

To: Environment Ministers of EU Member States
Cc: Commission President, Executive Vice-President for the European Green Deal and Commissioners for Environment, Transport, Energy, Industry, Agriculture, Health and Food Safety and the Chair of the European Parliament Environment Committee

Re: Input to the EU Environment Council Meeting, Luxembourg, 16 October 2023

Brussels, 3 October 2023

Dear Minister,

On behalf of the European Environmental Bureau, I am writing to share with you our views on some of the issues on the agenda of the forthcoming EU Environment Council. Given the importance to environment policy of the Commission President's SOTEU speech and the Informal Heads of State meeting on the 6 October and the associated Granada Declaration, points on these are also included in this letter. I hope that you find these informative and useful for your decisions on the 16 October and your wider deliberations on the European Green Deal.

I invite you to take our concerns into account during the final official level preparations, as well as at the meeting itself and beyond. Many files will of course remain active under the Belgian Presidency and a few during the Hungarian Presidency. We have structured the letter according to our understanding of the 16 October Council Agenda.

1. Directive on urban wastewater treatment (UWWTD)

a) (poss.) General Approach on the UWWTD

At the meeting on 16 October, you will aim to adopt a general approach on the recast of the Urban Wastewater Treatment Directive, proposed by the European Commission as part of its flagship zero pollution initiative to tackle pollution of air, water and soil. The EEB welcomes the revision of the rules related to urban wastewater treatment, including the new requirement for producers of cosmetics and pharmaceuticals, to share the costs associated to advanced treatment to remove micropollutants. The revised UWWTD should help Europeans benefit from cleaner rivers, lakes, and groundwaters, especially if synergies with other environmental legislation are fully used.

Urban wastewater is a footprint of society and our consumption and production patterns. It contains a complex mix of domestic discharges, run-off from streets and buildings and industrial and other non-domestic effluents that needs proper treatment to not pose a threat to human health and the environment. While pollution control should always primarily be directed at source, urban wastewater treatment acts as a last filter of protection before discharging into the receiving environment.

The decline of ecological status of streams (and small rivers) is directly linked to the ratio of wastewater to stream flow and quaternary ('advanced') treatment is shown to improve the health of aquatic species. Large wastewater treatment plants receive the main load of micropollutants, see, for example, the Baltic Sea Centre policy brief which shows that the 45 plants above 100,000 p.e. in the Baltic Sea coastal zone treat 70% of the wastewater load in the area and upgrading these would cut the micropollutant load to the sea in half.

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We therefore call upon the Environment Council to:

- **Support the new requirements as proposed by the European Commission as a minimum framework** to bring EU rules on urban wastewater treatment up to date and fit for the next two decades, including (interim) deadlines and the energy neutrality target;
- **Support the provisions to abate pollution at source and support the proposal to minimise remaining sources of untreated or insufficiently treated wastewater** by maintaining the ambition on scope and timeline for the extended requirements for selected wastewater treatment plants to remove organic matter and nutrients and avoid derogations;
- **Maintain the ambition on micropollutant removal** and maintain a requirement for all plants larger than 100,000 p.e. to remove micropollutants;
- **Maintain provisions on ‘storm water overflows’** to ensure that they also cover by-passes of insufficiently treated wastewater occurring at or by urban wastewater treatment plants after rains and not only those occurring from the collection system;
- **Maintain provisions on compensation**, including that the onus of proof should be on the person responsible for the breach and as well as that the provision that environmental and health NGOs can represent individuals that have suffered damage ;
- **Ensure that producers pay for the removal cost of any harmful substances** related to the products they bring to the market and minimise exemptions.

For further information, see the [Baltic Sea Centre Policy Brief](#).

b) Update list of priority water pollutants

The zero pollution package also includes a proposal to **update of the lists of priority substances and groundwater pollutants** complementing the recast of the UWWTD to achieve integrated water management across the EU.

