

Public Consultation on the EU environment policy priorities for 2020: Towards a 7th EU Environment Action Programme

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Added value of a new EAP and major challenges

The final assessment of the 6th EAP has pointed to strengths and weaknesses of such a programme. In your view, how could a new EAP best add value to EU environment policy?

By developing a strategic agenda for the environment, with clear priorities and objectives.	6
By ensuring full implementation of agreed policies and legislation	4
By providing a coherent framework and furthering the integration of environmental considerations into other policies	6
By ensuring a joint commitment from EU institutions and Member States to a common agenda	4
By stimulating public debate on environmental priorities and active participation of citizens, local authorities and businesses	6
By providing the long term certainty and a conducive framework for the private sector to invest in resource efficiency, low-carbon technology and eco-innovation	6
By defining a detailed list of actions to be implemented by 2020	3
By establishing environmental priority objectives for inclusion in the monitoring process of the EU semester	4
A new EAP has no added value	2

The final assessment of the 6th EAP has shown that a long term vision for Europe's environment would help in guiding the definition of priority objectives to be achieved by 2020. Bearing in mind the long term visions already set out in the Resource Efficiency Roadmap[1], the 2050 Low-Carbon Roadmap[2] and the EU Biodiversity Strategy to 2020[3], are there any elements you feel are missing?

[1] By 2050 the EU's economy has grown in a way that respects resource constraints and planetary boundaries, thus contributing to global economic transformation. Our economy is

competitive, inclusive and provides a high standard of living with much lower environmental impacts. All resources are sustainably managed, from raw materials to energy, water, air, land and soil. Climate change milestones have been reached, while biodiversity and the ecosystem services it underpins have been protected, valued and substantially restored.

[2] By 2050, the EU should cut its domestic greenhouse gas emissions by 80% compared to 1990 and all the sectors of the economy - power sector, industry, transport, agriculture, residential and tertiary should contribute to a varying degree and pace.

[3] By 2050, European Union biodiversity and the ecosystem services it provides – its natural capital – are protected, valued and appropriately restored for biodiversity's intrinsic value and for their essential contribution to human wellbeing and economic prosperity, and so that catastrophic changes caused by the loss of biodiversity are avoided.

Clearly the seminar issue of the EAP is the fact that while they are strategic documents the legislative priorities shift and move faster or slower during its term. The EAPs are good mid terms signalling where the Commission is going but it needs to be cross-read with the Annual Legislative Work Programme. Forward looking the EAP needs to build on the Europe2020 flagship initiatives and provide the medium term vision on how to implement them. Finally EAP , MFF & the CSF should be closely aligned

In your view, how important is it for the EU to address the following environmental challenges?

Unsustainable consumption patterns	Somewhat Important
Unsustainable production patterns	Somewhat Important
Resource over-consumption, potential scarcity and price volatility	Important
Pollution from hazardous chemicals	Important
Insufficient water quantity	Somewhat Important
Water pollution	Somewhat Important
Outdoor air pollution	Somewhat Important
Indoor air pollution	Somewhat Important
Biodiversity loss and degradation of ecosystem services	Somewhat Important
Deforestation	Somewhat Important
Climate change mitigation/greenhouse gas reductions	Important
Adaptation to the impacts of climate change	Important
Marine pollution	Important
Marine resource exploitation	Somewhat Important
Competing uses of land leading to environmental degradation	Not at all Important
Soil degradation and pollution	Somewhat Important
Generation and proliferation of waste	Important
Environmental challenges linked to food	Not at all Important
Environmental challenges linked to housing	Not at all Important
Environmental challenges linked to mobility	Not at all Important

Environmental challenges linked to the urban environment	No opinion
Environmental challenges linked to energy production and use	Not at all Important
Noise	Not at all Important
Major industrial accidents	Important

Which of the following best describes what needs to be done as a priority to address each of these challenges?

