

# WORK PROGRAMME





We are Europe's largest network of environmental citizens' organisations. We bring together over 180 civil society organisations from more than 35 European countries. Together, we work for a better future where people and nature thrive together.

The EEB is an International non-profit association / Association internationale sans but lucratif (AISBL). EC register for interest representatives: Identification number 06798511314-27 BCE identification number: 0415.814.848 RPM Tribunal de l'entreprise francophone de Bruxelles

Published: January 2023 Responsible editor: Patrick Ten Brink

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



With the support of the LIFE Programme of the European Union

Funded by the European Union. Views and opinions expressed are however those of the author(s) only and don't necessarily reflect those of the European Union nor CINEA. Neither the European Union nor CINEA can be held responsible for them.

# Contents

| About the EEB                                    | 1  |
|--|----|
| Introduction to the 2023 Work Programme          | 2  |
| Donor Overview                                   | 4  |
| European Institutions and Governance             | 6  |
| Environmental Law and Justice                    |    |
| Global and Regional Processes                    | 12 |
| Economic Transition                              | 15 |
| Nature – Biodiversity, Water, Soil               |    |
| Nature – Agriculture and Food                    | 20 |
| Circular Economy                                 | 22 |
| Climate and Energy                               | 26 |
| Health and Environment – Mercury                 | 29 |
| Health and Environment – Chemicals               |    |
| Health and Environment – Zero Pollution Industry |    |
| Health and Environment – Air Quality and Noise   |    |
| Staff, Organisation and Governance               |    |
| Membership, Partnership and Events               |    |
| Communications                                   | 40 |
| Budget 2023                                      |    |

# About the EEB

The EEB is the largest network of environmental citizens' organisations in Europe. It currently consists of 180 member organisations in 38 countries, including a growing number of European networks, and representing some 30 million individual members and supporters.

## Vision

#### "A better future where people and nature thrive together."

The next generation deserves a healthy planet. The EEB believes 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 well-being while respecting nature. The EEB believes that Europe has a crucial role to play in building this future.

### Mission

The EEB is the largest and most inclusive European network of environmental citizens' groups – and the only one that works on such a broad range of issues. It advocates 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 and promotes the principles of prevention, precaution and 'polluter pays.'

The EEB's values:

- **Democracy**: The EEB is a representative and inclusive organisation.
- Fairness: The EEB is committed to justice, equality and non-discrimination.
- **Respect**: The EEB provides an enabling, nurturing work culture that inspires excellence.
- Integrity: The EEB advocates policies based on science and communicates with honesty.
- **Sustainability:** The EEB strives to practice what it preaches, applying green principles to its work.

# Introduction to the 2023 Work Programme

The European Environmental Bureau brings together environmental citizens' groups from across Europe and beyond. 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. We are the only European network that works on such a wide range of environmental topics and open to any genuine environmental citizens' group joining us, whether national or European.

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

In 2023, the EEB will continue to push for greater ambition in the concrete policies being rolled out under the European Green Deal (EGD), now in its third year, and advocate for other policies needed to achieve its objectives. Despite the many political and lobbying pressures looking to drop, delay or dilute files being tabled and negotiated, the EEB still believes that the EGD should and can still be the transformative agenda to a just transition we need. We anticipate that there will be gaps in legislative coverage, emerging issues requiring new legislation, ever-stronger evidence underlining the need to strengthen existing files, as well as implementation challenges and investment needs. Thus, we will also work on developing a vision for an EGD2.

The EEB sees the EGD as essential to address climate and environmental challenges, as well as being fundamentally helpful for the EU's energy and materials independence from Russia; the EGD must also result in increased resilience to price rises, in face of resource constraints. We further recognise the strong interconnections between ecological, social, and economic systems. There is a need for a just transition to tackle the widespread and deepening inequalities in our societies. Measures include both incremental and system change, taking account of these interconnections between environmental and social dimensions.

To this end, the EEB will engage with the Commission, the Parliament, and the Council, in the latter case working closely with the Swedish, Spanish, and, in anticipation of 2024, the Belgian EU Presidencies, to channel input from the EEB's membership into EU decision-making processes. Among the specific policy files that will be in focus in the year are the co-decision processes for, inter alia, the remaining files in the Fit-for-55 package, Nature Restoration Law, Industrial Emissions Directive, CLP reform, Priority Substances Directive, Urban Wastewater Treatment Directive, Ambient Air Quality Directives, circular economy instruments, including the Sustainable Product Policy Initiative and Packaging, and the Packaging Waste Directive, as well as new legislation: the Economic Governance Review, the Critical Raw Materials Act,

Sustainable Food Law, REACH review, Right to Repair, Green Claims, and Environmental Liability Directive, to mention but a few.

The EEB's growth has accelerated significantly over the past three years. Managing that growth in a sustainable way is therefore a new, albeit positive challenge. A major overhaul of the EEB's financial and project management systems will be a key focus in 2023. The EEB will also be further upgrading its communications tools and methods. The EEB will continue its internal restructuring and strengthening, promoting staff empowerment and development, as well as ever-stronger links between policy, communications and membership to further strengthen impacts on environmental policy.

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.

# **Donor Overview**

The EEB could not do what it does without the generosity of its donors and partners. Through their support, the EEB has been able to continue to be a strong voice for environmental protection in the EU and beyond. The EEB gratefully acknowledges the financial support of the following for 2022:

### European Union through the European Commission

- <u>DG INTPA Development Education and</u> <u>Awareness Raising (DEAR)</u> <u>Programme</u> through a project led by WeWorld Italy
- <u>DG Environment</u> Service contracts
- <u>DG Environment CINEA LIFE</u> <u>Programme</u> including via projects led by <u>Deutsche Umwelthilfe eV (DUH)</u> and <u>Umweltbundesamt</u> (UBA)

### Governments

- The <u>Austrian Federal Ministry for Climate</u> <u>Action, Environment, Energy, Mobility,</u> <u>Innovation and Technology</u>
- <u>Austrian Federal Ministry of Social Affairs</u>, <u>Health, Care and Consumer Protection</u> including through a project led by Umweltdachverband (UWD)
- Belgian Federal Ministry of Climate, Environment, Sustainable Development and Green Deal
- Danish Ministry of the Environment
- <u>Deutsche Gesellschaft für Internationale</u> <u>Zusammenarbeit (GIZ) GmbH</u> through a project led by <u>CEEweb for Biodiversity</u>
- Finnish Ministry of the Environment
- <u>German Federal Ministry for Economic Affairs</u> <u>and Climate Action</u> through a project led <u>by</u> <u>Renewables Grid Initiative</u>

- DG RTD Horizon 2020 Programme including via projects led by <u>Stichting</u> Wageningen Research (WUR), Universidad de Valladolid (Uva), Institute of Studies for the Integration of Systems (ISINNOVA), GILab, <u>Research Institute for</u> <u>Sustainability (RIFS)</u>
  - German Federal Ministry of the Environment, Nature Conservation and Nuclear Safety (BMU) via direct funding as well as channelled via the European Climate Initiative (EUKI) and EURENI, including through projects led by HEJSupport and <u>ChemTrust</u> channelled via EURENI
  - Irish Department of Communications, Climate
    Action and Environment
  - Luxembourg Ministry of the Environment, Climate and Sustainable Development
  - Norwegian Ministry of Climate and Environment
  - <u>Swedish International Development</u> <u>Cooperation Agency (SIDA)</u> channelled via the Swedish Chemicals Agency (KEMI) and the Swedish Society for Nature Conservation (SSNC)
  - Walloon Ministry of Environment, Nature, Forests, Rural Areas and Animal Welfare

### Intergovernmental Organisations and Agencies

- OECD Organisation for Economic Cooperation and Development
- <u>UNEP The United Nations Environment</u> <u>Programme</u> via direct funding as well as channelled via the <u>European Development</u> <u>Fund</u> (EDF) including through a project led by <u>Women Engage for a Common Future</u>
- European Economic Area (<u>EEA) Grants</u> <u>financed by Norway, Iceland and</u> <u>Lichtenstein</u> via a project led by <u>Társadalomtudományi Kutatóközpont</u>

### Foundations and Other Organisations

- Adessium Foundation
- <u>Bloomberg Philanthropies</u> channelled via <u>European Climate Foundation</u>
- <u>CHEM Trust</u>
- <u>CLASP</u>
- <u>Clean Air Fund</u>
- <u>Client Earth</u>
- <u>Climate Action Network Europe</u>
  <u>Headquarters (CAN Europe)</u> channelled via
  the Europe Beyond Coal Campaign
- European Climate Foundation (ECF)
- Fondation Hans Wilsdorf
- Laudes Foundation

- MAVA Foundation
- <u>Nature and Biodiversity Conservation</u>
  <u>Union (NABU)</u>
- <u>New Economics Foundation (NEF)</u>
- Oak Foundation
- Open Society Foundations (OSF)
- Plastic Solutions Fund
- <u>Swiss Philanthropy Foundation</u>
- <u>Tides Foundation</u>
- <u>Wellspring Philanthropic Fund</u> channelled via the <u>Environmental</u> <u>Investigation Agency UK (EIA UK)</u>

# **Policy Priorities**

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

- High impact on the environment
- Public and media concern
- Potential to make a difference on policy level
- Unique role, niche or gap
- Achievable with reasonable effort

- Potential to get funded
- Strategic political opportunities and/or commitments
- 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 specialised on that topic, rather than by recruiting new staff capacity to deliver the work.