Using the opportunity that you will discuss tackling water pollution at your meeting on 16 October, **we would like to stress the urgency that the Council adopts a general approach on the update of the lists of priority substances and groundwater pollutants before the end of the year** so that trilogue negotiations can start and an inter-institutional agreement can be adopted before the end of the current parliamentary term. Otherwise, there is a real risk that the new regulatory standards of water pollutants will be adopted too late to be included in the next river basin management cycle under the Water Framework Directive. The Commission’s proposal was presented in the same zero pollution package as the proposal for a recast UWWTD in October 2022, but the Council discussions didn’t start until June this year and have so far been very slow.

These lists of pollutants set EU-wide thresholds for pollutants posing a risk to the aquatic environment and mandates the Member States to monitor their presence as well as to take measures to make sure the legal thresholds are not surpassed. The ongoing update is already several years overdue, and the lists of EU-wide surface and groundwater pollutants no longer reflect the situation in European waters nor serve to efficiently guide measures to curb water pollution. Notably, we are lacking EU-wide thresholds for critical pollutants like PFAS and pharmaceuticals in natural waters. The European

Parliament has already adopted their [position](#) on the file and are ready to start the negotiations. The EEB welcomes the Parliament's [ambition](#).

We therefore call upon the Environment Council to:

- **Adopt a general approach on the update of the lists of priority substances and groundwater pollutants before the end of the year** so that trilogue negotiations can start and an inter-institutional agreement can be reached before the end of the current parliamentary term. This would enable for these new standards to be properly included in the next generation River Basin Management Plans under the Water Framework Directive.

2. Regulation amending Regulation (EU) 2019/1242 on CO2 emission standards for heavy-duty vehicles

Heavy duty vehicles (HDVs) are a significant and rapidly growing source of GHG emissions, air pollution and noise. While trucks and buses accounted for around 2% of the fleet in 2019, they were responsible for a [27% share of CO2 emissions](#), and there is an expectation of a 40% growth in truck activity from 2019 to 2050. While the EEB does not focus on transport emissions, given the importance of the file and the discussions at the 16 October Environment Council meeting, we are sharing here some key asks from [Transport & Environment's April 2023 HDV Position Paper](#) and building upon them.

In order for the EU to meet its commitment to carbon neutrality by 2050 and to achieve zero pollution EU by 2050, **trucks and buses must be fully decarbonised, covering both new and existing vehicles and requiring an overhaul of the entire fleet**. If the world is to stay within the 1.5 degrees target, emissions from transport will have to be reduced faster than would be the case if the measures proposed by the Commission were adopted. There is also a huge **market potential for European firms to lead in electric HDVs**, and regulation that creates a clear direction of travel and level playing field will help catalyse innovation in Europe, boost European competitiveness and support the wider triple win of climate, air quality and economic development as well as fossil fuel independence.

We therefore call upon the Environment Council to:

- **Bring forward the commitment to make all new city buses zero-emission from 2030 to 2027**. This will be a win-win in terms of GHG emissions, fossil fuel use and local air emissions, while sending a signal of commitment to citizens' health and to tackling the climate crisis, which is doubly important as the EP elections approach. We also invite ministers to explore how public procurement processes can help accelerate the uptake already now to strengthen the market pull. Some bus manufacturers have already committed to going fully zero emissions by 2030;
- **Increase the global CO2 target from -45 to -65% for trucks, buses and coaches in 2030**. The availability of zero-emission HDVs on the market is growing rapidly and increasing the ambition can catalyse EU leadership in this economic segment. T&E analysis suggest that this step would result in just 8% more zero-emission trucks on European roads than what truck makers have already publicly announced to produce until 2030;

