The top ten problems for renewable energy in Europe are not linked with nature protection • Green 10 joint letter – REPowerEU package and environmental roll-back • NGO letter on the importance of nature restoration targets for EU forests • NGO letter on the Nature Restoration Law • NGO Reaction to the Nature Restoration Law • Proposal for a Regulation on Nature Restoration – NGO analysis

#### 3. Initiate a transition towards sustainable food and agriculture

More information: · EEB position paper 'Beyond net-zero emission in agriculture: Creating an enabling climate governance for agriculture' · EEB submission to the public consultation on the certification of carbon removals · EEB report 'Carbon Farming for Climate, Nature, and Farmers' · EEB position paper 'Revision of the Sustainable Use of Pesticides Legislation – "Reduce Use" Proposal (RUP)' · EEB comments on the Revision of the Sustainable Use of Pesticides Directive · EEB – BirdLife – WWF report 'Will CAP eco-schemes be worth their name?' · EEB – BirdLife analyses of submitted CAP Strategic Plans in relation to Space for Nature; Peatlands and Wetlands · Soil and carbon farming, Grasslands and Pesticides

#### 4. Ensure clean air towards zero environmental and health impacts

More information: The Final Sprint for Europe's Rivers  $\cdot$  EEB position: Civil Society Vision for a Zero Pollution Future  $\cdot$  EEB Submission to AAQD review  $\cdot$  Airy promises: how EU governments are failing to cut air pollution and what to do about it  $\cdot$  Six necessary steps for cleaner air  $\cdot$  Views on the review of the Gothenburg Protocol and expectations on a revised Protocol  $\cdot$  National Air Pollution Control Programmes: analysis and suggestions for the way forward

#### 5. Tackle surface and groundwater pollution and ensure clean water for all

More information: EEB position for a revised Urban Waste Water Directive · EEB Comments on the Revision of the Lists of Pollutants Affecting Surface and Groundwater and the Corresponding Regulatory Standards · The Final Sprint for Europe's Rivers

## 6. Call for a toxic-free environment and the ambitious implementation of the Chemicals Strategy for Sustainability

More information: The European Commission must act on pollution and not delay the legislation on the sustainable use of pesticides • EEB response on the revision of the RoHS Directive • Executive Summary – Skin lighteners still available online despite mercury findings • ES EEB reaction to the chemical strategy for sustainability • EEB comments to the Inception Impact Assessment for the CLP revision • Contribution to the Inception Impact Assessment on the revision of REACH Regulation: EEB proposals for objectives and policy options • Analysis of microplastics emissions by 2030 • EEB comments on the EU Mercury Regulation review • Mercury Skin lighteners 2022 report • NGO key demands to improve REACH (2022) • The Need For Speed – Why it takes the EU a decade to control harmful chemicals and how to secure more rapid protections

#### 7. Shift towards a zero-pollution industry

More information: EIPIE/review of the IED section and detailed position to IED review • IED-Review-TSS\_EEB\_\_-FINAL-Submission-8april2021.pdf (eipie.eu) • EEB's input to targeted Stakeholder Survey on E-PRTR review • EEB input to E-PRTR inception assessment / UNECE PRTR review • EEB briefings on the IED review • EEB briefing on IEP – Transparency and participation in environmental decision making

# 8. Grasp the full potential of the circular economy through improved products policy, waste reduction and transparency for consumers

More information: Detailed position paper on batteries, shared by more than 40 organisations; A joint statement on removable, replaceable and repairable batteries • NGOs open letter on the Battery Regulation opposing the risks of delays in the latest Council Position • Waste Shipment Regulation (WSR): Feedback on the inception impact assessment • Waste Shipment Regulation – recommendations by Rethink Plastic alliance • META article on Waste Shipment Revision • NGOs open letter for an ambitious EPBD revision • Brief on introduction of social and due diligence criteria in Sustainable Product Initiative • EEB Position paper on Sustainable Product Policy • Briefing on prohibiting the destruction of unsold goods • EEB position on legislative proposal on substantiating green claims • EEB position on empowering the consumer for the green transition • EU strategy for sustainable textiles – EEB response

#### 9. Strengthen accountability and the rule of law and promote environmental justice

More information: Civil Society Statement on the Proposed EU Corporate Sustainability Due Diligence Directive • META article: Effort Staring Regulation – MEPs vote for access to justice • META article: Climate Laws that Bite – an introduction to access to justice • META article: why the Social Climate Fund needs access to justice • EEB Implement for Life report: Crime and punishment • Meta article: MOP-7 Geneva Wrap-Up • Meta article: EU reputation at stake • Protecting Public Watchdogs Across the EU: A Proposal for an EU Anti-SLAPP Law • Joint letter regarding the EU position on the Aarhus Convention • Joint NGO paper: Putting the Environment in Human Rights and Environmental Due Diligence • Joint NGO Demand: The Need for an EU Anti-SLAPP Directive • Stepping up enforcement – Recommendations for a better compliance agenda • Briefing: Access to Justice in the Effort Sharing Regulation

### 10. Mainstream a transformative Green Deal, foster social, environmental and economic justice, and improve governance

More information: European Green Deal: One Year In • A Feminist European Green Deal • Turning fear into hope: Corona crisis measures to help build a better future' • Reprotecting Europe: The EU Green Deal v The War on Regulations • Towards a wellbeing economy that serves people and nature