# **European Institutions and Governance**

### Description

The European Institutions and Governance Team will follow the timeline determined by the rotating EU presidencies and the timing of the Council formation meetings that occur regularly across presidencies, the European Parliament votes and trilogues as negotiations advance. EEB engagement with the Council will be a priority with a different leadership every six months (Sweden and Spain in 2023). Hence the EEB's prime interlocutors and target groups change. The EEB develops 'Ten Green Tests' for each six-month presidency (and uses these to assess performance) and Presidency Trio Memoranda and associated 'EEB Dozen Demands' ahead of each Presidency Trio. The EEB will write and send two letters to all EU Environment Ministers per presidency ahead of the Environment Council meetings and letters to other ministers ahead of other council formations on priority files will organise Green 10 coalition-Minister meetings once per presidency and will have at least one meeting with each presidency Perm Rep.

The Commission's EGD will continue to be rolled out, hopefully with most milestones completed by the end of 2023 and avoiding delaying anything that will be hostage to the elections and changes to the Commission. The EEB will advocate for ambition across most EGD files and enhanced policy coherence in 2023, the nature of inputs depending on where they are in the policy cycle and what is left to do to make them fit for purpose. We will encourage improved implementation (across thematic areas), and we will review the adequacy of progress under the EGD and prepare recommendations for an eventual EGD 2.0.

The EEB remains committed to the 2030 Agenda and the implementation of the SDGs in and by the EU. The EEB is hosting the SDG Watch Europe Coordinator and the coalition's secretariat. Through a new project on citizens' deliberation and participation around the European Green Deal, the EEB is engaging with SDG Watch Europe members and its own membership in monitoring and following EGD developments from a broader sustainability perspective. 2023 comes with an interesting opportunity to push for the implementation of the SDGs with the EU presenting a first European Voluntary Review at the SDG Summit in September 2023 in New York.

The engagement in the European elections and appointment of a new Commission will dominate the political agenda in 2024 but will also significantly influence activities and priorities in 2023. The elections are foreseen for the second quarter of 2024, with a new EP in place in the third quarter and a new Commission, potentially with new priorities, expected for the fourth quarter of 2024. While this will create a focused effort on getting climate and environment into the public campaigns during the latter part of 2023 and in 2024, the EEB will work throughout 2023 and beyond on getting due amendments into committee and plenary votes on a range of European Green Deal (EGD) files and supporting the wider trilogues.

# **Policies Addressed**

European Green Deal (EGD); Sustainable Development Goals (SDGs); 8th Environment Action Programme (8EAP); Better Regulation and Better Lawmaking; Greening the European Semester; the European Council's Strategic Agenda 2019-2024 and the reform of the EU's democratic structures.

# Objective

By 31 December 2023, the EEB has succeeded through policy advocacy in improving the understanding of the need for transformative change by the EU institutions – notably the European Commission, Parliament and Council – and this is manifested in increased ambition and delivery of high-level policy frameworks and governance – strengthening the European Green Deal, 8EAP, SDGs – and defending the EGD from those seeking to undermine it by instrumentalising the Ukraine conflict for own interests. The EEB will do this through engagement with Commission proposals, European Parliament positions and votes, Council Conclusions, supporting trilogues and wider engagement in public narratives for ecological transformation and the European project in a changing global context. Looking ahead at the 2024 European Parliament elections, the EEB by the end of 2023 has had an impact on election manifestos and has shaped the EU-wide debate on the European Green Deal 2.0.

### Activities

1. Strengthening and implementing the European Green Deal and horizontal Commission policies and governance

The EEB will continue to promote an ambitious European Green Deal (EGD), honouring the Green Oath of 'Do no harm' and progressing towards zero pollution and zero carbon commitments (see also descriptions in other teams in this Work Programme for thematic elements). The EEB will engage in helping implement the 8EAP to ensure EGD progress is monitored, discussed and responded to, including preparing a position on the need for an EGD 2.0 in light of gaps and inadequacies in policy progress. The EEB will continue to engage in the Fit-for-Future platform and other high-level platforms and expert groups (see other thematic chapters), seeking to push for fair representation, transparency and good governance. The EEB will continue to push for both improved policy coherence and better implementation across policy files. Considering the war waged against Ukraine and its instrumentalisation by vested interest to undermine aspects of the EGD, the EEB will continue to argue against false solutions and promote the EGD as an essential tool for both ecological transition and political independence from autocratic regimes.

# 2. Strengthening commitment to the European Green Deal and sustainability in the European Parliament

The EEB will continue its close work with a range of parliamentary committees and MEPs, supporting amendments, votes and promoting progressive amendments in the Council trilogues. The EEB will do this directly and by encouraging its members to engage with

MEPs from their countries. The EEB will work on a strategy plan and demands for ensuring that environmental and climate issues are strongly reflected in political agendas in preparation for the European Parliament elections.

#### 3. Increasing Council commitments to the European Green Deal and sustainability

The EEB will continue to intensively engage with the Member States holding the rotating Council presidency, pushing for ambition, complemented by engagement with other Member States to encourage proactive ambition and discourage those trying to slow progress, by debunking false arguments used, and by demonstrating the need and benefits of progress. Explicit recommendations will be crafted across EGD files and wider decisions tabled at the Council meetings, and before that at Working Party meetings. The EEB's Ten Green Tests, Memoranda to the EU Presidencies, Council letters, organisation of Green 10 Ministers meetings, engagement in Informal Council meetings, together with close working relationships with Permanent Representatives and presidency teams, together with EEB national members, will help nudge Member States towards embracing transformative agendas.

#### 4. Putting the Sustainable Development Goals centre-stage

The EEB will continue to promote the importance of Agenda 2030 and the SDGs and their implementation. Hosting the SDG Watch Europe Coordinator, the EEB together with its allies in the EU's largest coalition advocating on the 2030 Agenda will build on its network with MEPs and step up its collaboration with the SDG Alliance in the EP to ensure the EP becomes a stronger voice in monitoring progress towards the SDGs. The EEB will contribute to the further improvement of Eurostat's annual monitoring report, building on its work on SDG indicators and a first shadow SDG monitoring report for the EU. It will also work with the Council Presidencies to give higher priority to the implementation of the SDGs. In 2023, the EU will present the first European Voluntary Review (EUVR) in New York, and the EEB, through SDG Watch Europe, will closely monitor the development of the EUVR and eventually present a civil society driven shadow report.

# 5. Stepping up citizens' deliberation on the green and just transition beyond the Conference on the Future of Europe (CoFoE)

The EEB will contribute, together with a wider range of civil society organisations, to press for the CoFoE's outcomes to be translated into new policies, including new reflections on the potential need for a new Convention. Through a dedicated project, funded by Horizon 2020 as part of the EU's Democracy Action Plan, launched in February 2022, the EEB will present recommendations for the citizens deliberation processes to be institutionalised at EU-level and to improve participatory environmental democracy.





# **Environmental Law and Justice**

# Description

The work done by the Environmental Law and Justice Team will focus on promoting strong EU environmental governance and participatory rights, also through the engagement and integration of EEB members in its activities. The EEB will monitor the implementation of the revised Aarhus Regulation and the further steps needed to ensure full compliance with the Aarhus Convention and lead on the coordination of civil society in the Aarhus Convention processes and promotion of the Convention. Furthermore, the EEB will focus its advocacy on ambitious accountability, liability and enforcement in the EU and maintenance of high standards of protection with less deregulation and stronger implementation.

# **Policies Addressed**

Environmental Liability Directive; Environmental Crime Directive; Corporate Sustainable Due Diligence and related due diligence rules in products and certain sectors; Aarhus Convention and its implementing legislation, including the Aarhus Regulation; Protocol on Pollutant Release and Transfer Registers and its implementing legislation.

# Objective

By 31 December 2023, the EEB has successfully coordinated civil society in the Aarhus Convention processes and meetings; vigorously advocated for an ambitious revision of the Environmental Crime Directive; vigorously advocated for an ambitious new Directive on Corporate Sustainable Due Diligence with mandatory environmental and climate due diligence obligations throughout value chains and proper access to remedies; actively engaged with the Commission to revise the Environmental Liability Directive to ensure that there truly is accountability for environmental damage and that the polluter does pay, as well as pushed for high standards of protection by promoting the implementation of environmental laws and opposing deregulation, aligning the EU legal framework with progressive policies.