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- **Increase the global CO2 target from -65 to -100% in 2035 for trucks, buses and coaches.** Moving away from fossil fuels for HDVs at the same time as phasing out internal combustion engines (ICEs) for cars would strengthen the clear commitment, be consistent, and possible given the rate of innovation. There is a clear need for a 100% emissions-reduction target to give clarity to industry of the commitment. It is important to keep catalysing EU innovation to avoid being overtaken by international competition;
- **Introduce CO2 targets for vocational trucks of -35% (2030), -85% (2035), and 100% (2040) and introduce ZEV targets for non-certified trucks of 30% (2030), 80% (2035), and 100% (2040)** and hence address the 20% of HDV sales that are unregulated and that are responsible for 12% of fleet emissions;
- **Change the ZEV definition back to 1 gCO2/kWh** as set in the current regulation to avoid dual-fuel engines running partially on diesel to qualify as zero-emission.

These will be essential if the commitment to a climate neutral EU by 2050 is to be met, complemented by appropriate measures to tackle emissions from the existing fleet, and demonstrate strong commitments in advance of the climate COP and to manufacturers of innovation needs, and support fossil-fuel independence from regimes not supportive of EU interests. And in parallel with legislation:

- **Explore and support options to increase freight via rail** to support road safety and address congestion concerns;
- **We also call on Ministers to explore options to ensure that all city buses are zero-emission by 2030 or as soon as possible thereafter** through fleet renewal programmes.

For a broader set of asks, and evidence to support the higher ambition, see [Truck CO2: Europe's chance to lead: T&E's Position paper on the CO2 standards for heavy-duty vehicles](#).

3. Conclusions on preparations for the 28th Conference of the Parties (COP 28) to the United Nations Framework Convention on Climate Change (UNFCCC) (Dubai, United Arab Emirates, 30 November-12 December 2023)

The climate COP in UAE is an essential multilateral milestone to demonstrate global commitment to address the climate crisis that is affecting all continents of the globe through flooding costing thousands of lives and damage, sea-level rise putting at risk entire communities in a number of small island states and coastal regions, warming and drought severely impacting human health and many areas ability to produce crops. Coming to a region where cheap oil has driven economic development, but where free sunlight offers an accessible and undeniable alternative, the COP will highlight the tension between making money from climate-destroying underground resources and having the courage to leave that behind and use solar power, wider renewables and energy efficiency gains to drive the next phase of the region's and the world's development.

We therefore call upon the Environment Council to:

- **Agree alongside all UNFCCC parties to a swift, equitable and resolute global phase-out of all fossil fuels** in all sectors in line with the 1.5°C temperature limit by 2050 at the latest, with binding commitments and ensuring that historically large and rich emitters move first. The EU should support a full phase-out and refrain from succumbing to a misleading

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‘unabated’ fossil fuel phaseout. The responsibility of fossil fuels in climate change is undisputed; alternatives exist. Industry, finance and society must not doubt the international determination. Text using “phase down” instead of “phase out”, should be resisted as this undermines the clarity of commitment;

- **Ensure the adoption of a global renewables target: to triple global renewables capacity to 11,000 GW by 2030, deploying at least 1,500 GW per year by 2030.** The global pledge must avoid damage to biodiversity from new infrastructure through nature-positive spatial planning and permitting. The EU and its Member States should lead by example with more ambitious national and EU binding targets and policies;
- **Support the target for a doubling of Energy efficiency:** the latest International Energy Agency’s Net Zero [roadmap](#), as well as many other civil-society backed scenarios, indicate that we need to more than halve our final energy consumption by 2050 at the latest if we are to stand a chance to achieve carbon neutrality;
- **The EU should support a COP28 decision to operationalise the Loss & Damage fund**, as central to new and existing funding arrangements. The EU must close the gap in order to live up to its promise on climate finance in line with the **global \$100 bn pledge**, with new and additional grants. The least developed countries and the most fragile countries are suffering most from the current funding shortfall;
- Ensure that civil society organisations and communities, especially the most marginalised, can **meaningfully engage and participate at COP28**. There can be no climate justice without open civic space and adequate protection for journalists, activists and environmental defenders;
- **Ensure that Nature-based solutions to climate mitigation and adaptation are recognised as a key priority**, given they are often highly cost-effective solutions that also offer a wider range of additional co-benefits in terms of ecosystem services, while also helping restoration and biodiversity protection;
- **Accountability for the Marrakech Partnership for Global Climate Action.** The role of sub-national actors, industry, finance and civil society has been present over many COPs. While many announcements were made, accountability is poor. A systematic review of past commitments and focus on implementation could help here. The COP28 presidency should require participants in the Global Champions forum to discuss any past pledges with a wide range of stakeholders and participate in the global stocktake.

