



Implementation of the 7th Environment Action Programme

Mid-term review

European Implementation Assessment

STUDY

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Ex-Post Evaluation Unit

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Implementation of the 7th Environment Action Programme Mid-term review

Study

In January 2017, the coordinators of the European Parliament's Committee on the Environment, Public Health and Food Safety requested authorisation to draw up an own-initiative implementation report on the 'Implementation of the 7th Environment Action Programme (Decision 1386/2013/EU)' - rapporteur: Daciana Octavia Sârbu (S&D, Romania).

The authorisation to draw up the report triggered the automatic production of this European Implementation Assessment by the Ex-Post Evaluation Unit within the European Parliamentary Research Service's Directorate for Impact Assessment and European Added Value. This supportive study looks at the progress made on the implementation of the 7th EAP.

Abstract

The 7th Environment Action Programme (7th EAP) is the long term overarching strategy of the EU and its Member States in the field of environment and climate change. It covers a seven-year time frame (between 2014 and 2020) and is the first to set a long-term vision for policy-making in the field, until 2050.

This European Implementation Assessment found that while the EAP scope remains relevant to current needs and adds value to EU and national policy-making efforts, its objectives are unlikely to be fully met by 2020, despite sporadic progress in some areas.

Another key finding in this document is that environmental and climate-related concerns are not sufficiently integrated into a number of EU policies.

These findings were made on the basis of publicly available sources of information (specifically aimed at informing the evaluation of the 7th EAP) and views shared in the course of the targeted stakeholder consultation in support of this document.

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The stakeholder consultation (published in Annex VI to the European Implementation Assessment) has been conducted by Technopolis Group in consortium with Trinomics at the request of the Ex-Post Evaluation Unit mentioned above.

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List of abbreviations and acronyms

CAP	Common Agricultural Policy
DG	Directorate-General
EAP	Environment Action Programme
EEA	European Environment Agency
EIA	European implementation assessment
EIR	Environmental implementation review
ENVI	European Parliament's Committee on the Environment, Public Health and Food Safety
EP	European Parliament
ETS	Emission Trading System
EU	European Union
GES	Good Environmental Status
NO₂	Nitrogen dioxide
PBT	Persistent, Bioaccumulative and/or Toxic chemicals
PM₁₀	particulate matter
SDGs	Sustainable Development Goals
SOER	State of the Environment Report published by the European Environment Agency
TEN-P	Trans-European Network Policy
TFEU	Treaty on the Functioning of the European Union
UN	The United Nations

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The EPRS acknowledges in particular the support of the European Court of Auditors and the European Environment Agency in the collection of data, as well as the work done by Technopolis Group and Trinomics on the stakeholder consultation.

Executive summary

This European Implementation Assessment (EIA) was drafted in support of the work done by the European Parliament's Committee on Environment, Public Health and Food Safety (ENVI) on a dedicated implementation report. It evaluates the implementation of the 7th Environment Action Programme (EAP), which gives the EU and its Member States long-term guidance (policy objectives and instruments) for environmental and climate-related policy-making.

The conclusions presented in this EIA are based on available sources of information of direct relevance to the monitoring and evaluation of the EAP, namely:

- the first edition of the Environmental indicator report (European Environment Agency, December 2016);
- the Environmental implementation review (European Commission, February 2017);
- a targeted stakeholder consultation on the EAP implementation specifically conducted in support of the ENVI draft implementation report and complementing the first two sources (May-September 2017);
- a special contribution from the European Court of Auditors highlighting its key findings sourced from selected special reports in the field of environment and climate change published since 2014.

Viewed separately, none of the sources provides an exhaustive picture of implementation in terms of scope (objectives covered), and timing (years of implementation covered); furthermore, even though the stakeholder consultation managed to cover all objectives and is the most up-to-date source of data among all four sources, it is based on stakeholders' perceptions only, and is thus highly subjective. Therefore, this document does not claim to be a comprehensive evaluation of the 7th EAP, and should only be viewed as a mid-term snapshot of its implementation.

This EIA found that the 'core thematic' and 'horizontal' objectives of the 7th EAP remain relevant to current needs in the policy area of environment and climate change. Several knowledge gaps were identified in the context of all EAP objectives and in areas where existing knowledge is not given due attention by policy-making.

Policy coherence appears to be problematic. Many EU sectoral policies do not reflect sufficiently (or are even in conflict with) environmental and climate objectives, as is the case of, for example, the EU's Common Agricultural Policy, which has often been quoted as an example of 'incoherence' in the context of each 'core thematic' objective (1, 2 and 3).

Progress on implementing the various policy instruments under the EAP is mixed, and hence progress in achieving the various related objectives is equally mixed. The following policy areas appear to be the most problematic when it comes to implementing the relevant legislation: biodiversity (Objective 1), waste management (Objective 2), air quality and noise (Objective 3). Furthermore, in terms of 'core thematic' objectives, the outlook for 2020 varies from not promising (in the worst case of Objective 1) to uncertain (in the best case of Objective 2); lack of data makes giving an outlook for Objective 3 difficult at this stage. On a more positive note, overall, stakeholders consider the current implementation of EU

environment and climate-related policies as beneficial to nature, citizens and economic operators.

Stakeholders consider that existing results could not have been achieved at a lower price. Funding at both EU and national level is viewed as not adequate to current needs, and public and private funding is not increasing as needed. Furthermore, when it comes to spending of available funding, project execution often faces problems, as revealed by the work of the European Court of Auditors (with relevance mainly to Objectives 1 and 2).

It could be concluded from the above that the implementation of the 'enabling' 7th EAP framework – aimed at improving coherence, implementation, knowledge and funding and initially designed to overcome systemic obstacles in the field of environment and climate change – is lagging behind, thus undermining the achievement of the 'core thematic' (and 'horizontal') objectives.

Notwithstanding the problems identified, the EAP is viewed as adding value to EU and national efforts in this policy field (with some differences across the different objectives).

Stakeholders are of the opinion that the long-term (post-2020) vision of the EU and its Member States in this policy field should continue to take the form of an Environment Action Programme, as stipulated by the Treaty on the Functioning of the European Union, and that the current, 7th EAP could be taken as a model. However, stakeholders' support for the 8th EAP would depend on the content of the future document, which they would like to see drafted with their active participation.

The present EIA is divided into two main parts. **Part 1** presents the EU's long tradition of adopting EAPs and lays out the structure, scope and evaluation modalities of the 7th EAP. **Part 2** gives the main findings on the implementation of the EAP's 'core thematic' objectives (1, 2 and 3) and 'horizontal' objectives (8 and 9). Findings are grouped on the basis of the key evaluation criteria: relevance, coherence, effectiveness, efficiency and EU added value. The EIA concludes by making an overall assessment of the 7th EAP as a policy instrument and comments on the prospects for an 8th EAP.

The information sources used contain many recommendations on due action to improve the EAP's implementation. These recommendations are presented in the Annexes to this document.

1. The 7th Environment Action Programme – general overview

1.1. The EU tradition of adopting action programmes in the field of environment and climate change

The EU has a long tradition of framing its long-term policy objectives in the field of environment and climate change into action programmes. The first Environment Action Programme (EAP), adopted in 1972, introduced the principles of 'prevention is better than cure' and 'polluter pays',¹ which are among the fundamental policy-making principles of EU environmental policy, as also enshrined in the Treaty on the Functioning of the European Union (TFEU).² Thus far, seven such programmes have been adopted and implemented. They have evolved substantially as regards their purpose, scope and timeframe, the procedures followed for their adoption and hence their legal status, and the modalities of evaluating their implementation.

1.1.1. Purpose, scope and time-frame of the Environment Action Programmes

EAPs are developed with the aim of taking stock of the current and long-term environmental and climate challenges in the EU and the world. Accordingly, EAPs outline the desirable shape of the environmental and climate action goals that are to be achieved through the joint efforts of the EU and its Member States.

The EAPs' time frame has also varied over time – while the 6th EAP³ covered ten years, the 7th one was designed to cover seven years (2014-2020) and is the first to lay out a long-term vision for policy-making in the field, until 2050.

This is the general framework that has determined the specific scope, structure and content of each of the seven EAPs that have been agreed and adopted at EU level to date.

1.1.2. Adoption procedure(s) and legal status of the Environment Action Programmes

EAPs became mandatory under the Treaty of Maastricht,⁴ which introduced a legislative procedure for their adoption. It was the legislative nature of the decision-making procedure that gave EAPs a legally binding status. This is why, in contrast to other policy areas where the EU adopts programmes, action programmes in the field of environment and climate change 'are not soft law, but hard law from a legal point of view'.⁵ Hence, the relevant EU institutions and the Member States are responsible for taking appropriate

¹ [Celebrating Europe and its environment](#), EEA (2011).

² The fundamental EU environmental policy principles are laid out in Article 191(2) TFEU.

³ See [Decision No 1600/2002/EC](#) of the European Parliament and of the Council of 22 July 2002, laying down the Sixth Community Environment Action Programme.

⁴ In force since 1 November 1993.

⁵ Epiney, A. 'EU environmental law: sources, instruments and enforcement: reflections on major developments over the last 20 years', 2013.

action, with a view to delivering the priority objectives set out in the EAPs, including the seventh one.⁶

Under the above 'cooperation' legislative procedure introduced by the Treaty of Maastricht, which was followed for the adoption of the 5th EAP, the European Parliament (EP) had limited powers in contrast to the Council of the EU, which played the leading role in the procedure. It was not until 1999, when the Amsterdam Treaty⁷ extended the co-decision legislative procedure to also cover EU environmental policies that the EP became a co-legislator in the adoption of EAPs on an equal footing with the Council⁸. The 6th EAP was the first to have been adopted under the co-decision legislative procedure and covered the period between 2002 and 2012.

Following the reform introduced with the Lisbon Treaty in 2007,⁹ EAPs are to be adopted through the ordinary legislative procedure, which is the 'Lisbon' equivalent of the co-decision procedure.

1.1.3. Evaluating the implementation of Environment Action Programmes

Over time, different approaches have been applied to evaluate EAP implementation. For instance, while the 6th EAP foresaw a mid-term review in its fourth year of operation, the 7th EAP does not contain such a provision.

Furthermore, with each successive EAP the co-legislators became more and more precise in their requirements as to what data sources must be taken into account when evaluating the programme.

1.2. The 7th Environment Action Programme (2014-2020)

1.2.1. The way to the 7th Environment Action Programme - the European Commission's proposal

In November 2012, the Commission put forward a proposal for a General Union Environment Action Programme to 2020, entitled 'Living well, within the limits of our planet'¹⁰ and commonly known as the 7th EAP. The Commission proposal was based on:

- the lessons learned (achievements and shortcomings) from the (final) ex-post evaluation of the implementation of the 6th EAP;¹¹ and

⁶ See Article 3 of [Decision No 1386/2013/EU](#) of the European Parliament and of the Council of 20 November 2013 on a General Union Environment Action Programme to 2020, 'Living well within the limits of our planet'.

⁷ In force since 1 May 1999.

⁸ In the co-decision procedure the European Economic and Social Committee and the Committee of the Regions are being consulted.

⁹ In force since 1 December 2009. See, in particular, Article 192(3) TFEU, which requires that General Action Programmes be adopted by the Parliament and the Council.

¹⁰ [COM/2012/0710 final](#)

¹¹ The implementation of the 6th EAP was evaluated by means of a two-step approach. As required by the EAP itself, the Commission first published a mid-term review at the end of April 2007

- the result of an ex-ante impact assessment supporting the course suggested by the Commission in the proposal for a new (7th) EAP.¹²

The 6th EAP's final ex-post evaluation was based on an external assessment,¹³ the result of a stakeholder consultation,¹⁴ and on the European Environment Agency's (EEA) State of the Environment (SOER 2010) report.¹⁵ Overall, the Commission found that the approach taken in the 6th EAP was positive and that significant progress had been made in reaching the EAP targets. However, the evaluation also spotted several shortcomings of the EAP, such as insufficient focus, lack of long-term vision, inadequate implementation and enforcement of the relevant EU legislation, and lack of harmonisation with the budgetary cycles.

When preparing the ex-ante impact assessment accompanying its proposal for a 7th EAP, the Commission took into account the results of the ex-post evaluation. Among other things, the ex-ante impact assessment was also informed by the results of an open stakeholder consultation conducted by the Commission,¹⁶ available studies¹⁷ and the positions expressed by various EU institutions and bodies, such as the Parliament,¹⁸ the Council,¹⁹ the European Committee of the Regions²⁰ and the European Economic and Social Committee.²¹ These EU institutions and bodies, together with the stakeholders that took part in the consultation, recognised the added value of having an EAP to streamline environmental policy-making and stressed the need for a next 7th EAP, as is also required by the TFEU.

In the results of the ex-ante impact assessment accompanying the Commission proposal for a 7th EAP, the Commission stressed that EU environmental policy has three key mutually reinforcing contributions to make in achieving the 'smart, sustainable and inclusive growth' that lies at the heart of the Europe 2020 strategy:²²

1. ensuring that Europe's natural capital is sufficiently resilient to pressure and change;

([COM/2007/0225 final](#)), largely based on a stakeholder consultation, to which the Parliament replied with a [resolution](#) adopted on 10 April 2008. In the second step, the Commission published its final ex-post evaluation of the implementation of the 6th EAP at the end of August 2011 ([COM\(2011\) 531 final](#)); the Parliament responded to it with a [resolution](#) of 20 April 2012, which also laid out the Parliament's position on the then forthcoming 7th EAP.

¹² [SWD/2012/0398](#)

¹³ [Final Report](#) for the assessment of the 6th EAP, prepared by the Ecologic Institute in cooperation with the Institute for European Environmental Policy and the Central European University, 2011.

¹⁴ The stakeholder consultation took the form of a 'stakeholder consultation meeting', organised by the Commission's DG Environment on 29 March 2011. More information on the participating stakeholders and the outcome of the consultation can be found [here](#).

¹⁵ State of the environment report ([SOER 2010](#)), prepared by the European Environment Agency.

¹⁶ The stakeholder consultation was conducted between 12 March and 1 June 2012. More information on the participating stakeholders and the outcome of the consultation can be found [here](#).

¹⁷ The list of studies used by the Commission for the ex-ante impact assessment is available [here](#).

¹⁸ European Parliament [resolution](#) of 20 April 2012.

¹⁹ Council of the European Union [Conclusions](#) on setting the framework for a 7th EAP - 3173rd Environment Council meeting, Luxembourg, 11 June 2012.

²⁰ [Opinion](#) of the European Committee of the Regions on the proposal for a 7th EAP, 30 May 2013.

²¹ [Opinion](#) of the European Economic and Social committee on the proposal for a 7th EAP, 20 March 2013.

²² [Europe 2020: A strategy for smart, sustainable and inclusive growth](#)

2. ensuring that Europe's economy is highly resource-efficient and low-carbon emitting;
3. ensuring that the health and wellbeing of EU citizens continue to benefit from high degrees of environmental protection.

The Commission structured its proposal for a 7th EAP around these three objectives, thereafter commonly referred to as the EAP's 'core thematic objectives'. Thus, the EAP was expected to serve as an overarching framework reinforcing policy efforts at both EU and national level for the achievement of these three objectives up to 2020.

Furthermore, the Commission identified four main problems hindering the fulfilment of the objectives:

1. inadequate implementation of and gaps in the existing environment policy acquis;
2. insufficiently coordinated data and information on the environment, gaps in the knowledge base, emerging issues and trends that are not properly addressed at present;
3. lack of coherence in addressing increasingly interlinked challenges, which also requires efforts in other policy fields;
4. problems related to incentives for investment in environment-related measures.

The Commission proposal took these four problems as objectives *per se*, whose achievement would enable the achievement of the 'core thematic objectives'. Therefore, these four objectives are commonly referred to as the 'enabling objectives' or the 'enabling framework' of the 7th EAP.

In its proposal, the Commission also acknowledged the need for the 7th EAP to address the urban and global dimension of the EU environment and climate change policies. However, because they relate to specific problems, these two dimensions were not included in the set of 'core thematic' objectives, but were added instead as 'horizontal' ones. By doing so, the Commission wanted to ensure that these horizontal issues are given specially-targeted responses.

1.2.2. The adopted 7th Environment Action Programme

As mentioned, the 7th EAP was adopted by the Parliament and the Council on an equal footing under the 'ordinary' legislative procedure. It took the form of a 'decision'²³ and covered the period between 2014 and 2020, thus matching the seven-year policy (including multiannual financial) cycle of the EU – something the previous EAP had fallen short of.

Article 2(1) of the Decision lists the EAP objectives as agreed upon by the co-legislators and following largely the policy line suggested by the Commission in its proposal:

'Core thematic' objectives

- Objective 1: to protect, conserve and enhance the Union's natural capital;
- Objective 2: to turn the Union into a resource-efficient, green and competitive low-carbon economy;

²³ [Decision No 1386/2013/EU](#)

Objective 3: to safeguard the Union's citizens from environment-related pressures and risks to health and well-being;

'Enabling' objectives

Objective 4: to maximise the benefits of Union environment legislation by improving implementation;

Objective 5: to improve the knowledge and evidence base for Union environment policy;

Objective 6: to secure investment for environment and climate policy and address environmental externalities;

Objective 7: to improve environmental integration and policy coherence;

'Horizontal' objectives

Objective 8: to enhance the sustainability of the Union's cities;

Objective 9: to increase the Union's effectiveness in addressing international environmental and climate-related challenges.

These objectives were established in light of a clear long-term vision for the period up to 2050, which the previous (6th) EAP lacked. During the decision-making process, the Parliament had stressed the need for a long-term vision for environmental and climate policy-making as conducive to a stable environment for achieving sustainable investment and growth in the next decades.

Annex I to the Decision describes the challenges associated with the achievement of each of the nine EAP objectives in greater detail. It also lists a set of policy initiatives and actions that should be undertaken, instruments that should be applied and requirements that should be met under each 'core thematic' or 'horizontal' objective;²⁴ these policy initiatives must be proposed and implemented in accordance with the principles of smart regulation and, where appropriate, subjected to a comprehensive impact assessment.

The Decision stipulates that the EAP is based on the 'precautionary' principle and the principles of 'preventive action', 'rectification of pollution at source' and 'polluter-pays', as required by the TFEU.

1.2.3. How is the implementation of the 7th Environment Action Programme to be monitored and evaluated?

The implementation of the 7th EAP is monitored and evaluated according to the provisions laid out in Article 4 of Decision 1386/2013/EU.

Monitoring

The Commission is responsible for monitoring the implementation of the various elements of the EAP, which it performs in the context of the regular Europe 2020 Strategy monitoring process. In particular, EAP monitoring must rely on the various EEA indicators on the state of the environment as well as indicators used to monitor progress in achieving existing environment and climate-related legislation and targets such as the climate and energy targets and biodiversity targets and resource-efficiency milestones.

²⁴ For more details see Annex I to this EIA.

Evaluation

The evaluation of the 7th EAP has been entrusted to the Commission. In particular, the evaluation should be based, inter alia, on the EEA SOER report and a consultation with interested stakeholders.²⁵ In the light of the evaluation outcome and other relevant policy developments, the Commission will, if appropriate, present a proposal for an 8th EAP in a timely manner, with a view to ensuring continuity with the current one.

²⁵ The Commission plans to publish the results of the evaluation in the second quarter of 2019, i.e., well before the end of the 7th EAP. See more on the Commission evaluation strategy in the Evaluation/Fitness check [Roadmap](#) from 8 November 2017.

2. The implementation of the 7th Environment Action Programme – Key findings

This part presents the main findings contained in the sources of information on the implementation of the 7th EAP that were used in drawing up the present EIA. It should be noted that only sources designed to serve the monitoring and evaluation of the 7th EAP were taken into account. In particular, these include:

- the first edition of the Environmental indicator report (EEA, December 2016);²⁶
- the Environmental Implementation Review (Commission, February 2017); and
- the targeted stakeholder consultation on the EAP implementation (May-September 2017).²⁷

In addition, the EIA relied on a paper prepared by the European Court of Auditors (ECA) at the request of the EPRS.²⁸ This paper summarises the key findings of the Court from selected special reports in the field of environment and climate change published since 2014 (i.e. the first year of implementation of the 7th EAP), with relevance to the EAP's Objective 6.

It is worth noting that the picture painted by the above sources holds true only for the first three and a half years of the EAP's implementation (2014-mid 2017) and that most of these sources have only focused on the 'core thematic' objectives. Therefore, the findings presented here should be considered to constitute a mid-term snapshot of progress and not a comprehensive evaluation of the EAP's implementation.

Section 2.1 explains the purpose, scope and methodology of the key sources used. Five sections (2.2.1-2.2.5) present the key findings of these sources regarding the 7th EAP's²⁹ 'core thematic' Objectives 1, 2, 3, and 'horizontal' Objectives 8 and 9. Each of these five sections has been dedicated to the five criteria for evaluation: relevance, coherence, effectiveness, efficiency and EU added value. In particular, these criteria are used as follows:

- **Relevance** – checks whether the set of policy (sub-)objectives sufficiently reflect current needs. In the context of 'relevance', the question on whether there is available knowledge for policy-making under the explored EAP objective is pertinent, not least in the context of EAP 'enabling' Objective 5, 'To improve the knowledge and evidence base for Union environment policy';
- **Coherence** – EU and Member State policies in other sectors should be coherent with the 7th EAP and support the achievement of environmental and climate-related objectives; this is required under EAP 'enabling' Objective 7, 'To improve environmental integration and policy coherence';

²⁶ The [EEA SOER](#), which gets published every five years, was not taken into account, as it gives a picture that is not up-to-date. Instead, the EEA indicator report was given priority, because even though it also mainly covers the 2014-2015 period, it has the advantage of following the structure of the 7th EAP.

²⁷ The results from the targeted stakeholder consultation have been published in Annex VI of this document.

²⁸ The full text of the paper has been published in Annex V to this EIA.

²⁹ The findings on the 'enabling' Objectives 4, 5, 6 and 7 have been presented in the context of each 'core thematic' objective and each 'horizontal' objective.

- **Effectiveness** – here one seeks to establish whether the set objectives have been achieved where implementation matters; hence, in the context of the 7th EAP, this criterion is related to 'enabling' Objective 4, 'To maximise the benefits of Union environment legislation by improving implementation';
- **Efficiency** – here the question is whether the existing policy results could have been achieved with less costs/resources. In the context of the 7th EAP, this criterion also measures the level of funding as well as taking environmental considerations into account when designing the funding of public policies; hence, it is related to 'enabling' Objective 6, 'To secure investment for environment and climate policy and address environmental externalities'.
- **EU added value** – this criterion checks whether Member States could have achieved existing results better if acting alone (i.e. without policy-making at EU level).

Subsequently, a sixth criterion, **knowledge base**, was added to the above standard set of evaluation criteria, and was also applied when evaluating the implementation of the 7th EAP, which, as already mentioned, serves as an overarching strategy for policy-making in the large environment and climate change policy field. In particular, the sixth criterion is considered as complementing the 'relevance' criterion, as knowledge base is a *conditio sine qua non* for developing policies that best reflect the needs in the field. Each of the above-mentioned sections ends with a summary of the main findings for each criterion under the relevant 'core thematic' or 'horizontal' objective.

Finally, section 2.3 explores whether the EAP as a policy instrument is fit for achieving the set objectives. The way forward to the next (8th) EAP is also discussed.

2.1. Key data sources – purpose, scope and methodology

2.1.1. Environmental indicator report 2016 in support to the monitoring of the 7th Environment Action Programme

In December 2016, the EEA published its Environmental indicator report 2016.³⁰ It was prepared in response to Article 4(1) of Decision 1386/2013/EU establishing the 7th EAP. The main purpose of the report was to assess past trends and the prospects for achieving the objectives of the 7th EAP by 2020.

The report only covers the EAP 'core thematic' objectives (1, 2 and 3),³¹ although a few findings on the enabling framework were presented for each of those objectives as well. The key findings of the report are based on a set of 29 indicators, which the EEA selected on the basis of their relevance to tracking progress towards the main aspects (policy objectives and requirements) of the 7th EAP three 'core thematic' objectives.

Detailed findings on each indicator were included in the so-called 'online briefings',³² featuring information on past trends and the main reasons for these trends, the key

³⁰ EEA [Environmental indicator report](#), 2016.

³¹ This is due to the fact that, as indicated by the EEA, 'indicators' availability outside these three objectives is fairly limited across the relevant bodies and institutions in Europe'. Nevertheless, the report also gives information on certain aspects of the 'enabling framework' (i.e. Objectives 4, 5, 6, and 7), which have been taken into account in this EIA.

³² The links to each online briefing can be found in Annex II to this EIA.

challenges and prospects of meeting the selected objectives/targets by 2020, and the challenges and opportunities beyond 2020. Wherever available, these online briefings also contain country-level data. The results for each indicator and each objective were summarised in three scoreboards, which can be seen in Annex III to this document.

It should be noted that even if a trend is displayed as 'improving' for a given indicator, this does not automatically mean that the relevant indicator target will be achieved by 2020, since the speed of improvement may still be too slow for the target to be met. This is why for some of the 29 indicators used in the report, an improving trend is followed by a deteriorating 2020 forecast.

The latest available year for most of the indicators used in the report is 2014, i.e. the first year of implementation of the 7th EAP. Thus, the report can serve as a baseline for tracking progress towards achieving the three 'core thematic' objectives over the next few years. However, the EEA report cannot be considered as a 'comprehensive and integrated assessment' of the implementation of the 7th EAP, because it reflects mostly the EAP's first year of implementation³³ and covers only three of its objectives.

2.1.2. Environmental implementation review

On 3 February 2017, the European Commission published an Environmental implementation review³⁴ (EIR) aimed at supporting Member States in their efforts to deliver under the various objectives set up in the EU acquis in the field of environment³⁵.

The EIR consists of two main parts:

- A [communication with an annex](#) identifying common challenges across countries and giving advice on how to combine efforts to deliver better results,³⁶ which is accompanied by
- 28 country-specific reports mapping national strengths, opportunities and weaknesses.

While the EIR covers the entire relevant EU legislation, important policy areas, such as chemicals and climate change, have not been included in this first edition. Furthermore, the EIR does not make conclusions on the outlook for 2020, and therefore it can only be used as an indicative source of information on trends regarding the implementation of relevant pieces of legislation by Member States.

The present EIA used the overview published in the above-mentioned communication on the global picture of challenges and strengths, especially as regards the assessment of effectiveness, and, in particular, as regards 'enabling' Objective 4 of the 7th EAP on

³³ The EEA plans to regularly update the scoreboard of indicators. The first update is expected in late 2017, when almost half of the indicators will be updated with data for 2015, and a few with data for 2016. More information on the sources, time periods and expected updates of the scoreboard indicators can be found in Annex III to this EIA.

³⁴ [Environmental implementation review](#), 2017. See more about the specific EIR objectives and cycle [here](#).

³⁵ The European Parliament expressed its recommendations on the key findings of the EIR in a dedicated [resolution](#) adopted on 17 November 2017.

³⁶ The annex to the communication summarises suggested actions for improvement for all EU Member States.

implementation. The detailed recommendations that the Commission addressed to each Member State are presented in Annex IV to this EIA.

2.1.3. Targeted stakeholder consultation

The targeted stakeholder consultation was conducted by the EPRS' Ex-Post Evaluation Unit³⁷ in support of an ENVI implementation report, with the aim to inform parliamentarians on stakeholders' views regarding the implementation of the 7th EAP. It is in line with Article 4(2) of Decision 1386/2013/EU establishing the EAP, which requires that its evaluation is informed, among others, by stakeholders' views. The results, published under Annex VI to this document, constitute an added value to current and future evaluation initiatives at EU and Member State level in the context of the 7th EAP. The stakeholder consultation is the first to give evidence on the implementation of all of the 7th EAP objectives.³⁸

As the consultation covers virtually the entire EU acquis in the field of environment and climate-related policies, it can serve as a basis for the work of the Parliament not only with regard to the mid-term review of the 7th EAP, but also to its various activities in this large policy area and especially those of its Committee on the Environment, Public Health and Food Safety (ENVI).

Data was collected via an online survey, interviews and a focus group (testing the results from the survey and the interviews). Contributions were received from the following stakeholder categories: EU institutions, Member States (various governance structures, including ministries and environmental protection agencies), international organisations, regional and local authorities, industry, nature interest-support organisations, citizen interest-support organisations and the research community. Some stakeholder categories (e.g. Member States, a total of 22 out of 28) were better represented than others (e.g. industry, where key sectors remained unrepresented).³⁹ As in other similar exercises, it should be noted that the results of the consultation are based inevitably on the stakeholders' perceptions (subjective opinions).

The sections below contain only the general trends and most important conclusions. Specific details, for instance, regarding which stakeholder categories (or concrete stakeholder organisations) populated a certain trend and what their feedback was, can be found in Annex VI. Furthermore, only the results of the consultation for the 'core thematic' objectives (1, 2 and 3) and 'horizontal' objectives (8 and 9) are presented, while the results on the 'enabling' objective (4, 5, 6 and 7) are presented in the context of the former objectives.

The numerous recommendations made by stakeholders regarding the individual objectives and the implementation of the EAP as a whole can also be found in Annex VI.

2.1.4. Special contribution of the European Court of Auditors

³⁷ For the external study commissioned to Technopolis Group (in consortium with Trinomics), see Annex VI.

³⁸ In fact, evidence on the implementation of Objectives 8 and 9 (sections 2.2.4 and 2.2.5 below) comes only from the stakeholder consultation.

³⁹ See more on the selection and background of the stakeholders that took part in the consultation in Annex VI to this EIA (sections 2.2. and 2.3).

The special contribution made by the ECA at the request of the EPRS' Ex-Post Evaluation Unit lists the key findings and recommendations of selected special reports relevant to the implementation of the 7th EAP, and in particular to enabling Objective 6, 'To secure investment for environment and climate policy and address environmental externalities'.

In terms of policy areas covered, the findings and recommendations relate to sub-areas of 'core-thematic' Objectives 1 and 2, and are presented in the relevant sections below. The ECA's contribution and recommendations are laid out in Annex V to this EIA.

2.2. Key findings

2.2.1. Objective 1 (To protect, conserve and enhance the Union's natural capital)

This objective covers seven main areas for action: (1) biodiversity and ecosystem services; (2) transitional and coastal waters and freshwaters; (3) marine waters; (4) the impact of air pollution on ecosystems and biodiversity; (5) land; (6) the nutrient cycle; and (7) forests.

Key environmental legislation and policies include, among others: the Water Framework Directive, the Marine Strategy Framework Directive, the Birds Directive, the Habitats Directive, the Nitrates Directive, the Biodiversity Strategy to 2020, the Air Pollution Thematic Strategy and the Resource Efficiency Roadmap. The Directive on national emission ceilings for certain atmospheric pollutants and the Directive on ambient air quality, which are mostly relevant to Objective 3, are also relevant to Objective 1.⁴⁰

Relevance (and knowledge base)

The respondents in the **stakeholder consultation** almost unanimously agreed that Objective 1 and its sub-objectives are relevant/mainly relevant to the current needs in the field of nature protection and conservation. The majority considered that it was no necessary for more sub-objectives to be added to cover needs under Objective 1 at the moment. Those who said certain aspects were missing across the sub-objectives were actually referring to: protected area coverage and management; wildlife trafficking; endangered species; biodiversity and agriculture; green infrastructure (including biodiversity in the wider countryside); a need for more attention to prevent soil contamination (with regard to emerging contaminants); enhancing the integration/coherence of biodiversity protection; climate-change policies and natural resource policies (e.g. consumption impacts and the potential for resource efficiency in the use of biological resources); bioenergy; Common Agricultural Policy (CAP) reform; integrating natural capital into national financial reporting; and fossil fuel divestment.