Unsustainable consumption patterns	Improve implementation of existing policy and legislation
Unsustainable production patterns	Strengthen mainstreaming of environmental considerations in other policies
Resource overconsumption, potential scarcity and price volatility	More use of Market-based Instruments (cap and trade, taxation, subsidies, incentives)
Pollution from hazardous chemicals	Improve implementation of existing policy and legislation
Insufficient water quantity	Fill policy gaps (e.g. through new policy/legislation)
Water pollution	Strengthen mainstreaming of environmental considerations in other policies
Outdoor air pollution	Strengthen mainstreaming of environmental considerations in other policies
Indoor air pollution	Strengthen mainstreaming of environmental considerations in other policies
Biodiversity loss and degradation of ecosystem services	Strengthen mainstreaming of environmental considerations in other policies
Deforestation	Strengthen mainstreaming of environmental considerations in other policies
Climate change mitigation/greenhouse gas reductions	Improve implementation of existing policy and legislation
Adaptation to the impacts of climate change	Improve implementation of existing policy and legislation
Marine pollution	Improve implementation of existing policy and legislation
Marine resource exploitation	Improve implementation of existing policy and legislation
Competing uses of land leading to environmental degradation	No need for further action
Soil degradation and pollution	Improve implementation of existing policy and legislation
Generation of proliferation of waste	Improve implementation of existing policy and legislation
Environmental challenges linked to food	No need for further action

Environmental challenges linked to housing	No need for further action
Environmental challenges linked to mobility	No need for further action
Environmental challenges linked to the urban environment	No need for further action
Environmental challenges linked to energy production and use	Improve implementation of existing policy and legislation
Noise	No need for further action
Major industrial accidents	Fill policy gaps (e.g. through new policy/legislation)

In your view, which of the following policies hold the greatest potential for improving the quality of the environment? (1 least potential - 5 greatest potential)

Agriculture and rural development policy	5
Climate change policy	3
Competition policy (state aid)	2
Consumers and health policy	3
Development cooperation policy	3
Economic and financial policy (including taxation)	3
Education and culture policy	2
Employment policy	2
Energy policy	5
Enterprise and SMEs policy	4
External relations policy	5
Maritime and fisheries policy	3
Products/services standards	5
Public procurement policy	3
Regional policy	4
Research and innovation policy	5
Trade policy	5
Transport policy	4
Other	

If other, please specify (max 100 characters)

In your view, which of the following policies hold the greatest potential for contributing to meeting our climate objectives? (1 least potential - 5 greatest potential)

Agriculture and rural development policy	4
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Competition policy (state aid)	3
Consumers and health policy	3
Development cooperation policy	5
Economic and financial policy (including taxation)	3
Education and culture policy	2
Employment policy	3
Energy policy	5
Enterprise and SMEs policy	5
Environmental policy	5
External relations policy	5
Maritime and fisheries policy	3
Products/services standards	5
Public procurement policy	No opinion
Regional policy	3
Research and innovation policy	5
Trade policy	3
Transport policy	5
Other	

If other, please specify (maximum 100 characters)

New integrated approaches to improve competitiveness and enhance ecological and societal resilience

In your view, what are the 3 most important initiatives that should be taken at EU level to reduce the environmental impact of food production and consumption? (maximum 800 characters):

COSLA and our equivalent organisations have expressed in the past our concerns for addressing the issue of biowaste separately from a wider review of EU waste policy. We are pleased that this is the route finally decided and would be prepared to consider an EU role on Biowaste namely on its the potential cross border dimension , however we believe that the key is to build on existing best practices in those countries such as Scotland where this issue is being , and indeed will be, progressively addressed. The EU should however provide expertise and support to those countries and regions lagging behind.