4. Submission by the EU of an updated Nationally Determined Contribution (NDC) to the UNFCCC

The EEB is concerned that Russia’s war in the Ukraine and associated geopolitical turmoil is delaying countries’ acting on their engagements made in previous COP meetings. Countries are not honouring their commitments, including EU countries. The credibility of international climate diplomacy and the chance of averting catastrophic climate change depends vitally on rich countries living up to their commitments in an exemplary fashion. The EU is not living up to its own standards.

We therefore call upon the Environment Council to:

- Ensure **EU countries take a leading role in the loss and damage process** in good faith and make **concrete financial commitments** during COP28 at the latest;

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- Demonstrate clearly how the EU will close the gap and live up to its promise on climate finance in line with the **global \$100 bn pledge**. As noted above, the least developed countries and the most fragile countries are suffering most from the current funding gap;
- **Urgently review progress on Methane and deforestation pledges of COP26**. Concrete measures need to be taken and regular public updates on progress are necessary with respect to; slashing Methane emissions in line with the Global Methane Pledge and halting and reversing forest loss and land degradation;
- Ensure that EU countries **urgently update their NDCs** to be at least in line with updated Fit-for-55 goals and contribute adequately to the 1.5 degree target.

The credibility of the EU at the COP will be strengthened, as will its negotiation powers, if Member States prove their commitments in the NDCs.

While currently not on the Environment Council agenda, Commission President Ursula von der Leyen's State of the European Union (SOTEU) speech and the upcoming informal meeting of heads of states in Granada and the associated Granada Declaration are such important items to environment ministers and their teams, and will inevitably be discussed, that we are including some points on each of these for you in turn below.

5. Commission President Ursula von der Leyen's State of the European Union (SOTEU) speech

In her [State of the European Union speech](#), Ursula von der Leyen presented a narrative of promises kept and progress on the European Green Deal. She reiterated her commitment to the EGD and highlighted a number of issues of particular importance, including on climate and biodiversity. She recognised the climate crisis, noting the "*chaos and carnage of extreme weather*", the "*reality of a boiling planet*" and the need for a convincing EU response, committing to driving innovation. The President also recognised the importance of nature and that the "*loss of nature destroys not only the foundations of our life, but also our feeling of what constitutes home. We must protect it*" and that "*agriculture and protection of the natural world can go hand in hand*", which has arguably proven to be one of the more intractable challenges to date, given agriculture's multiple impacts on biodiversity and the state of the environment.

However, the speech glossed over the growingly stark contrast between promises and the reality of the numerous delays and diminishing ambition across critical regulations, such as agriculture, nature, sustainable food, animal welfare and chemicals, delays which pose a significant threat to the Green Deal's objectives. To be more specific:

- **Toxics-free future:** there was no mention of the REACH revision wished for by industry for regulatory clarity and by civil society for the essential health and environment benefits. Dropping, delaying or diluting the EU regulation of chemicals would be a major missed opportunity for legislative clarity, to catalyse innovation in Europe, and risks leaving citizens and future generations behind. As the PFAS scandals show, delays in the chemicals regulation reform cause suffering and sickness, as well as substantial costs related to health largely exceeding (by ten times) those of the costs of removal for the industry and hinders the EU's industry from becoming the world leader in clean production.