With regard to improving the scientific knowledge and evidence base for nature protection and conservation policies, stakeholders had the perception that there is progress in understanding the impact of climate change and natural disasters and the implications of species loss for ecosystem services. However, they pointed to some knowledge gaps preventing a better understanding of environmental thresholds and ecological tipping points. They also commented that more resources are needed at Member State level to improve monitoring systems and gather necessary data to assess the status and trends of

⁴⁰ See the concrete sub-objective and policy initiatives/actions/instruments/requirements under Objective 1 in Annex I to this EIA.

species and habitat types. This would also improve the methodologies applied to quantify pressures and impacts deemed necessary to formulate appropriate policy action and thereby turn nature into a more transversal theme in other EU policies. Furthermore, the evidence that we already have for understanding ecological tipping points and thresholds as well as ecosystem services operationalisation was felt to not be utilised to its full extent in policy-making.

In addition to the stakeholders' feedback, the Commission's Environmental implementation review underlines that the lack of knowledge on species, habitats and sites is one of the major obstacles to effective implementation in most of the Member States, including with regard to marine ecosystems.

Coherence

The majority of respondents in the stakeholder consultation considered 'nature protection and conservation' policy-making efforts at Member State level to be coherent with the policy instruments/actions under Objective 1 of the 7th EAP.

Only a slight majority of respondents considered sectoral policies at EU and Member State level to have been developed and implemented in a way that supports nature protection and conservation objectives.

In terms of coherence between concrete sectoral EU policies and Objective 1, the CAP was mentioned by a clear majority of respondents as being incoherent with Objective 1 of the 7th EAP. The Trans-European Network Policy (TENP) received a similar assessment (a clear majority of those who felt capable of making a judgement). Opinions regarding cohesion policy reflected a perception that as a result of recent reform, it now incorporates a number of environmental considerations, unlike before. Fisheries policy received a mixed response: positive opinions in favour of coherence slightly prevailed over negative ones.

The stakeholders' views are somewhat supported by the findings of the EEA's 2016 Environmental indicator report with regard to coherence. According to the EEA report, the current measures, policies and strategies addressing the erosion of natural capital at EU level are largely fragmented and independent from each other. In order to better manage natural capital, environmental objectives will increasingly need to be mainstreamed into sectors such as fisheries, agriculture, forestry, energy, food, transport and tourism. The systemic nature of the degradation of natural capital requires managing human activities in an integrated, holistic way. Therefore, the report recommends 'ecosystem-based management'⁴¹ as a suitable approach that could help to tackle the systemic challenge of protecting natural capital.

In this context, the report mentions intense agriculture as an example of a policy area having a considerable negative impact on the EU's natural capital. Furthermore, it indicates that the current CAP seems to be inadequate to sufficiently reduce pressures on natural capital in line with the ambitions of the 7th EAP. The report therefore recommends taking a more ambitious and long-term approach aiming to both increase environmentally friendly agricultural production and to consider ways to transform of our food systems. Such an approach could also include a policy focus on food consumption through, for example, dietary changes, more effective distribution chains and food waste prevention.

⁴¹ An integrated approach to management that considers the interdependence of human activities, ecosystems and human well-being, with a long-term outlook across different spatial scales.

According to the report, shifting to more sustainable agriculture, such as organic farming, would both reduce environmental pressures and create more jobs, as it involves more labour-intensive (and resource-efficient) practices.

Effectiveness

Data on effectiveness comes from the EEA indicator report, the Commission EIR and the stakeholder consultation.

A slight majority of respondents in the **stakeholder consultation** believed progress to be mixed across different sub-objectives. Around one quarter said that some progress has been made on all sub-objectives.

Only 1 out of the 9 initiatives/actions/instruments/requirements under Objective 1 – the Blueprint to safeguard Europe's water resources – was perceived as being sufficiently implemented at both EU and Member State level. The EU Strategy on adaptation to climate change was assessed as being sufficiently implemented at EU level, but not at Member State level. A slight majority of respondents considered the requirement for information provision, awareness and education on environment as being sufficiently implemented at Member State level. All other six initiatives/actions/instruments/requirements under Objective 1 were perceived as being insufficiently implemented at both EU and Member State level:

- the Biodiversity strategy;
- ensuring healthy fish stocks, combating marine litter, completing the Natura 2000 network of marine protected areas, and ensuring sustainable coastal zones management;
- the Union air quality legislation and defining strategic targets and actions beyond 2020;
- reducing soil erosion, increasing soil organic matter, remediating contaminated sites, adopting targets on soil and land as a resource, and adopting land-planning objectives;
- reducing nitrogen and phosphorus emissions, improving source control and waste phosphorus recovery;
- developing and implementing a renewed Union forest strategy.

The mixed rate of progress is often attributed by respondents to ineffective policy implementation and integration at national level.

Respondents were of the opinion that 'adjusting relevant legislation towards actual needs' and 'public access to information on the implementation of legislation' have mainly improved. They believed that 'compliance with legislation' and 'citizens' trust in the enforcement of legislation' have also scored improvement although to a lesser extent.

As to whether the implementation of policy instruments has led to, or will lead to, improved protection and satisfaction of the interests of citizens, economic actors and nature, the overall response was very positive. There are some areas of dissatisfaction in the nature protection area, but respondents assessed implementation as satisfactory; however, they pointed out that progress is too slow compared to the rapid rate of biodiversity loss.

Stakeholders' opinions were on the positive side about the impacts (resulting from the implementation of relevant EU law in the field of nature protection and conservation) on

nature, citizens and economic actors; views as regards nature and citizens were mainly positive (positive/very positive), while views on impacts on industry were mixed (positive/neutral).

Almost all respondents agreed that the nature protection and conservation policies of the EU and its Member States also bring economic benefits.

The Commission EIR identifies biodiversity and water quality and management (surface and marine water) as the policy fields where the main challenges and most pressing implementation gaps across Member States are found with relevance to Objective 1.

Some of the problems spotted in connection with biodiversity are:

- as regards the state of the environment, 75 % of habitat assessments point to an unfavourable conservation status and a significant proportion continues deteriorating: 60 % of EU assessments indicate an unfavourable status for non-bird species, while the status of 15 % of all bird species is near threatened, declining or depleted and another 17 % are threatened. Thus, the EIR concludes that the overall status of protected species and habitats has not significantly improved over the last six years. The EIR acknowledges that there has been progress in many areas, but also indicates that there are significant gaps in implementation, financing and policy integration. 'At the current rate of efforts, biodiversity loss would continue in the EU with potentially serious consequences for the capacity of natural ecosystems to provide for human needs in the future'. This finding is largely confirmed by the trend spotted in the EEA indicator report (see below) and the stakeholder consultation (see above);
- although the Commission's fitness check on the Birds and Habitats Directives concluded that they are fit for purpose, it also found that substantial improvement in their implementation is needed, if their objectives are to be fulfilled. In particular, the 'designation of (land/sea) sites' process under the Habitats Directive has not yet been completed across the EU. Management plans for Natura 2000 sites under both nature directives are often missing or their execution is problematic, which is assessed by the Commission as a 'systemic issue causing poor implementation of those pieces of EU law';
- pressure on land biodiversity, in particular unsustainable agricultural practices, the modification of natural conditions, and pollution;
- pressure on marine biodiversity, in particular unsustainable fishing and harvesting of aquatic resources, modification of natural conditions, climate change and ocean acidification, and also pollution by chemicals, plastics and noise.

The EIR underlines the following reasons for the spotted implementation problems: lack of adequate funding, lack of human resources and poor involvement and engagement of local communities and stakeholders such as landowners and land users. Annex IV contains the specific recommendations addressed to each Member State.

The EIR also lists a few examples of good practices in biodiversity protection: management of Natura 2000 sites, an integrated funding framework for Natura 2000, and natural capital accounting.

The problems identified in relation to water quality and management are:

- as regards natural surface water bodies, the picture is far more negative – in only a third of Member States do more than 50 % of all natural surface water bodies have a good or high ecological status, while in five Member States less than 20 % of water bodies have a good ecological status. More specifically (and also in relevance to Objective 2), all Member States' first-generation river basin management plans (RBMPs) are reported to have some or significant deficiencies, mainly as regards monitoring and methods for assessing and classifying the status of water bodies. All Member States have made use of extended deadlines. Some countries give a green light to new projects that are detrimental to achieving a good status of their river-water bodies. The Commission has issued recommendations to Member States to address these deficiencies and to close these gaps in their second-generation RBMPs. These were included in action plans to fulfil preconditions for receiving funding from the European Structural and Investment Funds for water infrastructure investments. Although the second generation RBMPs were due by the end of 2015, a few Member States have not yet adopted theirs. Flood risk management plans appear to be also challenging for many Member States – despite the 2015 deadline, by the end of November 2016 only 18 Member States had reported information on their plans;
- as regards groundwater bodies, a good quantitative status is registered in almost half of Member States; in 10 Member States the qualitative status of 70-90 % of all groundwater bodies is good, while in five Member States the figure ranges from 20 to 70 %;
- as regards marine waters, the EIR concluded that all Member States having marine waters still have gaps in implementing the Marine Strategy Framework Directive, in particular as regards the definition of a good environmental status. Most Member States' monitoring programmes will not be fully operational before 2018 or even 2020, which would lead to information gaps in the next assessment of their marine waters, due in 2018. Ten Member States have not adopted programmes of measures with the core actions that would give their marine waters a good environmental status, although the deadline was March 2016;
- nitrates concentrations and eutrophication levels remain a serious issue in nearly all Member States, despite the improved implementation of the Nitrates Directive, which was also highlighted by the EEA indicator report;⁴² eutrophication of the Baltic Sea, mainly due to intensive agriculture practices, is particularly problematic.

The EIR points to the following as being the underlying causes for the problems identified: ineffective control measures, lack of coordination between water management authorities at different regional or local levels; lack of cooperation between water and nature governance bodies, but also between them and bodies competent for other sectors; lack of access to data; and inadequate water pricing policies. Annex IV to this document presents the specific recommendations addressed to each Member State.

⁴² See more details in the [on-line briefing](#) 'Agricultural land: nitrogen balance' (EEA 2016 Indicator report).

In the context of the 'Planetary Boundaries' research initiative (hosted by the Stockholm Resilience Centre), [nitrogen and phosphorus flows](#) to the biosphere and oceans have been identified as an area where the humankind is exceeding planetary boundaries.

The EIR also quotes a few examples of good practices in water inspection and as regards the ecological status of freshwaters and their habitats.

Further information on effectiveness comes from the EEA's Indicator report, which comments on progress made under Objective 1 and the outlook by 2020.

The progress made under Objective 1 was tracked by nine indicators chosen from the EEA database. The selected indicators focused primarily on 2020 objectives in existing legislation and policies that correspond to the objectives of the seven main areas of action under this priority objective. The key findings for each indicator were included in nine online briefings.⁴³

The main conclusions regarding progress made and the outlook by 2020 are presented below.

Progress made

Only four of the nine indicators used for Objective 1 display an improving trend, while three indicators show deteriorating trends; for two indicator the assessment was stable or unclear as of December 2016:

- **an improving trend is spotted for:** 1. exposure of terrestrial ecosystems to eutrophication due to air pollution; 2. gross nutrient balance in agricultural land: nitrogen; 3. land take; 4. status of marine fish stocks;
- **a deteriorating trend is spotted for:** (biodiversity in general) 1. abundance and distribution of selected species (common birds and grassland butterflies); 2. species of European interest; 3. habitats of European interest;
- **a stable or unclear trend for:** 1. growing stock, increment and felling of forests, and 2. status of surface water⁴⁴ (information on these is available in the Commission's EIR (see above).

Hence, according to the EEA report, the EU's natural capital is not yet being protected, conserved and enhanced in line with the ambitions of Objective 1.

Outlook by 2020

The relevant objectives/targets for only one of the nine indicators used for Objective 1 are likely to be met by 2020, while for seven indicators this will not happen and for one more the prospects are uncertain. In particular:

- **The following objective is likely to be met by 2020:** forests are managed sustainably management;
- **The following objectives are unlikely to be met by 2020:** 1. to reduce areas of critical load exceedance with respect to eutrophication by 43 % from 2000 levels; 2. to manage the nutrient cycle in a more sustainable way (nitrogen); 3. to ensure healthy fish stock; 4. to halt the loss of biodiversity and the degradation of ecosystem services; 5. to ensure that 34.5 % of species assessed under the Habitats

⁴³ The briefings provide an overall picture of progress but they are not complete since they cover aspects only of the seven main areas of action. In addition, the briefings do not offer an integrated and systemic view of the types of pressure and their effects on the EU's natural capital. However, the EEA report provides additional relevant information to complement the findings in the indicator briefings. See more details in Chapter 1, pp. 16-22 of the EEA report.

⁴⁴ As of December 2016.

Directive are assigned a favourable or improved conservation status, and that 78 % of species assessed under the Birds Directive show a secure or improved status; 6. to ensure that 34 % of habitats assessed under the Habitats Directive are in a favourable or improved conservation status; 7. to achieve a good status for transitional and coastal waters and freshwaters;

- **It is uncertain whether or not the objective will be met by 2020:** to keep the rate of land take below 800 km² on average per year over the 2000-2020 period in order to stay on track to achieving the aim of no net land take by 2050.

Therefore, the EEA report concluded that, based on the selected 2020 policy objectives, the EU is not on track to meet priority Objective 1 by 2020.

Annex III to this EIA presents a scoreboard for each indicator with a brief justification. Further information on the objectives and rationale behind the 2020 outlooks can be found in the online indicator briefings.⁴⁵

Efficiency

Stakeholders viewed funding at EU and Member State level as mainly being inadequate to meet current needs. Furthermore, respondents considered that private funding has not increased and public funding has somewhat increased (but opinions on this issue were divided). Many respondents were not aware of the funding aspects of policy implementation under Objective 1. The CAP was highlighted as holding a high potential, but its current performance was generally viewed negatively.

The Commission's EIR stressed the lack of adequate funding as a problem in the field of biodiversity.

Very few stakeholders responded to a question related to compliance costs for industries and enforcement costs for authorities. However, based on stakeholders' opinions, it appears that monitoring conservation efforts focused on species and habitat and the restoration, structure and function of habitats, and especially initiatives such as Natura 2000, are very costly for national authorities. However, a statement was also made that costs are sometimes perceived as higher than they are. As for the question whether results could have been achieved with less costs and resources, respondents mostly replied 'no'.

Respondents raised the point that the value of natural capital and ecosystems at Member State level is not properly assessed and therefore the cost of degradation is not properly considered in policy-making. The costs seem to remain underappreciated and external costs are difficult to assess and therefore to be taken into consideration. This view is somewhat confirmed by the findings of the EEA indicator report with regard to the knowledge base.

The EEA report stresses the need of incorporating the EU's natural capital into accounting systems, which would help to adequately integrate natural capital concerns into economic systems and decision-making.⁴⁶ It lists several challenges that need to be addressed, if

⁴⁵ The list of indicators for Objective 1 and the links to the relevant online briefings are available in Annex II to this EIA.

⁴⁶ These findings are of particular relevance to sub-objective (c) of Objective 6: 'the value of natural capital and ecosystem services, as well as the costs of their degradation are properly assessed and considered in policy-making and investments'.

natural capital is to be managed better. For example, the report identifies the following challenges to understanding the EU's natural capital: (insufficient) assessments of the extent, structure and condition of the different ecosystem types, and (insufficient) assessments of the ecosystem service flows that they generate.⁴⁷ This will require investing in the development of a shared data platform for the integration of ecosystem-related data at EU level.⁴⁸ The report also recognises the need for knowledge on how the EU can operate safely within the limits of the planet, as required by the 7th EAP.⁴⁹

The EEA report also comments on green finance and eco-innovation, which also have an important role to play in improving the management of the EU's natural capital, especially if there are to be clear market returns from such improvement. Green finance initiatives, such as, for example, the Natural Capital Financing Facility,⁵⁰ will be important in helping to convince the market in the attractiveness of biodiversity and climate adaptation operations. One more example quoted in the report is the Natural Capital Coalition open-source platform that can help the private sector to share innovations on the development of methods for natural capital valuation in business.

The ECA special contribution provides evidence with regard to progress towards the concrete policy requirements under 'enabling' Objective 6,. All of the special reports selected by the Court in the context of Objective 1 refer to policy requirement (iii):⁵¹

on biodiversity

1. [Special Report No 1/2017: More efforts needed to implement the Natura 2000 network to its full potential](#)⁵²

This special report found that EU funds were not well mobilised to support the management of the Natura 2000 network, and that monitoring and reporting systems were not adequate to provide comprehensive information on the effectiveness of the Natura 2000 network.

⁴⁷ In this context, the report gives the example of the Mapping and Assessment of Ecosystems and their Services ('[MAES initiative](#)'), which is being carried out in collaboration between the Commission Directorate General for the Environment (DG ENV), the EEA and individual countries. The project has made important progress towards mapping and assessing the condition of Europe's ecosystems. The next step for this initiative is to assess ecosystem service delivery by assessing the ability of ecosystems to deliver ecosystem services, given their conditions.

⁴⁸ In this context, the report gives the example of a joint project by the Environment Knowledge Community (currently consisting of Commission's DGs for the environment, for climate action (DG CLIMA) and for Research and Innovation (DG R&I), as well as Eurostat, the Joint Research Centre (JRC) and the EEA. The project called Knowledge Innovation Project for an Integrated System for Natural Capital and Ecosystem Services Accounting ([KIP-INCA](#)) aims at developing an integrated EU ecosystem accounting system.

⁴⁹ A joint project by partners to the Environment Knowledge Community is underway to help operationalise the planetary boundary concepts in an EU policy context (Knowledge Innovation Project on 'Within Limits of the Planet', [KIP-WiLoP](#)).

⁵⁰ The Natural Capital Financing Facility is a financial instrument combining funding from the European Investment Bank and the European Commission.

⁵¹ (iii) adequately reflecting environment and climate priorities in policies and funding strategies to support economic, social and territorial cohesion.

⁵² This special report also related to requirement (viii) under Objective 6: 'further developing and encouraging 'payments for ecosystem services' schemes'.

2. [Special Report No 12/2014: Is the ERDF effective in funding projects that directly promote biodiversity under the EU biodiversity strategy to 2020?](#)

This special report found that the benefits for biodiversity from investments were not assessed.

on agricultural impacts

3. [Special Report No 20/2015: The cost-effectiveness of EU rural development support for non-productive investments in agriculture](#)

This special report found that the complementary role of non-productive investment to support the specific objectives of other agri-environmental objectives was not always realised.

4. [Special Report No 26/2016: Making cross-compliance more effective and achieving simplification remains challenging](#)

This special report found that the Commission could not adequately assess the effectiveness of cross-compliance, and that control procedures were complex.

on aquaculture

5. [Special Report No 10/2014: The effectiveness of European Fisheries Fund support for aquaculture](#)

This special report found that EU-level guidance related to environmental sustainability was insufficiently provided when funding aquaculture.

For each of these special reports, the ECA gave concrete recommendations that can be seen in Annex V to this EIA.

EU added value

At EU level, the 7th EAP seems to have a moderate effect of on policy areas in nature protection and conservation. At Member State level, this effect seems to be even more moderate. Some respondents feel that public administrations in the different Member States do not always pay attention to documents such as the EAP, which might be obstructing their overall approach towards environmental issues. Stakeholders recognise that environment-related challenges have also got a cross-border dimension and need a concerted approach at EU level, otherwise actions taken by one Member State risk being undone by inaction or adverse action by another Member State.

Summary of main findings for the implementation of Objective 1

Relevance (and knowledge base)

The scope of Objective 1 remains relevant to current needs in the field of nature protection and conservation. However, some stakeholders suggested certain aspects are missing from among the sub-objectives. Knowledge gaps on the status of species, habitats and ecosystems need to be filled, and existing knowledge should be better taken into account as a precondition for improving policy implementation.

Coherence

Several sectoral policies at EU level were indicated as incompatible with EU nature protection and conservation objectives. This holds true especially as regards the CAP's

negative impacts on natural capital, which points to the need of making relevant adjustments to ensure environmentally friendly agricultural production.

Effectiveness

Progress on the various policy areas under Objective 1 can be assessed as 'mixed', mainly as a result of implementation problems. Biodiversity appears to be the area where implementation is most problematic.⁵³ It is unlikely that Objective 1 will be entirely achieved by 2020; at the current rate of efforts, biodiversity loss in the EU will continue with potentially serious consequences for the capacity of natural ecosystems to provide for human needs in the future. Nevertheless, stakeholders perceived the implementation of nature protection and conservation policies as having a positive impact, particularly on nature and citizens and less so (yet still positive) on economic operators. Therefore, special efforts to improve implementation in the field of nature protection and conservation are required.

Efficiency

Stakeholders believed that funding for nature protection and conservation policies at EU and Member State level is largely inadequate for meeting current needs. This view is somewhat corroborated by the Commission which points to the lack of proper funding as regards biodiversity. This view also echoes feedback from responses under the stakeholder consultation saying that for national authorities, the task of monitoring conservation efforts addressed to species and habitat as well as efforts involving the restoration, structure and function of habitats is a very costly affair, giving initiatives such as Natura 2000 as an example. Nevertheless, stakeholders also considered that the actual results could not have been achieved with fewer costs and resources. In its special reports, the ECA found many deficiencies in the funding aspects of policy implementation in the field of nature protection and conservation, and notably as regards biodiversity. Finally, in its indicator report, the EEA expressed the opinion that natural capital as a concern needs to be better integrated into accounting systems, which would also help to better integrate it into economic systems and policy-making.

EU added value

At EU level the 7th EAP seems to have a moderate effect on policy areas related to nature protection and conservation and at Member State level this effect seems to be even lesser.

All four key sources of information have made concrete recommendations for due action, some of which have been included in section 2.2.1. In addition, greater detail on these recommendations is provided in the relevant annexes to this EIA.⁵⁴

2.2.2. Objective 2 (To turn the Union into a resource-efficient, green and competitive economy)

There are five main areas for action by 2020 under this priority objective: (1) resource efficiency, (2) waste, (3) climate and energy, (4) sustainable consumption and production, and (5) water efficiency.

⁵³ As confirmed by the three key sources of information and by the ECA's findings.

⁵⁴ See stakeholders' recommendations in Annex VI (Section 3.2.7.), the Commission's EIR recommendations to each Member State in Annex IV, and the ECA's recommendations in Annex V.

The legislative and policy framework under Objective 2 includes, among other things: the Waste Framework Directive, the Landfill Directive, the Energy Efficiency Directive, the Renewable Energy Directive, relevant water legislation, relevant emission trading system (ETS) legislation, and policy initiatives such as the Europe 2020 strategy, the Roadmap to a resource efficient Europe, the Roadmap for moving to a competitive low-carbon economy in 2050, the 2030 Climate and energy framework, the Circular economy action plan and the Energy union framework strategy.⁵⁵

Relevance (and knowledge base)

Stakeholders almost unanimously agreed that Objective 2 and its sub-objectives are relevant/mainly relevant to current needs in the field of a resource-efficient, green and low-carbon economy. A slight majority considered that there was no need for more sub-objectives to be added to cover needs that are not addressed by Objective 2 at the moment. Some found certain aspects to be missing from among the sub-objectives. More specifically, they pointed out that the existing gaps in product policies (notably consumption patterns as regards electronics and textiles) need to be targeted more effectively to give the circular economy an impetus; that emissions targets need to be adjusted to reflect the Paris Agreement, the UN Sustainable Development Goals and heightened ambitions the globe; that there are gaps with regard to policy on secondary raw materials and the circular economy (with a suggestion that waste objectives should be linked to the circular economy); that there is a need to promote low-carbon transport modes, align renewable energy with the Energy union and consider the impacts of digitalisation on society.

Most stakeholders considered the knowledge base to have increased.⁵⁶ Interestingly, even though they stated that there is increased understanding about how changes in individual and societal behaviour can contribute to environmental outcomes, their answers seem to suggest that this knowledge is nevertheless failing to get across to the relevant policy- and decision makers. This gap is most acutely visible in the context of the circular economy paradigm and in consumer education, but is also apparent when policy-makers set targets for future CO2 emissions.

As regards the possible under-utilisation of available knowledge, a most pressing issue is that of food consumption. Some respondents mentioned that policy-makers lack the political will to address current consumption patterns and that the consumption of livestock products in particular has since long been known to have a negative impact, with no action taken to address this. Respondents also reported on under-utilised knowledge on bioenergy, on the impacts of the CAP and the energy and climate targets (which some respondents felt as being set too low).

The EEA Indicator report suggests that much of the current bulk of knowledge in the areas under Objective 2 is based on monitoring, data, indicators and assessments mainly linked to the implementation of legislation. However, according to the report, there is a need to improve our understanding of what progress means when it comes to reducing the overall impacts of production and consumption in major sectors; addressing this need would require investing in knowledge development, in order to improve our understanding of

⁵⁵ See the concrete sub-objective and policy initiatives/actions/instruments/requirements under Objective 2 in Annex I to this EIA.

⁵⁶ In the areas covered by the stakeholder consultation. See the details in Section 3.3.2.1 of Annex I to this EIA.

the interplay between socio-economic and environmental factors, production and consumption patterns, and the costs and benefits of action and inaction.

The report also stresses the importance of environmental-economic accounting in providing information on the linkages between economic activity and environmental factors, and of producing indicators for production, consumption and trade perspectives.

It also highlights that available footprint indicators and indicators accounting for materials, land, water and GHG emissions associated with imports are still not being used in the policy process on a regular basis. The EEA report suggests that the resource-efficient, low-carbon, green economy concept should be translated into a small set of indicators that can be used to measure progress and inform policy-making. Developing such a set of indicators is challenging, given the large range of relevant environmental- and climate-policy objectives and targets, and the difficulties of measuring and monitoring externalities when social and environmental impacts are not reflected in market prices.

The report also lists a number of initiatives aimed at meeting the above challenges and helping to monitor the 7th EAP.⁵⁷ Among these initiatives is the simplified model of the circular economy developed by the EEA itself, which would help apply the monitoring framework for the circular economy package.⁵⁸ By the end of 2017, the Commission is expected to finalise a monitoring framework for the circular economy.⁵⁹

The EEA report also explores the potential that eco-innovation has for the transition to a green economy.

Coherence

A majority of stakeholders considered that 'resource-efficient, green and low-carbon' policy-making efforts at Member State level are mainly coherent with the policy instruments/actions under Objective 2 of the 7th EAP.

A little over half of all respondents considered that that sectoral policies at EU and Member State level have been developed and implemented (mainly) in a way that support (are coherent with) Objective 2.

Respondents seemed to have difficulties in assessing the coherence between concrete sectoral EU policies and Objective 2.⁶⁰ A dominant majority of respondents (from among those who were able to give an answer) mentioned the CAP as being inconsistent with Objective 2 on many accounts, and assessed it as a 'resource-intensive, wasteful, outdated' instrument that is in contradiction with the EAP's targets. Fisheries, TENP and cohesion

⁵⁷ These include the [Resource Efficiency Scoreboard](#), which is used to monitor the implementation of the Roadmap to a resource efficient Europe; the development of a monitoring framework for the circular economy; and the development of the indicator set that will be used to measure progress towards the UN Sustainable Development Goals. There is merit in exploring synergies between these indicator initiatives and monitoring the 7th EAP. There are shared elements and development needs for all, for example, the need for an indicator on food waste.

⁵⁸ See on p. 30 of the EEA [Environmental Indicator Report 2016](#).

⁵⁹ See the details in the Commission roadmap available [here](#).

⁶⁰ A large fraction of respondents indicated that they did not know the answer to questions related to common fisheries policy, cohesion policy and TEN policy. When it came to the CAP, though, they felt more comfortable in taking sides and assessing coherence.

policy also received criticism in terms of coherence. Fisheries policy is said not to be in line with the ambitions of the EAP or with the TEN and structural funds support investments in carbon-intensive technologies or practices.

The EEA's Indicator report stresses that although some progress has been made on the integration, for example, of climate and energy concerns into other policy areas, there is scope for more integrated and adaptive policy approaches that can respond to changes, deliver multiple benefits and manage difficult trade-offs.

Effectiveness

The effectiveness criterion seeks to establish whether the set objectives have been achieved. Data for the effectiveness of policy actions under Objective 2 come from the EEA Indicator report, the Commission EIR and the stakeholder consultation.

A slight majority of stakeholders believed progress to be mixed across different sub-objectives. The rest replied that some progress has been made on all sub-objectives. Among other things, respondents expressed concerns about the implementation of the energy and waste aspects of Objective 2.

None of the nine initiatives/actions/instruments/requirements under Objective 2 were perceived as being sufficiently implemented at either EU or Member State level. Four of them were assessed as being sufficiently implemented only at EU level:

- the climate and energy package, agreeing on the Union's 2030 climate and energy policy framework;
- promoting innovation and best available techniques in the context of the Industrial Emissions Directive;
- promoting research, innovation, development and uptake of innovative technologies, systems and business models for low-carbon, resource-efficient, safe and sustainable economy, implementation of the Eco-innovation action plan, enhancing the competitiveness of the European eco-industry, establishing indicators and targets for resource efficiency;
- improving water efficiency by setting and monitoring targets at river-basin level on the basis of the Common implementation strategy process, and using market mechanisms (the assessment here is almost 50/50 'sufficient/insufficient' as regards implementation at EU level).

All other five initiatives/actions/instruments/requirements under Objective 2 were perceived as being insufficiently implemented at both EU and Member State level:

- elaboration of measurement and benchmarking methodologies by 2015 for resource efficiency of land, carbon, water and material use and inclusion of a lead indicator and target in the European Semester;
- a more coherent policy and legal framework for sustainable production, consumption and demands; improving the environmental performance of products throughout their lifecycle; developing indicators and targets for the consumption reduction;
- developing training programmes geared towards green jobs;
- enhancing green public procurement and establishing a voluntary green purchaser network for EU businesses;

- fully implementing EU waste legislation in light of the circular economy and stimulating a change in behaviour (the assessment here is almost 50/50 'sufficient/insufficient' as regards implementation at EU level).

In terms of enhancing implementation in the area of a resource-efficient, green and competitive low-carbon economy, respondents assessed all of the following four elements as improving: adjusting relevant legislation towards actual needs, compliance with legislation, as well as (although to a lesser extent) public access to information on the implementation of the legislation and citizens' trust in the enforcement of legislation.

As to whether the implementation of the policy instruments under Objective 2 is on track to lead to improved protection and satisfaction of the interests of citizens, economic actors and nature, the overall response was positive.

Assessing the impact of the implementation of Objective 2-related EU law on nature, citizens and economic actors, views as regards nature and citizens were mainly positive ('positive/very positive'; a few 'neutral' assessments for both; and two opinions for a 'negative' impact on nature), while views regarding the impact on industry were mixed (mainly 'positive', but also some 'neutral' and 'negative' ones).

Respondents were of the opinion that, because green economy policies spur innovation, they have been contributing to improving the competitiveness of both industries and SMEs in the EU.

The Commission EIR identifies waste management (municipal waste in particular) as a policy field where the main challenges and most pressing implementation gaps across Member States are found with relevance to Objective 2. Some of the spotted problems are listed below:

- waste prevention remains a challenge in all Member States, including those with high recycling rates;
- reaching the waste-recycling targets is uneven across Member States; in particular, half of Member States still need to improve the effectiveness of separate waste collection, which would lead to improving recycling in terms of quantity and quality;
- a lack of waste-prevention programmes and waste-management plans in a limited number of Member States (also at regional level), making them non-compliant with the Waste Framework Directive;
- the inappropriate pricing of residual waste treatment (mechanical and biological treatment, landfilling and incineration) does not provide enough incentives to push waste towards prevention (the preferred option in the waste hierarchy). In addition, other market-based instruments, such as extended producer responsibility or 'pay-as-you-throw', are insufficiently used; in this respect, the EIR suggests that better use of public procurement rules can lead to more cost-efficient solutions;
- as regards urban wastewater, six Member States have excellent compliance rates on collection and treatment of urban wastewater, most struggle to reach full implementation and 13 are facing EU legal action.