# Activities

### 1. Ensuring strong EU environmental governance and participatory rights

The EEB will work throughout 2023 to ensure EU institutions commit to introducing stronger provisions on access to environmental information under the GreenData4All initiative. It will continue advocating for strong access to justice provisions in environmental and climate legislation. The EEB will also scrutinise the implementation of the revised Aarhus Regulation by the EU institutions and the measures being taken to address outstanding non-compliance issues in relation to state aid decisions. In addition, the EEB will focus on ensuring that environmental NGOs and activists will be protected under any proposal linked to the initiative against abusive litigation targeting journalists and rights defenders while supporting EEB members facing rule of law challenges, including discrimination.

# 2. Coordinating civil society in Aarhus Convention processes and promotion of the Convention

The EEB will continue to lead the coordination of the ECO Forum at the Aarhus Convention, including liaising with the Convention Secretariat; it will support the new Special Rapporteur under the Aarhus Convention Rapid Response Mechanism for the protection of individuals exercising their rights under the Convention; engage in the implementation of the Convention's Work Programme during the intersessional period (2022-2025) and bring the voice of civil society to the attention of the Parties so they can have a meaningful impact.

#### 3. Advocating for ambitious accountability, liability and enforcement in the EU

If the legislative process will still be ongoing in 2023, the EEB will advocate for an ambitious revision of the Environmental Crime Directive (ECD) so that more conduct harmful to the environment is criminalised, so that sanctions are truly proportionate, dissuasive, and effective, and so that enforcement bodies have better means to police environmental crimes.

The EEB will advocate for more corporate accountability under the Corporate Sustainable Due Diligence Directive with mandatory horizontal due diligence requirements on companies in the EU, where there are proper, practical and ample possibilities for access to remedies, and to ensure that also climate due diligence is included in the obligations; and push for greater transparency, accountability and liability provisions in EU environmental laws, in particular with a view to a possible revision of the Environmental Liability Directive, in full respect of the Polluter Pays Principle.

# 4. Ensuring maintenance of high standards of protection with less deregulation and stronger implementation

The EEB will promote the benefits of regulation and advocate for a reframing of the Better Regulation Agenda as a "reprotection agenda". It will emphasise the need for implementing EU environmental laws at national level by demonstrating good practices and highlighting gaps and will liaise with the Commission on enforcement at Member State level.

#### 5. Promoting environmental justice throughout EU policies and practices

The EEB will continue to promote and raise awareness of the concept of environmental justice by providing further analyses of situations in which vulnerable groups suffer from disproportionate environmental burdens. The work will build on previous advocacy and research on environmental racism in Eastern Europe and expand the focus to Western Europe. The EEB will also focus on Roma informal recyclers in North Macedonia and will organise the Roma Environmental Justice Conference in Eastern Europe as well as two environmental justice workshops geared towards building knowledge capacity for civil society. Lastly, the EEB will also seek to ensure that environmental justice initiatives are further integrated into EU policies and practices, e.g., the National Strategies to be presented and implemented as a result of the 2020-2030 EU Roma Strategic Framework, and issues related to environmental justice regarding refugee communities where appropriate.



# **Global and Regional Processes**

# Description

The EEB will build on its strong experience in being an important voice in the regional and global processes set up to ensure the strengthening and implementation of Multilateral Environmental Agreements, the 2030 Agenda and the SDGs. It will further build its capacity and its coordination role in making the EU and its Member States drive decision-making at the global level, e.g., through the UN Environment Assembly. Furthermore, the EEB will collaborate with the European Commission and Member States in negotiations on new international instruments, e.g., on plastic pollution. It will coordinate civil society's input to OECD-led environmental policy processes and ensure strong participation in the Environment for Europe process.

The work by the Global and Regional Policies Team also aims to further build its membership network and its partnership with environmental NGOs and other key stakeholders in the candidate countries and the Eastern Partnership region (depending on new funding sources for this part of the EEB's work). The EEB will work in support of its members in Ukraine, depending on the development of the situation and the specific needs of EEB members. Part of the Global and Regional Policies' work is also to engage in other areas that are of global concern for the environmental movement such as the nexus between gender/environment or the nexus between an increasing human population and the environment.

# **Policies Addressed**

Agenda 2030 and the SDGs; policies developed under the auspices of UNEP, in particular the UN Environment Assembly, e.g., with the push for a global instrument to curb plastic pollution supported by the EU; OECD instruments; European Enlargement and Neighbourhood Policy; Eastern Partnership and association agreements.

# Objective

By 31 December 2023, the EEB has contributed to ensuring that environmental NGOs have the capacity to shape more progressive environmental policies in accession countries and the Eastern Partnership countries and to advocate for ambitious and science-based outcomes in global and regional environmental and sustainability processes, in particular, UNEP/UN Environment Assembly (towards UNEA 6 in February 2024) and the OECD process, and c) that the EEB's policy and advocacy work integrates positions on cross-cutting, global sustainability topics such as gender equality, a growing human population, equity and global climate justice.

# Activities

1. Collaborating with eNGOs from candidate and partner countries in the Western Balkans and Eastern Europe to advocate for progressive policies

The EEB will build on its membership network in the Western Balkans and Eastern Partnership countries as well as previous projects such as the ENV.net project (funded

through EuropeAid up to 2021) to increase its support for environmental NGOs in the region to step up their capacity to push for progressive policies. Together with members and partners, the EEB will monitor the implementation of the Green Agenda for the Balkans as well as the rollout of the European Green Deal through the association agreements in the Eastern Partnership countries. The EEB will continue to identify opportunities to increase its resources to work with members and partners in the Eastern Partnership and other neighbouring countries. Regarding Russia's war against Ukraine, the EEB will step up its collaboration with its members and partners in Ukraine to support a green reconstruction and environmental peacebuilding in Ukraine.

# 2. Ensuring strong civil society participation in key regional and global UN environmental processes

Through its role as one of the UN Environment Major Groups Facilitators in Europe, the EEB will prepare and ensure the active participation of civil society towards the 6<sup>th</sup> UN Environment Assembly scheduled for February 2024, and it will closely work with the Commission and Member States to support them with resolutions to ensure progressive global environmental policies. The EEB will actively participate in and channel European (environmental) NGOs' input into the annual UNECE Regional Forum on Sustainable Development in March 2023 and the annual High-Level Political Forum (HLPF) in July 2023 and the SDG Summit in September 2023 (depending on additional funding). It will collaborate with other eNGOs and contribute to the negotiations of a legally binding international treaty to end plastic pollution (depending on additional resources). The EEB will organise events to give the opportunity to young people to express their opinion on climate change at international and EU forums.

#### 3. Facilitating eNGOs' contribution to OECD-led environmental processes

The EEB will disseminate information as well as calls for input and invitations to relevant OECD meetings to a list of eNGOs from Europe and OECD member states beyond. In 2023, the EEB will focus on building the network of eNGOs from the EU and other OECD member states. It will facilitate the eNGOs' participation and input to OECD meetings and processes.

# 4. Integrating positions on cross-cutting, global sustainability issues in EEB's policy and advocacy work

Through its work on Global and Regional Processes, the EEB will continue to develop positions on cross-cutting, global sustainability issues that have a strong link to environmental policies. This includes a continuation of the EEB's work on gender equality and environmental policies, building on its workshop on the nexus between a growing human population, environmental impact and equity as well as on global climate justice and climate-change-induced migration.





# **Economic Transition**

# Description

The work of the Economic Transition Team will focus on mainstreaming ecological economy concepts and narratives (such as post-growth, well-being, degrowth, and doughnut economy) and making EU trade policy a tool to service a wider economic transition while promoting Green Fiscal Reform and sustainable funding as well as addressing the link between mining, the needs for resource use reduction and caps on critical raw materials. The EEB will advocate for a socially and environmentally just economic transition, promoting a transformational change which steers away from the fixation on GDP growth and ever more material extraction, towards social, gender and ecological justice and wellbeing.

# **Policies Addressed**

Green fiscal reform, Multi-annual Financial Framework (MFF), National Recovery and Resilience Plans (NRRPs); relevant EGD files, trade policy review including Trade and Sustainable Development measures; macro-economic governance (EU Economic Governance Framework, European Semester); gender equality.

# Objective

By 31 December 2023, the EEB will have advocated for a socially and environmentally just economic transition, promoting transformational change that steers away from the fixation on GDP growth, increasing material extraction and global trade; and towards the goal of social, gender and ecological justice and wellbeing, in EU policies, driven also by improved incentives, governance and value outlooks.

## Activities

# 1. Mainstreaming ecological economy concepts and narratives (including post-growth, wellbeing, degrowth, doughnut economy)

The EEB will continue to collect and spread scientific evidence for deep, transformational changes in our economic system. The EEB engages in research-driven projects such as Horizon 2020 projects on modelling possible scenarios for an economic transition and will disseminate project results and translate them into concrete policy recommendations. The EEB will work with allies (eNGOS, social and youth organisations, women's rights organisations, think tanks and unions) on pushing a narrative around the need for and possibility of transformational change, and counteract populist tendencies connected to the transformation, both towards policymakers and a wider group of changemakers in society. This includes activities (advocacy, campaigning) and recommendations on how to achieve a just transition towards a well-being economy including social justice aspects such as rethinking work and a wider understanding of a just transition.