- **Sustainable Food:** EU's Farm to Fork Strategy committed a Sustainable Food Systems Law. It is EU's chance to create a better food system for people and the planet. The current system causes pollution, poor diets, and inequality. The promise to fix it remains unfulfilled and it is deeply concerning that the sustainable food systems law risks not being tabled; The proposed 'strategic dialogue' on nature and agriculture must by no means replace the sustainable food system proposal. Recent developments suggest that this dialogue will solely be led by DG AGRI, which is concerning and certainly doesn't contribute to overcoming 'polarization'. Such a dialogue cannot be led by one part of the administration, DGs ENVI, CLIMA and SANTE should be co-leading in both the development and the animation of this dialogue.
- **Energy Taxation:** Shelving the outdated Energy Taxation Directive is problematic. The current legislation, over two decades old, no longer suits today's energy markets and clashes with the EU's decarbonization goals. Inflation has greatly reduced the minimum taxation levels in real terms: polluting is becoming cheaper and cheaper.
- **Energy transition:** Concessions to the hydrogen and nuclear industries in renewable regulations and hydrogen delegated acts prioritise large energy corporations' profits over renewables and grid modernization. Valuable resources are diverted, instead of focusing on the fuel of the future: renewable electricity.
- **Critical Raw Materials:** The EU vowed to cut dependence on producing countries, increase recycling and refining capacity as well as domestic extraction. The vote in the European Parliament in September set higher standards for the Regulation, including the mention of mitigating demand rise for raw materials, the mention of UNDRIP, higher circularity measures and the inclusion of additional stakeholders in the raw materials Board. However, the inclusion of projects overriding public interest and the over reliance on industry certification schemes risks giving the green light to projects that do not meet high environmental and social standards.
- **Nature Restoration:** While Ursula von der Leyen's speech talks of the importance of nature and ecosystems, the European Parliament has eviscerated her legislation. The trilogues must restore the ambition of the Nature Restoration Law.
- **Access to justice:** Despite pledges, the Commission didn't introduce a promised directive to ensure minimum access to justice for environmental issues in the Member States. It also failed to secure access to justice for Fit for 55 proposals, undermining climate policy and favouring industry over environmental governance.
- **Animal Welfare:** Millions of animals suffer daily in an outdated system. The Commission pledged to update animal welfare laws, but it seems to be backtracking on this commitment, despite 1.4 million citizens supporting the 'End the Cage Age' initiative.
- **The Industrial Emissions Directive (IED)** proposal has faced multiple pressures to weaken it (on the inclusion of cattle, "integrated approach", justice measures).

Commission president Ursula von der Leyen said, *"four years ago, the European Green Deal was our answer to the call of history."* While a clear and welcome shift from the policies of the previous Commission, with the dramatic weakening of ambition over the last year, the EGD risks being a far from sufficient answer to the call of history.

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We therefore call upon the Environment Council to do all it can to ensure progress on EGD files:

- **Insist that the Commission table:**
 - **The REACH revision now** – with due ambition to give clarity and commitment. Anything less would not be understood by voters, would undermine faith in EU institutions, be a missed opportunity for innovation and competitiveness, and seriously impact the health of so many;
 - **The promised sustainable food system law;**
 - **The promised animal welfare law;**
 - **INMAP (Integrated Nutrient Management Plan);** and
 - **The Forest Monitoring and Strategic Planning Law.**

- **With a view of supporting the historical opportunity of the EGD, engage in the trilogues to:**
 - **Adopt impactful Nature Restoration Law** that was undermined by the EP battles, fought on ideological grounds and power interests, rather than any reflection of multiple benefits of the law itself and the cost of inaction¹;
 - **Uphold UNDRIP commitments within the Critical Raw Materials Act, which guarantees Free, Prior, and Informed Consent (FPIC)** to ensure indigenous peoples' consent and the protection of their rights;
 - **Ensure that the Sustainable Use of Pesticides Regulation (SUR) enables achievement of the EU and national reduction targets to reduce by at least 50% the use and risk of chemical pesticides by 2030**, and to reduce by 100% the use of more hazardous pesticides by 2030;
 - **Avoid further weakening of the Industrial Emissions Directive** as this would undermine one of the key EU instruments catalysing industry innovations and start to tackle the pollution responsibilities of the agricultural sector. See the recent EEB [letter](#) for additional details.