The Commission points to the following as constituting the root causes of bad waste policy implementation: a lack of legal enforcement; a lack of capacity to manage large investment projects; unreliable data; and insufficient control and monitoring. As regards urban wastewater treatment, the Commission suggests that closing the implementation gap requires building up the necessary infrastructure, which in its turn depends on good governance structures, adequate planning and coordination to secure funding (substantial EU funds have been made available to this end).

Annex IV to this EIA lays out the specific recommendations addressed to each Member State.

The EIR also lists a few examples of good practices in collecting waste separately, closing illegal landfills and financing clean-up and remediation works.

The EEA's Indicator report tracked progress under Objective 2 with the help of thirteen indicators chosen from among the EEA database. The key findings for each indicator were included in online briefings.⁶¹

Presented below are only the main conclusions on progress and on the outlook to 2020.

Progress made

Nine of the thirteen indicators used for Objective 2 display an improving trend, while three indicators display a stable or unclear trend. For one indicator, the trend was deteriorating.

- **An improving trend was spotted for:** resource productivity; recycling of municipal waste; use of freshwater resources; total greenhouse gas emission trends and projections; share of renewable energy in gross final energy consumption; progress on energy efficiency in Europe; energy consumption by households; employment and value added in the environmental goods and services sector; environmental protection expenditure in Europe;
- **A deteriorating trend was spotted for:** greenhouse gas emissions from transport;
- **A stable or unclear trend was spotted for:** waste generation in Europe; consumption of meat, dairy, fish and seafood; and the share of environmental labour taxes in total tax revenues.

The EEA report assessed these trends as encouraging when it comes to progress in terms of resource efficiency and the low-carbon economy. The indicators show that efficiency is improving in many areas and society is finding ways to increase economic output relative to the associated environmental pressures.

Outlook to 2020

Despite the improving trends for many indicators, the EEA report says making a forecast for the period up to 2020 (for Objective 2 as a whole) is difficult. In particular:

⁶¹ The briefings focus primarily on the 2020 objectives (including targets) in existing environmental legislation and policies. Whenever quantitative objectives were not available, qualitative 7th EAP objectives were used, which, when combined, provided an overall picture of progress. However, with such a diverse range of measures, the available indicator base cannot capture all aspects. It can, nevertheless, give an indication of progress in the main areas for action.

- **The following objectives are likely to be met by 2020:** to improve economic performance while reducing pressure on natural resources; to reduce greenhouse gas emissions by 20 % compared with 1990 levels; to reach a 20 % share of renewable energy in gross final energy consumption; to improve energy efficiency by 20 % (compared with a business-as-usual scenario); to reduce the overall environmental impact of production and consumption in the housing sector; to increase the public and private sector funding for environment- and climate-related expenditure.
- **The following objectives are unlikely to be met by 2020:** to reduce the overall environmental impact of production and consumption in the food sector; to shift taxation from labour towards the environment.
- **It is uncertain whether or not the objectives will be met by 2020:** to manage waste safely as a resource and reduce absolute and per-capita waste generation; to achieve 50 % of selected household and similar-waste materials to be recycled by each Member State; to maintain water abstraction below 20 % of available renewable freshwater resources; to reduce the overall environmental impact of production and consumption in the mobility sector; to promote a larger market share of green technologies in the EU and to enhance the competitiveness of the European eco-industry.

Annex III to this EIA presents a scoreboard for each indicator with a brief justification. Further information on the objectives and rationale behind the 2020 outlook can be found in the indicator briefings online.⁶²

Efficiency

Stakeholders indicated that although both public and private funding have increased, the funding available at EU and Member State level is still not adequate to meet current needs. Many respondents were not aware of the funding aspects of policy implementation under Objective 2.

It was difficult to outline a trend on compliance costs for industries and enforcement costs for national authorities, because only a few stakeholders responded. Member States were more active than businesses and pointed to the following as sources of high enforcement costs: setting up the necessary infrastructure for waste-management policies; ensuring enforcement of compliance with the best available techniques; monitoring, data gathering and analysis; applying low-carbon economy measures; regulating the use of secondary raw materials. The Effort Sharing Regulation and the Renewable Energy Directive was also associated with high enforcement costs.

Almost all respondents (who submitted an answer) argued that the results achieved to date could not have been achieved at a lower cost.

The EEA Indicator report features a chapter shedding light on the potential of 'green financing' to enable the transition to a green economy. In particular, the report explores the different channels for directing financial (public and private) resources to the green

⁶² The list of indicators for Objective 2 and the links to the relevant online briefings are available in Annex II to the EIA.

economy. It also presents the advantages of different financial market tools, such as 'green bonds'.

The ECA special contribution gives evidence about progress towards the concrete policy requirements under 'enabling' Objective 6. The ECA selected the following special reports as providing relevant information about 'enabling' Objective 6 in the context of Objective 2, especially as regards policy requirement (iii):⁶³

1. [Special Report No 6/2015: The integrity and implementation of the EU ETS](#)⁶⁴

This special report found problems with the framework for protecting the market integrity of the EU Emissions Trading Scheme – one of the main market-based instruments related to climate policy.

2. [Special Report No 1/2015: Inland waterway transport in Europe: No significant improvements in modal share and navigability conditions since 2001](#)

This special report found that the modal share of inland waterway transport (IWT) had not significantly increased, that EU funded projects did not effectively contribute to improvements, and that EU strategies for IWT were not based on a comprehensive analysis.

3. [Special Report No 8/2016: Rail freight transport in the EU: still not on the right track](#)

This special report found that the rail freight modal share in the EU had actually decreased compared to road transport, despite the advantages of rail in terms of environmental sustainability.

4. [Special Report No 18/2016: The EU system for the certification of sustainable biofuels](#)

This special report found that agricultural practices did not ensure respect for EU environmental requirements.

5. [Special Report No 2/2015: EU-funding of urban waste-water treatment plants in the Danube River basin: further efforts needed in helping Member States to achieve EU waste water policy objectives](#)

This special report found delays in meeting the requirements of the Urban Waste Water Treatment Directive, instances of oversized urban waste-water treatment plants, and inadequate monitoring for certain pollutants.

The following special report gives evidence on policy requirement (iv)⁶⁵ and (v)⁶⁶ in the context of Objective 2:

6. [Special Report No 31/2016: Spending at least one euro in every five from the EU budget on climate action: ambitious work underway, but at serious risk of falling short](#)

⁶³ (iii) adequately reflecting environment and climate priorities in policies and funding strategies to support economic, social and territorial cohesion.

⁶⁴ This report also refers to policy requirement (i): phasing out environmentally harmful subsidies at Union and Member State level without delay, and reporting on progress through the national reform programmes; increasing the use of market-based instruments, such as Member States' taxation policies, pricing and charging, and expanding markets for environmental goods and services, with due regard to any adverse social impacts, using an action-based approach, supported and monitored by the Commission, inter alia, via the European Semester.

⁶⁵ (vi) making dedicated efforts to ensure the full and efficient use of available Union funding for environmental action, including by significantly improving its early uptake under the Union's Multiannual financial framework 2014–2020 and devoting 20 % of the budget to climate change mitigation and adaptation by mainstreaming climate action and linking this funding to clear benchmarks, targets, monitoring and reporting.

⁶⁶ (v) developing and applying a system for reporting and tracking environment-related expenditure in the Union budget, in particular expenditure on climate change and biodiversity, by 2014.

This special report found that there was a serious risk that the 20 % target would not be met. There was still no significant shift towards climate action in the European Social Fund and in the areas of agriculture, rural development and fisheries.

In each of these special reports, the ECA gave concrete recommendations that can be seen in Annex V to this EIA.

7. [Landscape review 'EU action on energy and climate change'](#) (2017)⁶⁷

This report found that differences in the way Member States have implemented EU legislation and administered their energy markets have held back progress towards completing the EU's internal energy market. Even though there was some success in terms of renewables and in achieving a global decline in their costs, the auditors established a lack of cost-effectiveness and the presence of obstacles to making investments. In the past, cost-effectiveness issues have regularly been identified during energy efficiency audits in the field of nuclear energy. The shift to low-carbon transport modes is not taking place to a sufficient degree. In the area of adaptation, audits focused mainly on floods where problems refer to flood prevention, protection and response.

The Landscape review identified the following main challenges in the field of EU action on energy and climate change: governance, evidence-based policy, using research and innovation effectively, energy transition, planning for and tackling adaptation, financing, and involving EU citizens.

8. In addition, the [ECA Special report 34/2016 'Combating food waste: an opportunity for the EU to improve the resource efficiency of food supply chain'](#) looked at the role the EU plays in combating food waste, the actions taken so far and how the various EU policy instruments work to reduce food waste. It focused on the actions of prevention and donation, which are those most preferred in the fight against food waste.

The auditors found that the action to date had not been sufficient and that the EU strategy on food waste had to be strengthened and better coordinated. The ECA recommended that the Commission explore ways of using existing policies to better fight food waste and loss.

EU added value

Respondents perceived the influence of the 7th EAP on policy-making in the field of the green economy to be stronger at EU level than at national level.

The EU is perceived as the logical level of policy-making for environmental issues, as they defy borders and EU policy ensures a unified market. The influence of the EAP on policy-making at EU level was assessed as high. However, the actual influence remains hard to assess as most action points in the plan have no clear pathway for realisation or indicators that go with it.

Summary of the main findings regarding the implementation of Objective 2

Relevance (and knowledge base)

⁶⁷ The Landscape review is not an audit: it is a review largely based on publicly available information. It is not based on any new audit work and does not present any new audit findings or recommendations.

The scope of Objective 2 remains relevant to current needs linked to achieving a resource-efficient, green and low-carbon competitive economy. However, certain aspects are missing among the sub-objectives under Objective 2. The knowledge base was assessed as generally improving, although a few gaps were identified. Knowledge was found to be under-utilised in relation to food consumption as well as to certain available indicators that are not used on a regular basis in policy-making.

Coherence

Several sectoral policies at EU level have been highlighted as being inconsistent with the efforts under Objective 2 aimed at achieving a resource-efficient, green and competitive economy. The CAP was again pointed out as a source of incoherence, this time for its resource-intensive features. Furthermore, the TEN-T and cohesion policies were criticised for supporting carbon-intensive practices.

Effectiveness

Progress on the various policy areas under Objective 2 can be assessed as 'mixed', although stakeholders are generally of the view that implementation is improving in all policy areas, as confirmed by the EEA Indicator report. Waste management (in particular municipal waste and urban waste water management) appears to be the area where implementation is the most problematic, despite the improving trends identified in the EEA Indicator report. It is uncertain whether all sub-objectives of Objective 2 will be achieved by 2020, not least as regards waste management. Nevertheless, stakeholders view the impacts from the implementation of green policies as positive, especially with regard to nature and citizens and to a lesser extent to economic operators. Green economy policies are thought to be contributing to the improved competitiveness of EU industries and SMEs.

Efficiency

Stakeholders indicate that although both public and private forms of funding have increased, the funding available at EU and Member State level is still not adequate to meet current needs. Stakeholders also consider that the actual results could not have been achieved with fewer costs and resources. Almost all respondents (who gave an answer) argue that the results achieved to date could not have been achieved at lower costs. The EEA Indicator report explored the potential of green financing to enable the transition to a 'green economy'. Finally, the ECA found deficiencies in the implementation of green policies.

EU added value

The influence of the 7th EAP on policy-making in the field of the green economy is stronger at EU level than at national level. The EU is perceived as the logical level of policy-making for environmental issues, as they defy borders and EU policy ensures an integrated market. The influence of the EAP on European policy-making is assessed as high.

All four key sources of information made concrete recommendations for due action, and some of them were also mentioned under Section 2.2.2 above. More details are also laid out in the relevant annexes to this EIA.⁶⁸

⁶⁸ See stakeholders' recommendations in Annex VI (Section 3.3.7), the Commission EIR recommendations to each Member State in Annex IV, and the recommendations of the ECA in Annex V to this EIA.

2.2.3. Objective 3 (To safeguard the Union's citizens from environment-related pressures and risks to health and well-being)

There are seven key policy areas under Objective 3: (1) air quality, (2) environmental noise, (3) drinking and bathing water quality, (4) hazardous chemicals, (5) pesticides, (6) nanomaterials, and (7) climate change adaptation.

The fulfilment of Objective 3 relies on action mainly within the following EU legal and policy framework: the Ambient Air Quality Directive, the EU National Emission Ceilings Directive, the Industrial Emission Directive, the Environmental Noise Directive, the Bathing Water Directive, the Drinking Water Directive, the REACH Regulation, the CLP Regulation, the Regulation on plant protection products, the Regulation on biocidal products, the Directive on the sustainable use of pesticides, the Ecolabel Regulation, the Ecodesign Directive, as well as the EU strategy on adaptation to climate change.⁶⁹

Relevance (and knowledge base)

Stakeholders almost unanimously agreed that Objective 3 and its sub-objectives are relevant/mainly relevant to current needs in the field of environment-related pressures and risks to health and well-being. However, almost half considered that 'certain aspects are missing among sub-objectives', thus leaving certain current needs under Objective 3 unaddressed at the moment. Suggestions referred to: chemicals in products (also with a focus on effects on vulnerable groups, information for consumers, etc.); problems of co-exposition to chemicals (cumulative/cocktail effects); pharmaceutical effects on human health; endocrine disruptors; and urban planning and green infrastructure to support human health and wellbeing.

With regard to improving and making better use of knowledge, a majority of stakeholders considered that there was a better understanding of the health and environmental implications of endocrine disruptors as well as the health and environmental implications or toxicity of certain chemicals in products. This was not the case regarding the combined effects of chemicals and nano-materials.

Several respondents identified other knowledge gaps: e.g. hazard identification methods, PBT substances, micro-plastics impacts and flows, pharmaceuticals in the environment (including in sewage and waters), ultrafine particles. Several comments pointed to the need for legislation to adapt to the reality of hazards that are of a transversal nature and could not be isolated in a separate sector. The focus group agreed that the knowledge is there but it is not always used in policy-making to the maximum of its potential. The delayed adoption of criteria for endocrine disruptors appears to be of concern.

The EEA Indicator report also highlights the need for knowledge on the systemic risks (e.g. exposure to multiple stressors) to human health as yet another challenge. Methods are needed to integrate information on the various pressures that an individual is exposed to, while at the same time accounting for other important health determinants. The influence of individual health determinants on vulnerability introduces considerable uncertainty into our overall understanding of how exposure to a poor-quality environment contributes to the overall disease burden of the population.

⁶⁹ See the concrete sub-objective and policy initiatives/actions/instruments/requirements under Objective 3 in Annex I.

Another challenge relates to ongoing developments in the knowledge base, in particular as regards the evidence on the impacts of single stressors on health over the long term, whereby the hazards associated with single exposures are shown over time to be more diverse and widespread than first anticipated. The report lists the examples of lead, mercury, Bisphenol A, ozone and sulphur dioxide, whose levels of safety (thresholds of concern) have been reduced several times over the years in the light of new evidence on their harmfulness for human health. According to the report, these historic downward trends in the exposure levels known to be associated with health impacts indicate that policies focused on minimising exposure to single stressors must be flexible enough to respond dynamically to evolving scientific evidence on the relationship between exposure and health. The complexity of systemic risks to health, the related gaps and uncertainties in the current knowledge base, and the historic trend towards harm expansion in the environment and health dynamic warrant a precautionary approach to managing environmental risks to health. This is particularly relevant given the potential for severe, often irreversible, health impacts on large proportions of the European population.

The EEA report also mentions a number of areas of the environment, health and well-being nexus, for which valuable new approaches and methods are under development and for which evidence is being generated to address knowledge gaps, such as, for example, the Ecosystems-enriched drivers, pressures, state, exposure, effect, actions (eDPSEEA) model,⁷⁰ which visualises the pathways through which drivers generate the pressures that disrupt ecosystem services and affect human health and well-being. Another example of knowledge gap-filling is the targeted 'human bio monitoring' (HBM) tool,⁷¹ which can serve the chemical policy-making agenda by providing 'authorities with a more comprehensive view of actual exposure of the population, especially sensitive groups such as children, to pollutants. The report also cites the 'Information Platform for Chemical Monitoring'⁷² (IPChem), developed by the Commission with the aim to provide online access to HBM data, environmental monitoring data and data on chemical substances in products, food and feed. This allows making a cross-media analysis of exposure to a single substance and facilitates the identification of the most critical exposure pathways. IPChem is also intended to support work to identify which mixtures of chemicals are present in the environment and in humans.

Coherence

A majority of stakeholders consider that 'environment-related pressures and risks to health and well-being' policy-making efforts at Member State level are in line with the policy instruments/actions under Objective 3 of the 7th EAP.

⁷⁰ [eDPSEEA](#), 2015 (See in Reis S. et al).

⁷¹ [HBM](#) measures environmental contaminants in the human body, usually through analyses of blood, urine, hair, breast milk or other tissues. It provides an integrated measure of the level of exposure to chemicals through different pathways and exposure routes. As such, HBM is an important tool for generating evidence on the actual exposure of the human population to contaminants, and in some cases for estimating potential health effects linked to the exposure. Analysed over time, HBM data allow the evaluation of trends in exposure and can be used to assess the efficiency of implemented policies.

In 2017, the HBM4EU initiative was launched with the aim to coordinate and advance human biomonitoring in Europe. HBM4EU will support policy-making by providing better evidence on the actual exposure of citizens to chemicals and the possible health effects of this. It will run between 2017 and 2021.

⁷² [Information Platform for Chemical Monitoring](#) (IPChem).

Respondents are divided (between 'mainly yes' and 'mainly no') as to whether sectoral policies at EU and Member State level have been developed and implemented in line with Objective 3. Contradictions include the failure to take environmental externalities into account during ex-ante impact assessments, and a lack of ex-post work to assess the success or failure of policies.

When asked if specific European sectoral policies were consistent with pollution and health risk reduction goals, the majority of stakeholders were not able to provide an answer; this situation concerns the common fisheries policy, the Trans European Network policy, cohesion policy; among these cohesion policy is the one perceived to be mostly consistent with Objective 3, while the common fisheries policy scored mostly negative assessments.

When it comes to the CAP, though, the majority of respondents were able to provide an assessment. The answer was dominantly 'no'/'mainly no', thus pointing to mismatches between the CAP and Objective 3 of the 7th EAP.

In terms of coherence, the EEA Indicator report notes that the urban environment provides a focal point for integrating environmental health into urban planning and transport policies, in a context where 72 % of the EU population lives in urban areas, including cities, towns and suburbs. A modal shift in urban transport away from passenger cars would reduce GHG emissions, while simultaneously reducing the impact of key air pollutants and noise on health and bringing down the number of road traffic accidents. Urban planning with improved facilities for cycling and walking can help to reduce the health costs associated with physical inactivity. Climate-change adaptation policies to boost green spaces in urban areas may offer health benefits through the avoidance of heat-island effects and the promotion of well-being effects associated with increased access to green spaces. Green infrastructure can also deliver environmental benefits in urban areas, among them the maintenance and improvement of ecological functions and the conservation of biodiversity (with relevance to Objective 1).

Effectiveness

Data on the effectiveness (i.e. achieved objectives) of the policy actions under Objective 3 come from the EEA Indicator report, the Commission EIR and the stakeholder consultation.

Stakeholders are divided in their opinions on progress in achieving Objective 3, with a certain prevalence of those believing that there is a mixed progress across different sub-objectives over those considering that some progress has been made on all sub-objectives.

Only one of the six initiatives/actions/instruments/requirements under Objective 3 – the water legislation (the Water Framework Directive, the Bathing Water Directive and the Drinking Water Directive) – is perceived as being sufficiently implemented at both EU and Member State level. As under Objective 1, the EU Strategy on adaptation to climate change is assessed as sufficiently implemented at EU level, but not at Member State level. All other four initiatives/actions/instruments/requirements under Objective 3 are perceived as being insufficiently implemented at both EU and Member State level:

- the Union air quality policy, measures to combat air pollution at source;
- the Union noise policy, measures to reduce noise at source;

- the implementation of REACH for the protection of human health and the environment and for enhancing competitiveness and innovation; the development by 2018 of a Union strategy for a non-toxic environment;
- the Union legislation on sustainable use of biocidal products and plant protection products.

Nevertheless, stakeholders generally considered the relevant activities to have led to improvements in all areas except noise.

Respondents considered that 'adjusting relevant legislation towards actual needs', 'compliance with relevant legislation' and 'public access to information on the implementation of the legislation' have mainly improved. However, the majority (of those who gave an answer) assessed 'citizens' trust in the enforcement of legislation' as marking a declining rather than an upward trend.

The policies under Objective 3 were generally assessed as promoting the interests of the citizens, (a bit less but still positively) of nature and (even less, but also positively) of economic actors.

Stakeholders considered citizens to be the ones most positively impacted by the implementation of EU policies under Objective 3. This is also the case for nature, although to a lesser extent. As regards the impacts on economic actors, respondents rated them as far more neutral than positive.

The majority of respondents also agreed that EU policies under Objective 3 have brought about not only environmental and health benefits but also economic ones.

The Commission EIR identifies air quality and noise as the policy fields where the main challenges and most pressing implementation gaps across Member States are found with relevance to Objective 3.

Among the spotted problems in terms of ambient air quality and noise, reportedly together responsible for hundreds of thousands of premature deaths per year, are:

- the Commission has undertaken legal action against the majority of Member States for exceeding PM10 limit values, and against almost half of Member States for NO₂ exceedances and for lack of effective measures taken at national level;
- as regards PM10 pollution from domestic heating, measures addressing solid fuel burning (banned in some cities with high PM10 levels) need to be implemented by 18 Member States; agricultural waste burning is still contributing to high levels of PM10 pollution and needs to be addressed;
- as regards NO₂, measures need to target diesel vehicles, for instance by introducing stringent low-emission zones in inner city areas or by phasing out preferential tax treatment;

- the EIR indicates that for the current five-year reporting cycle,⁷³ more than 30 % of the required noise maps and around 60 % of the action plans are missing.

Annex IV to this EIA lays out the concrete recommendations addressed to each Member State.

The EIR mentions the introduction of low-emission zones in several cities limiting the circulation of certain vehicle categories depending on their respective emission potential, as a good practice in decreasing air pollution.

Even though the EIR has spotted problems with the implementation of water legislation under Objectives 1 and 2, the areas of relevance to Objective 3 – namely drinking and bathing water legislation – have scored positively: as regards drinking water quality, almost all Member States have very high compliance rates,⁷⁴⁷⁵ with some local-level exceptions in three Member States; as regards the bathing water quality, 96 % of all sites are of a 'sufficient' quality under the Bathing Water Directive, and almost 100 % of the sites in eight Member States are of excellent quality.

In the EEA Indicator report, the progress made under Objective 3 was tracked by seven indicators chosen from the EEA database. The key findings for each indicator were included in online briefings.⁷⁶

Below, only the main conclusions on progress and on outlook to 2020 have been presented.

Progress made

Three of the seven indicators used for Objective 3 display improving trends, while three indicators display stable or unclear trends; one indicator shows improvement with regard to some of its elements and a stable or unclear trend with regard to others. For one indicator only the trend is deteriorating. Therefore, the EEA report considered that assessment of the progress made under Objective 3 is difficult:

- **an improving trend is spotted for:** exceedance of air quality limit values in urban areas for NO₂; emissions of the main air pollutants in Europe (SO₂, NO_X, NH₃, non-methane volatile organic compounds (NMVOCs) and PM_{2.5}); bathing water quality, and production of chemicals by hazard class.
- **a deteriorating trend is spotted for:** total sales of pesticides
- **a stable or unclear trend is spotted for:** exceedance of air quality limit values in urban areas for O₃, PM_{2.5}, and exposure to environmental noise.

⁷³ Under the Noise Directive (2002/49/EC).

⁷⁴ The ECA has spotted some improvement in terms of water quality as regards Bulgaria, Hungary and Romania in [Special report 12/2007](#), although investment needs remain substantial.

⁷⁵ However, in 2016, the Commission [evaluation](#) of the implementation of the Drinking Water Directive found that the parameters and parametric values, which had not been updated since 1998, might be partly outdated and 'might not be appropriate anymore to protect human health'. See more in the EPRS [Implementation appraisal](#) on the Drinking Water Directive, July 2017.

⁷⁶ The online briefings that correspond to the seven indicators provide insight into the current situation and progress towards the objectives related to some of the main areas addressed by this priority objective. However, the picture remains incomplete, due to a lack of robust data on areas such as chemicals and climate change adaptation.

Outlook to 2020

The prospect for achieving the objective of safeguarding EU citizens from environment-related pressures and risks to health and well-being by 2020 is uncertain, due to a number of gaps in the available evidence. In particular:

- **The following objectives are likely to be met by 2020:** to reduce the air pollutant emissions in accordance with the requirements of the amended Gothenburg Protocol⁷⁷ by the following percentages by 2020: SO₂ 59 %, NO_X 42 %, NH₃ 6 %, NMVOCs 28 %, PM_{2.5} 22 % compared to 2005 levels; to increase the number of bathing waters classified as 'excellent' or 'good' under the Bathing Water Directive;
- **The following objectives are unlikely to be met by 2020:** to meet the Air Quality Directive standards for the protection of human health; to significantly decrease noise pollution;
- **It is uncertain whether or not the objectives will be met by 2020:** to make decisive progress in adapting to the impact of climate change; to ensure that the risks for the environment and health associated with the use of hazardous substances, including chemicals in products, are assessed and minimised; to ensure that the use of plant protection products does not have any harmful effects on human health or unacceptable influence on the environment, and that such products are used sustainably.

Annex III presents a scoreboard for each indicator with a brief justification. Further information on the objectives and rationale behind the 2020 outlooks can be found online in the indicator briefings.⁷⁸

Efficiency

Many respondents were not aware of the funding aspects of policy implementation under Objective 3. A clear majority (of those who gave an answer) considered that neither private nor public funding has increased (the views on 'public funding increase' are more negative than on 'private funding increase'). Furthermore, funding at both EU and Member State level is viewed as being mainly not adequately matched to current needs⁷⁹ (funding at national level has scored more negative points than funding at EU level).

The questions on enforcement and compliance costs of certain policy/legislation under Objective 3 for national authorities and industry did not receive many answers, therefore it is difficult to know whether respondents thought there were no particular costs or if they were simply unable to answer the question; the industry points to high costs arising from compliance with REACH and the Industrial Emissions Directive. Overall, stakeholders recognise as a fact that such policies are necessarily costly and that the current result could not have been achieved with significantly fewer resources or costs.

EU added value

A majority of responses emphasised that EU added-value lies in the capacity of the EU to design harmonised and constraining policies applicable to all Member States. Some

⁷⁷ The 1999 [Protocol](#) to Abate Acidification, Eutrophication and Ground-level Ozone (known as the 'Gothenburg Protocol') to the UN Convention on Long-range Transboundary Air Pollution (as amended in 2012).

⁷⁸ The list of indicators for Objective 3 and the links to the relevant online briefings are available in Annex II to the EIA.

⁷⁹ Unsatisfied investment needs were also confirmed by the [ECA Special report 17/2017](#) on drinking water quality in Bulgaria, Hungary and Romania.

responded that in the field of air pollution in particular, EU action is necessary because it is a transboundary problem that cannot be solved by national policies only. The capacity to create binding legislation and to make enforcement more constraining was also outlined as an EU-specific characteristic. Finally, cost reduction through knowledge-sharing and monitoring activities conducted at supranational level were also cited as reasons why EU action is beneficial.

Summary of main findings regarding the implementation of Objective 3

Relevance (and knowledge base)

The scope of Objective 3 remains relevant to current needs in the field of safeguarding EU citizens from environment-related pressures and risks to health and well-being. Certain aspects are missing among the sub-objectives. Knowledge on endocrine disruptors and chemicals in products is assessed as more advanced than knowledge on combined (cocktail) effects of chemicals and nano-materials. The EEA report gives further hints on how the challenge of cocktail effects could be tackled. Stakeholders agree that although the knowledge might be there, it is not always used in policy-making; furthermore, both the EEA and stakeholders point out that EU legislation needs to be flexible enough so as to be able to adapt to new scientific developments.

Coherence

Regarding Objectives 1 and 2, the CAP is again the one receiving negative opinions in terms of coherence with human health and well-being. The EEA report notes that the urban environment provides a focal point for integrating environmental health into urban planning and transport policies.

Effectiveness

Stakeholder opinions on progress in implementation in the various policy areas under Objective 3 are divided, with some dominance of 'mixed progress' across the areas. Air quality and noise appear to be the most problematic areas in terms of implementation.⁸⁰ Bathing water quality has scored positively.⁸¹ Due to a number of evidence gaps, the outlook to 2020 is uncertain at this stage. Stakeholders view the impacts from the implementation of policies under Objective 3 as positive, especially on citizens and to a lesser extent on nature; impacts on economic operators were assessed to be more 'neutral' rather than 'positive'. Stakeholders agree that EU policies under Objective 3 have also brought about economic benefits, next to environmental and health benefits.

Efficiency

Funding at both EU and Member State level is viewed as being mainly not adequate for current needs (funding at national level has scored more negative points). Data on compliance and enforcement costs are scarce. However, stakeholders recognise that such policies are necessarily costly and that the current result could not have been achieved with fewer resources or costs.

EU added value

Stakeholders see the capacity of the EU to design harmonised and constraining policies applicable to all Member States as the added value it brings. Some responded that EU

⁸⁰ As confirmed by three of the four key sources of information.

⁸¹ As confirmed by three of the four key sources of information.

action is particularly necessary in the field of air pollution, which is a transboundary problem that cannot be solved by national policies only.

All four key sources of information have made concrete recommendations for due action, and some of them have also been mentioned in Section 2.2.3. Further detail can also be found in the relevant annexes to this EIA.⁸²

2.2.4. Objective 8 (To enhance the sustainability of the Union's cities)

'Horizontal' Objective 8 seeks to underpin the achievement of the 'core thematic' objectives (1, 2, and 3) and thus requires that EU cities implement policies for sustainable urban planning and design, including innovative approaches for urban public transport and mobility, sustainable buildings, energy efficiency and urban biodiversity conservation.⁸³

Relevance (and knowledge base)

Respondents almost unanimously agreed that Objective 8 (and its sub-objectives) are relevant to current needs in the field of enhancing the sustainability of EU cities. However, a slight majority also considered that certain aspects are missing among the sub-objectives under Objective 8 at the moment, for example as regards: climate adaptation and mitigation in cities, circular economy aspects, noise, waste, air quality, sustainable urban mobility, green (including resilient) infrastructure, brownfield redevelopment, more links with the UN SDGs and human health and wellbeing, and better integration of urban and regional development planning.

Around half of respondents answered that the 7th EAP has a strong influence on policy-making at EU level, while about a fifth described this influence as moderate. The relevance of the objective is higher at EU level and lower at Member State and city level.

Respondents identified a number of understudied areas where evidence was missing. These included, among other things: cost-effectiveness of climate-change adaptation measures at urban level, social aspects of sustainability (opinion valid for Flanders/Belgium), and nature-based solutions for urban development that need to be further explored. Furthermore, it was suggested that the role of cities in implementing environmental legislation should be studied further. The interrelations between cities and their hinterland (rural areas) need more attention, especially as regards the identification of (supply and disposal) interdependencies, food and commuter flows, and so forth.

Available knowledge is said to be under-utilised as regards sustainable urban planning and design, air and noise pollution, urban and food waste, electromagnetic pollution, soil sealing and loss of fertile land, social exclusion, poverty and civil engagement, smart city concept and digitalisation, waste management, and so forth. It was mentioned that even though knowledge often exists, there may be barriers to using it in practice, such as

⁸² See the stakeholders' recommendations in Annex VI (Section 3.4.7), the recommendations of the Commission EIR to each Member State in Annex IV, and the recommendations of the ECA in Annex V to this EIA.

⁸³ See the concrete policy initiatives/actions/instruments/requirements under Objective 8 in Annex I.

regulatory requirements, lack of human resources and access to funding for integrated planning; hence, it was suggested that local capacities should be strengthened so that those barriers could be removed.