#### 2. Making EU trade policy a tool to serve a wider economic transition

The EEB will advocate for trade to be conditional upon the enforcement of environmental and climate standards and the SDGs. In this context, the EEB will scrutinise the implementation of the EU-UK Trade and Cooperation Agreement (TCA). The EEB will also campaign for investors and companies to be held accountable in domestic courts and be subject to the same laws as people, and will support the establishment of a Legally Binding Instrument to regulate the activities of TNCs in international Human Rights law. The EEB will call for the EU to primarily focus on implementing the SDGs and in particular building strong institutions (SDG 16) before entering any partnership or trade and investment agreements. The EEB will also keep connecting emerging political issues such as now the war against Ukraine and the crisis in energy prices to deeply flawed existing trade agreements that are beyond modernising, such as the Energy Charter Treaty. The EEB's aim is to challenge the underlying assumptions on which the EU's trade deals are made, such as trade as the great enabler of outsourcing extraction, production and pollution, with positive political change outside the EU as a built-in bonus.

#### 3. Advocating for green fiscal reform and funding

The EEB will engage its Green Budget and Economic Transition Working groups (where useful) and promote EGD policy reforms that incentivise and prioritise energy and resource efficiency, pollution reduction, circular economy practices (from take, make, use, dispose to a circular model with reuse, repair, remanufacture, recycle approach) and help avoid environmental damage, climate change and associated health impacts. It will prioritise wellbeing over economic growth by influencing the upcoming revision of the EU Economic Governance Framework and by fixing the incentives (EGD measures and aspects of Next Generation EU funding). The EEB will build expertise, build capacity of and mobilise EEB members and the wider CSO movement to join these efforts.

# 4. Engaging on topics related to green extractivism, resource use reduction and critical raw materials

Closely linked to the EEB's activities in advocating for stronger circular economy strategies and binding resource targets to reduce the EU's material footprint, the EEB will promote the rational use of raw materials and strict criteria for the mining of new materials. In addition, the EEB will also continue to engage on the blind spots of the energy transition by building on the green mining report by conducting research into the increase of lowcarbon projects through an environmental justice lens and by advocating for stronger due diligence measures by releasing a position paper on the right to say no, for instance with regards to new mining projects.

#### 5. Advocating for applying intersectionality in the economic transition

The EEB will create awareness and specific proposals for gender-just policies for a transition towards an ecofeminist well-being economy by applying an intersectional lens. For example, the EEB will raise awareness of the gender implications of circular economy policies and highlight the need for a feminist approach to a just transition by underlining the need for a wider understanding of sustainability and the transition and policy coherence (including care jobs as green jobs, etc.).





# Nature – Biodiversity, Water, Soil

# Description

The work done by the Biodiversity, Water & Soil Team will focus on pushing for a strong Nature Restoration Law in the negotiations, engaging in the implementation of the EGD Strategies relevant for biodiversity, water and soil and on improving the implementation and enforcement of nature and water legislation and shaping new nature, water, and soil laws.

The EEB will raise awareness of the values of healthy nature, water and soil and secure political commitment to urgently address the interrelated biodiversity, climate and pollution crises through sound and science-based implementation of the relevant EGD initiatives, the Zero Pollution Action Plan's ambitions and implementation, and the EU's water and nature laws supported by the EU budget and recovery instruments. Light pollution, a fast-growing problem with negative impacts on biodiversity and human health, will also be addressed.

# **Policies Addressed**

Biodiversity: EU Biodiversity Strategy; Nature Restoration Law; Birds and Habitats Directives

<u>Water:</u> Zero Pollution Action Plan; Water Framework Directive and daughter directives on Priority Substances (Environmental Quality Standards (EQS)) and Groundwater; Common Implementation Strategy for the Water Framework Directive (CIS)

### Soil: Soil Health Law

<u>Light pollution</u>: Zero Pollution Action Plan (ZPAP), Ecodesign, Ecolabel, Green Public Procurement, Taxonomy, Biodiversity Strategy, and other nature protection instruments. In coordination with EEB Members leading on the files: Marine Strategy Framework Directive (Seas at Risk), EU Deforestation Regulation (FERN).

## Objective

By 31 December 2023, the EEB will have succeeded in ensuring a transformative NRL is maintained and improved in co-decision processes, will have advocated for a stepped-up and science-based implementation of the EU strategies and legislation relevant for the EEB's priorities on biodiversity, water, and soil – especially where it contributes to the upscaling of the green and blue infrastructure and making sure that the European Green Deal delivers specific results for nature.

The EEB will have also contributed to the zero-pollution revisions of the water pollution legislation, as well as supported the Zero Pollution Action Plan's integrated approach and pushed for increased focus on the resource nexus in relevant EU policies. This new science-based legislation as well as sound implementation and enforcement of the EU's nature and water legislation can put biodiversity on a path of recovery by 2030 and help tackle the interlinked biodiversity, climate and pollution crises.

### Activities

# **1.** Engaging in the implementation of the Green Deal Strategies relevant for biodiversity, water and soil

The EEB will track and encourage progress in the implementation of the EU's Biodiversity Strategy, with a particular focus on securing a strong nature restoration law, as well as advancing the Zero Pollution Action Plan and advocate for strong political support and their ambitious and science-based implementation supported by the necessary funding. The EEB will highlight emerging issues and promote solutions such as developing naturefriendly renewable energy in full compliance with environmental safeguards. The EEB will also inform and build the capacity of its members so that they can play an active role in influencing decision-making at national level.

#### 2. Improving the implementation and enforcement of nature and water legislation

The EEB will contribute to the work of the platforms at EU level that have been set up to improve the implementation of the Nature Directives and the Water Framework Directive including addressing key drivers such as hydropower or other damaging projects. The EEB will also inform and build the capacity of its members so that they can play an active role in influencing decision-making at national level and bring forward cases of non-compliance.

#### 3. Shaping new nature, water and soil laws

The EEB will promote its position on the Nature Restoration Law and Soil Health Law visà-vis the Commission, Parliament and Council. The EEB will also contribute to the revision of the rules for treating wastewater (UWWTD) and to update lists of pollutants of surface and groundwater (WFD-EQSD and WFD-GD) as well as promote its position vis-à-vis the European Parliament and Council during the co-decision procedure, engaging the EEB's Working Groups as required.

#### 4. Coordinating with other NGOs on advocacy for marine and forest laws

The EEB will continue to coordinate advocacy actions with other NGOs on EU marine and forest legislation and promote key NGO asks in its high-level advocacy.

#### 5. Tackling light pollution

The EEB will advocate for light pollution to be addressed under the EU Biodiversity Strategy for 2030 as well as the Zero Pollution Action Plan using the opportunity of upcoming mid-term revisions while also pushing for more stringent measures to tackle the sources of light pollution e.g., through product policies such as eco-design (with the Circular Economy Team).

# Nature – Agriculture and Food

### Description

The work done by the Agriculture and Food Team will focus first on climate action and environmental (including biodiversity) protection in the national Common Agricultural Policy strategic plans, second on ensuring an ambitious legislative framework for climate action in agriculture in the Fit for 55 package, and third on the proper implementation of the Farm to Fork Strategy at EU and national level (focusing on defending and implementing its targets and pushing for an ambitious new sustainable food systems law). The EEB will actively advocate for the transition towards a sustainable food and farming system to limit its impact on climate and the environment across EU policies including the Common Agricultural Policy (CAP), the Fit-for-55 package, the revision of the Sustainable Use of Pesticides Directive and the forthcoming Sustainable Food Systems Law. In this work, particular attention will be paid to policy solutions for restoring agro-ecosystems (including cutting pesticide use and expanding landscape features), tackling emissions from drained peatlands, and moving away from intensive livestock production and consumption.

### **Policies Addressed**

Common Agricultural Policy; Farm to Fork Strategy; Sustainable Use of Pesticides Directive (SUD) or Regulation; Sustainable Food Systems (SFS) Law; Sustainable Use of Pesticides Regulation (SUR); Land Use, Land Use Change and Forestry Regulation; Effort Sharing Regulation; new regulatory framework for the certification of carbon removals

# Objective

By 31 December 2023, the EEB will have advocated for the transition towards a sustainable food and farming system to limit its impact on climate and the environment, with a particular focus on the implementation of CAP national strategic plans and the development of a Farm Sustainability Data Network, the implementation of the revised Effort Sharing Regulation (ESR) and LULUCF regulation and the revision of the SUD and the upcoming sustainable food systems law.

## Activities

1. Promoting a greener and more evidence-based Common Agricultural Policy (CAP)

The EEB will continue to monitor and seek to influence the implementation of national CAP Strategic Plans and call for possible revisions to better align it with the new European Green Deal and new legislative targets emanating from it. Additionally, the EEB will closely follow the development of a harmonised monitoring and evaluation framework for the CAP and the revision of the Farm Accountancy Data Network (FADN) Regulation to transform the FADN into a Farm Sustainability Data Network (FSDN).