Launching the remaining promised proposals now will give time for the Council and the Parliament to explore the laws and develop positions before the EP elections in June 2024, and hence avoid the very real risk that the elections bring into power a Parliament that will vote in a Commission President who will not table these legislative files and not honour this Commission's promises. This would create a missed opportunity for almost a decade, given the time it would then take to restart the legislative process under the subsequent Commission. As the EU Bank Chiefs [say](#), the Green Transition needs to be accelerated, not "watered down".

6. The informal meeting of heads of state in Granada, 6 October & Granada Declaration

The Granada Summits of 5-6 October, with the anticipated Granada Declaration, is a key moment where Europe sets the foundations of the strategic priorities for the next five years and guide the political guidelines of the next Commission President, through the developing Strategic Agenda. A Spanish Presidency "non-paper", [Resilient 2030](#), that informs reflections on the Granada Declaration

¹ Statement by NGOs on priorities for the impactful Nature Restoration Law available at <https://www.restorenature.eu/en/our-work-past-actions/trilogue-joint-restorenature-statement>

and the Strategic Agenda includes a focus on climate change (adopting a mainly technology-based way forward), but biodiversity and pollution crises are close to ignored.

The draft of the Granada declaration itself is silent on biodiversity and pollution and could only be taken by citizens as a statement that political leaders don't care about the impact of chemicals on their children, of pollution on their health, on the destruction of biodiversity and multiple impacts this will have on wellbeing, society and the economy. It is also currently unconvincing as regards how seriously leaders are taking the climate and environmental challenges and risks creating a far too weak strategic guide for the next Commission President and the next five years. Climate, biodiversity loss, pollution and toxics impacts on health and environment are crises that merit full heads of state commitment.

The EEB and partners WWF, CAN Europe, Birdlife and T&E (see [joint letter](#)), implore you to ask your heads of state to include the following priorities in the Granada Declaration, which are essential to unlocking the societal and industrial benefits of a well-executed green transition:

- Radically **increase public climate, environment and social investments**, while aligning all public and private investments with the objectives of the green transition and ensure big polluters are fully held accountable.
- **Accelerate the implementation of the European Green Deal and address the ambition gaps on both nature and climate as well as pollution** by further establishing robust legally binding targets and new ambitious protection standards based on the latest science available. Only with continued efforts can Europe safeguard our health, nature, safety and economy and create crucial links between those.
- **Strengthen EU governance, democracy and the effective participation of civil society.** The role of citizens at national and EU levels needs to be strengthened, equal access to decision-makers as well as justice across Europe needs to be ensured.

Backtracking on Europe's commitment to a green, fair, and socially just transition would play into the hands of those seeking to destabilise the EU and undermine its core values. It would jeopardise Europe's competitiveness in the global race for sustainability and prolong reliance on authoritarian regimes.

We urge you to raise your voices and work with EU Leaders to aspire to a higher standard by including a clear commitment in the Granada Declaration to truly tackle today's multiple crises and avoid these from undermining our futures.

Thank you in advance for your consideration of these points which will help address the climate, biodiversity and pollution crises in the EU, and give citizens the confidence that their leaders are taking the necessarily bold decisions to create the basis for a better future for them, rather than delaying to act. Supporting the measures will also strengthen EU resilience and create a better basis for EU economy and productivity in the future. Your support and engagement on each of these files in the Council, in trilogues and at home are essential.

Yours sincerely,



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