Coherence

More than half of respondents think that the policies of major European cities have been consistent with the 7th EAP, although just over 10 % think that coherence is high. A big portion of respondents have difficulties in assessing policy coherence, which is not surprising given the heterogeneity of cities and their policies; however, the lack of knowledge does not mean that city policies are not aligned with the 7th EAP, so, there is some uncertainty as regards coherence in terms of 'city level'.

See also the findings of the EEA Indicator report under 'coherence' for Objective 3 (Section 2.2.3 above) which are also relevant to Objective 8.

Effectiveness

Data on the effectiveness (i.e. achieved objectives) of policy actions under Objective 3 come from the stakeholder consultation only. Therefore, the assessment of this Objective 8-related criterion is highly subjective. Furthermore, it has to be kept in mind that assessing implementation progress under Objective 8 is difficult, because of the high diversity of cities⁸⁴ and the lack of objective evaluation criteria.

Respondents felt that there has been some or mixed progress in cities regarding all sub-objectives under Objective 8, namely: energy efficiency, sustainable transport and mobility, sustainable urban planning and design, sustainable buildings and urban biodiversity. Comments suggest that more could be done in all areas, although this may have more to do with steady progress in some cities, but not in others. Lack of targets makes it hard to measure progress.

In terms of specific initiatives/actions/instruments/requirements under Objective 8, progress on 'agreeing a set of criteria to assess the environmental performance of cities' was assessed as 'weak'; on this latter point a tool has been developed, but knowledge/use of it is very low. Respondents assessed progress on the following initiatives/actions/instruments/requirements as predominantly 'moderate':

- ensuring that cities have information about, and better access to, financing for measures to improve urban sustainability;
- sharing best practice between cities at Union and international level in relation to innovative and sustainable urban development;
- integration of urban planning with objectives related to resource efficiency, low-carbon economy, sustainable urban land-use, sustainable mobility, urban biodiversity management, ecosystem resilience, water management, human health, public education and participation in decision-making.

Respondents gave a positive assessment on the impacts of these actions on citizens, nature and economic actors; some 'very positive' assessments were scored as regards citizens and nature.

⁸⁴ Further information on good practices implemented in individual cities and EU support for cities can be found in the EPRS [briefing](#) on 'Cities: frontline of climate action' (2017).

See also the EIR findings on urban waste water under Objective 2 (Section 2.2.2 above), which are also relevant to Objective 8.

Efficiency (with relevance to enabling Objective 6)

Funding for sustainable development of cities was assessed as insufficient by half of respondents. Two main issues linked to funding are the lack of skills for drafting proposals and the difficulty of securing constant funding for sustainable urban projects as opposed to one-off funding.

Respondents were asked whether the results achieved so far could have been achieved with fewer costs/resources. Half of them were unable to decide. Those who responded almost unanimously concluded that existing results under Objective 8 could not have been achieved with fewer costs/resources. The consulted stakeholders drew attention to the need to better streamline the objectives in order to achieve higher efficiency. Additionally, respondents noted that the focus on effectiveness and efficiency should remain in the future as well.

See also the ECA findings on urban waste water under Objective 2 (section 2.2.2 above), which are also relevant to Objective 8.

EU added value

An overwhelming majority of respondents think that the 7th EAP has played an important role in achieving the existing urban sustainability results, but also point out that these results might be more directly associated with the effect of other policies, such as cohesion policy. However, they acknowledged the importance of having an overall strategy driving the EU and national urban-sustainability agenda.

Summary of the main findings regarding the implementation of Objective 8

Relevance (and knowledge base)

The scope of Objective 8 remains relevant to current needs in the field of urban sustainability. However, stakeholders believe that certain aspects are missing from among the sub-objectives. Furthermore, they identified some knowledge gaps and barriers before the use of existing knowledge in practice. These barriers are often in the form of regulatory requirements, lack of human resources and access to funding for integrated planning, which would require building capacities at local level to overcome them.

Coherence

This criterion was difficult to measure because of the diversity of EU cities and their policies. Nevertheless, the opinions gathered suggest that the policies of major European cities have been in line with the 7th EAP. In any case, as mentioned under 'coherence' under Objective 3, the EEA has underlined the potential of urban policies (in their 'planning' and 'mobility' aspects) to contribute to human health and well-being if environmental and health aspects are properly integrated into the policies, thus ensuring coherence. In the stakeholder consultation, coherence was identified as a precondition for better efficiency of implementation.

Effectiveness

Although this criterion was also difficult to measure, respondents said that there has been 'moderate' progress on the majority of policy requirements under Objective 8: the most problematic one appears to be 'the agreeing a set of criteria to assess the environmental

performance of cities', which stakeholders assessed as 'weak' (the lack of targets makes it hard to measure progress). Comments suggest that more could be done in all areas, although this may have more to do with steady progress in some cities but not in others. Impacts of policy actions under Objective 8 on citizens, nature and economic actors were assessed as positive.

Efficiency

Funding for sustainable urban development has been assessed as insufficient. Two main issues linked to funding are the lack of skills for drafting proposals and the difficulty of securing constant funding for sustainable urban projects as opposed to one-off funding. The results achieved under Objective 8 so far could not have been achieved with fewer costs/resources. Respondents drew attention to the need to better streamline the objectives in order to achieve higher efficiency.

EU added value

While stakeholders believe that the 7th EAP has played an important role in achieving the existing urban sustainability results, they also point out that these results might be more directly associated with other policies, such as cohesion policy. However, they acknowledge the importance of having an overall strategy driving the EU and national urban sustainability agenda.

Stakeholders came up with some recommendations for due action under Objective 8.⁸⁵

2.2.5. Objective 9 (To increase the Union's effectiveness in addressing international environmental and climate related challenges)

'Horizontal' Objective 9 sets the international agenda of the EU in the field of environment and climate change.⁸⁶

Relevance (and knowledge base)

Respondents almost unanimously agreed that Objective 9 (and its sub-objectives) are relevant to current needs as regards increasing the Union's effectiveness in addressing international environmental and climate-related challenges. However, more than half those who gave an answer said that indeed there were aspects missing from the sub-objectives under Objective 9. Among other things, the suggestions for new sub-objectives referred to: adjustment of Objective 9 to the UN SDGs and the 2030 Agenda (in particular, building synergies between the 2030 Agenda and the Paris Agreement on climate change); illegal wildlife trade; the use of biofuels/biomass; the international responsibility of businesses, especially trans-national corporations, to incorporate environmental (as well as social) responsibility throughout their value and product chains; and closure of the EU market to products that drive deforestation and forest degradation.

⁸⁵ See stakeholders' recommendations in Annex VI (Section 3.5.7).

⁸⁶ See the concrete sub-objectives and policy initiatives/actions/instruments/requirements under Objective 9 in Annex I.

Respondents shared little on knowledge gaps. The development of common indicator sets was suggested as necessary. There was also a comment that a better understanding of the links between various global targets and pathways of goods and financial flows across nations and regions would be required in order to effectively address targets under Objective 9. Advancing knowledge on the CAP was also suggested.

In terms of available but under-utilised knowledge, policy coherence and impacts of consumption patterns were mentioned as two areas where knowledge exists but is not utilised in an optimal way. Other examples refer to modelling for both climate and energy systems, use of big data, use of new technologies and their assessment from a sustainability perspective.

Coherence

A majority of respondents (able to give an answer) considered that the EU has successfully integrated and addressed the Rio+20 outcomes into its internal and external policies. There were however negative opinions as well. The EU is perceived by some stakeholders as addressing the SDGs as a matter of external action, while they should be integrated into the EU's internal policies as well.

A majority of respondents considered that the EU is ('mainly') adopting a comprehensive approach in addressing the UN SDGs and poverty eradication globally. Areas that could be improved include corporate responsibility and accountability, tax evasion, income redistribution and a switch in sharing the burden of negative social and environmental externalities related to global trade and production. Respondents pointed out cross-cutting nature of the 2030 Agenda, i.e. that it applies to all EU policy, not just external action.

The Commission EIR mentions that several Member States have not yet ratified certain international environmental agreements, which compromises environmental implementation, the EU's strength in related negotiations and its credibility in advocating action by third countries.

Effectiveness

Data on the effectiveness (i.e. achieved objectives) of policy actions under Objective 3 come from the stakeholder consultation only. Therefore, the assessment of this criterion with regard to Objective 9 is highly subjective.

Half of respondents believe progress to be mixed across different sub-objectives. The rest replied that some progress has been made on all sub-objectives. Only one stated that much progress has been made on all sub-objectives.

Assessing the implementation of specific initiatives/actions/instruments/requirements under Objective 9 turned out to be a difficult task, especially as regards the following two, where, because almost half of respondents replied with 'don't know', the assessment results should be viewed as uncertain:

- Strengthening the impact of various (non-traditional) sources of funding in development aid for sustainable development, commitments on climate and biodiversity finance (the opinions of those who gave an answer were divided between 'moderate' and 'weak' implementation);
- Assessing the environmental impact, in a global context, of EU consumption of food and non-food commodities; development of an EU action plan on

deforestation and forest degradation (the opinions of those who gave an answer were mostly negative, saying implementation was weak or missing).

Respondents assessed progress on the following requirements as predominantly 'moderate' (to 'strong'):

- Working as part of a post-2015 approach to the universal challenges of poverty eradication and sustainable development, towards adoption of enhanced SDGs;
- More strategic cooperation in promoting best policy practices with neighbouring and developing countries;
- Consistent, proactive and effective implementation of all key multilateral environmental agreements well before 2020; in this regard, some negative ('weak' implementation to 'no' implementation) opinions were also cast.

The three other initiatives/actions/instruments/requirements on which respondents were able to respond more actively, received very diverse opinions, which makes their assessment difficult:

- Working towards a more effective UN structure for sustainable development: an almost equal number of respondents believe that implementation has been 'strong', 'moderate' and 'weak';
- Promoting the emissions trading schemes around the world: assessments were mostly positive ('strong' to 'moderate' implementation), with also a few negative ones ('weak' to 'none');
- Ensuring that economic progress is achieved within the carrying capacity of the Earth: assessments were mostly negative ('weak' to 'none'), although there were also some (but fewer) positive opinions ('moderate' to 'strong').

The majority of respondents agreed that the EU is making an effective contribution to global efforts to implement agreed commitments (e.g. the Rio Convention).

Respondents assessed positively the impacts of global environment- and climate change-related policies on citizens, nature and economic actors; some 'very positive' assessments were scored in each case, especially as regards nature. One stakeholder believes that if ambition were increased and legislation properly implemented, the overall impact would be 'extremely positive'. This could be facilitated by, for example, common indicator sets and better understanding of linkages between various global targets and pathways of financial support.

In relation to reducing the impacts of EU food consumption on the environment beyond EU borders, respondents replied in general that there is 'mainly no progress', or that they 'didn't know'. The same was true for non-food commodities, which could indicate that this is an area where the EU is lacking in effort.

Efficiency

This criterion was difficult to assess because of the many 'do not know' answers. Respondents mainly did not believe that there has been sufficient funding for addressing international environment- and climate change-related challenges, and many also didn't know. A slight majority of respondents said that the existing results could not have been achieved with fewer costs/resources. It should also be noted that almost half of respondents answered with 'do not know'.

EU added value

Respondents were mainly in agreement that the existing results and progress could not have been achieved without the 7th EAP, as it offers the possibility to engage in broad policy discussions. However, comments from the stakeholders were mixed on the added value of the 7th EAP, with some remarking that the actions are mainly driven by other initiatives, such as the UN SDGs.

Summary of the main findings regarding the implementation of Objective 9

Relevance (and knowledge base)

Objective 9 and its sub-objectives remain relevant to current needs as regards increasing the Union's effectiveness in addressing international environment- and climate-related challenges. However, certain aspects are missing among the sub-objectives. In terms of knowledge gaps, better understanding of the linkages between various global targets and pathways of goods and finances across nations and regions is needed, if targets are to be effectively addressed under Objective 9. In terms of available but under-utilised knowledge, policy coherence and impacts of consumption patterns were mentioned as two areas where knowledge exists but is not utilised in an optimal way.

Coherence

Stakeholders considered that the EU has successfully integrated and addressed the Rio+20 outcomes into its internal and external policies. However, some believe that the EU is addressing the SDGs as a matter of external action, rather than integrating them into its internal policies. Incoherencies stem from the fact that several Member States have not yet ratified certain international environmental agreements, which compromises environmental implementation and the EU's international role in the field of environment and climate change.

Effectiveness

As for Objective 8, data came only from the stakeholder consultation and should therefore be regarded as highly subjective. Opinions about different initiatives were either uncertain or very diverse, making it impossible to draw any clear trends. Stakeholders assessed the impacts of global environment- and climate change-related policies on citizens, nature and economic actors as positive. As regards reducing the impacts of EU consumption of food and non-food commodities on the environment beyond the Union's borders, respondents replied in general that there is 'mainly no progress' or that they did not know, which could indicate that this is an area where the EU is lacking in effort.

Efficiency

Efficiency was difficult to assess because of the many 'do not know' answers. Nevertheless, funding was judged (by the few who gave their opinion on this matter) as insufficient for addressing international environmental and climate change-related challenges. Stakeholders claim that existing results could not have been achieved with fewer costs/resources.

EU added value

The existing results could not have been achieved without the 7th EAP, which offers the possibility to engage in broad policy discussions. Some respondents questioned the

Programme's added value and suggested that the UN SDGs-related agenda is the main driver in the field.

Stakeholders came up with some recommendations for due action under Objective 9.⁸⁷

2.3. Overall assessment of the implementation of the 7th Environment Action Programme and the prospects towards a next (8th) Environment Action Programme

While the previous sections gave detailed evidence on the implementation of the various environment- and climate-related policy areas under the 7th EAP, Section 2.3 explores whether the Programme as a policy instrument is fit for achieving the set objectives. The prospects towards a next (8th) EAP are also discussed.

The analysis is based on the perceptions of the participants in the stakeholder consultation. The text is again structured along the five evaluation criteria: relevance, coherence, effectiveness, efficiency and EU added value.

2.3.1. Overall assessment of implementation of the 7th Environment Action Programme

Relevance

Stakeholders confirmed that the scope of the Programme (in its nine objectives) is relevant to current needs. However, the Programme is sometimes viewed as 'too ambitious' or 'not ambitious enough' by stakeholders.

Coherence

Stakeholders generally consider that there is coherence between the 7th EAP and other high-level EU policy instruments and sectoral policies. However, there were opinions on conflicts between the 7th EAP and some of the high-level EU policy instruments: for example the Europe 2020 strategy, the European semester and the Investment plan for Europe. The majority of respondents indicated that coherence is lacking between the 7th EAP and the CAP. Other areas, such as trade policy, industrial policy, common fisheries and cohesion policy were also quoted as problematic, although by fewer respondents. Additional problematic areas include: energy policy (including on renewable energy) and the UN SDGs.

Effectiveness

One of the main purposes of the 7th EAP as a policy instrument is to provide guidance to EU policy-making in the field of environment and climate. The majority of respondents consider that the 7th EAP has 'moderate' influence on EU policy-making; only around a quarter consider this influence to be strong, and even fewer consider it to be 'weak'.

Stakeholders consider the 7th EAP mostly as fit for serving as a strategic guidance document (with the capacity to raise awareness of priority actions; to serve as a tool for national authorities to put issues on the agenda; and to increase the predictability of European policy-making), but also to act as a tool for holding the EU to account, rather

⁸⁷ See the recommendations of stakeholders under Annex VI (section 3.6.7).

than to serve as a tool for implementation. Other benefits of the Programme, as (suggested by stakeholders themselves, are: it demonstrates the EU added value to citizens, acts as an inter-institutional roadmap for environmental policy-making and policy coherence, supports NGOs in advocacy, and also assists neighbouring countries to decouple economic growth from environmental degradation and resource depletion.

As explained in Part 1 of this EIA, the relevant EU institutions and the Member States are responsible for taking appropriate action, with a view to the delivery of the priority objectives set out in the environment action programmes, including the seventh one.

However, stakeholders consider that the Objectives of the 7th EAP will not be met at EU level. The prospects at Member State level are even worse.

The Commission EIR gives insights about the reasons for insufficient implementation at national level. These include:

- **Ineffective coordination among local, regional and national authorities:** the sectors of 'air and mobility', 'water-nature- food', and 'nature-rural land use-urbanisation' require strong integration;
- **Lack of administrative/human resources capacity and insufficient financing:** when these are not available, the authorities are not able to prepare and manage investment projects; when financing is available but human resources are lacking, authorities (especially at local level) are not able to organise public procurement. Nature protection is given as an example, where the lack of capacity resulted in the inability to carry out and monitor due management and conservation measures;
- **Lack of knowledge and data:** in particular, as regards lack of (access to) data and unreliable data, which also causes implementation problems as, e.g., in the case of lack of knowledge and data on species and habitats that hinders their effective protection;
- **Insufficient compliance assurance mechanisms:** there are often concerns over compliance monitoring and enforcement, including through effective and proportionate sanctions;
- **Lack of integration and policy coherence:** whenever environmental concerns are not properly integrated into other policy areas, this creates room for bad implementation.

The Commission addressed its specific recommendations for improving the implementation of the Programme to each Member State.⁸⁸ Stakeholders too gave their recommendations in this regard.⁸⁹

Efficiency

Efficiency could not be assessed in the context of the overall implementation of the 7th EAP as a whole; instead, it has been assessed in Part 2 in the context of each thematic objective.

EU added value

EU added value was largely acknowledged by stakeholders. A large majority of the respondents indicated that the EU and Member States could not have achieved better

⁸⁸ See the Commission recommendations in Annex IV to this EIA.

⁸⁹ See the recommendations of stakeholders in Annex VI, section 3.1.6.

results without the strategic guidance of the 7th EAP. The Programme is also ('mainly') viewed as a sufficiently clear long-term vision for the development of environment and climate change policies.

2.3.2. Prospects for a next (8th) Environment Action Programme

A majority of stakeholders are fully convinced that strategic guidance for policy-making in the field of environment and climate (in the form of an environment action programme) would be a good framework for the post-2020 period. Furthermore, stakeholders almost unanimously agreed that the 8th EAP should follow the model of its predecessor. However, the endorsement of a new programme by the wider stakeholder community will depend on its content. Respondents have suggested the following: the next EAP should have a simplified framework and should be better communicated at the national level; all stakeholder groups should be more involved with the drafting; it should reflect the new political landscape; and progress towards implementing the new Programme should be monitored very closely.

Conclusion

This EIA found that the 'core thematic' and 'horizontal' objectives of the 7th EAP remain relevant to current needs in the policy area of environment and climate change. Several knowledge gaps were identified in the context of all EAP objectives and in areas where existing knowledge is not given due attention by policy-making.

Policy coherence appears to be problematic. Many EU sectoral policies do not reflect sufficiently (or are even in conflict with) environmental and climate objectives, as is the case of, for example, the EU's Common Agricultural Policy, which has often been quoted as an example of 'incoherence' in the context of each 'core thematic' objective (1, 2 and 3).

Progress on implementing the various policy instruments under the EAP is mixed, and hence progress in achieving the various related objectives is equally mixed. The following policy areas appear to be the most problematic when it comes to implementing the relevant legislation: biodiversity (Objective 1), waste management (Objective 2), air quality and noise (Objective 3). Furthermore, in terms of 'core thematic' objectives, the outlook for 2020 varies from not promising (in the worst case of Objective 1) to uncertain (in the best case of Objective 2); lack of data makes giving an outlook for Objective 3 difficult at this stage. On a more positive note, overall, stakeholders consider the current implementation of EU environment and climate-related policies as beneficial to nature, citizens and economic operators.

Stakeholders consider that existing results could not have been achieved at a lower price. Funding at both EU and national level is viewed as not adequate to current needs, and public and private funding is not increasing as needed. Furthermore, when it comes to spending of available funding, project execution often faces problems, as revealed by the work of the European Court of Auditors (with relevance mainly to Objectives 1 and 2).

It could be concluded from the above that the implementation of the 'enabling' 7th EAP framework – aimed at improving coherence, implementation, knowledge and funding and initially designed to overcome systemic obstacles in the field of environment and climate change – is lagging behind, thus undermining the achievement of the 'core thematic' (and 'horizontal') objectives.

Notwithstanding the problems identified, the EAP is viewed as adding value to EU and national efforts in this policy field (with some differences across the different objectives).

Stakeholders are of the opinion that the long-term (post-2020) vision of the EU and its Member States in this policy field should continue to take the form of an Environment Action Programme, as stipulated by the Treaty on the Functioning of the European Union, and that the current, 7th EAP could be taken as a model. However, stakeholders' support for the 8th EAP would depend on the content of the future document, which they would like to see drafted with their active participation.

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Annex I - The 7th Environment Action Programme - (sub-) objectives and policy initiatives/actions/instruments/requirements

Priority Objective	2020 sub objectives
<p>1. To protect, conserve and enhance the Union's natural capital</p>	<p>(a) the loss of biodiversity and the degradation of ecosystem services, including pollination, are halted, ecosystems and their services are maintained and at least 15 % of degraded ecosystems have been restored;</p> <p>(b) the impact of pressures on transitional, coastal and fresh waters (including surface and ground waters) is significantly reduced to achieve, maintain or enhance good status, as defined by the Water Framework Directive;</p> <p>(c) the impact of pressures on marine waters is reduced to achieve or maintain good environmental status, as required by the Marine Strategy Framework Directive, and coastal zones are managed sustainably;</p> <p>(d) air pollution and its impacts on ecosystems and biodiversity are further reduced with the long-term aim of not exceeding critical loads and levels;</p> <p>(e) land is managed sustainably in the Union, soil is adequately protected and the remediation of contaminated sites is well underway;</p> <p>(f) the nutrient cycle (nitrogen and phosphorus) is managed in a more sustainable and resource-efficient way;</p> <p>(g) forest management is sustainable, and forests, their biodiversity and the services they provide are protected and, as far as feasible, enhanced and the resilience of forests to climate change, fires, storms, pests and diseases is improved.</p> <p>This requires, in particular:</p> <ul style="list-style-type: none"> i) stepping up the implementation of the EU Biodiversity Strategy without delay, in order to meet its targets; ii) fully implementing the Blueprint to Safeguard Europe's Water Resources, having due regard for Member States' specific circumstances, and ensuring that water quality objectives are adequately supported by source-based policy measures; iii) urgently increasing efforts, inter alia, to ensure that healthy fish stocks are achieved in line with the Common Fisheries Policy, the Marine Strategy Framework Directive and international obligations. Combating pollution and establishing a Union-wide quantitative reduction headline target for marine litter supported by source-based measures and taking into account the marine strategies established by Member States. Completing the Natura 2000 network of marine protected areas, and ensuring that coastal zones are managed sustainably; iv) agreeing and implementing an EU Strategy on adaptation to climate change, including the mainstreaming of climate change adaptation into key Union policy initiatives and sectors; v) strengthening efforts to reach full compliance with Union air quality legislation and defining strategic targets and actions beyond 2020;

	<ul style="list-style-type: none"> vi) increasing efforts to reduce soil erosion and increase soil organic matter, to remediate contaminated sites and to enhance the integration of land use aspects into coordinated decision-making involving all relevant levels of government, supported by the adoption of targets on soil and on land as a resource, and land planning objectives; vii) taking further steps to reduce emissions of nitrogen and phosphorus, including those from urban and industrial wastewater and from fertiliser use, inter alia through better source control, and the recovery of waste phosphorus; viii) developing and implementing a renewed Union Forest Strategy that addresses the multiple demands on, and benefits of, forests and contributes to a more strategic approach to protecting and enhancing forests, including through sustainable forest management; ix) enhancing Union public information provision, awareness and education on environment policy.
<p>2. To turn the Union into a resource-efficient, green, and competitive low-carbon economy</p>	<p>(a) the Union has met its 2020 climate and energy targets and is working towards reducing by 2050 GHG emissions by 80–95 % compared to 1990 levels, as part of a global effort to limit the average temperature increase below 2 °C compared to pre-industrial levels, with the agreement of a climate and energy framework for 2030 as a key step in this process;</p> <p>(b) the overall environmental impact of all major sectors of the Union economy is significantly reduced, resource efficiency has increased, and benchmarking and measurement methodologies are in place. Market and policy incentives that foster business investments in resource efficiency are in place, while green growth is stimulated through measures to foster innovation;</p> <p>(c) structural changes in production, technology and innovation, as well as consumption patterns and lifestyles have reduced the overall environmental impact of production and consumption, in particular in the food, housing and mobility sectors;</p> <p>(d) waste is safely managed as a resource and to prevent harm to health and the environment, absolute waste generation and waste generated per capita are in decline, landfilling is limited to residual (i.e. non-recyclable and non-recoverable) waste, having regard to the postponements provided for in Article 5(2) of the Landfill Directive and energy recovery is limited to non-recyclable materials, having regard to Article 4(2) of the Waste Framework Directive ;</p> <p>(e) water stress in the Union is prevented or significantly reduced</p> <p>This requires, in particular:</p> <ul style="list-style-type: none"> i) fully implementing the Climate and Energy Package and urgently agreeing on the Union's 2030 climate and energy policy framework, with due regard for the most recent IPCC assessment report, taking into account the indicative milestones set out in the Low-Carbon Roadmap, as well as developments within the UNFCCC and other relevant processes; ii) generalising the application of 'Best Available Techniques' in the context of the Industrial Emissions Directive and enhancing efforts

	<p>to promote the uptake of emerging innovative technologies, processes and services;</p> <p>iii) giving impetus to the public and private research and innovation efforts required for the development and uptake of innovative technologies, systems and business models which will speed up and lower the cost of transition to a low-carbon, resource-efficient, safe and sustainable economy. Further developing the approach set out in the Eco-innovation Action Plan, identifying priorities for incremental innovation as well as system changes, promoting a larger market share of green technologies in the Union and enhancing the competitiveness of the European eco-industry. Establishing indicators and setting realistic and achievable targets for resource efficiency;</p> <p>iv) developing measurement and benchmarking methodologies by 2015 for resource efficiency of land, carbon, water and material use and assessing the appropriateness of the inclusion of a lead indicator and target in the European Semester;</p> <p>v) establishing a more coherent policy framework for sustainable production and consumption including, where appropriate, the consolidation of existing instruments into a coherent legal framework. Reviewing product legislation with a view to improving the environmental performance and resource efficiency of products throughout their lifecycle. Stimulating consumer demand for environmentally sustainable products and services through policies which promote their availability, affordability, functionality and attractiveness. Developing indicators and realistic and achievable targets for the reduction of the overall impact of consumption;</p> <p>vi) developing training programmes geared towards green jobs;</p> <p>vii) increasing efforts to reach existing targets and reviewing approaches to green public procurement, including its scope, in order to increase its effectiveness. Establishing a voluntary green purchaser network for Union businesses;</p> <p>viii) fully implementing Union waste legislation. Such implementation will include applying the waste hierarchy in accordance with the Waste Framework Directive and the effective use of market-based instruments and other measures to ensure that: (1) landfilling is limited to residual (i.e. non-recyclable and non-recoverable) waste, having regard to the postponements provided for in Article 5(2) of the Landfill Directive; (2) energy recovery is limited to non-recyclable materials, having regard to Article 4(2) of the Waste Framework Directive; (3) recycled waste is used as a major, reliable source of raw material for the Union, through the development of non-toxic material cycles; (4) hazardous waste is safely managed and its generation is reduced; (5) illegal waste shipments are eradicated, with the support of stringent monitoring; and (6) food waste is reduced. Reviews of existing product and waste legislation are carried out, including a review of the main targets of the relevant waste directives, informed by the Roadmap to a Resource Efficient Europe, so as to move towards a circular economy; and internal market barriers for environmentally-sound recycling activities in the Union are removed. Public information</p>
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	<p>campaigns are required to build awareness and understanding of waste policy and to stimulate a change in behaviour; improving water efficiency by setting and monitoring targets at river basin level on the basis of a common methodology for water efficiency targets to be developed under the Common Implementation Strategy process, and using market mechanisms, such as water pricing, as provided for in Article 9 of the Water Framework Directive and, where appropriate, other market measures. Developing approaches to manage the use of treated wastewater</p>
<p>3. To safeguard the Union's citizens from environment-related pressures and risks to health and wellbeing</p>	<p>(a) outdoor air quality in the Union has significantly improved, moving closer to WHO recommended levels, while indoor air quality has improved, informed by the relevant WHO guidelines; (b) noise pollution in the Union has significantly decreased, moving closer to WHO recommended levels; (c) citizens throughout the Union benefit from high standards for safe drinking and bathing water; (d) the combination effects of chemicals and safety concerns related to endocrine disruptors are effectively addressed in all relevant Union legislation, and risks for the environment and health, in particular in relation to children, associated with the use of hazardous substances, including chemicals in products, are assessed and minimised. Long-term actions with a view to reaching the objective of a non-toxic environment will be identified; (e) the use of plant protection products does not have any harmful effects on human health or unacceptable influence on the environment, and such products are used sustainably; (f) safety concerns related to nanomaterials and materials with similar properties are effectively addressed as part of a coherent approach in legislation; (g) decisive progress is made in adapting to the impact of climate change.</p> <p>This requires, in particular:</p> <ul style="list-style-type: none"> i) implementing an updated Union air quality policy, aligned with the latest scientific knowledge, and developing and implementing measures to combat air pollution at source taking into account the differences between the sources of indoor and outdoor air pollution; ii) implementing an updated Union noise policy aligned with the latest scientific knowledge, and measures to reduce noise at source, and including improvements in city design; iii) increasing efforts to implement the Water Framework Directive, the Bathing Water Directive and the Drinking Water Directive, in particular for small drinking water supplies; iv) continuing to implement REACH in order to ensure a high level of protection for human health and the environment as well as the free circulation of chemicals within the internal market while enhancing competitiveness and innovation, while being mindful of the specific needs of SMEs. Developing by 2018 a Union strategy for a non-toxic environment that is conducive to innovation and the

	<p>development of sustainable substitutes including non-chemical solutions, building on horizontal measures to be undertaken by 2015 to ensure: (1) the safety of manufactured nanomaterials and materials with similar properties; (2) the minimisation of exposure to endocrine disruptors; (3) appropriate regulatory approaches to address combination effects of chemicals and (4) the minimisation of exposure to chemicals in products, including, inter alia, imported products, with a view to promoting non-toxic material cycles and reducing indoor exposure to harmful substances;</p> <p>v) monitoring the implementation of Union legislation on the sustainable use of biocidal products and plant protection products and reviewing it, as necessary, to keep it up to date with the latest scientific knowledge;</p> <p>vi) agreeing and implementing an EU Strategy on adaptation to climate change, including the integration of climate change adaptation and disaster risk management considerations into key Union policy initiatives and sectors.</p>
<p>4. To maximise the benefits of Union environment legislation by improving implementation</p>	<p>(a) the public has access to clear information showing how Union environment law is being implemented consistent with the Aarhus Convention;</p> <p>(b) compliance with specific environment legislation has increased;</p> <p>(c) Union environment law is enforced at all administrative levels and a level-playing field in the internal market is guaranteed;</p> <p>(d) citizens' trust and confidence in Union environment law and its enforcement is enhanced;</p> <p>(e) the principle of effective legal protection for citizens and their organisations is facilitated.</p> <p>This requires, in particular:</p> <p>i) ensuring that systems at national level actively disseminate information about how Union environment legislation is being implemented, and complementing such information with a Union level overview of individual Member States' performance;</p> <p>ii) drawing up partnership implementation agreements on a voluntary basis between Member States and the Commission, involving local and regional participation where appropriate;</p> <p>iii) extending binding criteria for effective Member State inspections and surveillance to the wider body of Union environment law, and further developing inspection support capacity at Union level, drawing on existing structures, backed up by support for networks of professionals such as IMPEL, and by the reinforcement of peer reviews and best practice sharing, with a view to increasing the efficiency and effectiveness of inspections;</p> <p>iv) ensuring consistent and effective mechanisms at national level for the handling of complaints about implementation of Union environment law;</p> <p>v) ensuring that national provisions on access to justice reflect the case law of the Court of Justice of the European Union. Promoting non-judicial dispute resolution as a means of finding amicable and effective solutions for disputes in the environmental field.</p>