# 2. Shaping an ambitious EU legislative framework for climate action in agriculture and supporting effective national implementation

The EEB will work closely with its members to promote the effective implementation of the revised ESR and LULUCF regulation, and it will advocate for a robust carbon removal certification framework which delivers on the EU's climate and biodiversity objectives.

#### 3. Advocating for a transformative Sustainable Food Systems (SFS) Law

In close collaboration with other CSOs and EEB members, the EEB will raise awareness for the need for strong action on food systems and advocate for ambitious legislative action through the SFS Law.

### 4. Advocating for strong sustainable use of pesticides regulation and Integrated Nutrient Management Plan

To protect human health, biodiversity and the environment and to contribute to a more sustainable agricultural system, the EEB, in collaboration with other CSOs and EEB members will advocate for a strong Sustainable Use of the Pesticides Regulation (SUR) as well as the decrease of nutrient loss and fertiliser use through the implementation of the Zero-Pollution Action Plan and the Integrated Nutrient Management Action Plan (INMAP).



# **Circular Economy**

### Description

The work done by the Circular Economy (CE) team will focus on securing ambitious provisions to save on resource use in all steps of the legislative processes linked to sustainable product and waste policy, to make sustainable products the norm in key value chains targeted by the CE Action Plan and to define waste prevention targets. It will also seek that the leverage potential of CE is reflected in legal provisions of other environmental policy areas, notably climate & energy, zero pollution industry, and more widely that the circular economy is anchored at the heart of the EU economy and helps to achieve the European Green Deal objectives and turn EU into a Wellbeing economy. As far as made possible through new project funding, the CE Team will intensify its work beyond EU boundaries to spread further and adapt identified circular best practices.

## **Policies Addressed**

Continuous implementation of the CE Action Plan of 2020; Waste Shipment Regulation and Energy Performance of Buildings Directive; Ecodesign for Sustainable Products & Construction Products regulation; First implementation steps of the Strategy for Circular and Sustainable Textiles; Packaging and Packaging Waste Directive; implementation of the existing Eco-design and Energy Label policies on Energy Products; Circular Electronics Initiative (if confirmed); Empowering Consumers & Green Claims initiatives, bridging with Product Environmental Footprint methodology; Development of Ecolabel and Green Public Procurement criteria and promotion of these demand side policy instruments; Continuous monitoring of EU Plastic Strategy notably with regards micro-plastics release and bio-based/biodegradable plastics; Preparatory steps to the Revision of the End-of-Life vehicles directive and the Revision of the Waste Framework Directive; Initial discussion on the revision of RoHS Directive and if started by the Commission, first steps of WEEE Directive assessment; Monitoring of the implementation of the Taxonomy for Sustainable Finances. In addition and collaboration with other colleagues, the EEB CE Team may contribute to additional files, particularly the last steps of revision of the Industrial Emissions Directive as well as the start of the debate on Sustainable Food Systems.

# Objective

By 31 December 2023, the legislative framework at EU level shows clear progress towards making sustainable products the norm in key value chains targeted by the Circular Economy Action Plan, the uptake of Circular Economy is reflected in legal provisions of other environmental policy areas, notably climate and energy and zero pollution action plan; and the EU is better equipped to reduce the resource use and material footprint of its economy.

### Activities

1. Securing ambitious Circular Economy provisions at all steps of the legislative processes linked to sustainable product and waste policy and key value chains referred to in the Circular Economy Action Plan

In 2023, the EEB will be engaged in legislative initiatives related to Circular Economy at different stages of their respective co-decision and implementation processes. Focused attention will be paid to the negotiations for the Ecodesign for Sustainable Products Regulation, the Packaging and Packaging Waste Directive revision, the Empowering the Consumer initiative, the Green Claims initiative, and the Right to Repair initiative. All of these files will be negotiated through the course of 2023. Additionally, work will continue on the finalisation of the Batteries Regulation, the Waste Shipment Regulation and the definition of implementing measures for key product groups, such as smartphones and heating products, in the Ecodesign and Energy Labelling Framework. The EEB will also follow the implementation of key communication documents from the Commission such as the Sustainable Textiles Strategy, the Circular Electronics Initiative, and the update of the Circular Economy Monitoring Framework. Considering the EU's Circular Economy Action Plan's commitment to lead efforts at the global level, the issue of EU global responsibility, and the influence of the international dimension on EU policy, the EEB will also reinforce its network at international level and attend international events linked to CE.

The EEB will also actively contribute to the preparatory steps of the revision of the Waste Framework Directive, the RoHS Directive and the WEEE Directive, promoting reuse and waste prevention targets, as well as detoxification of products. The EEB will make sure to inform the respective development steps and influence the formulation of all these policies towards ambitious resource use reduction. At the same time, the EEB will work with its members on the implementation and enforcement of products and waste policies and as far as possible trigger related new projects between EU and national levels. These efforts should all be set in the perspective of the EEB's continued campaign on reducing resource use and the material footprint of the EU economy.

# 2. Helping the uptake of sustainable consumption through information schemes and demand-side instruments

In 2023, the EEB will continue to actively contribute to the development of the Green Claims and Right to Repair initiatives, linking them with the related EU endeavours on Product Environmental Footprint and Digital Product Passport. The EEB will promote the establishment of trustworthy labelling schemes, enabling the comparison of product sustainability performances and avoiding the risk of greenwashing notably in the following sectors: EEE, Textiles, Furniture, Construction and Intermediary Products. The EEB will also pay close attention to the development of specific EU or MS initiatives to develop labelling schemes for the textiles and food sectors, notably when they are based on the use life cycle assessment data. The EEB shall also monitor the implementation of the Taxonomy on Sustainable Finances to ensure that this remains a real driver for the most sustainable activities contributing to the Circular Economy (despite the risk of poor legitimacy after the inclusion of gas and nuclear activities). Furthermore, the EEB shall promote circular

business models and sustainable consumption and production patterns through other economic and fiscal instruments, such as Extended Producer Responsibility and Circular Taxation. Partnering with progressive stakeholder networks will be continued to enhance the awareness of and uptake of circular consumption practices. The efforts on information schemes and demand side measures should help in phasing out unsustainable products as soon as possible by complementing regulatory measures on minimum sustainability criteria.

# 3. Further anchoring Circular Economy in Climate, Industry and Bioeconomy policies and pursuing the integration with Chemicals policy

In 2023, the EEB aims to support with CE intelligence the last steps of the Energy Performance of Buildings Directive and the revision of the Industrial Emissions Directive – better bridging the circular economy with climate, energy and zero pollution objectives of the EU. The EEB will constantly raise awareness of the need to address the embodied emissions and pollution in the material resources we use and promote CE as a clear leverage to decarbonise and depollute our economy in line with the sufficiency perspective. The EEB will also support the design of more resource-efficient and more sustainable practices in the context of the EU legislative initiative on Sustainable Food Systems and in the broader perspective of a Circular Bio-Economy aiming to optimise the use of biomass in respect of natural ecosystems. The EEB will maintain a constant exchange with the community working on chemicals to make the best use of product Passports and the possible parallel revisions of Ecodesign and REACH policies (if confirmed for REACH).

# 4. Contributing to the development of circular economy policies outside the EU, and as a leverage policy for a global well-being economy

In 2023, the EEB Team will strive for extending its activities beyond EU boundaries by promoting social and environmental due diligence requirements in global value chains leading to products placed on the EU market, by informing on the positive and negative impacts of the EU CE policy on the rest of the world and calling for better integration of such impacts in our regulatory impact assessments. The EEB will also endeavour to join international projects with partners in EU neighbourhood countries, in Africa and India and where possible prepare the setting up of a network of CSO partners in low- and medium-income countries on CE. The development and adaptation of CE practices beyond EU boundaries will take place in the context of new narratives promoting a global well-being economy and balancing 'extractivism' and GDP growth ideology with new circular and sufficiency approaches and new indicators helping us to act within planetary boundaries and to spread the wealth more fairly. In this endeavour, we may try to collaborate more intensively with trade unions and development platforms.





# **Climate and Energy**

# Description

The work done by the Climate and Energy Team will focus on advocating for an ambitious and science-based 2030 Climate & Energy legislative package (Fit for 55) and regulatory framework for 2030 which takes stock of the findings of the IPCC 6th Assessment Report on Climate Change, aims to keep global average temperature rise below 1.5°C, and ensures policy coherence with other European Green Deal environmental objectives (biodiversity protection, zero pollution and circularity). The EEB will work towards ensuring that the revision of the National Energy and Climate Plans (due by June 2023) is in line with the ambition required. Furthermore, the EEB will work on accelerating the energy transition to reach a 100% renewable energy grid before 2040 with full involvement of civil society and monitor developments on the REPowerEU Communication and related legislative initiatives (electricity market, permitting, etc.) in the energy sector expected in 2022 following Russia's war against Ukraine; improving the legal framework of the EU regulation on Fluorinated Gases (F-Gases); and accelerating the decarbonisation of heating and cooling in the EU. Furthermore, the EEB will steer public and private finance in a coherent direction and put EU citizens at the core of climate action and the transition to a clean energy system.