In your view, what are the 3 most important initiatives that should be taken at EU level to reduce the environmental impact of housing? (maximum 800 characters)

Clearly planning is a local competence in most Member States. Therefore we are always quite hesitant whenever the Commission signals potential moves that will affect local planning and subsidiarity or, conversely, setting up EU wide legislative standards that have limited regard of the local competences or availability of financial resources . The EPBD or the EED are recent cases in point on this. The EU should play what it is best at, namely providing technical standards that would improve the internal market on energy efficient products and technologies. This is perhaps a more indirect route toward addressing environmental performance of the housing sector however it is more consistent with the

Treaty mandate of the EU institutions.

In your view, what are the 3 most important initiatives that should be taken at EU level to reduce the environmental impact of mobility?
(maximum 800 characters)

As above urban mobility it is NOT an EU competence. The European Commission must stay away on legislating on this area. This is a consistent message given to the Commission during the preparation of the Urban Mobility Action Plan and the more recent moves towards access restriction schemes (congestion charging, low emissions zones, etc). We are extremely concerned to moves being currently considered towards EU legislation being imposed on Local Authorities competences on urban mobility. The EU should focus on the internal market, support EU Trans European Networks and provide best practices. This is not to say that some aspects on mobility cuttign across these three areas could not be subject to EU regulatory consideration, however it should be extremely cautious before making any such move

Sustainable land use has been identified as a major environmental challenge. In relation to this, how important do you consider the following areas to tackle the issue at EU level?

Desertification	Somewhat important
Deforestation	Somewhat important
Conversion of agricultural land to urban land	Important
Conversion of grassland to cropland	Important
Conversion of land for energy crop cultivation	Somewhat important
Other land use changes	Not at all important
Land fragmentation	Not at all important

In your view, how important are the following additional measures to the Soil Thematic Strategy for reducing, directly or indirectly, soil degradation?

Reinforce existing legislation to improve the application of the 'polluter pays' principle to address soil degradation	Somewhat important
Establish a soil monitoring scheme to measure and/or evaluate progress towards less soil degradation	Not at all important
Set binding targets to reduce soil degradation	Not at all important
Provide platforms for exchanging best practice	Very important
Promote greater public awareness of the role played by soil as a resource in the environment and the economy	Very important

Scientific evidence points to a certain number of environment-related impacts on human health. In your view, how well does EU policy currently address the following environment & health related challenges?

Endocrine disruptors	No opinion
Nanomaterials	No opinion
Combined effects of chemicals	No opinion
Harmful chemicals in products	No opinion
Outdoor air pollution	No opinion
Indoor air pollution	No opinion
Water pollution	No opinion
Noise	No opinion
Climate change	No opinion
Nuclear radiation	No opinion
Other	No opinion

If other, please specify (maximum 100 characters)

In determining whether cities are sustainable, attractive and clean places to live, what is important for you? The list reflects the 12 criteria identified for the [European Green Capital Award](#)

Local contribution to global climate change	Important
Local transport	Very important
Green urban areas incorporating sustainable land use	Very important
Nature and biodiversity	Somewhat important
Quality of local ambient air	Important
Noise pollution	Important
Waste production and management	Very important
Water consumption	Very important
Waste water treatment	Very important
Eco innovation and sustainable employment	Somewhat important
Environmental management of the local authority	Very important
Energy performance	Important

Making Change Happen

In your view, does the type of EU climate and environment legislation (Regulations, which have direct effect, vs. Directives, which need to be transposed into national law) make a difference in terms of delivering environmental benefits, and if so, why? (max 800 characters)

Absolutely, given the complex, heterogeneous and multi-level governance nature of most environmental

challenges the EU should try as a general rule to use Directives rather than Regulations. It is understandable the frustration by the Commission of the lack of implementation of the Environmental acquis, however it is important for the European institutions to internalise that its powers were given under the principle of Conferral and ultimately rest of the legitimacy voluntarily given by national and local citizens. While it is understandable that this result in less than optimal implementation of EU rules forcing the march through detailed EU legislation would be counterproductive as in many cases would reduce the public support for EU action in the future.

