

***Comhar* – the National Sustainable Development Partnership**

comments on

The EU Sixth Environmental Action Programme

Introduction

Comhar, Ireland's National Sustainable Development Partnership, welcomes the opportunity to contribute to the development of the EU's Sixth Environmental Action Programme. We believe it is important that this programme should take into account the views of the various stakeholders across society, if it is to maximise the involvement and commitment of all sectors and of individual citizens. Our own experience of consultation on this issue shows that there is a high degree of interest in, and concern about, environmental issues and how EU policy affects them. Following on this consultation, and further discussion within *Comhar*, this paper sets out a number of comments and suggestions which will, we trust, inform the work of finalising the Programme.

Relationship with the Sustainable Development Strategy

The Sixth Environmental Action Programme will form the environmental pillar of the forthcoming EU Sustainable Development Strategy. Research into sustainability highlights the importance of bringing together economic, social and environmental issues. Given the different timescales and processes for developing the Programme and the Sustainable Development Strategy, there is a danger that separating out the environmental issues could work against their subsequent integration. It will therefore be vital to give attention at this preparatory stage to the ultimate integration of the Programme with the Strategy and other social and economic policies.

Fundamental objectives and priorities

The Programme should have overarching objectives that focus on sustainable development and the quality of life. The objectives should address the need to decouple economic activity and environmental degradation. As a means to achieving these objectives, the Programme should have a clear focus on environmental issues, both with regard to protecting and improving the overall state of the environment, and

to addressing particular environmental problems. It should provide a strong framework for the various sectoral strategies by setting environmental quality standards and objectives which they must achieve. While the taking of specific actions will be a matter for the sectoral strategies, the Programme should comprehensively assess and identify areas where particular problems exist, or can be foreseen, where remedial or precautionary action must be taken within or across sectors. By taking an overview of environmental sustainability, the Programme can highlight the changes which must be made, sometimes through the mechanism of other strategies and policies, to meet its own objectives.

Key environmental issues which the Programme should address are those which underpin sustainable development and include:

- Water quality, including the right of access to clean water,
- Waste management, especially reversal of the trend of increased waste production,
- Reducing emissions of greenhouse gases,
- Addressing urban air quality,
- Protecting natural resources and biodiversity, and
- Promoting increased use of renewable energy resources.

The Programme should aim at resolving contradictions in EU policy, in order to make it more coherent, and thus easier to implement and understand. It should also seek to overcome the present lack of integration across Union policies. The lack of follow-through on policies in different sectors, owing to difficulties in integration, cross-compliance and coherence across policies, was one reason why the Fifth Programme was not as effective as had been hoped. Environmental issues are still often regarded as matters to be considered at the end-stage of decision-making, rather than integrated into the process from the start. There is a need to change the attitudes of decision-makers at all levels, so that they understand that changes must be made now to save the environment and avoid future problems.

The Programme should be underpinned by the precautionary principle, integration and the “polluter pays” principle. It should include specific provisions for mid-term review and ongoing evaluation, including concrete indicators of performance, quantified targets and monitoring mechanisms. This ongoing evaluation should

reflect current work on developing indicators of sustainability, and should be used as a means of monitoring progress in the broad context of sustainable development. The Programme should also consider how best to communicate its results, including the interaction between economic, environmental and social aspects.

We believe that major structural changes are needed in the economy and society in order to make the Programme a success. Both greater awareness and practical incentives will be needed in order to overcome the problem of inertia, so that environment is seen as an integral part of economy and society, and not as a hurdle for economic development.

Instruments to address priorities

The Programme should continue to broaden the range of instruments, carrying on from the Fifth Programme, including a strong emphasis on tax reform, with a greater integration of environmental priorities into the fiscal system. Environmentally harmful or perverse subsidies should be targeted for early removal, and positive environmental taxes should be encouraged. Greater acceptance of such taxes may be secured by directing the revenues to environmental improvement projects.

The EU should take the lead in ensuring that its own funding mechanisms do not have adverse environmental effects. Integration of environmental considerations in the various sectors should be a central requirement for future funding. Funds allocated must be tracked more carefully and efficient instruments developed to suspend funds which lead to action which is not in keeping with EU regulations and policy.

We recognise that strategic environmental impact assessment (SEA) is important and deserves to be further developed. We would like to see SEA subscribed to explicitly at EU level, with more support for its practical implementation, and further work on developing evaluation processes. However, it is important to ensure consistency between assessment and evaluation processes used at different levels, in order to ensure integration of policies.

It is important that the research requirements of the Programme are incorporated into the Sixth Framework Research Programme. There is also a need to involve the

research community in developing environment policy, and to improve significantly communication between policy makers and researchers. Furthermore, environmental, social and economic research must be integrated with each other.

The Programme should incorporate and build upon the provisions for access to environmental information, public participation and access to justice in environmental matters which are contained in the Aarhus Convention. This will be necessary to underpin the communication of the Programme, and to ensure citizen involvement.

Communicating the Programme/involving citizens

Communicating the Programme will be vitally important – it will need to do better than the Fifth Programme in translating principles into user-friendly and concrete action. Surveys show that although people may have a high degree of concern for the environment, they often have only a limited view of what they themselves can do, and the impact of their contribution. This lack of awareness and understanding of the links between actions and effects is a key issue which the Programme must address. Environmental information should be linked more closely to modern lifestyles and issues of sustainable production and consumption, rather than simply providing basic environmental facts. Environment is an important quality of life issue, so the Programme should seek ways of linking this to individual behaviour/responsibility. It should also emphasise and support greater use of the education system (in its broadest sense); this would help to avoid situations where information tends to be provided, for example by the media, only in response to a particular crisis and in a sensational manner. The Programme should take up the EU pilot action on integrating environmental education into the school curriculum and provide adequate opportunity for educators to produce teaching materials on EU environment policy, key legislation and citizens' role and rights.

The Fifth Programme's emphasis on shared responsibility assumed an acknowledgement of responsibility, which is not always the case, perhaps because of lack of awareness. The Sixth Programme should continue with this focus, and pay more attention to clearly identifying stakeholders – including governments, commercial sectors, and individual consumers – and encouraging them to play their part. Leadership is a key; the Programme should encourage and support not only

governments, but other influential groups, to play their part in this regard. Integration will not work unless stakeholders take responsibility.

Greater participation by citizens and communities is crucial if changes in behaviour are sought. It is not sufficient to tell people to change; they must also be involved and given access to the decision-making process. The Programme can give leadership in this regard by providing substantial support for demonstration projects which explore ways in which local communities can take ownership of sustainability. Means of providing for public participation must ensure that legitimate concerns are taken on board without losing sight of the wider picture; this is necessary in order to overcome conflict between different levels of targets and interests, and to ensure a holistic and coherent view across sectors and policies. The community development approach needs to be given more importance, especially in regard to consultation and involvement; resources and attention need to be directed to including marginalised and disadvantaged communities.

Enlargement

The Programme will have to take account of the coming enlargement of the EU, which may affect the range or prioritisation of environmental issues and problems to be addressed. We believe that enlargement will highlight again the need for better integration across policies. Issues which should be considered within the Programme include whether EU investment in new Member States should focus to a greater extent on environmental protection and improvement; the balance to be struck between completing regulatory frameworks and complementary social measures; and optimal information systems to promote communication and awareness.

The Programme should fully acknowledge cases of better environmental practice and infrastructure, wherever these occur, and set out to maintain them and adopt them as models.