<p>5. To improve the knowledge and evidence base for Union environment policy</p>	<p>(a) policy-makers and stakeholders have a more informed basis for developing and implementing environment and climate policies, including understanding the environmental impacts of human activities and measuring the costs and benefits of action and the costs of inaction;</p> <p>(b) the understanding of, and the ability to evaluate and manage, emerging environmental and climate risks are greatly improved;</p> <p>(c) the environment science-policy interface is strengthened, including the accessibility of data for citizens and the contribution of citizens' science;</p> <p>(d) the impact of the Union and its Member States in international science-policy fora is enhanced in order to improve the knowledge base for international environment policy.</p> <p>This requires, in particular:</p> <ul style="list-style-type: none"> i) coordinating, sharing and promoting research efforts at Union and Member State level with regard to addressing key environmental knowledge gaps, including the risks of crossing environmental tipping-points and planetary boundaries; ii) adopting a systematic and integrated approach to risk management, particularly in relation to the evaluation and management of new and emerging policy areas and related risks as well as the adequacy and coherence of regulatory responses. This could help to stimulate further research on the hazards of new products, processes and technologies; iii) simplifying, streamlining and modernising environmental and climate change data and information collection, management, sharing and re-use, including the development and implementation of a Shared Environmental Information System; iv) developing a comprehensive chemical exposure and toxicity knowledge base which draws on data generated without animal testing where possible. Continuing the Union's coordinated approach to human and environmental biomonitoring including, where appropriate, standardisation of research protocols and assessment criteria; v) intensifying cooperation at international, Union and Member State level on the environment science-policy interface.
<p>6. To secure investment for environment and climate policy and address environmental externalities.</p>	<p>(a) environment and climate policy objectives are achieved in a cost-effective way and are supported by adequate finance;</p> <p>(b) public and private sector funding for environment and climate-related expenditure is increased;</p> <p>(c) the value of natural capital and ecosystem services, as well as the costs of their degradation are properly assessed and considered in policy-making and investments.</p> <p>This requires, in particular:</p> <ul style="list-style-type: none"> i) phasing out environmentally harmful subsidies at Union and Member State level without delay, and reporting on progress through the National Reform Programmes; increasing the use of market-based instruments, such as Member States' taxation policies, pricing and charging, and expanding markets for

	<p>environmental goods and services, with due regard to any adverse social impacts, using an action-based approach, supported and monitored by the Commission, inter alia, via the European Semester;</p> <ul style="list-style-type: none"> ii) facilitating the development of, and access to, innovative financial instruments and funding for eco-innovation; iii) adequately reflecting environment and climate priorities in policies and funding strategies to support economic, social and territorial cohesion; iv) making dedicated efforts to ensure the full and efficient use of available Union funding for environmental action, including by significantly improving its early uptake under the Union's Multiannual Financial Framework 2014–2020 and devoting 20 % of the budget to climate change mitigation and adaptation through the mainstreaming of climate action and linking that funding to clear benchmarks, target setting, monitoring and reporting; v) developing and applying a system for reporting and tracking environment-related expenditure in the Union budget, in particular expenditure on climate change and biodiversity, by 2014; vi) integrating environmental and climate-related considerations into the European Semester process, where this is relevant for individual Member States' prospects for sustainable growth and is appropriate for country-specific recommendations; vii) developing and applying alternative indicators that complement and go beyond GDP to monitor the sustainability of progress and continuing work to integrate economic indicators with environmental and social indicators, including by means of natural capital accounting; viii) further developing and encouraging 'payments for ecosystem services' schemes; ix) putting in place incentives and methodologies that stimulate companies to measure the environmental costs of their business and profits derived from using environmental services and to disclose environmental information as part of their annual reporting. Encouraging companies to exercise due diligence, including throughout their supply chain.
<p>7. To improve environmental integration and policy coherence</p>	<p>(a) sectoral policies at Union and Member State level are developed and implemented in a way that supports relevant environment and climate-related targets and objectives.</p> <p>This requires, in particular:</p> <ul style="list-style-type: none"> i) integrating environmental and climate-related conditionalities and incentives in policy initiatives, including reviews and reforms of existing policy, as well as new initiatives, at Union and Member State level; ii) carrying out ex-ante assessments of the environmental, social and economic impacts of policy initiatives at appropriate Union and Member State level to ensure their coherence and effectiveness; iii) fully implementing the Strategic Environmental Assessment Directive and the Environmental Impact Assessment Directive;

	<ul style="list-style-type: none"> iv) using ex-post evaluation information relating to experience with implementation of the environment acquis in order to improve its consistency and coherence v) addressing potential trade-offs in all policies in order to maximise synergies and avoid, reduce and, if possible, remedy unintended negative effects on the environment.
<p>8. To enhance the sustainability of the Union's cities.</p>	<p>a majority of cities in the Union are implementing policies for sustainable urban planning and design, including innovative approaches for urban public transport and mobility, sustainable buildings, energy efficiency and urban biodiversity conservation.</p> <p>This requires, in particular:</p> <ul style="list-style-type: none"> i) agreeing on a set of criteria to assess the environmental performance of cities, taking into account economic, social and territorial impacts; ii) ensuring that cities have information about, and better access to, financing for measures to improve urban sustainability; iii) sharing best practice between cities at Union and international level in relation to innovative and sustainable urban development; iv) in the context of ongoing Union initiatives and networks, developing and promoting a common understanding of how to contribute to improved urban environments by focusing on the integration of urban planning with objectives related to resource efficiency, an innovative safe and sustainable low-carbon economy, sustainable urban land-use, sustainable urban mobility, urban biodiversity management and conservation, ecosystem resilience, water management, human health, public participation in decision-making and environmental education and awareness.
<p>9. To increase the Union's effectiveness in addressing international environment and climate-related challenges.</p>	<ul style="list-style-type: none"> (a) the outcomes of Rio + 20 are fully integrated into the Union's internal and external policies and the Union is contributing effectively to global efforts to implement agreed commitments, including those under the Rio conventions and to initiatives aimed at promoting the global transition towards an inclusive and green economy in the context of sustainable development and poverty eradication; (b) the Union is providing effective support to national, regional and international efforts to address environmental and climate-related challenges and to ensure sustainable development; (c) the impact of consumption in the Union on the environment beyond the Union's borders is reduced. <p>This requires, in particular:</p> <ul style="list-style-type: none"> i) working as part of a coherent and comprehensive post-2015 approach to the universal challenges of poverty eradication and sustainable development, and through an inclusive, collaborative process, towards the adoption of sustainable development goals that: <ul style="list-style-type: none"> a. are coherent with existing internationally agreed goals and targets on, inter alia, biodiversity, climate change, social inclusion and social protection floors; b. address, at national and international level, priority areas such as energy, water, food security, oceans and sustainable consumption

	<p>and production, decent work, good governance and the rule of law;</p> <ul style="list-style-type: none"> c. are universally applicable, covering all three dimensions of sustainable development; d. are assessed and accompanied by targets and indicators, while taking into account different national circumstances, capacities and levels of development, and e. are consistent with, and supportive of, other international commitments, such as those concerning climate change and biodiversity; <p>ii) working towards a more effective UN structure for sustainable development, in particular its environmental dimension by:</p> <ul style="list-style-type: none"> a. further strengthening the United Nations Environment Programme (UNEP) in line with the outcome of Rio + 20, building on the decision by the UN General Assembly to change the designation of the Governing Council of the UNEP to the UN Environment Assembly of the UNEP, while continuing to strive for an upgrade of the UNEP's status to that of a specialised Agency; b. supporting efforts to enhance synergies between multilateral environmental agreements, in particular in the chemicals and waste cluster and the biodiversity cluster; and c. contributing to ensuring a strong and authoritative voice for the environment in the work of the High-Level Political Forum <p>iii) strengthening the impact of various sources of funding, including taxation and domestic resource mobilisation, private investment, new partnerships and innovative financing sources, and creating options for using development aid to leverage those other sources of financing as part of a sustainable development financing strategy, as well as in the Union's own policies, including international commitments on climate and biodiversity finance;</p> <p>iv) engaging with partner countries in a more strategic way, for example by focusing cooperation with:</p> <ul style="list-style-type: none"> a. strategic partners on the promotion of best practice in domestic environment policy and legislation and convergence in multilateral environmental negotiations; b. countries covered by the European Neighbourhood Policy on gradual approximation with key Union environment and climate policy and legislation and on strengthening cooperation to address regional environmental and climate-related challenges; c. developing countries to support their efforts to protect the environment, fight climate change and reduce natural disasters, and implement international environmental commitments as a contribution to poverty reduction and sustainable development; <p>v) engaging in existing and new multilateral environmental and other relevant processes, in a more consistent, proactive and effective way, including through the timely outreach to third countries and other stakeholders, with a view to ensuring that commitments for 2020 are met at Union level and promoted globally, and to agree on international action to be taken beyond 2020, and ratifying and boosting efforts to implement all key multilateral environmental</p>
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	<p>agreements well before 2020. Implementing the 10-year Framework of Programmes on Sustainable Consumption and Production;</p> <ul style="list-style-type: none">vi) assessing the environmental impact, in a global context, of Union consumption of food and non-food commodities and, if appropriate, developing policy proposals to address the findings of such assessments, and considering the development of a Union action plan on deforestation and forest degradation;vii) promoting the further development and implementation of emissions trading schemes around the world and facilitating the linking of such systems;viii) ensuring that economic and social progress is achieved within the carrying capacity of the Earth, by increasing understanding of planetary boundaries, inter alia, in the development of the post-2015 framework in order to secure human well-being and prosperity in the long-term.
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Annex II - EEA Environmental Indicator Report 2016 - links to the relevant on-line briefings

Objective 1:

AIRS_PO1.1, 2016, *Eutrophication of terrestrial ecosystems due to air pollution*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/natural-capital/eutrophication-of-terrestrial-ecosystems>).

AIRS_PO1.2, 2016, *Agricultural land: nitrogen balance*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/natural-capital/agricultural-land-nitrogen-balance>).

AIRS_PO1.3, 2016, *Urban land expansion*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/natural-capital/urban-land-expansion>).

AIRS_PO1.4, 2016, *Forest utilisation*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/natural-capital/forest-utilisation>).

AIRS_PO1.5, 2016, *Marine fish stocks*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/natural-capital/marine-fish-stocks>).

AIRS_PO1.6, 2016, *Common birds and butterflies*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/natural-capital/common-birds-and-butterflies>).

AIRS_PO1.7, 2016, *EU protected species*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/natural-capital/eu-protected-species>).

AIRS_PO1.8, 2016, *EU protected habitats*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/natural-capital/eu-protected-habitats>).

AIRS_PO1.9, 2016, *Surface waters*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/natural-capital/surface-waters>).

Objective 2:

AIRS_PO2.1, 2016, *Resource efficiency*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/resource-efficiency-and-low-carbon-economy/resource-efficiency>).

AIRS_PO2.2, 2016, *Waste generation*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/resource-efficiency-and-low-carbon-economy/waste-generation>).

AIRS_PO2.3, 2016, *Recycling of municipal waste*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/resource-efficiency-and-low-carbon-economy/recycling-of-municipal-waste>).

AIRS_PO2.4, 2016, *Freshwater use*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/resource-efficiency-and-low-carbon-economy/freshwater-use>).

AIRS_PO2.5, 2016, *Greenhouse gas emissions*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/resource-efficiency-and-low-carbon-economy/greenhouse-gas-emission>).

AIRS_PO2.6, 2016, *Renewable energies*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/resource-efficiency-and-low-carbon-economy/renewable-energies>).

AIRS_PO2.7, 2016, *Energy efficiency*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/resource-efficiency-and-low-carbon-economy/energy-efficiency>).

AIRS_PO2.8, 2016, *Household energy consumption*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/resource-efficiency-and-low-carbon-economy/household-energy-consumption>).

AIRS_PO2.9, 2016, *Transport greenhouse gas emissions*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/resource-efficiency-and-low-carbon-economy/transport-ghg-emissions>).

AIRS_PO2.10, 2016, *Food consumption – animal based products*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/resource-efficiency-and-low-carbon-economy/food-consumption-animal-based>).

AIRS_PO2.11, 2016, *Environmental and labour taxation*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/resource-efficiency-and-low-carbon-economy/environmental-and-labour-taxation>).

AIRS_PO2.12, 2016, *Environmental goods and services sector: employment and value added*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/resource-efficiency-and-low-carbon-economy/environmental-goods-and-services-sector>).

AIRS_PO2.13, 2016, *Environmental protection expenditure*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/resource-efficiency-and-low-carbon-economy/environmental-protection-expenditure>)

Objective 3:

AIRS_PO3.1, 2016, *Outdoor air quality in urban areas*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/environment-and-health/outdoor-air-quality-urban-areas>).

AIRS_PO3.2, 2016, *Air pollutant emissions*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/environment-and-health/air-pollutant-emissions>).

AIRS_PO3.3, 2016, *Quality of bathing waters*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/environment-and-health/bathing-water-quality>).

AIRS_PO3.4, 2016, *Number of countries that have adopted a climate change adaptation strategy/plan*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/environment-and-health/climate-change-adaptation-strategies>).

AIRS_PO3.5, 2016, *Environmental noise*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/environment-and-health/environmental-noise>).

AIRS_PO3.6, 2016, *Production of hazardous chemicals*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/environment-and-health/production-of-hazardous-chemicals>).

AIRS_PO3.7, 2016, *Pesticide sales*, European Environment Agency (<http://www.eea.europa.eu/airs/2016/environment-and-health/pesticides-sales>).

Annex III - EEA Environmental Indicator report 2016 - scoreboards /as per December 2016/ and calendar of indicator up-dates

Objective

1

Indicator	EU indicator past trend	Selected objective to be met by 2020	Indicative outlook of the EU meeting the selected objective by 2020
Exposure of terrestrial ecosystems to eutrophication due to air pollution (*)	▲	Reduce areas of critical load exceedance with respect to eutrophication by 43 % from 2000 levels — Air Pollution Thematic Strategy	●
The area where ecosystems are exposed to eutrophication because of excess atmospheric nitrogen deposition has decreased. According to a scenario assuming that current legislation is fully implemented, it will, nevertheless, fall short of the 2020 objective			
Gross nutrient balance in agricultural land: nitrogen	▲	Manage the nutrient cycle in a more sustainable way (nitrogen) — 7th EAP	●
Overall, the agricultural nitrogen balance shows an improving trend. However, on average, the EU still has an unacceptable level of nitrogen losses from agricultural land to the environment and further efforts are needed to manage the nutrient cycle for nitrogen sustainably in the EU			
Land take (*)	▲	Keep the rate of land take below 800 km ² on average per year from 2000–2020 in order to keep on track to achieve the aim of no net land take by 2050 — Resource Efficiency Roadmap	●
The EU annual average land take from 2000–2012 was above the 800-km ² milestone. Nevertheless the average annual land take in 2006–2012 was less than in 2000–2006. It is uncertain if a further reduction will take place and at what rate			
Forest: growing stock, increment and fellings	▲	Forest management is sustainable — 7th EAP (focus solely on forest utilisation)	●
Since 1990, EU forests overall have been harvested at a lower rate than they have grown (at around 60–70 %), indicating sustainable forest management in relation to the forest utilisation rate. Despite expected increased harvesting of forests, the overall forest utilisation is expected to remain sustainable up to 2020			
Status of marine fish stocks	▲	Ensure healthy fish stocks — Common Fisheries Policy and Marine Strategy Framework Directive	●
The EU is improving the state of its commercial fish species in only North-east Atlantic and Baltic waters. As the 2020 objective of healthy commercial fish populations applies to all marine waters, it is unlikely to be met			
Abundance and distribution of selected species (common birds (*) and grassland butterflies)	▲	Meet the headline target of the EU Biodiversity Strategy: to halt the loss of biodiversity and the degradation of ecosystem services	●
It is highly unlikely that the objective will be achieved by 2020 given the continuing declining trends apparent for certain groups, such as grassland butterflies and farmland birds			
Species of European interest	▲	Ensure that 34.5 % of species assessments under the Habitats Directive are in a favourable or improved conservation status, and that 78 % of species assessments under the Birds Directive show a secure or improved status — EU Biodiversity Strategy	●
The EU has shown limited progress in improving the conservation status of EU protected species and the pressures on species remain. It is therefore unlikely that the 2020 target will be met			
Habitats of European interest	▲	Ensure that 34 % of habitat assessments under the Habitats Directive are in a favourable or improved conservation status — EU Biodiversity Strategy	●
The EU has shown limited progress in improving the conservation status of EU protected habitats and the pressures on these habitats remain. It is therefore unlikely that the 2020 target will be met			
Status of surface waters	N.A.	Achieve good status of transitional and coastal waters and freshwaters — Water Framework Directive	●
Considering the large proportion of surface waters failing to meet 'good' ecological status, it is unlikely that the objective of achieving good status of waters will be met by 2020			
EU indicator past trend		Indicative outlook of the EU meeting the selected objective by 2020	
▲ Improving trend		● It is likely that the objective will be met by 2020	
▲ Stable or unclear trend		● It is uncertain whether or not the objective will be met by 2020	
▲ Deteriorating trend		● It is unlikely that the objective will be met by 2020	

Notes: (*) The indicator past trend is also available at EEA member country aggregate level and not just at the EU aggregate level. In all of these cases, the assessment (in terms of colour) remains the same for the EU and the EEA member country (including the EU) indicator past trend.

The available time period and country coverage are specified in the corresponding charts in the online briefings.
N.A. Non applicable as the time series is not yet available.

Objective 2

Indicator	EU indicator past trend	Selected objective to be met by 2020	Indicative outlook of the EU meeting the selected objective by 2020
Resource productivity	▲	Improve economic performance while reducing pressure on natural resources — Roadmap to a resource efficient Europe	●
There was a decline in the use of materials and a rapid rate of increase in resource productivity following the economic downturn of 2007/2008. The rate of increase in resource productivity has been projected to return to the more gradual rate seen prior to the economic downturn of just below 1 % per year			
Waste generation in Europe (*)	▲	Manage waste safely as a resource. Reduce absolute and per capita waste generation — 7th EAP	●
The historic trend shows variation in waste generation among sectors, with reduction in some, little change in others and some increases. This mixed picture suggests that the outlook to 2020 is unclear			
Recycling of municipal waste (%)	▲	50 % of selected materials in household and similar waste to be recycled by each EU Member State — Waste Framework Directive	●
The amount of municipal waste being recycled has been steadily increasing. The outlook for reaching the 2020 target is mixed, with the above level of recycling already achieved by some Member States and others on course to do so. However, the target is some way off for others			
Use of freshwater resources	▲	Water abstraction should stay below 20 % of available renewable freshwater resources — Roadmap to a resource efficient Europe	●
While efficiency gains have been achieved, hotspots for water stress conditions are likely to remain given continued pressures such as climate change, increasing population and rapid urbanisation			
Total greenhouse gas emission trends and projections	▲	Reduce greenhouse gas emissions by 20 % compared with 1990 levels — 2020 Climate and Energy Package	●
The decreasing trend of greenhouse gases and the future evolution as projected by EU Member States indicate that the 2020 greenhouse gas reduction target will be met			
Share of renewable energy in gross final energy consumption	▲	Reach a 20 % share of renewable energy in gross final energy consumption — Renewable Energy Directive	●
The EU has steadily increased the share of renewable energy in its gross final energy consumption. If the current pace of growth is maintained, the 2020 renewable energy target will be met			
Progress on energy efficiency in Europe	▲	Improve energy efficiency by 20 % (compared with a business-as-usual scenario) — Energy Efficiency Directive	●
The EU as a whole is currently on track to meet its energy efficiency target. This has been mainly due to the implementation of energy efficiency policies as well as the economic downturn. As economic growth returns, higher levels of ambition for some national targets and better implementation across the board will be required to keep Europe on track			
Energy consumption by households	▲	Reduce the overall environmental impact of production and consumption in the housing sector — 7th EAP	●
The energy consumption of households in the EU decreased. Policies in place and the targets set for energy consumption under the Energy Union process should help to maintain this trend up to 2020 and beyond			
Greenhouse gas emissions from transport	▲	Reduce the overall environmental impact of production and consumption in the mobility sector — 7th EAP	●
Past transport greenhouse gas emissions increased from 1990 to 2014 despite a decline between 2008 and 2013. It is uncertain if emissions will reduce by 2020, since according to projections by the EU Member States emissions will remain more or less stable between 2015 and 2020			
Consumption of meat, dairy, fish and seafood	▲	Reduce the overall environmental impact of production and consumption in the food sector — 7th EAP	●
Reducing the consumption of animal products and shifting to other sources of protein has the potential to reduce environmental impacts related to food. Consumption of meat, dairy, and fish and seafood products increased gradually between 1995 and 2008, but has stabilised since then. Levels of saturated fat and red meat consumption remain above dietary guidelines and result in high GHG and nitrogen emissions			

Share of environmental and labour taxes in total tax revenues	▲	Shift taxation from labour towards the environment — 7th EAP	●
For the EU as a whole, there has been no positive progress over the examined period and there are no indications of any change in the coming years			
Employment and value added in the environmental goods and services sector	▲	Promote a larger market share of green technologies in the Union and enhance the competitiveness of the European eco-industry — 7th EAP	●
Overall employment and value added continue to increase, although growth in the sector has slowed since 2011. The prospects of continued growth are uncertain and dependant on the sector competing with equivalent sectors in China and the USA, and continuing ambitious renewable energy and green growth policies in Europe			
Environmental protection expenditure in Europe	▲	Increase in public and private sector funding for environment- and climate-related expenditure — 7th EAP	●
Environmental protection expenditure has increased over the years and this seems likely to continue to 2020, strengthened by the EU's decision that at least 20 % of its 2014–2020 budget should be used on climate change activities			
EU indicator past trend		Indicative outlook of the EU meeting the selected objective by 2020	
▲ Improving trend		● It is likely that the objective will be met by 2020	
▲ Stable or unclear trend		● It is uncertain whether or not the objective will be met by 2020	
▲ Deteriorating trend		● It is unlikely that the objective will be met by 2020	

Notes: (*) The indicator past trend is also available at EEA member country aggregate level and not just at the EU aggregate level. In all of these cases, the assessment (in terms of colour) remains the same for the EU and the EEA member country (including the EU) indicator past trend.

The available time period and country coverage are specified in the corresponding charts in the online briefings.

Objective 3

Indicator	EU indicator past trend	Selected objective to be met by 2020	Indicative outlook of the EU meeting the selected objective by 2020
Exceedance of air quality limit values in urban areas (nitrogen dioxide: NO ₂ ; coarse dust particles: PM ₁₀ ; ozone: O ₃ ; fine particulate matter: PM _{2.5})	 NO ₂ , PM ₁₀  O ₃ , PM _{2.5}	Meet Air Quality Directive standards for the protection of human health — Air Quality Directive	
Despite reductions in concentrations in urban areas of coarse dust particles and nitrogen dioxide and no significant change in ozone and fine particulate matter, due to their high and widespread exceedance levels in urban areas it is unlikely that the air quality standards for these pollutants will be met by 2020			
Emissions of the main air pollutants in Europe (sulphur oxides: SO ₂ ; nitrogen oxides: NO _x ; ammonia: NH ₃ ; non-methane volatile organic compounds: NMVOCs; fine particulate matter: PM _{2.5}) (*)		Reduce air pollutant emissions in accordance with the requirements of the amended Gothenburg Protocol by the following percentages by 2005: SO ₂ 59 %, NO _x 42 %, NH ₃ 6 %, NMVOCs 28 %, PM _{2.5} 22 % compared to 2005 levels	
Air pollutant emissions have declined and current projections suggest that the EU is on target to meet the 2020 Gothenburg Protocol emission reduction commitments			
Bathing water quality		Increase the number of bathing waters classified as 'excellent' or 'good' under the Bathing Water Directive	
The share of bathing waters that meet excellent and good quality standards are likely to increase further due to implementation of the Bathing Water Directive, in particular the effect of measures on poor quality waters			
Number of countries that have adopted a national climate change adaptation strategy and/or plan	N.A.	Make decisive progress in adapting to the impact of climate change — 7th EAP	
There has been an increase in the number of countries that have adopted a national adaptation strategy and/or plan and this is expected to continue. However information on the 'decisive progress' of these policies towards reducing vulnerability and enhancing resilience to climate change is limited, preventing firm conclusions with respect to the 2020 outlook			
Exposure to environmental noise		Significantly decrease noise pollution — 7th EAP	
Efforts to reduce environmental noise tend to be offset by an increase in the number of people being exposed to high noise levels, in particular due to increasing road and aviation traffic and an increase in the number of city inhabitants			
Production of chemicals, by hazard class		Risks for the environment and health associated with the use of hazardous substances, including chemicals in products, are assessed and minimised — 7th EAP	
While the production of chemicals that are hazardous to health has declined over the years, it is not possible to equate this to a reduction in the risks to environment and health and the outlook towards 2020 is therefore unclear			
Total sales of pesticides		The use of plant protection products does not have any harmful effects on human health or unacceptable influence on the environment, and such products are used sustainably — 7th EAP	
The selected indicator does not afford for an evaluation of progress towards the 2020 objective. Rather the analysis serves to highlight gaps in the knowledge base for assessing progress towards this objective			
EU indicator past trend		Indicative outlook of the EU meeting the selected objective by 2020	
 Improving trend		 It is likely that the objective will be met by 2020	
 Stable or unclear trend		 It is uncertain whether or not the objective will be met by 2020	
 Deteriorating trend		 It is unlikely that the objective will be met by 2020	

Notes: (*) The indicator past trend is also available at EEA member country aggregate level and not just at the EU aggregate level. The assessment (in terms of colour) remains the same for the EU and the EEA member country (including the EU) indicator past trend for all the examined air pollutant emissions except ammonia for which the EEA member country past trend deteriorated while the EU trend improved.

The available time period and country coverage are specified in the corresponding charts in the online briefings.

N.A. Non applicable: it is not possible to measure a trend for the 'number of countries that have adopted national climate change adaptation strategies and/or plans', since this is a measure of binary evidence, i.e. whether a policy has been adopted or not.

Calendar of indicator up-dates under Objectives 1, 2 and 3

Indicator in scoreboard	Indicator source (*)	Time period	Update frequency	Expected update with data from more recent years
7th EAP priority objective 1				
Exposure of terrestrial ecosystems to eutrophication due to air pollution	EEA indicator CSI 005	2000–2020	Not known	Not known
Gross nutrient balance in agricultural land: nitrogen	Eurostat t2020_rn310	2000–2013	Annually	2017 to include 2014 data
Land take	EEA indicator CSI 014/LSI 001	2000–2012	Every 6 years	2021 to include 2012–2018 data
Forest: growing stock, increment and fellings	UNECE report (*) and EEA indicator SEBI 017	1990–2010	Every 4–5 years	2018 to include 2015 data
Status of marine fish stocks	EEA indicator CSI 032	Status 2008–2012, trend 2003–2012	Annually	2017 to include 2013 data
Abundance and distribution of selected species (common birds and grassland butterflies)	EEA indicator CSI 050/SEBI 001	1990–2013	Annually	2017 to include 2014–2015 data
Species of European interest	EEA indicator CSI 007/SEBI 003	2007–2012	Every 6 years	2020 to include 2013–2018 data
Habitats of European interest	EEA indicator SEBI 005	2007–2012	Every 6 years	2020 to include 2013–2018 data
Status of surface waters	EEA report (*)	By 2009	Every 6 years	2017 to include 2010–2015 data
7th EAP priority objective 2				
Resource productivity	Eurostat data set tsdpc100	2000–2015	Annually	2017 to include 2016 data
Waste generation in Europe	EEA indicator CSI 041	2004–2012	Every 2 years	2017 to include 2014 data
Recycling of municipal waste	EEA indicator WST 005	2004–2014	Every 2 years	2018 to include 2016 data
Use of freshwater resources	EEA indicator CSI 018	2002–2014	Annually	2017 to include 2015 data
Total greenhouse gas emission trends and projections	EEA report (*) and EEA indicator CSI 010	1990–2015 Data for 2015 are approximated estimates	Annually	2017 to include 2015 data and 2016 estimates
Share of renewable energy in gross final energy consumption	EEA indicator ENER 028	2005–2015 Data for 2015 are approximated estimates	Annually	2017 to include 2015 data and 2016 estimates
Progress on energy efficiency in Europe	EEA indicator ENER 026	2005–2015 Data for 2015 are approximated estimates	Annually	2017 to include 2015 data and 2016 estimates

Energy consumption by households	Odyssee (*)	2005–2014	Annually	2017 to include 2015 data
Greenhouse gas emissions from transport	EEA indicator TERM 002	1990–2014	Annually	2017 to include 2015 data
Consumption of meat, dairy, fish and seafood	EEA indicator SCP 020	1995–2011	Every 2–3 years	2018/2019 to include 2015/2016 data
Share of environmental and labour taxes in total tax revenues	Eurostat data set tsdgo410 and DG ECFIN (†)	2003–2014	Annually	2017 to include 2015 data
Employment and value added in the environmental goods and services sector	Eurostat data set env_egs	2000–2013	Annually	2017 to include 2014 data
Environmental protection expenditure in Europe	Eurostat data set env_ac_exp2	2003–2013	Annually	2017 to include 2014 data
7th EAP priority objective 3				
Exceedance of air quality limit values in urban areas (nitrogen dioxide: NO ₂ ; coarse dust particles: PM ₁₀ ; ozone: O ₃ ; fine particulate matter: PM _{2.5})	EEA indicator CSI 004	2000–2014	Annually	2017 to include 2015 data
Emissions of the main air pollutants in Europe (sulphur oxides: SO ₂ ; nitrogen oxides: NO _x ; ammonia: NH ₃ ; non-methane volatile organic compounds: NMVOCs; fine particulate matter: PM _{2.5})	EEA indicator CSI 040	2005–2014	Annually	2017 to include 2015 data
Bathing water quality	EEA report (‡)	2011–2015	Annually	2017 to include 2016 data
Number of countries that have adopted a climate change adaptation strategy and/or plan	Climate-adapt (¶)	2005–2015	Annually	2017 to include 2016 data
Exposure to environmental noise	EEA indicator CSI 051 — forthcoming	2007–2012	Annually but without data for more recent years	2018 to include 2017 data
Production of chemicals, by hazard class	Eurostat data set env_chmhaz	2005–2014	Annually	2017 to include 2015 data
Total sales of pesticides	Eurostat data set aei_fm_salpest09	2011–2014	Annually	2017 to include 2015 data

Notes: (*) All EEA indicators and Eurostat data sets are accessible through the EEA www.eea.europa and Eurostat www.ec.europa.eu/Eurostat websites respectively.

(†) UNECE report ECE/TIM/SP/37, Forests in the UNECE region.

(‡) EEA Report No 8/2012, *European waters — assessment of status and pressures*.

(§) EEA Report No 29/2016, *Trends and projections in Europe 2016*.

(¶) <http://www.indicators.odyssee-mure.eu/online-indicators.html>.

(||) https://ec.europa.eu/taxation_customs/business/economic-analysis-taxation/data-taxation_en.

(¶) EEA Report No 9/2016, *European bathing water quality in 2015*.

(*) <http://climate-adapt.eea.europa.eu/countries-regions/countries>.