### **Policies Addressed**

Fit for 55 Legislative Package (inter-institutional co-decision process): Revision of EU ETS; Carbon border adjustment mechanism; Effort Sharing Regulation; Renewable Energy Directive, Energy Efficiency Directive; LULUCF Regulation; New EU Methane Strategy; Energy Taxation Directive; Energy Performance in Buildings Directive; Regulation on F-gases; Ecodesign of heating appliances; A Renovation Wave for Europe; Battery Regulation; Climate Adaptation Strategy; REPowerEU and the emergency regulation on renewable energy.

# Objective

By 31 December 2023, the EEB will have successfully advocated for an ambitious, sciencebased EU climate and energy policy and regulatory framework for 2030 (Fit for 55) which takes stock of the findings of the IPCC 6th Assessment Report on Climate Change to keep global average temperature rise below 1.5°C, ensure policy coherence with other European Green Deal environmental objectives (biodiversity protection, zero pollution and circularity), steer public and private finance in a coherent direction and put EU citizens and communities at the core of climate action and transition to a nature-positive energy system, also by participating in the European Climate Pact Initiative.

### Activities

1. Advocating for an ambitious and science-based 2030 Climate & Energy Legislative Package (Fit for 55) and ambitious revised National Energy and Climate Plans

The EEB will roll out an advocacy strategy towards the EU institutions during the finalisation of the co-decision process on the Fit for 55 Legislative Package. The strategy will aim at three deliverables:

- Increasing the ambition of the Package by aligning policy targets and measures with the latest scientific findings on climate change. Targets should aim by 2030 for 65% GHG emissions reductions, 50% renewable energy, 45% energy efficiency and a specific target to tackle agriculture emissions;
- Making the most of available economic and financial instruments (public and private) including EU Budget 2021-2027 (MFF) and the implementation of Recovery Plans; 3) Empowering EEB members to play an active role in influencing decision-making at national level by reinforcing the knowledge base, capacity building and impact.

The EEB will work towards ensuring that the revision of the National Energy and Climate Plans (due by June 2023) is in line with the ambition required in the Fit for 55 and matched with the right targets, policies and measures at national level.

# 2. Accelerating the energy transition to reach a 100% renewable energy grid by 2040 with full involvement of civil society

The EEB will establish a dialogue with other green NGOs, civil society and a wide range of other relevant stakeholders (notably large energy consumers) to build alliances to move towards a Paris Agreement Compatible energy scenario by identifying the main challenges and potential solutions to accelerate the deployment of renewable energy plants and infrastructures. In particular, their impacts on nature, biodiversity, local economics and landscape will be highlighted and serve as a basis to advocate for a nature-friendly, peoplecentric renewable energy transition in Europe. This will include analytical work to increase the information basis as well as establishing an effective multi-stakeholder dialogue on infrastructure planning with an ultimate aim to phase out fossil fuels in the EU by 2040. Energy sources such as hydrogen and bioenergy will further be addressed by the EEB's work under this activity, building on previous positions and recent publications advocating for a residual role for hydrogen and biomass in the energy mix, reflecting strict sustainability criteria. The EEB will also take stock of the impacts of Russia's war against Ukraine's on the EU's energy system and the REPower EU initiatives and focus on the need to have a just energy transition that leaves no one behind. Nature-based mitigation solutions will be promoted over unproven technologies.

#### 3. Improving the legal framework of the EU regulation on Fluorinated Gases (F-Gases)

The EEB will advocate for an ambitious review of the EU Regulation on F-Gases to ask for a faster phase-down of these highly climate-impactful non-CO2 greenhouse gases and the promotion of climate-friendly alternatives such as natural refrigerants, as well as a swift implementation of the regulation at national level through the involvement of some of the EEB's more active members in key Member States. This will be key to fully grasp all the climate benefits of the rapid deployment of heat pumps in the REPowerEU plan.

#### 4. Accelerating the decarbonisation of heating and cooling in the EU

Building on the IEA's policy suggestions - among others – and its Renewable Heating for All Manifesto, the EEB will actively advocate for the banning of fossil fuel heating subsidies and technologies in the market from 2025, and will produce research, reports and news that will highlight the need to decarbonise the heating system as soon as possible to achieve climate neutrality in a timeframe that is in line with the latest IPCC reports. The EEB will also advocate for measures that make sure these changes do not leave anyone behind and do not increase energy poverty and the gender imbalance of households suffering from it.



# Health and Environment – Mercury

### Description

The work done by the Mercury Team will focus on running an active and sustainable Zero Mercury Working Group; seek to strengthen the Minamata Convention with the aim of further reducing mercury use, releases and emissions, supply and demand, trade and exposure to mercury, which is in line with EU global commitments as noted, inter alia, in the 8<sup>th</sup> Environment Action Programme. Furthermore, the EEB will focus on strengthening EU policies and their implementation related to mercury as well as building the capacity of developing countries' NGOs and governments to implement and enforce the Minamata Convention.

# **Policies Addressed**

Minamata Convention on Mercury and EU Mercury Regulation and other mercury-related policies

# Objective

By 31 December 2023, the EEB will have actively contributed towards strengthening the EU mercury regulation as well as the Minamata Convention and its implementation, to reduce mercury use, releases and emissions, supply and demand, trade and exposure to mercury.

### Activities

### 1. Ensuring an active and sustainable Zero Mercury Working Group

The EEB will continue to lead the global Zero Mercury Working Group (ZMWG), currently bringing together over 110 NGOs from more than 55 countries, and the Zero Mercury Campaign, as it has since 2005. ZMWG strives for zero supply, demand and emissions of mercury from all anthropogenic sources, to reduce mercury in the global environment to a minimum.

#### 2. Strengthening the Minamata Convention

The Minamata Convention on Mercury was adopted in October 2013, to protect human health and the environment from anthropogenic mercury emissions. In 2023, the EEB will continue its 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. COP5 will take place from 30 October - 3 November 2023 in Geneva. Relevant EU legislation would need to be strengthened to ensure more chances to push the global debate.

#### 3. Strengthening EU policies and their implementation related to mercury

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 public consultation in preparation for the review of the EU Mercury regulation started in 2021. A feasibility study on the phase-out of mercury from dentistry was published in 2020 and a revised legislative proposal expected by the end of 2022 is now foreseen for spring 2023. The work at EU level will be feeding directly into 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 other things.

# 4. Building the capacity of developing countries' NGOs/governments to implement and enforce the Minamata Convention

The EEB will work to build the capacity within developing country NGOs and governments also by supporting international projects and assisting in the implementation and enforcement of the Convention a main focus on phasing out mercury-added products. The EEB will build on the ongoing global campaign towards phasing out mercury from skinlightening products, with a focus on controlling illegal manufacturing and trade broadly and via internet sales, and also assist NGOs in supporting governments to implement and enforce restrictions related to skin creams.



### Description

The work done by the Chemicals Team will focus on substantially influencing the EU to progress towards a toxic-free environment by phasing-out hazardous chemicals and by delivering its political commitments on safety and sustainability of chemicals, notably under the Chemicals Strategy for Sustainability (CSS), in particular through the revision of the REACH regulation. It will advocate for EU institutions to reinforce the chemicals legislation and engage high-level decision-makers to prioritise a toxic-free environment and to tackle chemical pollution in a preventive and precautionary way as fundamental issues. Furthermore, the EEB will continue to coordinate the EU NGO and the low- and middle-income countries (LMIC) civil society organisations (CSOs) global campaign for a toxic-free future, strengthen its networks, intensify its capacity-building activities and reinforce collaboration with CSOs in the EU and beyond.

### **Policies Addressed**

Chemicals Strategy for Sustainability (CSS); REACH regulation; non-REACH chemicals legislation; Classification, Labelling and Packaging (CLP) Regulation; Zero Pollution Action Plan (ZPAP); European Chemicals Agency (ECHA) Governance, global policies on chemicals management e.g., SAICM, (in synergy with the EEB's Nature cluster's work on pesticides and biodiversity)

## Objective

By 31 December 2023, the EU will have delivered on 2023 commitments in the Chemicals Strategy for Sustainability (CSS) in a timely manner while adopting the ambition of a toxic-free environment as promised in the strategy and coherent with the zero-pollution ambition.

## Activities

1. Advocating to ensure that the commitments of the CSS to achieve a toxic-free environment are delivered

Among the 80+ commitments proposed under the CSS, key actions will be either starting, be proposed or finalised in 2023; particularly, the establishment of an EU-wide safe and sustainable-by-design support network and an EU Chemical Early Warning and Action System, and proposals to address the emissions of 'forever chemicals' PFAS. The EEB will advocate for the EU institutions to enhance the protection of health and the environment and ensure the delivery of all relevant commitments in a timely and ambitious manner.