On a scale of 1-5 (1=least, 5=most), how would you rate the usefulness of increasing the information being actively disseminated on-line by Member States and the Commission and how EU environment legislation is being implemented?	5
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What contribution do you think the following could make at EU level to strengthen the correct implementation of EU environment law by Member States and ensure a level playing field?

More extensive criteria on how Member States should undertake inspections and surveillance	Significant
Complementing national inspections and surveillance with enhanced capacity at EU level to ensure consistency and effectiveness of implementation	Not significant
Criteria on complaint-handling systems in each Member State or similar alternative dispute resolution mechanisms	Somewhat significant
Legislation to ensure better access to national courts	Very significant
Support for experts' networks, e.g. inspectors, prosecutors and judges to share best practice and develop projects of common interest	Very significant
Implementation plans that target resources at solving environmental problems	Significant

Science provides the evidence-base underpinning the development and implementation of climate and environment policy. On a scale of 1-5 (1=insufficient, 5=excellent), how would you rate the environmental data currently available to you?	5
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How would you consider the potential of the following measures to strengthen the knowledge base for environment policy?

Give to citizens a greater role in monitoring environmental data (e.g. through new media tools such as 'eye on earth')	High potential
Improve data collection on and analysis of compliance and enforcement within each Member State	Very high potential
Improve the science-policy interface and ensure that scientific environmental data are accessible and user-friendly	Very high potential
Fill existing research gaps (e.g. ecological thresholds, environmental tipping points, impacts of new technologies, etc.)	Very high potential
Improve knowledge on consumers' perceptions, values and their actual behaviour	Very high potential
Improve EUs international research cooperation on global environmental issues (i.e. biodiversity, climate change)	Very high potential
Other	

If other, please specify (max 100 characters)

How potentially effective do you consider the following initiatives to be in encouraging environmentally-friendly behaviour?

Provide more detailed information to consumers through more detailed labels	Somewhat effective
Increase consumers' education and awareness through general awareness-raising campaigns	Very effective
Increase consumers' education and awareness through targeted actions and on-the-spot information	Effective
Provide examples of positive/successful behaviours to consumers	Effective
Reward environmentally-friendly behaviours	Effective
Discourage environmentally-damaging behaviours	Very effective
Apply different approaches for each specific context via "behavioural experiments"	Effective

How significant do you consider each of the following actions to be for strengthening the external dimension of EU environment policy?

Strengthening International Environmental Governance	Significant
Strengthening the EU leadership in Multilateral Environmental Agreements	Very significant
Leading by example - EU leadership through	Very significant

setting unilateral targets and commitments	
Ensuring that the EU consistently speaks with one voice in international fora	Significant
Enhancing the integration of environment in the EU's external policies	Significant
Promoting EU environmental standards abroad	Very significant
Engaging bilaterally with key partners to address global environmental challenges	Significant
Building alliances with other countries in line with our environmental objectives	Significant
Enhancing the effectiveness of environment and climate-related EU development cooperation assistance	Significant
Other	

If other, please specify (maximum 100 characters)

If you have further comments on this consultation or suggestions please write them in the box below (optional) (max 1000 characters)

The Convention of Scottish Local Authorities (COSLA) supports EU initiatives on environmental and sustainability matters as this is a matter that often has cross-border implications and requires combined multi-national responses. However we continue to stress the need for the EU to fully respect the principle of conferral - whereby the EU should only intervene on matters that the EU Treaties have explicitly enabled it to - and full respect of the principle of subsidiarity and proportionality - whereby the respect of local competences and roles on environmental matters, particularly those regarding spatial planning. On Climate Change, we believe that that Local Authorities are at the forefront of the challenge of mitigating and, crucially, of adapting to climate change and therefore defend that the EU climate change initiatives should support and be informed by the efforts at local level, both in terms of impacts, scenario planning and financial support.