Annex IV - Recommendations to Member States under the first edition of the Environmental Implementation Review European Commission, February 2017⁹⁰

<i>Suggested actions</i>	<i>Member State(s)</i>
Developing a circular economy and improving resource efficiency	
<ul style="list-style-type: none"> Strengthen the policy framework to speed up the uptake of the circular economy by all economic sectors, providing further support to local businesses and increasing investments in the public research and education systems, especially concerning water and energy savings, waste reduction, the recycling of materials, eco-design and the uptake of secondary raw materials market. 	BE, BG, CZ, DE, HR, HU, IT, RO, SE, SK
<ul style="list-style-type: none"> Implement a better monitoring of the circular economy policies in order to assess their effectiveness and be able to revise them. 	PT, SI
<ul style="list-style-type: none"> Facilitate development and exchange of good practices between all government entities especially at local level regarding circular economy and eco-innovation matters. 	BE, CY, EL, ES
<ul style="list-style-type: none"> Incentivise academia and schools in order to promote circular economy. Raise awareness of the consumers and SMEs on the benefits of circular economy. 	IT, PL, SK
<ul style="list-style-type: none"> Adopt circular economy principles; increase the level of recycling and the use of eco-design in the SME sector, in particular by investing further in education and training. Incentivise resource efficiency measures (e.g. savings of energy and water). 	BE, EL, ES, HU, IT, RO, SK
<ul style="list-style-type: none"> Incentivise investments in green products and services. Facilitate green investments and ease the access to funding. Foster R&D funding among SMEs. 	CZ, ES, HU, MT, RO, SE, SK
Waste management	
<ul style="list-style-type: none"> Introduce policies, including economic instruments (<i>Extended Producer Responsibility, Pay As You Throw</i> schemes), to implement further the waste hierarchy, i.e. promote prevention, and make reuse and recycling more economically attractive. Eliminate free-riding and ensure financial viability of waste management companies. 	AT, BG, CY, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LU, LV, MT, NL, PL, PT, RO, SE, SI, SK, UK
<ul style="list-style-type: none"> Shift reusable and recyclable waste away from incineration by gradually phasing out subsidies to incineration or by introducing an incineration tax. 	AT, BE, CZ, DE, DK, EE, FI, IE, LU, PL, PT, SE
<ul style="list-style-type: none"> Introduce and/or gradually increase landfill taxes to phase-out landfilling of recyclable and recoverable waste. Harmonise regional landfill taxes. Pursue the review of the level of landfill gate fees. Use the revenues from 	CY, CZ, EL, ES, HR, HU, IT, LT, LV, MT, PL, RO, SI, SK, UK

⁹⁰ [COM\(2017\) 63 final](#)

Annex I 'Guidance to Member States: suggested actions on better environmental implementation to the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions 'The Environmental Implementation Review: Common challenges and how to combine efforts to deliver better results'.

the economic instruments to support the separate collection and alternative infrastructure.	
<ul style="list-style-type: none"> Focus on implementation of the separate collection obligation to increase recycling rates and prioritise the separate collection of bio-waste in order to increase composting rates. Establish sites for collection of specific waste (so called 'points for collection of selective waste') in each municipality. 	BG, CY, CZ, EE, EL, ES, FR, HR, IE, IT, LT, PL, PT, RO, SK
<ul style="list-style-type: none"> Complete and update the Waste Management Plan(s) and/or Waste Prevention Programme(s) in order to cover the whole territory. 	BE, DE, EL, ES, FR, RO
<ul style="list-style-type: none"> Finalise the work on the irregular landfills as a matter of high priority. 	BG, CY, EL, RO
<ul style="list-style-type: none"> Avoid building excessive infrastructure for the treatment of residual waste. 	BG, CY, CZ, EL, ES, HR, HU, IT, LT, LV, MT, PL, RO, SK
<ul style="list-style-type: none"> Ensure waste statistics are compatible with Eurostat Guidelines. Improve consistency of data on waste management from various sources (also as to the large gap between waste generated and treated). 	CZ, SI
<ul style="list-style-type: none"> Intensify cooperation between the regions to use waste treatment capacity more efficiently and to achieve the national recycling targets. 	ES, IT
<ul style="list-style-type: none"> Strengthen and empower enforcement capability. 	MT, PL, RO
Nature and Biodiversity & Estimating Natural Capital	
<ul style="list-style-type: none"> Complete the site designation process, including in the marine part, and put in place clearly defined conservation objectives and the necessary conservation measures for the sites and provide adequate resources for their implementation in order to maintain/restore species and habitats of community interest to a favourable conservation status across their natural range. Complete and update prioritised action framework (PAFs). Improve knowledge and data availability to be in a better position to implement appropriate conservation measures. 	AT, BE, BG, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, PT, RO, SE, SI, SK, UK
<ul style="list-style-type: none"> Ensure that Natura 2000 management plans are being effectively implemented with administrative capacity and finance. Build capacity of competent authorities (central, regional, site management bodies) to implementing Management Plans, increasing awareness about Natura 2000 and incentives for investments promoting its benefits, and tackling illegal activities affecting wildlife through enhanced enforcement, both within and outside Natura 2000 areas. 	BG, EE, EL, IT, PL, RO, SI, SK
<ul style="list-style-type: none"> Develop and promote smart and streamlined implementation approaches, in particular as regards site and species permitting procedures, ensuring the necessary knowledge and data availability and strengthen communication with stakeholders. 	AT, BG, CY, CZ, DE, EE, ES, HU, IT, LT, MT, PL, PT
<ul style="list-style-type: none"> Continue supporting the mapping and assessment of ecosystems and their services, evaluation and development of natural capital accounting systems. 	AT, BE, BG, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LV, MT, NL, PL, PT, RO, SE, SI, SK

<ul style="list-style-type: none"> Build the capacity of the administration in order to improve Appropriate Assessment procedures and prevent deterioration of Natura 2000 sites from damaging developments. 	CY, EL, IT
<ul style="list-style-type: none"> Ensure the appropriate enforcement of hunting bans for protected bird species. 	CY, FR, MT
<ul style="list-style-type: none"> Strengthen the integration of biodiversity concerns into other policies (in particular in agriculture, but also in forestry, fisheries, urban and infrastructure planning and tourism) and the promotion of communication between actors. 	DE, DK, FR, PT, SI
<ul style="list-style-type: none"> Optimise the contribution of the Natura 2000 and the national nature networks to achieving good conservation status, and to reduce habitat fragmentation, atmospheric nitrogen deposition, desiccation and acidification. 	NL
<ul style="list-style-type: none"> Avoid further habitat fragmentation and take measures to restore connectivity. 	LU
<ul style="list-style-type: none"> Ensure that the Rural Development Programmes and the implementation of greening favour biodiversity measures and contribute to achieving a favourable conservation status of habitats and species, especially for the maintenance of High Nature Value farming. 	LU, NL, RO
<ul style="list-style-type: none"> Capitalise valuable natural capital to create jobs and income. In this context, promoting further sustainable tourism. 	EL, ES
<ul style="list-style-type: none"> Continue to support the ongoing work on a sustainable partnership for biodiversity protection, sustainable development and climate change adaptation and mitigation measures in the Outermost Regions and the Overseas Countries and Territories. 	FR, UK
<ul style="list-style-type: none"> Improve the incentives for foresters and farmers to better protect forest and grassland habitat. Ensure the sustainable forest management and promote efficient use of biomass. 	LV, SK
Marine protection⁹¹	
<ul style="list-style-type: none"> Continue work to improve the definitions of <i>good environmental status</i> (GES) (in particular for biodiversity descriptors), including through regional cooperation by using the work of the relevant Regional Sea Convention(s). 	BE, CY, DE, DK, EE, EL, ES, FI, FR, HR, IE, IT, LT, LV, MT, NL, PT, RO, SE, SI, UK
<ul style="list-style-type: none"> Identify and address knowledge gaps underpinning the GES. 	BE, BG, CY, DE, DK, EE, FI, FR, IE, LT, LV, MT, NL, PT, RO, SI
<ul style="list-style-type: none"> Further develop approaches assessing (and quantifying) impacts from the main pressures in order to lead to improved and more conclusive assessment results for 2018 reporting. 	BE, BG, CY, DE, EE, EL, HR, IE, IT, LV, LT, MT, NL, RO, SE, UK
<ul style="list-style-type: none"> Continue to integrate monitoring programmes existing under other EU legislation and to implement joint monitoring programmes developed at (sub)regional level (HELCOM, OSPAR, the Barcelona Convention, the 	BE, BG, CY, DE, DK, EE, ES, FI, FR, HR, IE, IT,

⁹¹ Commission did not formulate guidance to Poland due to its late reporting under the Marine Strategy Framework Directive.

Black Sea Commission). Enhance comparability and consistency of monitoring methods within the country's marine region(s).	LT, LV, NL, PT, RO, SE, SI, UK
<ul style="list-style-type: none"> Urgently finalise, report and implement the national programme of measures. 	BG, CY, DK, EE, EL, HR, LT, MT, SI, RO
<ul style="list-style-type: none"> Ensure that the Member State's monitoring programme is implemented without delay, and is appropriate to monitor progress towards GES. 	BE, BG, CY, DE, DK, EE, ES, FI, FR, HR, IT, IE, LT, LV, MT, NL, PT, RO, SE, SI, UK
Air quality	
<ul style="list-style-type: none"> Maintain downward emissions trends of air pollutants in order to achieve full compliance with currently applicable <i>national emission ceilings and air quality limit values</i>. Reduce adverse air pollution impacts on health, environment and economy. 	AT, BE, DE, DK, ES, FI, FR, LU, NL
<ul style="list-style-type: none"> Maintain downward emissions trends of air pollutants in order to achieve full compliance with <i>air quality limit values</i>. Reduce adverse air pollution impacts on health, environment and economy. 	BG, CZ, EL, HR, HU, IT, LT, PL, PT, RO, SE, SI, SK, UK
<ul style="list-style-type: none"> Maintain downward emission trends of air pollutants - and reduce adverse air pollution impact on health, environment and economy, including through the development of a comprehensive strategy and action plan to tackle traffic congestion. 	CY, EE, MT
<ul style="list-style-type: none"> Reduce ammonia (NH₃) emissions to comply with currently applicable national emission ceilings, for example by introducing or expanding the use of low-emission agricultural techniques. 	AT, DE, DK, ES, FI, NL
<ul style="list-style-type: none"> Reduce NMVOCs emissions to comply with currently applicable national emission ceilings and, where applicable, to reduce ozone concentrations. 	DE, DK, IE, LU
<ul style="list-style-type: none"> Reduce nitrogen oxide (NO_x) emissions to comply with currently applicable national emission ceilings <i>and/or</i> to reduce nitrogen dioxide (NO₂) (and, where applicable, ozone concentrations), inter alia, by reducing transport related emissions - in particular in urban areas. 	AT, BE, CZ, DE, DK, EL, ES, FI, FR, HU, IE, IT, LU, NL, PL, PT, RO, SE, SK, UK
<ul style="list-style-type: none"> Reduce PM₁₀ (and where applicable benzo[a]pyrene) emission and concentration, inter alia, by reducing emissions related to energy and heat generation using solid fuels, to transport and to agriculture. 	AT, BE, BG, CZ, DE, EL, ES, FR, HR, HU, IT, LT, LV, PL, RO, SE, SI, SK
Noise	
<ul style="list-style-type: none"> Complete missing noise action plans. 	BE, CY, CZ, DE, EL, ES, FR, HR, IT, LV, PL, PT, RO, SE, SI, SK
<ul style="list-style-type: none"> Complete missing noise maps. 	BE, EL, ES, FR, IT, LV, PT, RO, SK
Water quality and management	
<ul style="list-style-type: none"> Improve water policy in line with the intervention logic of the Water Framework Directive in the second cycle of the river basin management plans (RBMPs), i.e., provide a more detailed assessment of pressures to improve monitoring to know the status of water bodies and design <i>Programmes of Measures</i> that address all the main pressures identified, in 	AT, BE, BG, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT,

particular hydromorphological pressures and pollution, from agriculture, industry and urban wastewater. The Programmes of Measures and monitoring programmes should be adequately funded.	LU, LV, MT, NL, PL, PT, RO, SE, SI, SK, UK
<ul style="list-style-type: none"> Ensure that exemptions granted fulfil all conditions of the Water Framework Directive and are supported by evidence, in particular regarding the assessment of significantly better environmental option. Maintain effort to reduce the number of exemptions. 	AT, BE, MT, NL, PL
<ul style="list-style-type: none"> Establish and/or roll out a water pricing policy covering a broad range of water services and based on metering that would include tariffs reflecting environmental and resource costs and provide incentives for more efficient use of water. Exemptions from water fees should be reconsidered. The setup of a national regulator or supervisor body to ensure consistency and the adequate cost-recovery in the tariffs would be also advisable. 	BG, CY, CZ, ES, HU, IE, IT, SK
<ul style="list-style-type: none"> Ensure that water pollution by agriculture is effectively addressed both under the Nitrates and the Water Framework Directive. Take effective basic and supplementary measures to address that pollution. Monitor the development of agricultural pressure and water quality, with a view to informing the designation of vulnerable zones and the review of <i>Nitrate Action Programmes</i>. Take account, where relevant, of areas of intensive agriculture and nitrate levels, trends of increasing agricultural pressure and particularly sensitive water bodies, such as the Baltic Sea. 	BE, BG, CY, CZ, DE, DK, EE, EL, ES, FI, FR, IE, IT, LT, LV, MT, NL, PL, PT, RO, SE, SI, UK
<ul style="list-style-type: none"> Control of water abstraction both for surface and ground waters should improve. Promote water efficiency and sustainable water retention including natural water retention measures in the Programme of Measures and ensure adequate funding. In the case of Cyprus, water from desalination should not be destined for agricultural use. 	CY, ES
<ul style="list-style-type: none"> Review water permits, so they are consistent with environmental objectives and ensure that new projects which may cause deterioration of the status are properly assessed according to the Water Framework Directive Article 4(7). In these assessments alternative options and adequate mitigation measures have to be considered. Licencing policy to allow or maintain hydropower plants should be reviewed and updated 	BG, CY, CZ, EL, ES, HU, IT, LT, LU, PL, PT, SE, SK
<ul style="list-style-type: none"> Complete implementation of the Urban Waste Water Treatment Directive for all agglomerations. Build up the infrastructure to comply with the Drinking Water Directive and the Urban Waste Water Treatment Directive (UWWTD). Improve the national reporting system under the UWWTD. Continue to prioritise the investments for UWWT plants, including through efficient use of the Cohesion Policy funding where eligible. 	BE, BG, CY, EL, ES, HR, HU, IE, IT, PL, PT, RO, SI
<ul style="list-style-type: none"> Measures to rationalise water and wastewater management structures and services could also be considered together with incentives for increasing the level of physical connections to the networks. 	LV
<ul style="list-style-type: none"> Adopt all flood risk and flood hazard maps. Focus on nature-based retention measures when implementing flood protection projects. Combine flood management with water retention in a comprehensive way, considering also the serious water scarcity problems. 	BG, HU, IT, MT

<ul style="list-style-type: none"> Improve the coordinated implementation between water, marine and nature policies as well as between water management authorities. 	BE, IT, PT
International agreements	
<ul style="list-style-type: none"> Increase efforts to be party to relevant multilateral environmental agreements, by signing and ratifying the remaining ones. 	EL, IE, IT, MT
Effective governance within central, regional and local government & Coordination and Integration	
<ul style="list-style-type: none"> Simplify environmental administrative procedures and improve cooperation of public authorities (at national, regional and local levels) involved in the application of environmental policies. 	EL
<ul style="list-style-type: none"> Strengthen the administrative capacity in the Ministry of Environmental and Nature Protection, as this would affect positively the use of EU Funds and speed up the alignment with the EU environmental policies and legislation. 	HR
<ul style="list-style-type: none"> Address the fragmentation at regional and local levels by developing better coordination mechanisms for environment. 	ES, HU, IT
<ul style="list-style-type: none"> Ensure that the opinion on the assessment of the effects of certain public and private projects on the environment referred to in Article 6 of the EIA Directive as amended is delivered by a functionally independent authority. 	FR
<ul style="list-style-type: none"> Ensure increased partnership and transparency all over the public administration and strengthen public participation in decision-making relating to environmental matters. 	HU
<ul style="list-style-type: none"> Make greater use of impact assessments of draft legislation, covering in particular environmental impacts. 	HU
<ul style="list-style-type: none"> Establish a clear and transparent process for the authorisation of activities and facilities that have impact on the environment. 	HU
<ul style="list-style-type: none"> Improve the timely reporting under the EU environmental legislation and ensure sufficient staff capacity for this purpose in particular and more generally for a more effective implementation and enforcement of the environmental policy. 	MT
<ul style="list-style-type: none"> Ensure that the newly established Environment and Resources Authority has strong responsibilities. There should be clear and transparent processes for the authorisation of facilities and activities that have impact on the environment. 	MT
<ul style="list-style-type: none"> Use EU Funds to build necessary capacities and know-how at all levels of administration involved in implementation and enforcement. 	PL
<ul style="list-style-type: none"> Strengthen governance of EU environmental legislation and policies, in particular in nature conservation and water management (e.g. adapt the structure and tasks of the water authorities to better perform the tasks related to the implementation of the Water Framework Directive and involve them in the permitting process). 	PL

<ul style="list-style-type: none"> Improve enforcement in case of failures to implement mitigation and compensatory measures imposed on project developers in environmental decisions and construction permits. 	PL
<ul style="list-style-type: none"> The experience obtained on the definition and implementation of the mitigation and compensation measures regarding the dam projects should be extended to other infrastructure likely to have significant impacts on the Natura 2000 network. The composition of follow-up commissions for these projects should be as broad as possible and include representative NGOs 	PT
<ul style="list-style-type: none"> Effectively implementing and making use of the recently created initiatives in order to improve efficiency, effectiveness and coordination of the public sector in the environmental domain, namely improving information sharing and documentation exchange between public entities that are responsible for inspection and monitoring in the areas of Agriculture, Sea and Environment, with an operational platform. 	PT
<ul style="list-style-type: none"> Speed up its implementation of the strategy for strengthening public administration, within which environment should be given due attention. 	RO
<ul style="list-style-type: none"> Improve the administrative capacity and the coordination of the agencies involved in implementation, in particular with regard to water and waste management as well as to the quality of the impact assessments. 	RO
<ul style="list-style-type: none"> Ensure that the EU environmental legislation is respected as part of the reform of the national permitting system aiming to remove unnecessary administrative burden and streamline procedures. 	SI
<ul style="list-style-type: none"> Improve the application of EIA and SEA as important tools to ensure environmental integration. 	CZ, SK
Compliance assurance	
<ul style="list-style-type: none"> Improve transparency on the organisation and functioning of compliance assurance and on how significant risks are addressed. 	AT, BE, BG, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, PT, RO, SE, SI, SK, UK
<ul style="list-style-type: none"> Encourage greater participation of competent authorities in environmental compliance networks. 	AT, BG, CY, CZ, DK, EE, EL, FI, HR, HU, LU, LV, PT, RO, SE, SI, SK
<ul style="list-style-type: none"> Step up efforts in the implementation of the Environmental Liability Directive (ELD) with proactive initiatives, such as setting up a national register of ELD incidents and/or drafting national guidance. 	AT, BE, BG, CY, CZ, DE, EE, EL, FI, FR, HR, HU, IT, LT, LU, LV, MT, PL, RO, SE, SI, SK
<ul style="list-style-type: none"> Take further steps to ensure an effective system of financial security for environmental liabilities. 	BE, CY, DK, EE, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, RO, SE, SI, UK
Public participation and access to justice	
<ul style="list-style-type: none"> Take the necessary measures to ensure standing of environmental NGOs to challenge acts or omissions of a public authority in all sectoral EU environmental laws, in full compliance with EU law as well as the Convention on Access to Information, Public Participation in Decision- 	AT, BE, BG, CZ, DE, HU, IT, PL, SE, SI, SK

making and Access to Justice in environmental matters (Aarhus Convention).	
<ul style="list-style-type: none"> Evaluate the costs of legal challenges involving EU environmental law and pursue efforts in order to ensure that they are not prohibitively expensive. 	CY, DK, EE, ES, FR, IE, LU, MT, RO, UK
Access to Information, knowledge and evidence	
<ul style="list-style-type: none"> Critically review the effectiveness of the country's data policies and amend them, taking 'best practices' into consideration. 	AT, BE, BG, CY, CZ, EE, EL, HR, HU, IT, LT, MT, PT, RO, SI, SK
<ul style="list-style-type: none"> Identify and document all spatial data sets required for the implementation of environmental law, and make the data and documentation at least accessible 'as is' to other public authorities and the public through the digital services foreseen in the INSPIRE Directive. 	AT, BE, BG, CY, CZ, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IT, LT, LU, LV, MT, NL, PL, PT, RO, SE, SI, SK, UK

Annex V - Contribution of the European Court of Auditors to the European Implementation Assessment of the European Parliamentary Research Service

This note is a contribution from the services of the European Court of Auditors (ECA) to the European Parliamentary Research Service's assessment study for the mid-term review of the 7th Environmental Action Programme (EAP), based on the most relevant published Special Reports for the 6th priority objective of the EAP (to secure investment for environment and climate policy and address environmental externalities).

ECA's Special Reports aim to provide relevant audit findings and practical recommendations to help policy makers and managers in the EU improve policy implementation and the use of EU funds. While ECA has not carried out a performance audit focused specifically on the Environmental Action Programmes, ECA regularly publishes Special Reports relating to environmental issues, raising findings and recommendations which are relevant to the objectives of the Environmental Action Programmes, including the 6th priority objective.

Box 1 identifies ECA Special Reports with findings and recommendations most related to the EAP's 6th priority objective. This shows that the requirement of the EAP's 6th priority objective relating to the need to adequately reflect environment and climate priorities in policies and funding strategies was often the subject of relevant audit findings.

Box 1 – European Court of Auditor Special Reports most related to the EAP's 6th priority objective	
<p>EAP Priority objective 6⁹² In order to secure investment for environment and climate policy and address environmental externalities, the 7th EAP shall ensure that by 2020:</p> <ul style="list-style-type: none"> a) environment and climate policy objectives are achieved in a cost-effective way and are supported by adequate finance; b) public and private sector funding for environment and climate-related expenditure is increased; c) the value of natural capital and ecosystem services, as well as the costs of their degradation are properly assessed and considered in policy-making and investments. 	
EAP priority objective 6 requirements	Relevant European Court of Auditor Special Reports

⁹² Source for this column: Decision 1386/2013/EU of the European Parliament and of the Council of 20 November 2013 on a General Union Environment Action Programme to 2020 'Living well, within the limits of our planet' OJ L 28.12.2013.

<p>This requires, in particular:</p> <p>i) phasing out environmentally harmful subsidies at Union and Member State level without delay, and reporting on progress through the National Reform Programmes; increasing the use of market-based instruments, such as Member States' taxation policies, pricing and charging, and expanding markets for environmental goods and services, with due regard to any adverse social impacts, using an action-based approach, supported and monitored by the Commission, inter alia, via the European Semester;</p>	<p>Special Report No 6/2015: The integrity and implementation of the EU ETS</p> <p>This Special Report found problems with the framework for protecting market integrity of the EU Emissions Trading Scheme - one of the main market based instruments related to climate policy.</p>
<p>ii) facilitating the development of, and access to, innovative financial instruments and funding for eco-innovation;</p>	<p>N/A</p>
<p>iii) adequately reflecting environment and climate priorities in policies and funding strategies to support economic, social and territorial cohesion;</p>	<p>Special Report No 10/2014: The effectiveness of European Fisheries Fund support for aquaculture</p> <p>This Special Report found that insufficient guidance related to environmental sustainability was provided at EU level when funding aquaculture.</p> <p>Special Report No 12/2014: Is the ERDF effective in funding projects that directly promote biodiversity under the EU biodiversity strategy to 2020?</p> <p>This Special Report found that the benefits for biodiversity from investments were not assessed.</p> <p>Special Report No 1/2015: Inland Waterway Transport in Europe: No significant improvements in modal share and navigability conditions since 2001</p> <p>This Special Report found that the modal share of inland waterway transport (IWT) had not significantly increased, that EU funded projects did not effectively contribute to improvements, and that EU strategies for IWT were not based on a comprehensive analysis.</p> <p>Special Report No 2/2015: EU-funding of Urban Waste Water Treatment plants in the Danube river basin: further efforts needed in helping Member States to achieve EU waste water policy objectives</p> <p>This Special Report found delays in meeting the requirements of the urban waste water treatment directive, some oversizing of urban waste water treatment plants, and inadequate monitoring for certain pollutants.</p> <p>Special Report No 20/2015: The cost-effectiveness of EU Rural Development support for non-productive investments in agriculture</p> <p>This Special Report found that the complementary role of non-productive investment to support the specific objectives of other agri-environmental objectives was not always realised.</p>

	<p>Special Report No 8/2016: Rail freight transport in the EU: still not on the right track This Special Report found that the rail freight modal share in the EU had actually decreased compared to road transport, despite the advantages of rail in terms of environmental sustainability.</p> <p>Special Report No 18/2016: The EU system for the certification of sustainable biofuels This Special Report found that the respect of EU environmental requirements for agriculture was not ensured.</p> <p>Special Report No 26/2016: Making cross-compliance more effective and achieving simplification remains challenging This Special Report found that the Commission could not assess adequately the effectiveness of cross-compliance, and that control procedures were complex.</p> <p>Special Report No 1/2017: More efforts needed to implement the Natura 2000 network to its full potential This Special Report found that EU funds were not well mobilised to support the management of the Natura 2000 network, and that monitoring and reporting systems were not adequate to provide comprehensive information on the effectiveness of the Natura 2000 network.</p>
	<p>Landscape review: EU action on energy and climate change This landscape review aims to provide an overview of what the EU is doing in this field; to summarise key audit work the European Court of Auditors (ECA) and other Supreme Audit Institutions (SAIs) in the EU have done to date; and to identify main challenges to inform the legislative debate and future audit work.</p>
<p>iv) making dedicated efforts to ensure the full and efficient use of available Union funding for environmental action, including by significantly improving its early uptake under the Union's Multiannual Financial Framework 2014–2020 and devoting 20 % of the budget to climate change mitigation and adaptation through the mainstreaming of climate action and linking that funding to clear benchmarks, target setting, monitoring and reporting;</p>	<p>Special Report No 31/2016: Spending at least one euro in every five from the EU budget on climate action: ambitious work underway, but at serious risk of falling short This Special Report found that there was a serious risk that the 20% target will not be met. There was still no significant shift towards climate action in the European Social Fund and in the areas of agriculture, rural development and fisheries.</p>
<p>v) developing and applying a system for reporting and tracking environment-related expenditure in the Union budget, in particular expenditure on climate change and biodiversity, by 2014;</p>	<p>See Special Report No 31/2016 mentioned above.</p>
<p>vi) integrating environmental and climate-related considerations into the European Semester process, where this is relevant for</p>	<p>N/A</p>

<p>individual Member States' prospects for sustainable growth and is appropriate for country-specific recommendations;</p>	
<p>vii) developing and applying alternative indicators that complement and go beyond GDP to monitor the sustainability of progress and continuing work to integrate economic indicators with environmental and social indicators, including by means of natural capital accounting;</p>	
<p>viii) further developing and encouraging 'payments for ecosystem services' schemes;</p>	<p>See 'Special Report 1/2017' described above. This audit found that in some cases, public compensation was too low to act as an incentive to participate in Natura 2000.</p>
<p>ix) putting in place incentives and methodologies that stimulate companies to measure the environmental costs of their business and profits derived from using environmental services and to disclose environmental information as part of their annual reporting. Encouraging companies to exercise due diligence, including throughout their supply chain.</p>	<p>N/A</p>

Box 2 provides an overview of the ECA Special Reports identified above and refers to key information such as the audited subjects, the relevant Commission services, the audited programming periods and the periods in which the recommendations must be applied.

Box 2 - Overview of relevant ECA Special Reports							
EAP Priority objective 6	Domain	SR No	Audited subject	Main audited DGs	Audited Fund	Audited during the programming period	Recommendations for the period
requirement i)	Other	06 2015	EU ETS cap-and-trade system for greenhouse gas (GHG) emissions.	CLIMA	N/A	Other phase II of the EU ETS (2008-12)	post 2015
requirement iii)	Natural resources	10 2014	Aquaculture	MARE	EFF	2007-2013	2014-2020
		20 2015	Non-productive investments	AGRI	EAFRD	2007-2013	2014-2020
		18 2016	The EU system for the certification of sustainable biofuels	ENER	N/A	2007-2013	post 2016
		26 2016	The cross compliance management and control system	AGRI	CAP payments	2007-2013 & 2014-2020	mainly post 2020
		01 2017	The Natura 2000 network	ENV REGIO	CF EAFRD ERDF LIFE	2007-2013 & 2014-2020	mainly post 2020
		12 2014	Biodiversity	ENV REGIO	ERDF	2007-2013	2014-2020
	Cohesion	01 2015	Inland waterway transport	MOVE REGIO	CF ERDF	2007-2013	2014-2020

Box 2 - Overview of relevant ECA Special Reports							
EAP Priority objective 6	Domain	SR No	Audited subject	Main audited DGs	Audited Fund	Audited during the programming period	Recommendations for the period
		02 2015	Urban waste water treatment plants	REGIO	CF ERDF	2007-2013	2014-2020
		08 2016	Rail freight transport	REGIO	CF ERDF	2007-2013	2014-2020
requirement iv)	Other	31 2016	'Mainstream' climate action.	DG RTD DG REGIO DG EMPL DG AGRI DG MARE DG ENV DG CLIMA	EU BUDGET	2014-2020	post 2016

Abbreviations**DGs**

AGRI	<i>Directorate-General for Agriculture and Rural Development</i>
CLIMA	<i>Directorate-General for Climate Action</i>
ENER	<i>Directorate-General for Energy</i>
ENV	<i>Directorate-General for Environment</i>
EMPL	<i>Directorate-General for Employment, Social Affairs and Inclusion</i>
MARE	<i>Directorate-General for Maritime Affairs and Fisheries</i>
MOVE	<i>Directorate-General for Mobility and Transport</i>
REGIO	<i>Directorate-General for Regional and Urban Policy</i>
RTD	<i>Directorate-General for Research and Innovation</i>

Funds

CF	<i>Cohesion Fund</i>
CAP payments	<i>Payments related to the EU common agricultural policy</i>
EAFRD	<i>European Agricultural Fund for Rural Development</i>
EFF	<i>European Fisheries Fund</i>
ERDF	<i>European Regional Development Fund</i>
LIFE	<i>Financial instrument for the environment</i>

Finally, **Box 3** includes a brief description of the relevant recommendations from ECA's Special Reports.

Box 3 – Relevant recommendations from ECA Special Reports			
EAP priority objective 6 requirement	Special Report No	Recommendation number	Brief description⁹³
iii)	10 201 4	1(b)	Guidelines for relevant environmental factors should be established
iii)	12 201 4	2(b)	Benefits for biodiversity from investments should be evaluated
iii)	01 201 5	1(a), 1(b)	EU funded projects should contribute to improving overall navigability conditions
		2(b)	EU strategies should be based on a comprehensive and robust analysis
iii)	02 201 5	1(a), 4(b)	The treatment of urban waste water should comply with the Directive
		1(b)	The Member States' reporting should be verified
		1(c)	Clear legal obligations for households connect to existing sewage networks should be established
		1(d), 1(e)	The reporting time should be reduced
		2(a)	Updated information on the financial amounts should be provided

⁹³ The brief description is just a summary of the recommendation. Only the recommendations published in the ECA Special Reports are binding.