# 2. Advocating for EU Institutions to properly implement and reinforce the chemicals legislation

The EEB will work on 2023 commitments to implement chemicals legislation (proposals as part of the Restrictions Roadmap, in particular for the 'broad PFAS' Restriction as well as other wide restrictions such as bisphenols, flame retardants and PVC plastic). Since the Commission will propose revisions to the REACH and CLP Regulations by late 2023, the EEB will work to reinforce the status of the REACH and CLP. The EEB will push for reformed laws that boost the phasing-out of harmful chemicals with particular emphasis on consumer products and support safe and sustainable chemicals, speeding up processes to regulate chemicals and avoid regulatory delays.

# **3.** Engaging high-level decision makers to deliver REACH reform proposals in time to set the foundation for delivering a toxic-free environment

The EEB will focus advocacy efforts to ensure that the Commission publishes the REACH revision proposals before summer to allow this Parliament to adopt its position. A reform of key REACH provision is required to enable an acceleration of banning all the most harmful chemicals across sectors and set the foundation for moving towards a toxic-free environment. The EEB will therefore reinforce its existing relations with high-level decision-makers, such as European Commissioners, members of the European Parliament, environment ministers or high-level Member State officials, representatives of the Council and its Presidency, and high-level representatives of ECHA.

# 4. Capacity-building and reinforcing collaboration with other policy teams as well as with EEB members, NGOs and other civil society organisations (CSOs) operating in the EU and in the global south to support the push for better EU policy and practice

The EEB will continue collaborating with other EEB teams such as circular economy, zero pollution industry and biodiversity. The EEB will also continue coordinating the regular channels and networks (EEB Chemicals Working Group (WG), Chemicals taskforce group, and major EU civil society organisations (BEUC and ETUC)) and engage in joint projects at EU and international level. The EEB will use its European and global NGO networks to put pressure and ensure the CSS commitment to stop exports of banned chemicals stays true. Finally, the EEB will coordinate an NGO campaign for a toxic-free future to advocate for ambitious reforms of REACH and CLP.



# Health and Environment – Zero Pollution Industry

# Description

The work done by the Zero Pollution Industry Team will focus on engaging in the Industrial Emissions Directive (IED) Review pushing for a strengthened integrated approach and will work to support the transition away from fossil fuels. Furthermore, the EEB will contribute to the review of chemicals-in-water legislation to support a non-toxic environment. It will also seek to make the EU's Zero Pollution Ambition and the Paris goals a reality. Another focus will be on the internalisation of external costs (pricing negative impacts), notably through engaging in the Environmental Liability Directive and seeking to re-design reporting obligations in order to improve progress tracking on environmental performance and accountability in decision making, such as through a strengthened UNECE Kiev Protocol and a review of Commission expert group rules and Council work practices.

# **Policies Addressed**

IED review and implementation such as Best Available Technique Reference documents (BREFs); Zero Pollution Action Plan (ZPAP); Water Framework Directive, Environmental Liability Directive (ELD), the Climate and Energy files (Fit for 55 and in particular EU-ETS Review), adhoc Industrial Forum related outputs, Energy and Environmental State aid guidelines (CEEAG), E-PRTR / Kiev Protocol, Corporate Sustainability Directive Review, COM expert group rules, Council work practice.

# Objectives

By 31 December 2023, the EEB will have strengthened its networks and knowledge to ensure that the EU's Zero Pollution Ambition and the Paris goals become a reality. It will have strived to ensure that the Commission 'walks the European Green Deal talk' and that decision-making serves public interest first, is accountable and makes progress on the delivery of the Zero Pollution ambition through consistent and ambitious policy actions. The EEB will have worked towards a transition of industrial production towards a truly circular, decarbonised zero pollution industry.

## Activities

 Engaging in the Industrial Emissions Directive (IED) / EU Pollution Release and Transfer Register (PRTR) (now: Industry Emissions Portal (IEP)) Review – strengthening pollution prevention at the source standards

The EEB will build support to improve the Industrial Emissions Directive (IED) so that it fully reflects the zero pollution, climate and circular economy ambitions, both among other

NGOs and among decision-makers. The EEB will also strengthen standards to address and prevent industry pollution at source.

# 2. Advocating for the transition away from fossil fuels and internalisation of external environmental and human health costs

The EEB will expose cases of overt and hidden subsidies to fossil fuels, especially lignite mining, and will highlight failures of Member States to strengthen the energy-water-mine nexus through improved Water Framework Directive implementation at Member State level. The EEB will advocate adding climate aspects to the revised IED; and promote the internalisation of external costs, notably through the review of the Environmental Liability Directive (ELD), to fully reflect the 'Polluter Pays' Principle.

#### 3. Reviewing the chemicals-in-water legislation

The EEB will advocate for an ambitious and up-to-date water protection policy in the EQS directive review, by regularly participating in the meetings of the CIS-WG on chemicals, by providing technical and scientific input on environmental pressures and specific EQSs and derivation methods as well as through securing NGO engagement in the co-decision phase.

#### 4. Promoting inclusive governance and public accountability in decision-making

The EEB will advocate for providing single-access platforms and databases for environmental information serving various purposes such as compliance promotion, benchmarking of performance, improved information exchange for EU standards-making and more up-to-date and complete access to information to the public. In addition, the EEB will engage in changing Commission expert group rules or Council work practices to improve on inclusive governance, so as to ensure full transparency and accountability to the 'Green Oath' and to improve the balance of public versus private interests.



# Health and Environment – Air Quality and Noise

# Description

The work done by the Air & Noise Pollution Team will focus on advocating for the strengthening of the Ambient Air Quality Directives (AAQDs) and reducing national emissions through effective National Air Pollution Control Programmes as well as strengthening of the National Emission Ceilings Directive review of 2025. The EEB will also work to make the Zero Pollution Action Plan (ZPAP) promote substantive progress on the zero-pollution ambition (and not just focus on the specific legislative files), in particular in the domestic heating and agricultural sectors. Furthermore, the EEB will engage in the review of the Gothenburg Protocol, aiming to extend the number of pollutants covered from five to eight. With noise being the second biggest environmental health risk in Europe after air pollution, EEB will keep advocating for the revision of the Environmental Noise Directive while pushing for a Zero Pollution Action Plan which effectively tackles this issue.

# **Policies Addressed**

<u>Air pollution:</u> National Emission Ceilings Directive (NECD); Ambient Air Quality Directives (AAQD); Gothenburg Protocol; Zero Pollution Action Plan (ZPAP)

Noise: Environmental Noise Directive (END); Zero Pollution Action Plan (ZPAP)

# Objective

By 31 December 2023, the EEB has successfully advocated for the strengthening of the Ambient Air Quality legislation, reducing national emissions through effective National Air Pollution Control Programmes and supported the revision of the Gothenburg Protocol, strengthening of and buying into the Zero Pollution Action Plan and its core zero pollution ambition, including for domestic heating and agricultural sources. By that time, the European Commission will have started the revision of the Environmental Noise Directive and the promotion of meaningful actions to reduce noise pollution through the Zero Pollution Action Plan.

## Activities

### 1. Strengthening the EU Ambient Air Quality legislation

The EEB will continue to promote a strengthening of the Ambient Air Quality legislation and strongly advocate for the full alignment with the revised WHO guidelines. The European Commission will table a proposal for the revision of the Ambient Air Quality Directives in the second half of 2022 and the EEB will engage with the council, European Parliament and Commission. The EEB will continue to cooperate with other relevant stakeholders.

### 2. Reducing national emissions through commitments under the National Emission Ceilings Directive (NECD) and the Gothenburg Protocol

The EEB will continue to monitor and seek to influence the implementation of the National Air Pollution Control Programmes (NAPCPs) to at least reach National Emission Reduction Targets identified by the NECD and support an ambitious review of the Gothenburg Protocol. In addition, the EEB will continue cooperating with other relevant stakeholders.

#### 3. Promoting a transformative Zero-Pollution Action Plan

The EEB will advocate for the objective of zero pollution to become a cross-cutting target recognised in relevant EU legislation and policies, as carbon neutrality is now, as well as promote the preventative approach and reduction of pollution at source. The EEB's focus will in particular be on emissions from agriculture and heating, which are still disregarded sources of air pollution. Dedicated instruments (legislative and policies) should be put in place to prevent pollution.

#### 4. Strengthening the Environmental Noise Directive (END)

If and when the revision of the END is announced, the EEB will also advocate for binding noise reduction targets in the new directive. The EEB will keep cooperating, where possible, with other relevant stakeholders.



# Staff, Organisation and Governance

### Description

The work done under Organisational Development will focus on ensuring that the EEB continues to evolve as an efficient, effective and financially sustainable organisation with the desired political impact to achieve its mission. As agreed in its Long-Term Strategy (LTS), the EEB will carry out a governance reform (decision at the 2022 AGM, implementation as of 2023) to ensure that the organisation remains fit for purpose. Another priority is to include measures to ensure staff well-being and to offer training opportunities where feasible. In 2023, the EEB will further develop and expand the use of the software platform put in place in 2022 for project and finance management and monitoring of the LTS.