Box 3 – Relevant recommendations from ECA Special Reports			
EAP priority objective 6 requirement	Special Report No	Recommendation number	Brief description⁹³
		2(b)	The agglomerations should carry out the projects to ensure compliance with the directive
		3(a), 3(b), 3(c)	The performance of urban waste water treatment plants should be assessed
		3(d)	The waste water treatment plants should take into account the possibilities of reducing groundwater infiltration
		3(e)	Dissemination of information should be promoted
		4(a)	A payment should be applied under certain conditions for the reuse of sewage sludge
		5(a)	A responsible waste water tariff policy should be implemented
		5(b)	The funding for maintenance and renewal of waste water infrastructure should be ensured
i)	06 2015	1	Remaining issues in emission market regulation and oversights should be addressed
		2	The definition of allowances should be clarified
		3	The systems for processing fundamental EU ETS information should be improved
		4	The systems for recording and reporting of emissions of the EU ETS should be improved
		5	The level of guidance and information about the implementation of the EU ETS should be improved
		6	The implementation of sanctions in relation to the EU ETS should be made more transparent
iii)	20 2015	1(a)	The complementary role of non-productive investments (NPI) should be maximised
		1(b)	The evaluation plans should include an assessment with other measures or schemes
iii)	08 2016	5	The infrastructure needs of the rail freight sector should be better targeted by EU funding
iii)	18 2016	1(b)	The EU biofuel feedstock producers should comply with EU environmental requirements for agriculture
iii)	26 2016	3	The rules regarding cross-compliance on-the-spot checks should be adapted
		4	The impact assessment for the CAP post-2020 should analyse the experience of having two systems
iv)	31 2016	1	A robust multi-annual consolidation exercise should be carried out annually
		2	The reporting should be reliable and focused on results

Box 3 - Relevant recommendations from ECA Special Reports			
EAP priority objective 6 requirement	Special Report No	Recommendation number	Brief description⁹³
		3	The planning should be ensured based on a realistic and robust assessment of the climate change needs
		4	The principle of conservativeness and correction of the overestimation should be applied
		5	A detailed action plan should be drawn up in order to ensure the catch-up needed
		6	Indicators monitoring actual spending on climate action and related results should be developed
		7	A real shift towards climate action should be ensured
iii)	01 2017	2(c)	The consistency between the priorities and objectives should be ensured for the various funding instruments
		2(d)	Guidelines to support the management of the Natura 2000 from EU funding programmes should be established
		3	Measuring the results achieved by Natura 2000 should be adequate

Annex VI

**Mid-term review of the implementation of the
7th Environment Action Programme -
stakeholders' perspective**

AUTHORS

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List of abbreviations and acronyms

ANEC	European Association for the coordination of consumer representation in standardization
BAT	Best Available Techniques
BBI	Bio-Based Industries (Public-Private Partnership)
BEUC	Bureau européen des consommateurs (The European Consumer Organisation)
BREF	Best available technique reference document
CAN	Climate Action Network
CAP	Common Agricultural Policy
CCPIE -CCIM	Comité de coordination de la politique internationale de l'environnement (Belgian Coordination Committee for the International Environment Policy)
CE	Circular Economy (policy)
CEFIC	European Chemical Industry Council
CEMBUREAU	European Cement Association
CER	Community of European Railway
CFP	Common Fisheries Policy
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora
CLP	Regulation (EC) No 1272/2008 on Classification, Labelling and Packaging (CLP Regulation)
CO2	carbon dioxide
CSO	Civil Society Organisation
DG	Directorate General
EAP	Environment Action Programme
EBRD	European Bank for Reconstruction and Development
EC	European Commission
ECHA	European Chemicals Agency
ECOS	European Environmental Citizens Organisation for Standardisation
EDC	Endocrine disrupting chemicals
EEA	European Environment Agency
EEB	European Environmental Bureau
EFSA	European Food Safety Authority

ELO	European Landowners' Organisation
ENVI	European Parliament's Committee on the Environment, Public Health and Food Safety
EP	European Parliament
EPO	European Patent Office
EPRS	European Parliamentary Research Service
ERDF	European Regional Development Fund
ESF	European Social Fund
ESIF	European Structural and Investment Fund
ETS	Emission Trading System
EU	European Union
EUPHA	European Public Health Association
FLEGT	Forest Law Enforcement, Governance and Trade
FP	Framework Programme
GDP	Gross Domestic Product
GHG	Greenhouse gases
GNI	Gross National Income
GPP	green public procurement
GPSD	General Product Safety Directive
HEAL	Health and Environment Alliance
ICLEI	International Council for Local Environmental Initiatives
IED	Industrial Emissions Directive 2010/75/EU (IED Directive)
Ihobe	Public agency of environment, belonging to the Department of the Environment and Territorial Policy of the Basque Government (Spain)
IMPEL	European Union Network for the Implementation and Enforcement of Environmental Law
IPCC	International Panel on Climate Change
ISPRA	Istituto Superiore per la Protezione e la Ricerca Ambientale (Italian National Institute for Environmental Protection and Research)
JRC	Joint Research Centre
LCA	Life-Cycle Assessment
LIFE	The LIFE Programme is the EU's funding instrument for the environment and climate action

MPF	Multiannual Financial Framework
MoE	Ministry of Environment
MSs	Member State(s)
NGO	Non-Governmental Organisation
ODA	Official development assistance
OECD	Organisation for Economic Co-operation and Development
PBT substances	Persistent, Bioaccumulative and Toxic
PO	priority objective
REACH	Regulation (EC) 1907/2006 on chemicals (REACH Regulation)
RTD	Directorate-General for Research & Innovation
SDG	Sustainable Development Goals (UN)
SMEs	Small and Medium-sized Enterprises
SOER	State of the Environment Report (EEA)
SPIRE	Sustainable Process Industry through Resource and Energy Efficiency
TEN-P	EU Trans-European Networks Policy
TG	Technopolis Group
UN	United Nations Organization
UNECE	United Nations Economic Commission for Europe
UNEP	United Nations Environment Programme
UNFCCC	United Nations Framework Convention on Climate Change
WFD	Water Framework Directive
WHO	World Health Organisation
WWF	World Wide Fund for Nature

Introduction

This study was prepared at the request of the Ex-Post Evaluation Unit of the European Parliamentary Research Service (DG EPRS). It uses stakeholder focused approach and draws on assessment of the 7th EAP implementation progress and challenges as perceived and reported by relevant stakeholders. The study relies on primary data collected within the framework of a targeted stakeholder consultation, and in particular, an online survey, interviews and a focus group that were designed and conducted under this assignment. In total, 75 survey responses from targeted stakeholder categories and eight spontaneous responses from non-targeted respondents have been collected. In addition, two position papers were received from the stakeholders as an alternative to their survey responses, 13 interviews were conducted and a focus group with selected stakeholders was organised.

A number of EU institutions and agencies, Member States, regional and local authorities, associations representing industries and other economic players, non-governmental organisations promoting nature protection and citizens' interests, and representatives of the research community contributed to the stakeholder consultation.

This report starts with **Part 1** providing a brief overview of the 7th EAP in order to inform the reader about the scope of the Programme and the actions promoted under the priority objectives. **Part 2** presents the stakeholders' consultation process (methodology) including the online survey, interviews and focus groups, and also explains how stakeholders were selected. The results of the stakeholders' consultation are presented in **Part 3**. Being a core of the report this section makes it clear which stakeholder category(ies) stay(s) behind the identified trends, which is a definite added value of this report. The survey statistics is complemented by the views expressed during interviews and in the comment fields of the questionnaire. Part 3 is divided in subsections which cover stakeholders' opinions on the implementation of the 7th EAP as a policy instrument and on each 'core thematic' objective (1, 2 and 3) and each 'horizontal' objective (8 and 9); the collected data is analysed against the key criteria for evaluation: relevance, coherence, effectiveness, efficiency and EU added value. **Part 4** makes a final assessment of implementation and draws conclusions.

1 The 7th Environment Action Programme

1.1 Vision

The EU's 7th Environment Action Programme was adopted in November 2013 and has been guiding European environmental policy since this date and will continue to do so until 2020.

Through this Environment Action Programme (EAP), the EU has agreed to step up its efforts to protect our natural capital, stimulate resource-efficient, low-carbon growth and innovation, and safeguard people's health and wellbeing – while respecting the Earth's natural limits. It's a common overall strategy that should guide action by the EU institutions and the Member States, who share responsibility for its implementation and the achievement of its objectives.

The Programme is guided by the following long-term vision:

In 2050, we live well, within the planet's ecological limits. Our prosperity and healthy environment stem from an innovative, circular economy where nothing is wasted and where natural resources are managed sustainably, and biodiversity is protected, valued and restored in ways that enhance our society's resilience. Our low-carbon growth has long been decoupled from resource use, setting the pace for a safe and sustainable global society.

1.2 Objectives of the 7th EAP

The 7th Environment Action Programme sets out the objectives that the EU and its Member States are bound to achieve in the field of environment and climate change by 2020. Article 2(1) of Decision 1386/2013/EU of the European Parliament and the Council, which laid down the Programme, contains nine objectives. Figure 1 below gives an overview of the Programme objectives.

CORE THEMATIC OBJECTIVES

Objective 1

Objective 2

Objective 3

To protect, conserve and enhance the Union's natural capital

To turn the Union into a resource-efficient, green and competitive low-carbon economy

To safeguard the Union's citizens from environmental-related pressures and risk to health and well-being

ENABLING FRAMEWORK OBJECTIVES

Objective 4

To maximise the benefits of Union environmental legislation by improving implementation

Objective 5

To improve the knowledge and evidence base for Union environment policy

Objective 6

To secure investment for environment and climate policy and address environmental externalities

Objective 7

To improve environmental integration & policy coherence

HORIZONTAL OBJECTIVES

Objective 8 To enhance sustainability of the Union's cities

meeting local, regional and global challenges

Objective 9 To increase the Union's effectiveness in addressing international environmental and climate challenges

Figure 1 The 7th EAP objectives

Each of the nine objectives has sub-objectives covering a wide range of policy areas and instruments addressing the relevant needs and ensuring a comprehensive scope of the 7th EAP (see Annex I to the European Implementation Assessment of the European Parliamentary Research Service)

Core thematic objectives

The first three objectives - also called 'core thematic' objectives- reflect the specific environmental and climate needs that the EU and its Member States must tackle:

- (1) To protect, conserve and enhance the Union's natural capital;*
- (2) To turn the Union into a resource-efficient, green and competitive low-carbon economy;*
- (3) To safeguard the Union's citizens from environment-related pressures and risks to health and well-being;*

Objective 1 is linked to "natural capital" -from fertile soil and productive land and seas to fresh water and clean air - as well as the biodiversity that supports it. The EU has put in place commitments under the *Water Framework Directive*, the *Air Quality Directive*, the *Habitats and Birds Directives*, *2020 Biodiversity Strategy* and the *Blueprint to Safeguard Europe's Water Resources*, together with financial and technical support.

Objective 2 concerns the conditions that will help transform the EU into a *resource-efficient, low-carbon economy*. The EU has committed to deliver climate and energy package towards the '20-20-20' targets, improve environmental performance of products, reduce impact of consumption, promote eco-industries, eco-innovation and circular economy.

Objective 3 covers challenges to human health and wellbeing, such as air and water pollution, excessive noise, exposure to toxic and endocrine disrupting chemicals. The EAP sets out commitments under existing legislation secure further reductions in air and noise pollution. It also sets out a long-term vision of a non-toxic environment and proposes to address risks associated with the use of chemicals, especially those impacting the endocrine system.

Enabling framework objectives

Objectives 4 to 7 give the 'enabling framework' for the effective achievement of the core thematic objectives, namely:

- (4) To maximise the benefits of Union environment legislation by improving implementation;*
- (5) To improve the knowledge and evidence base for Union environment policy;*
- (6) To secure investment for environment and climate policy and address environmental externalities;*
- (7) To improve environmental integration and policy coherence;*

Objective 4 promotes better implementation of existing environmental legislation to ensure benefits for the environment and health through improving the governance of enforcement process and equipping those involved in implementing environment legislation at Union, national, regional and local levels with needed knowledge, tools and capacity.

Objective 5 encouraged scientific research, monitoring and reporting environmental developments to improve knowledge base about the environment and factors that influence it. It aims that this knowledge base is made more accessible to citizens and policy-makers to ensure that policy draws on a sound understanding of the state of the environment.

Objective 6 promotes the adequate investments from public and private sources in innovation of products, services and public policies needed to achieve thematic objectives set out in the Programme.

Objective 7 supports better integration of environmental concerns into other policy areas, such as regional policy, agriculture, fisheries, energy and transport. It also encourages systematic assessment of the environmental, social and economic impacts of policy initiatives.

Horizontal objectives

The listed above seven objectives are complemented by two more specific 'horizontal' objectives addressing the local (city level) and global challenges for environment and climate change. These are:

(8) To enhance the sustainability of the Union's cities;

(9) To increase the Union's effectiveness in addressing international environmental and climate-related challenges.

Objective 8 is to help cities become more sustainable and address a common set of problems such as poor air quality, high levels of noise, greenhouse gas emissions, water scarcity, and waste via promoting initiatives that support innovation and best practice sharing in cities.

Objective 9 concerns wider global challenges and many of the objectives in the EAP can only be achieved as part of a global approach. It aims to promote more active working with international partners towards the adoption of Sustainable Development Goals and to reduce impact on the environment beyond EU borders.

2 Methodology

2.1 Stakeholder centred approach

The 7th EAP addresses issues that are vitally important for all: citizens, industries, environment, wildlife, as well as for future generations. Therefore, achieving the objectives set by the Programme is in the interest of many stakeholders: especially of citizens who need a clean and healthy environment to live in, of nature and wildlife to have healthy habitats, of public bodies whose responsibility is to implement policies in the most effective and efficient way, and last but not least of economic actors (industry) who must ensure compliance with the environmental regulations under the umbrella of the 7th EAP and whose economic activities depend on the availability and quality of environmental services.

Stakeholder's assessment of the implementation of the 7th EAP is at the core of this study, which has been set up to provide a major contribution to the work of policy-makers by running a comprehensive stakeholder consultation exercise. Stakeholder consultation is an important approach for collecting views, assessment, feedback, and perceptions of a wide range of actors on the issues that impact them. The advantage of this approach is that it is based on inclusiveness, participation of various groups of actors and allow voices to be heard. Thus, the stakeholder-centred approach is well justified in the general context of evaluation of the 7th EAP.

In contrast to widely applied open public stakeholder consultations, which are open to the general public, this study uses a selective approach (i.e. selecting stakeholders) in order to ensure that **relevant** stakeholders from industry, civil society and research, as well as relevant EU institutions (bodies and agencies), Member States' authorities as well as international organization are addressed in an effective way. The **relevance** in this case is defined by their exposure to and their interest in the goals, actions and changes facilitated by the Programme. Given that the 7th EAP is a complex high level strategic guidance framework that covers a wide range of environmental and climate-related concerns, objectives, targets, as well as various legislative instruments and other policy actions aimed at achieving those objectives and targets, it was important to have a comprehensive, justifiable and hence legitimate outreach to stakeholders. The approach to selection of stakeholders is presented below.

2.2 Identification and selection of stakeholders

Three groups of stakeholders defined by their relevance to the 7th EAP were suggested to be targeted in this study:

- **Category 1: Stakeholders with legal obligations under the 7th EAP**

The 7th EAP refers to the large EU environment and climate acquis, which imposes legal obligations to a number of stakeholders. Such stakeholders include the following:

- Economic operators/industry/ - responsible for ensuring compliance with the relevant acquis
- Public authorities responsible for enforcement of legal obligations and/or control of implementation:
 - At EU level - European Commission services and relevant EU agencies;
 - At MS level (including regions and cities) - relevant ministries, Environment Protection Agencies, regional and local authorities.

- **Category 2: Stakeholders with legitimate interest in the achievement of the 7th EAP objectives**

These are organisations with no legal obligations to comply with environmental regulation and policy of relevance, but with a legitimate interest in the achievement of the regulatory targets due to their direct subject to impact and/or concern over the problem. The following types of stakeholders were identified in this category:

- Nature interest support organizations (environmental NGOs);
- Citizens' interest support organizations in their various aspects: consumers, patient/healthcare, employees, etc.;
- Certain businesses/industries that could be viewed as depending on (good quality) environmental services (natural resources) for their production of goods/delivery of services. (e.g. tourism, recreation, water suppliers, agriculture, fishery, food processing, clean technology providers, health and disaster insurance companies, etc.);
- international organizations setting up the global environmental and climate change agenda.

- **Category 3: Stakeholders from research and experts' community focusing on the issues scoped under the 7th EAP**

Strictly speaking, these stakeholders do not have either legal obligations or legitimate interest in the achievement of the objectives, but they have research interest and deep knowledge in the topics covered under the Programme. Their views are very valuable due to the deep insights and scientific basis, which is of main concern under Objective 5 of the Programme itself. The following stakeholders have been defined:

- Research and academic organisations and think tanks, and
- Individual researchers, experts, evaluators in the field of environment.

Criteria applied in selection of stakeholders

When identifying the concrete stakeholder organisations and academics to be consulted, it was important to contact those that are most relevant, most representative and most impacted by the EAP framework or by the topics and issues covered by the Programme and its objectives. A set of criteria has been defined, out of which only criteria relevant to the respective stakeholder category have been applied, as presented in Table 2-1 below.

Furthermore, stakeholders (from all categories) that have participated in the various consultations organised for ex-post evaluation of the previous (6th) EAP⁹⁴, as well as in the consultation organized by the European Commission for ex-ante impact assessment of the current 7th EAP⁹⁵ were considered as much as possible (also in the light of the other applicable criteria), as those stakeholders were viewed as having declared their interest to be heard in the context of development and implementation of the Union's Environment Action Programme.

In addition, while selecting and listing the concrete stakeholder organizations / academics to be targeted, a balance between categories and subcategories has been maintained in order to avoid excessive representation or too weak representation from specific categories/subcategories.

⁹⁴ See the list of stakeholders in section 7.4 in the Final Report for the Assessment of the 6th Environment Action Programme – Annexes, DG ENV.1/SER/2009/0044, at http://ec.europa.eu/environment/archives/action-programme/pdf/Ecologic_6EAP_Report_ANNEXES.pdf

⁹⁵ See the list of stakeholders who contributed to the consultation on the EU environment policy priorities for 2020: Towards a 7th EU Environment Action Programme at <http://ec.europa.eu/environment/archives/action-programme/archives/results.htm>

Table 2-1: Criteria applied for selection of various stakeholders for consultation

	Selection criteria								
	Highest interest / role in achievement of the EAP objectives	Largest geographical coverage - EU 28	Largest geographical coverage - Global	Largest membership and inclusiveness	Large "weight" / influence	Sectors affected by the Programme	Biggest environmental cost producers	Most concerned by the environmental and health impact	Expertise/knowledge in issues covered by EAP
Category 1: those with legal obligations under the 7th EAP									
Public - EU institutions (European Commission, relevant EU agencies)	X					X			X
Public - Member States	X								
Public - Regions/Cities	X	X							X
Industry/business network organisations ⁹⁶	X	X		X	X	X	X		
Category 2: those with legitimate interest in the achievement of the 7th EAP objectives									
Citizens' interest organisations	X	X		X	X		X ⁹⁷	X	X
Nature interest organisations	X	X		X	X			X	X
(Affected) business network organisation	X	X		X	X	X		X	X
International organisations	X		X	X	X				X
Category 3: research and experts' community									
Research and Academic organisations					X				X
Think tanks					X				X
Network of/or individual researchers/experts		X			X				X

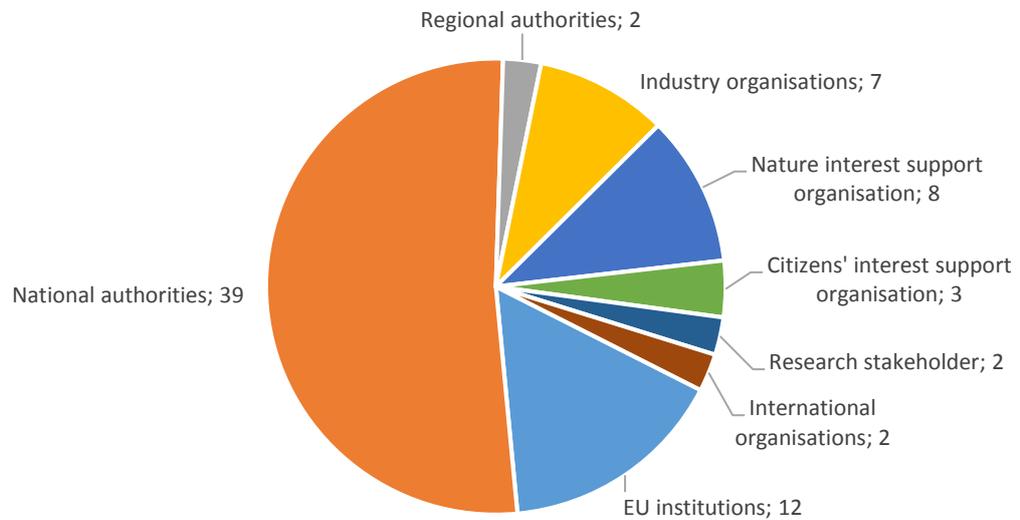
⁹⁶ See Table 2-4 below for more details on the various industrial sectors that were targeted.

⁹⁷ As regards 'consumption' aspects.

2.3 Representativeness of selected stakeholders

Following the above selection grid, in total **243** individual stakeholder organisations (including research institutions and individual researchers) have been identified and invited to take part in the survey representing the above three stakeholder categories. By the survey closure (15 September 2017), **75** valid answers have been recorded from them, which is a 31% response rate. The survey was run between 22 June and 26 July 2017 with further extension till 15 September 2017. Despite the summer holiday season the response rate achieved is rather high, which showed that respondents recognized the importance of sharing their views on the mid-term review of the 7th EAP.

Survey responses (valid answers) from various stakeholder groups



It has to be noted that, more than one survey response has been received from some organisations (namely from the Member State authorities). This happened when different departments from the same organisation provided their inputs to the survey. Considering this, **56** unique participations from Member States have been recorded (see Table 2-2).

Table 2-2: Targeted stakeholders - stakeholder categories, representativeness and response rate (at closure of the survey)

Stakeholders categories and groups	Approached	Answers recorded	Unique participations	% who responded	% of overall respondents
Category 1: those with legal obligations under the 7th EAP	144	60	41	28%	80%
Public	82	53	34	41%	71%
EU institutions (European Commission services and EU agencies)	9	12	4	44%	16%
Member States (Ministries)	28	30	20	71%	40%
MS (Environmental Protection Agencies)	39	9	8	21%	12%
Regional/Local authorities	6	2	2	33%	3%
Industry/business ⁹⁸ (representing the various sectors relevant to the 7th EAP)	62	7	7	11%	9%
Category 2: those with legitimate interest in the achievement of the 7th EAP objectives	63	13	13	21%	17%
Citizens' interest organisations	15	3	3	20%	4%
Nature interest organisations	30	8	8	27%	11%
International organisations	18	2	2	11%	3%
Category 3: research and experts' community	36	2	2	6%	3%
Research and Academic organisations	9	0	0	0%	0%
Think tanks	17	1	1	6%	1%
Network of/or individual researchers/experts	10	1	1	10%	1%
Total:	243	75	56	23%	100%

⁹⁸ some of the industry/business also can be considered in Category 2, but for overall count we provide the statistics here

It must also be noted that eight stakeholders that were not originally invited to participate in the public consultation responded to the survey and increased the number of survey responses to **83** (64 unique participations).

All eight spontaneous responses were taken into account for the purposes of the analysis (e.g. their comments are displayed wherever direct quotation was authorized) but were excluded from the statistics of the survey. See Table 2-3 below.

Table 2-3 Total stakeholders participations and answers - targeted and non-targeted (at survey closure)

	Invited	Answers recorded	Unique participations
Stakeholders selected in representativeness strategy	243	75	56
Stakeholders not selected in representativeness strategy (five coming from Nature interest support organisation, and three from Citizens interest support organisation: Others)	-	8	8
Total	243	83	64

In addition, two organisations instead of providing answers in the survey prepared and submitted **position papers**, which addressed selected questions of the survey.

Notes from the position papers were taken into account for the purposes of the analysis (e.g. notes are displayed wherever direct quotation was authorized) but were excluded from the statistics of the survey.

In selection of the industry stakeholders a great attention was given to ensuring good coverage of all relevant industrial sectors. Table 2-4 below presents the entire list of industrial sectors that have been included in the selection for coverage. In total 62 network/associations representing these industries have been contacted and invited to take part in the survey, only seven have responded within the given time frame. A number of those who did not take part in the survey have been invited for interviews.

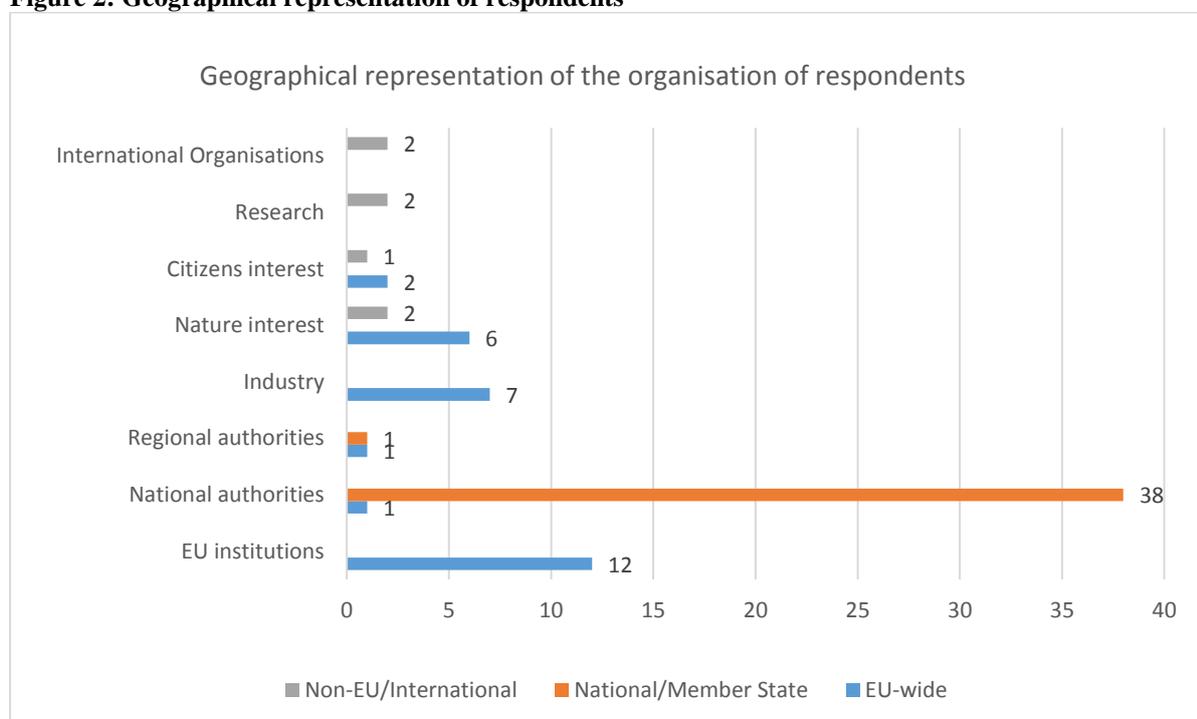
Table 2-4 Detailed targeted categories for representativeness of the industry

Targeted industrial sectors	Approached	Answers recorded	Unique participations
	62	7	7
<i>Agricultural production</i>	3	1	1
<i>Automotive/Aircraft</i>	2	0	0
<i>Biotech</i>	2	0	0
<i>Catering</i>	1	0	0
<i>Chemical</i>	7	1	1
<i>Clean technology providers</i>	4	0	0
<i>Construction/building</i>	2	1	1
<i>Cosmetics</i>	1	0	0
<i>Energy</i>	1	0	0
<i>Environmental services (including waste management)</i>	4	0	0
<i>Fishery</i>	3	0	0
<i>Food and food processing</i>	2	0	0
<i>Health</i>	1	1	1
<i>Metals/steel, Minerals</i>	5	1	1

Targeted industrial sectors	Approached	Answers recorded	Unique participations
<i>Business organisations</i>	4	0	0
<i>Petrochemical</i>	3	0	0
<i>Pharmaceuticals</i>	1	0	0
<i>Risk, disaster, and insurances services</i>	2	0	0
<i>Timber/forest based industries</i>	4	0	0
<i>Tourism, recreation, hospitality</i>	1	0	0
<i>Toys</i>	1	0	0
<i>Transport</i>	5	1	1
<i>Water suppliers</i>	3	1	1

The geographic representation of the organisation of the respondents are presented in Figure 2 below.

Figure 2: Geographical representation of respondents



In total, authorities from 23 Member States have participated in the survey.

2.4 Framework for the assessment

The assessment of the progress under the 7th EAP was done for each priority objective of the Programme against the five key assessment criteria used at European level and, in particular, in the EP: relevance, coherence, effectiveness, efficiency and European added value.

- **Relevance:** Are the objectives and action/initiatives/instruments set under this objective relevant to the needs in the area?
- **Coherence:** Is the set of actions/initiatives/instruments implemented towards a specific objective coherent with other relevant European or national policies/programmes/initiatives?
- **Effectiveness:** Are the Programme objectives being reached and how effective have the actions/initiatives/instruments been in contributing to reaching those objectives?

- **Efficiency:** Are the cost and time/work spent for achieving the result justified and proportionate?
- **EU added value:** What is the additional value of the Programme compared to what could have been achieved by Member States themselves?

These assessment criteria were translated into specific questions covering the implementation of the 7th EAP in the light of each of the 'core thematic' (1, 2, and 3) and 'horizontal' (8 and 9) objectives of the Programme. These questions became the basis for the survey questionnaire, interview guides, as well as for the discussion at the focus group where the results from the survey and the interviews were tested.

The analysis has also been structured along these five criteria. An additional component - "**Knowledge base**"- has been incorporated in the framework, which addressed Objective 5 of the 7th EAP promoting scientific knowledge and evidence base for policy-making in the thematic areas covered by the Programme.

2.5 Survey

2.5.1 Survey design

The assessment framework is based on five assessment criteria (relevance, coherence, effectiveness, efficiency, EU value added) and is the basis for the design of the data collection tools (including for the on-line survey, the interviews and the focus group). The assessment criteria were translated into a set of questions addressing the progress in each 'core thematic' and 'horizontal' objective of the 7th EAP, as well as the overall progress made under the implementation of the Programme. The questionnaire had several parts, including the following:

- Introduction and respondent identification
- Part A – Overall assessment of the implementation and progress of the 7th EAP as a policy instrument
- Part B – Assessment of progress on the implementation of the 'core thematic' objectives (1, 2 and 3) and 'horizontal' (8 and 9) objectives of the 7th EAP:
 - Objective 1: To protect, conserve and enhance the Union's natural capital
 - Objective 2: To turn the Union into a resource-efficient, green, and competitive low-carbon economy
 - Objective 3: To safeguard the Union's citizens from environment-related pressures and risks to health and wellbeing
 - Objective 8: To enhance the sustainability of the Union's cities
 - Objective 9: To increase the Union's effectiveness in addressing international environment and climate-related challenge

The 'enabling framework' objectives (objectives 4, 5, 6 and 7), which underpin the achievement of each of the 'core thematic' and 'horizontal' objectives were translated into relevant questions, which were asked for the relevant objective. Table 2-5 below shows the enabling framework related questions, which were integrated in the thematic objective modules of the questionnaire.