# Objective

By 31 December 2023, the EEB will have continued to be a value-driven and effective organisation multiplying its impact through a living LTS, invested in staff wellbeing and training opportunities, strengthened its capacity to fundraise and further developed the software platform to serve the organisation.

# Activities

### 1. Boosting organisational development and capacity-building

In 2023, the EEB will continue to implement its Long-Term Strategy for 2020-2030 (LTS) to ensure that the operational base is fit for purpose and to offer training for staff and members where feasible.

### 2. Implementing the 2022-2024 Fundraising Strategy

The EEB will continue its work to have secure, stable, adequate, and increased financial resources in 2023 to deliver on the EEB's mandate, in line with the strategic outcomes set out in the EEB's Long-Term Strategy 2020–2030, the fundraising strategy for 2022-2024 and the EEB work programme for 2023. To this end, the EEB will work to maintain funding from existing donors and secure funding from new donors, while keeping its total expenditure under control with sufficient safeguards and maintaining sufficient reserves.

# 3. Ensuring strategic and sustainable growth of the EEB staff while adapting to a new hybrid working environment

To remain a central player, the EEB needs to continue to attract and retain highly skilled individuals by making sure that what is on offer is attractive and sustainable. Employees are likely to expect more flexibility and freedom to be mobile and work remotely in the future. The COVID-19 pandemic led the EEB to re-think its remote work set-up, recognising both the pros and cons of remote working. In light of the growing number of staff in recent

years, the EEB will focus on investigating options and finding solutions to make the best use of its office space and on reinforcing its organisational identity and shared sense of purpose among staff. The organisation's strategy for sustainable growth put in place in 2022 will be implemented and further developed in 2023.

#### 4. Monitoring and evaluating the Long-Term Strategy

In 2023, the EEB will continue to monitor progress towards achieving its LTS objectives with the help of EEB staff and members (through Working Groups). The EEB is committed to keeping the LTS a living document and working tool that staff and members come back to in order to review their areas of work on an ongoing basis. The aim is for the Theory of Change (ToC) methodology to become an integral part of how the EEB designs and implements projects and activities together with its members. A thorough mid-term review is foreseen for 2025.





# Membership, Partnership and Events

### Description

The work done under Membership, Partnerships and Events will focus on the organic growth of the EEB's membership while the organisation strives to become an even more comprehensive umbrella network. The EEB will ensure that all members are empowered to act by offering networking opportunities and advocacy tools. There will be a special focus on mobilising civil society ahead of the European elections in 2024. The EEB will also continue to organise relevant and attractive events and reflect on the frequency, funding model and format of its events.

## Objective

By 31 December 2023, the EEB will have an even broader and more diverse membership that is empowered and engaged with an increased capacity to advocate.

### Activities

1. Promoting organic growth of the membership

In 2023, the EEB will reach out to potential members – with a special focus on Ukraine, new EU candidate countries and the Balkans, as well as organisations from countries or regions where the EEB is currently underrepresented or not yet represented and European networks.

#### 2. Ensuring an empowered and engaged membership

In 2023, the EEB will continue to ensure that all members are empowered to act by offering the opportunity for close cooperation, networking, information exchange and capacitybuilding on key environmental issues. Throughout the year, there will be a special focus on working with the membership, as well as in partnerships and coalitions, to mobilise and prepare for the 2024 European elections. The EEB will consolidate the network and make sure that the membership services and capacity-building offer remains relevant by carrying out a review of membership services and benefits, taking into account feedback from the annual membership satisfaction survey.

#### 3. Organising well-attended and interactive events

In 2023, the EEB will continue to organise regular events that bring together members of the environmental movement across Europe with policymakers, other civil society actors, thought leaders as well as entrepreneurs to debate shared challenges and opportunities. The 2023 Annual Conference will be organised in Stockholm, Sweden in collaboration with the Swedish Society for Nature Conservation.



# Communications

## Description

The work done under Communications will focus on further developing the EEB's communications area to accompany the organisation's growth, and formalising processes to ensure coherence in the organisation's communications outputs. A shared understanding of what the EEB's voice should be and of how communications, used strategically, can serve to underpin the objectives of the more policy-focused work areas, can significantly strengthen thematic policy areas. Externally, strategic use of digital tools can help broaden the EEB's reach, increase engagement, and ensure the buy-in of policymakers, members, and the broader citizens' movement. A reformulation of its digital presence and a 'from-the-outside-in' communication across the organisation's different platforms, i.e., from the perspective of the 'digital onlooker', will further increase the impact and reach of the EEB's content, maximising the potential of new communications products.

### Objective

By 31 December 2023, the EEB will be well underway in its efforts to further professionalise communications, both internally as a work area and externally as a means to effectively advocate for a future where people and nature thrive together. Internally, it will have concluded stock-taking and assessment exercises, and have developed tools to potentiate a healthy and coherent 'communications culture'. Externally, the EEB will have launched new flagship products, keeping abreast of digital developments.

## Activities

### 1. Formalising Communications

The EEB's total number of staff has rapidly increased, almost doubling over the last three years. The need for communications support by the different thematic policy areas has accompanied this growth, with an increasing number of staff members relying on this expertise. The way the communications work area is structured needs to evolve accordingly and an important degree of change management is needed. Policy areas are increasingly linked – even interdependent – and continuous dialogue is needed to ensure that the EEB's narrative is coherent, and that synergies and communications opportunities are not missed. Formalising communications is therefore needed to foster an organisation-wide understanding of communications, ensure coherence and build up basic communications expertise across all relevant work areas. It also requires formulating new options for a more agile organisational setup.

#### 2. Communicating from the 'outside in'

As the organisation grows, more content is produced by a growing number of staff members across the different policy work areas. A revision of the EEB's standard publications and flagship products and the assessment of their suitability to meet the organisation's goals, in line with its long-term strategy, will contribute to greater coherence in how the EEB presents itself and its work. An important aspect of this revision is that the EEB needs to consistently present its work with a given, external audience in mind. Content can, for example, have a narrower policy focus or reflect internal structures, rather than be adapted to a non-expert audience. This can lead to missed opportunities to communicate more broadly on the topic, increasing the mileage for the content produced, for both the EEB and its network. The EEB, as an organisation, must be easily understood and its external presentation seen as coherent.

#### 3. Harnessing the potential of digital communication

The EEB will assess its digital capabilities and identify areas for improvement and propose solutions. It will work towards a broader organisational digital know-how and begin its efforts to build capacity beyond the Communications Team; it will add at least one new digital item to its flagship products. The EEB will strive to be perceived as a modern organisation that uses digital tools to reach a targeted but broad audience.

DONUT GO BREAKING THE PLANETARY BOUNDARIES

LEAVE NO ONE IN THE HOLE

# Budget 2023

| General Costs           | EUR     |
|-------------------------|---------|
| Office costs            | 216,268 |
| Office supplies         | 110,877 |
| Communications          | 153,939 |
| Depreciations           | 175,000 |
| Financial costs         | 4,066   |
| Unforeseen expenditures | 10,000  |
| Sub-Total               | 670,149 |

| Salary Costs   | EUR       |
|--|-----------|
| President's Secretariat  | 10,000    |
| Secretary General's Team   | 221,118   |
| Policy Division (NB: 'EU Policy<br>Unit' and 'GPS Unit' added up)  | 3,668,493 |
| Information and<br>Communication Team (i.e.<br>Membership & Development<br>Division, and Communications<br>Division) | 1,327,448 |
| Finance, Personnel and<br>Administration Division (NB:<br>used to be called Accounting<br>and Support Team)          | 997,078   |
| Volunteers and Temporary<br>Staff  | 24,000    |
| Other Personnel Costs  | 112,020   |
| Sub-Total  | 6,360.156 |

| Activities                | EUR       |
|---------------------------|-----------|
| Overarching Policy        |           |
| Framework – European      | 25,199    |
| Institutions & Governance |           |
| Environmental Law and     | 21,000    |
| Justice                   | 21,000    |
| Global and Regional       | 658,311   |
| Processes                 | 050,511   |
| Economic Transition       | 110,067   |
| Nature                    | 91,165    |
| Circular Economy          | 365,879   |
| Climate & Energy          | 20,304    |
| Health and Environment    | 727,495   |
| Staff, Organisation and   | 57,514    |
| Governance                | 410,70    |
| Membership,               | 134,000   |
| Partnerships, and Events  | 134,000   |
| Communications            | 12,000    |
| High Political Impact     | 22,000    |
| Sub-Total                 | 2,244,935 |

| Working Capital | EUR    |
|-----------------|--------|
| Allocation      | 60,000 |
| to reserves     |        |

| Total             | EUR       |
|-------------------|-----------|
| Total Expenditure | 9,335,241 |





A better future where people and nature thrive together