Table 2-5: Integration of questions addressing Objectives 4, 5, 6, and 7 in the questionnaire modules on the ‘core thematic’ objectives (1, 2, 3) and ‘horizontal’ objectives (8 and 9)

Objectives	‘Enabling framework’ questions applied in each thematic objective questionnaire module
Objective 4: Improving implementation of the relevant EU legislation	<ul style="list-style-type: none"> • With regard to enhancing the implementation of the legislation in the area of <u>[Objective X]</u>, do you agree with the following statements: <ul style="list-style-type: none"> ◦ improving relevant legislation to match real needs has been given top priority ◦ compliance with legislation in this area has been improved ◦ public access to information on the implementation or relevant legislation in this area has been improved ◦ citizens’ trust and confidence in the enforcement of relevant legislation has been enhanced • Do you think that the legislative activities under <u>[Objective X]</u> have led (or are on the good track to leading) to improved protection/satisfaction of the interests of various stakeholders (citizens, nature/flora & fauna, economic actors, etc.) • What do you think the overall impact on citizens, nature and industries is from the implementation of EU policies and legislation in the area of <u>[Objective X]</u>? • Are there any particular pieces of EU policy and legislation <u>[related to the area of Objective X]</u> that are associated with high compliance costs for industry? • Are there any particular pieces of EU policy and legislation <u>[related to the area of Objective X]</u> that are associated with high enforcement costs for national authorities?
Objective 5 Improving scientific knowledge & evidence for EU policy-making in the field	<ul style="list-style-type: none"> • With regard to improving the scientific knowledge and evidence base for nature protection and conservation policies, do you agree with the following: <ul style="list-style-type: none"> ◦ there is a progress in better understanding of <u>[specific issues/problem under the area related to Objective X]</u> • Are there any areas within <u>[Objective X]</u> which have been understudied and where evidence is missing? • Are there any areas within <u>[Objective X]</u> where knowledge exists but it is not utilised for evidence during policy-making?
Objective 6 Securing investment/funding	<ul style="list-style-type: none"> • With regard to securing funding for <u>[Objective X related]</u> policies, do you agree with the following: <ul style="list-style-type: none"> ◦ Public funding has increased ◦ Private funding has increased ◦ The funding at EU level is adequate for real needs ◦ The Funding at MS level is adequate for real needs <u>(Objective 1 only related question)</u> • Do you think that the value of natural capital and ecosystem services, as well as the costs of their degradation are becoming properly assessed and considered in policy-making and investments in Members States? • Could the results achieved so far under <u>[Objective X]</u> be achieved with less costs/resources?

Objectives	'Enabling framework' questions applied in each thematic objective questionnaire module
Objective 7 Improving environmental integration & policy coherence	<ul style="list-style-type: none"> • Do you agree that sectorial policies at EU and Member State level have been developed and implemented in a way that support (or are coherent with) <u>[Objective X]</u>?
	<ul style="list-style-type: none"> • Do you agree that the following EU policies have integrated (or are coherent with) <u>[Objective X]</u> concerns and objectives? <ul style="list-style-type: none"> ◦ Common Agricultural Policy ◦ Common Fisheries Policy ◦ EU Trans-European Networks Policy ◦ Cohesion Policy ◦ other

Identification of respondents

The questionnaire tool allowed the respondents to identify themselves using the following categorisation for stakeholders

- EU institution
- National authority
- Regional or local authority
- Industry network organisation
- Citizens interest support organisation, namely:
- Consumers interest support
- Patients/healthcare interest support
- Others, please specify your perspective (e.g. employees , passengers, tourists, ...)
- Nature interest support organisation
- International (beyond EU) organisation
- Research, please specify (e.g. academic organisation, academy of science, research organisation, think tanks, individual researcher, ...)

The questionnaire was tailored to reflect the specific implementation roles of the stakeholders to whom it was addressed. Several complementary questions were included in the relevant questionnaires aimed at taking stock of specific implementation activities. E.g. only industry respondents were asked to assess the costs resulting from ensuring compliance with legislation, and only Member States and regional/local authorities were asked to assess the costs stemming from ensuring enforcement of legislation.

The introductory part of the questionnaire also allowed respondents to identify the thematic area/EAP objective(s) that they are interested in and/or knowledgeable on, which defined the set of questions that the respondent saw and could answer (see Table 2-6 below)

Table 2-6: Options in the introduction of the survey: preselection of a thematic objective area and a relevant survey section

<i>Instruction:</i> <i>Please select which of the following policy areas you are interested in / knowledgeable about. (This will decide the questions we ask for your views on progress)</i>	<i>Section of the questionnaire that is automatically selected for the respondent</i>
• Natural capital protection, conservation, and enhancement in EU	➔ Objective 1 section
• Resource-efficient, green, and competitive low-carbon economy in EU	➔ Objective 2 section
• Environment-related pressures and risks to health and wellbeing in EU	➔ Objective 3 section
• Sustainable city development in the EU	➔ Objective 8 section
• International environmental and climate-related challenges and role of the EU	➔ Objective 9 section

Stakeholders were allowed to choose between three options, as regards the confidentiality of their responses:

- *My/our contribution can be directly published with my personal/organisation information (I consent to publication of all information in my contribution in whole or in part including my name/the name of my organisation, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication).*
- *My/our contribution can be directly published provided that I/my organisation remain(s) anonymous (I consent to publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that this is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication. I am aware that I am solely responsible if my answer reveals accidentally my identity.*
- *My/our contribution cannot be directly published but may be included within statistical data (I understand that my contribution will not be directly published, but that my anonymised responses may be included in published statistical data, for example, to show general trends in the response to this consultation) Note that your answers may be subject to a request for public access to documents under Regulation (EC) No 1049/2001.*

References to specific citations of stakeholder views presented in this report were guided by these confidentiality notes. Therefore, some quotations are introduced with the exact names of the stakeholders, while others are introduced only with their respective stakeholder category (and without quoting the name of the organisation). Wherever relevant, stakeholders' comments are published entirely. They have been checked and corrected for grammar and spelling but the content was untouched.

Most of the questions listed in the questionnaire are closed-end questions with options for categorical answers. In the majority of cases the closed-end questions are supplemented with a comments field and invite respondents to add comments and clarification to their answers.

The full version of the questionnaire could be submitted upon request.

2.5.2 Data collection and processing

The survey has been implemented electronically using the Checkmarket tool (www.checkmarket.com/survey-tool). The selected stakeholders received invitations per e-mail with a link to the survey, which was transferrable to other parties within their organisation in case this was needed.

The survey was open between 22 June and 26 July 2017. Extension till 15 September 2017 was granted to selected respondents from all stakeholder categories who confirmed their participation but due to the holiday season were not able to collect aggregated inputs from their representatives or members.

Stakeholders' responses are considered to be their official positions and/or that of the organisations representing their interests. Stakeholders provided responses with various degrees of exhaustiveness, accuracy and clarity. Some stakeholders provided additional clarification and comments in separate documents, due to the word number limitation in the comments field of the electronic questionnaire. Others provided only their written positions because filling in the questionnaire turned out to be impossible for their particular case given the interest they represent in the context of the implementation of the 7h EAP. Those additional contributions were taken into account here as much as possible. It should be borne in mind that the questionnaire only collected stakeholders' perceptions of implementation. This means that the views stakeholders have shared may not necessarily reflect an actual fact.

Data processing involved categorisation of the information received, presentation of it in the charts or tables⁹⁹, segregation of the responses by the categories of the stakeholders which allowed to make comparative analysis of perception by stakeholder categories/subcategories.

Comments of the respondents provided additional depth and valuable insights to the analysis on specific issues. Some comments under specific questions were more relevant to other question and were thus taken into account as pertinent answers with regard to the latter question.

Some responses and comments suggest recommendations; these have been used in framing the recommendations from this study.

None of the questions that were asked was mandatory which gave the respondents the freedom to participate in the survey to their highest capacity and represented interest. This explains why some respondents skipped certain questions

2.6 Interviews

2.6.1 Interview design and implementation

Interviews is another method of consulting the stakeholders that contributed to the analysis. In this study, interviews were used for the purpose of:

- (1) filling the gaps in the survey responses, particularly with the organisations that did not take part in the survey.
- (2) filling the gaps in the information collected in the survey with respect to some questions.

Special 'interview guides' have been prepared for each objective¹⁰⁰. The structure of the interview questionnaire followed the sets of questions addressing the five evaluation criteria. They also reflect the structure of the survey questionnaire, which was to make the integrated analysis easier in preparing the report.

Interviewees were preselected following two criteria justified by those purposes:

⁹⁹ The charts and tables included in this report allow the reader to grasp which stakeholder category(ies) stay behind the spotted trend(s).

¹⁰⁰ The full text of the interview guides could be provided upon request.

- those who wanted to take part in the survey but, for various reasons could not do so within the established deadlines;
- those from stakeholder categories which remained relatively underrepresented under the survey (mainly some industry sectors with high relevance to the policy areas covered by the 7th EAP, as well as regional and local authorities, international organisations as well as researchers);

In addition, the following criteria were applied:

- Largest possible membership and good overview of processes at EU level;
- Balance between categories

The interviews were undertaken via telephone, as well as face-to-face when possible.

Over 130 potential interviewees across all stakeholder categories were contacted (via email and follow up calls) with an invitation to an interview.

In total 13 stakeholders agreed to be interviewed. They represent the following stakeholder categories: EU institutions (4 interviewees), national authority (1 interviewee), nature interest support organization (2 interviewees), industry network organization citizens' interest support organization (1 interviewee), (3 interviewees), and international organization (2 interviewees).

2.6.2 Interview data processing

The interviews have been documented by the research team in the interview notes, which have been checked with the interviewees to validate the correctness of the information presented there.

Once validated, the interview records have been shared within the research team. Further, the information from each interview that is relevant to each objective has been incorporated to the relevant sections of the report.

The information in the interview notes was structured by Objectives and evaluation criteria; notes referred to specific questions listed in the interview guide.

No specific data processing method (except for the targeted reading of the interview notes, and identifying the relevant information for specific section or question) has been applied.

Responses collected in the interviews largely got reflected in the qualitative analysis and in form of quotes presented in the report following the anonymity preferences of the interviewees.

2.7 Focus group

2.7.1 Focus group design and process

The focus group took place on the 26th of September 2017, after the data collection phase was completed and the results of the analysis (based on the data from the survey and the interviews) have been available. It lasted for three hours and was hosted at the premises of the project partner Trinomics in Brussels.

The purpose of the focus group was:

- To present the results of the stakeholder consultation covering data collected via the on-line survey and interviews;
- To discuss, challenge and, where possible, validate the results from the consultation.
- To provide feedback on the first set of recommendations and suggest new ones.

Ahead of the focus group meeting, the participants received a briefing paper with a short summary of the results including the findings, recommendation and points for discussion on each objective as well as on the overall assessment of the 7th EAP implementation.

The focus group meeting consisted of six mini sessions focusing on discussion of the Programme's overall assessment and assessment of thematic Objectives 1, 2, 3, 8 and 9 (while objectives 4, 5, 6 and 7 were integrated in the analysis on the 'core thematic' and 'horizontal' objectives).

2.7.2 Selection of stakeholders for the focus group

In selection of stakeholders for the focus group meeting the consistency with the stakeholders' selection for the survey and interviews has been followed. All stakeholder categories and sub categories defined in the survey have been envisaged to be invited. The criteria for selecting them were:

- Highest interest/role in achievement of the Programme objectives
- Largest membership and inclusive representation of a relevant stakeholder category
- Best geographical coverage

The preliminary list of envisaged participants included the following:

- EU institutions
- Member States
- Organisation supporting the interest of nature
- Organisation supporting the interest of consumers
- Organisation supporting the interest of citizens (general)
- Organisation supporting the interest of industry
- Organisation representing the urban aspects of the 7th EAP
- Organisation supporting the international aspects of the 7th EAP
- Representative of the research community

Due to various reasons, some of the above stakeholder categories remained unpopulated.

The final list of the participants who attended the meeting (or sent a written contribution) included¹⁰¹:

- European Commission (DG ENV) and European Court of Auditors (EU institutions)
- Estonian Presidency of the Council of the EU (Member States)
- European Environment Bureau (nature interest support organization)
- BEUC (consumers' support organization)

¹⁰¹ None of the stakeholders invited to take part in the focus group were legally obliged to do so. Therefore, in order to respect the individual reasons of invited stakeholders not to participate in the focus group, only the names of those stakeholder organisations who did take part are published here.

- HEAL (citizens' interest support organization, general)
- Eurocities (organisation representing the urban aspects of the 7th EAP)

3 Key findings – stakeholders’ perception and assessment of the 7th EAP implementation

This section presents the results of the targeted stakeholder consultation based on stakeholder views expressed during the survey, interview programme and focus group carried out in this study. It is structured in subsections presenting the consultation results on each ‘core thematic’ and ‘horizontal’ objectives. Each of these subsections discusses the perceived impact against the evaluation criteria - relevance, coherence, effectiveness, efficiency, and EU added value. Questions that address specific evaluation criteria have been grouped and discussed under a relevant heading.

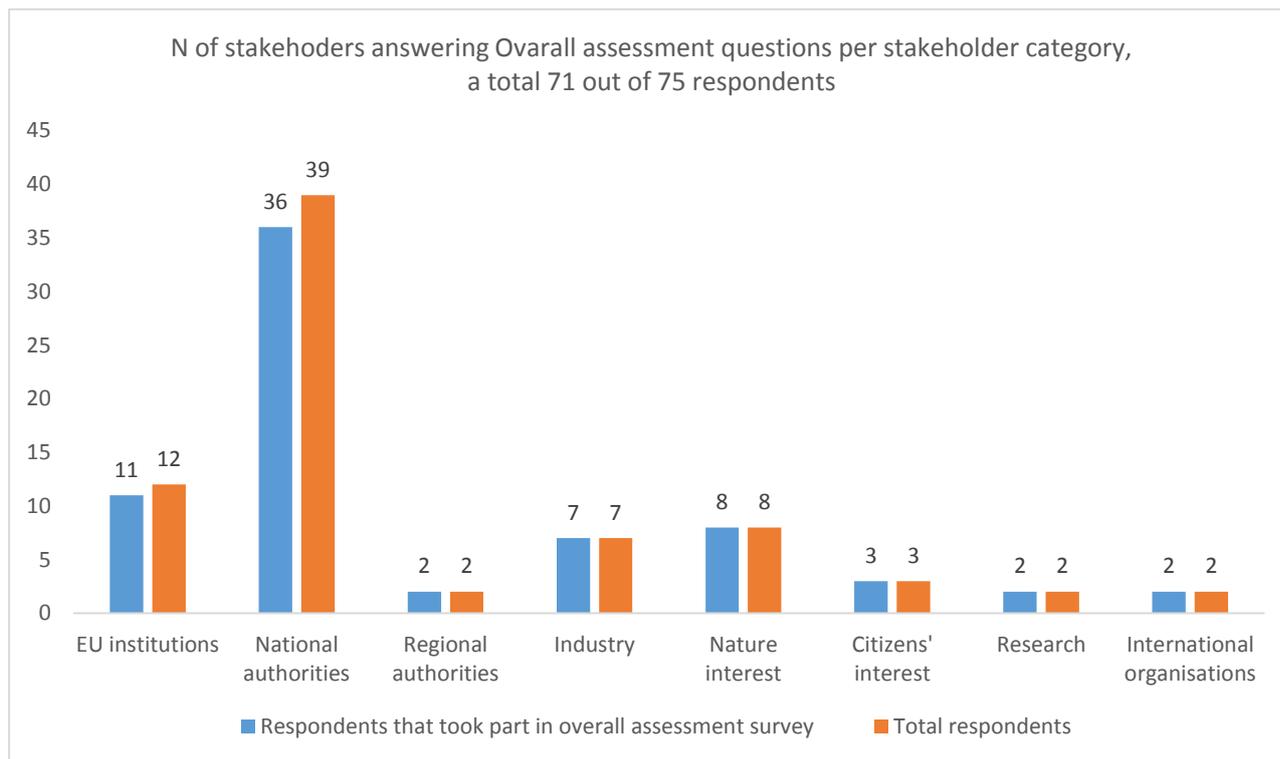
The text mainly presents the results of the survey. The content in *italics* reflects the comments left by the stakeholders in the survey, interviews and focus group following the disclosure preferences of the respondents. The individual comments are published entirely with any minor (grammar and spelling) corrections in no way changing the opinions of the respondent. Similar comments from different stakeholders on the same question have been combined into one and integrated into the descriptive text. The citations also reflect the most interesting and relevant opinions gathered from the interviews (also following the disclosure preferences of the interviewees) and the focus group.

A few comments have not been very relevant to the question that was asked. Such comments were taken into account as much as possible under that particular question, and, if relevant, under other questions as deemed appropriate.

The confidentiality requests of the respondents have been considered when attributing comments in the text.

3.1 Overall assessment of the 7th EAP

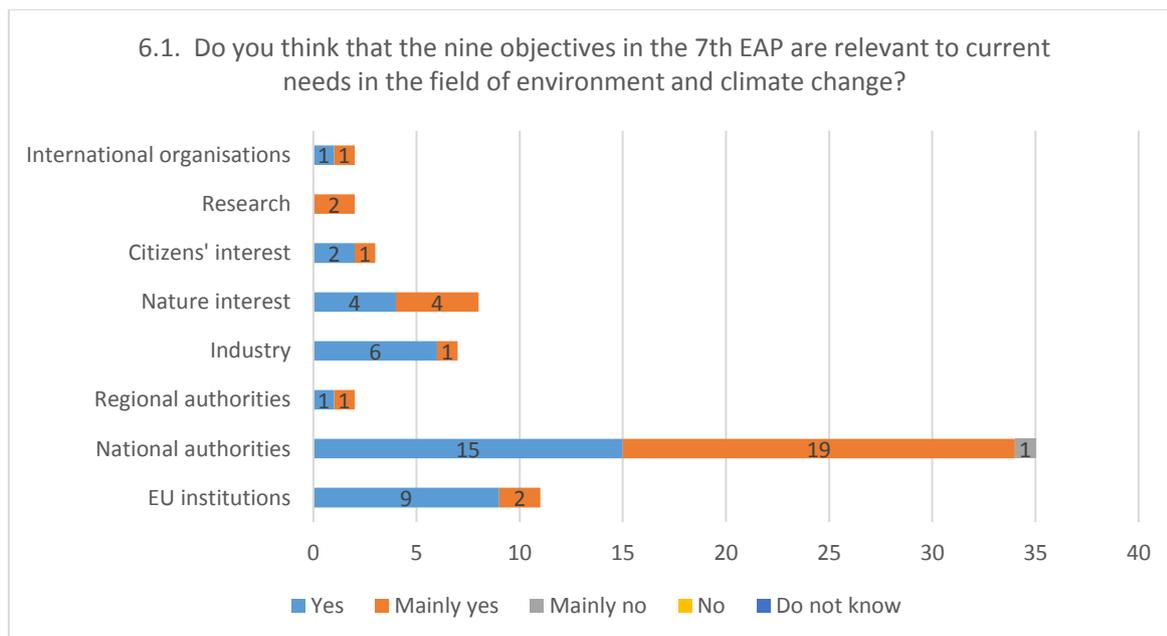
The overall assessment in this section is based on Part A of the survey, interviews and the inputs from the focus group which was addressed to all respondents. In total 71 out of 75 respondents representing all stakeholder categories under the consultation, filled in Part A, although some respondents skipped some of the questions. Those who participated include 11 out of 12 respondents from the EU institutions, 36 out of 39 national authorities, as well as full groups of other stakeholders.



3.1.1 Relevance

Relevance to the needs in the field of environment and climate change

The question seeks to determine the relevance of the Programme as a whole (i.e. its nine objectives) to the needs in the field of environment and climate change.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	70	11	35	2	7	8	3	2

A slight majority of respondents fully agreed with the statement that the nine objectives are relevant to current needs, the other (almost) half replied that they ‘mainly’ thought this was true, and very few felt that this was ‘mainly’ untrue. The few opinions opposing the statement were cast by national authorities.

Multiple nature interest support organisations feel that the objectives are still broadly relevant, however, they are unsure about how “living within planetary boundaries” is being translated into EU policy, and feel that ambitions are sometimes too low. One national authority replied ‘mainly no’ to the question, otherwise the rest of the respondents from all stakeholder groups were positive towards the question (total respondents 70).

Comments from the survey:

One national authority, however, thought that ambitions are too high and not always feasible to be implemented.

FoodDrinkEurope, an industry network organisation, commented that ‘the 7th EAP is mostly covering current needs however food waste is an important area that seems missing. Sustainable consumption is becoming more well known as a topic but it could be implemented better in EU policies. Also, some targets need to be updated as since the adoption of the 7th EAP some changes and new knowledge has surfaced.’ They further added that overall the 7th EAP is very relevant, and it also relates to the SDGs. ‘It is good that the EU is taking on the role as environmental leader but they should also take into account the needs of industries such as competitiveness as this is also important for the economics of the EU.’

An international organisation commented that ‘pollution, climate change, habitat destruction and over-exploitation of natural resources such as fresh water and fisheries are doing great harm to human health, wellbeing and livelihoods, especially among poorer regions, and are undermining the prospects for a long-term resilient and robust economy. One of the prerequisites for industry to flourish in a sustainable manner is the availability of an assured supply of affordable and clean energy, together with improved resource efficiency, in order to achieve a circular economy. The risks of climate change are well documented and its impacts are already affecting people and ecosystems. Meeting the climate challenge requires industries and institutions — both public and private — to be able to assess and understand climate change, design and implement adequate policies and to work towards resource efficient societies and low emission growth. ‘Decoupling’ natural resource use and environmental impacts from economic growth is a key requirement for overcoming the pressing challenge of growing resource consumption levels.’

European Chemical Industry Council (Cefic), an industry network organisation, commented that ‘we already have a good set of legislation in place but the implementation stage is key and this area needs improvement. Right now, there is a patchwork of policies and better alignment of policies and regulations across different policy areas is needed. The Better Regulation objective should address this and propose concrete actions. A widely recognised issue of concern is the blacklisting impact of re-classification. An unintended consequence of the hazard based determination is market blacklisting. This is contrary to the letter and the spirit of the risk based regulatory approach the EU has adopted for chemicals. However, CLP (Classification, Labelling and Packaging) classification can for certain uses (e.g. cosmetics, medical equipment, and food contact material) lead to impacts.’

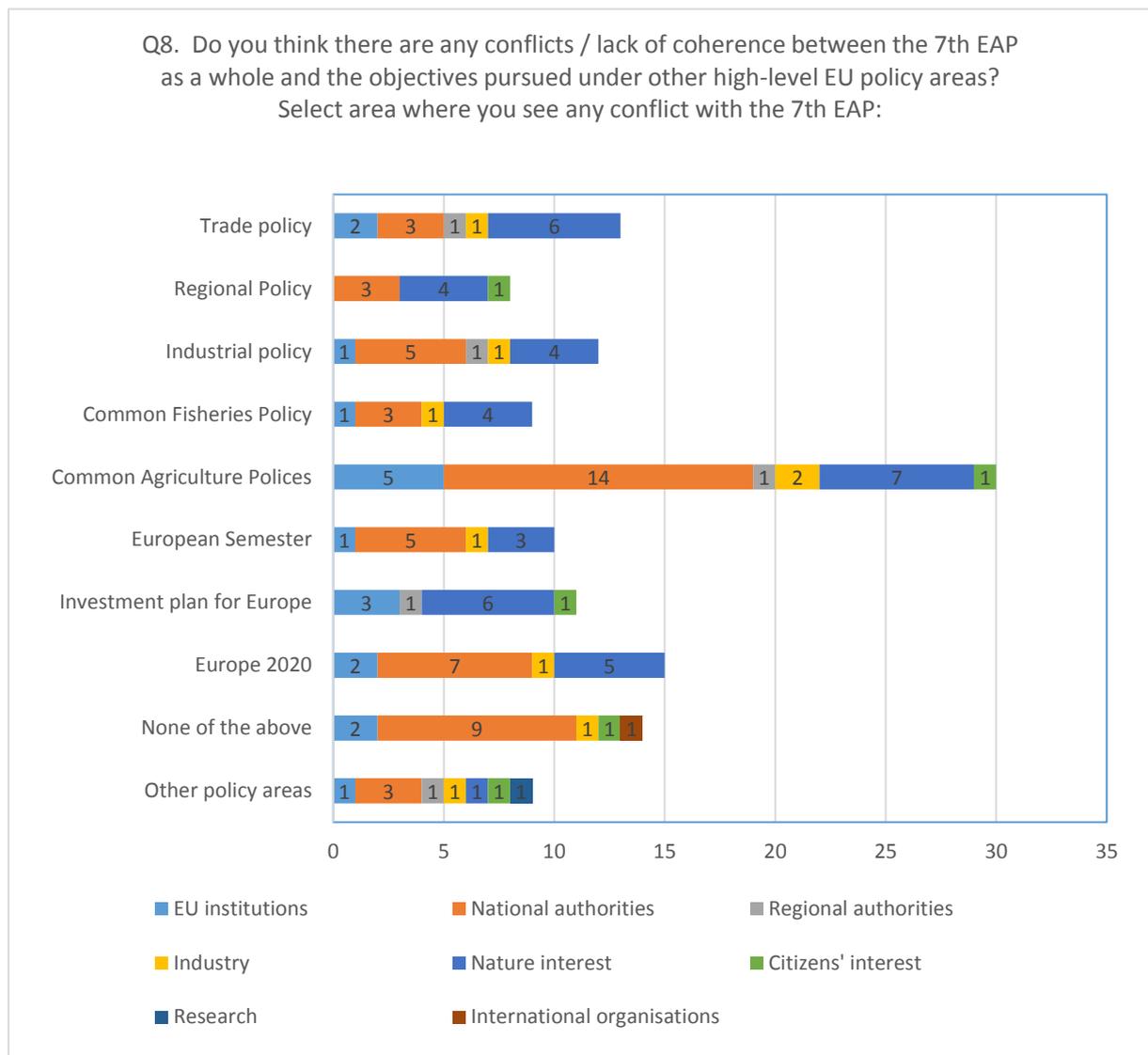
BEUC - the European Consumer Organisation, citizens’ interest support organisation, while pointing at the drawbacks in the 7th EAP implementation and not fulfilling its potential, also acknowledged a high

relevant of the Programme as a strategic guidance document. BEUC considers that the nine objectives of the programme are relevant to current needs in the fields of environment and climate change. Regarding the areas they work on, the Programme is of highest significance for energy, transport, chemicals and sustainable product policy

3.1.2 Coherence

Coherence of 7th EAP with other key EU policy areas

This question is more detailed than the one above, and is seeking to uncover gaps in coherence between the 7th EAP and other high-level EU policy areas.



EU institutions National authorities Regional authorities Industry Nature interest Citizens' interest Research International organisations

						interes t	interes t		organisati ons
Total respondents:	56	9	26	2	6	8	3	1	1

To answer this question, stakeholders needed to be aware of all the suggested EU policies. They were also given the opportunity to quote policies that they consider problematic in terms of coherence with the 7th EAP.

The area that respondents felt was most in conflict with the 7th EAP is the Common Agriculture Policies, which was also highlighted at many occasions when individual objectives of the Programme were analysed. Other policy instruments that were assessed by respondents as incoherent with the 7th EAP (although to a lesser extent compared to the CAP) are: Trade Policy, Industrial Policy, Europe 2020, and the “none of the above” option (total respondents 56).

In the comments, a few pointed to what other policy areas should be mentioned as lacking in coherence with the 7th EAP, and they included: the SDG Agenda 2030, Mobility, Renewable Energy and Energy Policy.

Comments from the survey:

FoodDrinkEurope remarked that most EU countries have waste directives but it is important that these are harmonised across borders. Also, the 7th EAP was adopted under a different Commission so would be interesting to see if anything changed under the current Commission. Food waste is beginning to get more attraction as a topic, however, more harmonization would be good. Also, the legislation is more or less in place but the implementation is lacking in this area, for example the Packaging Directive, where the current trend is that MS legislation on products diverge from the single market principles. Another example is waste legislation and other EU laws. It would be good to have clear definitions and more coherence and cross-referencing between different EU laws.

*Cefic commented that policy ambitions and targets should be feasible and **coherent and holistic strategies** will be necessary to work towards policy goals. E.g. there are technologies to find alternatives for the fossil fuel feedstock, but they will require a lot of low-carbon energy; much more than there will be available according to current predictions.*

3.1.3 Effectiveness

Contribution of the 7th EAP

This question concerns the effectiveness of the 7th EAP - as a policy instrument - to reach its objectives in a number of areas.

Q10. As an overarching strategy for EU and Member State environmental/climate policy-making, how would you rank the following contributions that the 7th EAP can make? [Assign 1 (high) - 6 (low) ranking]		EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations	TOTAL
	Total	10	35	2	7	8	3	2	2	69
	1	0	2	1	0	2	1	0	0	6

Q10. As an overarching strategy for EU and Member State environmental/climate policy-making, how would you rank the following contributions that the 7th EAP can make?										
[Assign 1 (high) - 6 (low) ranking]		EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations	TOTAL
Serve as a tool for implementation	2	2	8	1	0	2	0	0	1	14
	3	2	8	0	4	0	2	0	0	16
	4	1	10	0	0	1	0	0	0	12
	5	2	4	0	2	2	0	2	0	12
	6	2	2	0	1	1	0	0	0	6
	Do not know	1	0	0	0	0	0	0	1	2
Serve as a strategic guidance document	1	4	10	2	0	3	2	0	1	22
	2	5	16	0	6	1	1	0	1	30
	3	1	2	0	0	1	0	0	0	4
	4	0	4	0	0	2	0	0	0	6
	5	0	1	0	1	0	0	2	0	4
	6	0	1	0	0	1	0	0	0	2
	Do not know	0	0	0	0	0	0	0	0	0
Raise awareness of priority areas	1	6	5	1	0	3	2	0	1	18
	2	3	18	1	3	1	0	0	1	27
	3	1	6	0	2	2	0	0	0	11
	4	0	4	0	0	1	0	0	0	5
	5	0	0	0	1	0	1	1	0	3
	6	0	2	0	1	1	0	1	0	5
	Do not know	0	0	0	0	0	0	0	0	0
Increase the predictability of European policy-making	1	2	3	0	0	0	1	0	0	6
	2	2	9	1	2	4	0	0	2	20
	3	4	12	1	4	1	2	0	0	24
	4	1	6	0	0	0	0	1	0	8
	5	0	3	0	1	1	0	1	0	6
	6	0	0	0	0	2	0	0	0	2
	Do not know	1	2	0	0	0	0	0	0	3
Act as a tool to hold the EU to account	1	2	1	1	0	3	2	0	1	10
	2	5	9	1	2	1	0	0	0	18
	3	2	9	0	1	2	0	0	0	14
	4	1	8	0	2	0	0	1	0	12
	5	0	3	0	2	1	0	1	0	7
	6	0	2	0	0	1	1	0	0	4
	Do not know	0	2	0	0	0	0	0	1	3
Tool for national authorities to put issues on the agenda	1	3	3	1	0	1	2	0	0	10
	2	3	11	1	3	2	0	0	2	22
	3	3	8	0	0	0	0	1	0	12
	4	0	8	0	3	1	0	0	0	12

Q10. As an overarching strategy for EU and Member State environmental/climate policy-making, how would you rank the following contributions that the 7th EAP can make? [Assign 1 (high) - 6 (low) ranking]		EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations	TOTAL
		5	1	3	0	0	2	1	1	0
6	0	2	0	1	0	0	0	0	3	
Do not know	0	0	0	0	2	0	0	0	2	

On average, the 7th EAP contribution in the listed fields is perceived as rather positive, by showing more above average rankings. There is a wider perception that the Programme preforms strategic guidance and raising people’s awareness functions, while fewer (but still over half) of respondents think that it also has practical functions by helping policy implementation at EU and national levels and holding EU to account. EU, national and regional authorities and international organisations are mostly positive in their assessment. Slightly mixed views come from the industries, nature and citizens interest support organisations, while research organisations (two in total) gave below average assessment across the listed fields.

Sub-question: *Serve as a tool for implementation* (total respondents 68). Respondents were not in agreement on the overall ranking of this sub-question. Although, overall the ranking that got most hits was ‘3’. Ranking ‘low’ and ‘high’ got six votes each.

Sub-question: *Act as a tool to hold the EU to account* (total respondents 68). The ranking that got most hits was ‘2’. The two rankings that got least hits were ‘5’ and ‘6’.

Sub-question: *Tool for national authorities to put issues on the agenda* (total respondents 69). That ranking that got most hits was ‘2’. The two rankings that got least hits were ‘5’ and ‘6’.

Sub-question: *Increase the predictability of European policy-making* (total respondents 69). A convincing majority of the respondents ranked the contribution as high (‘2’ and ‘3’).

Sub-question: *Raise awareness of priority areas* (total respondents 69). A large majority ranked the contribution as high (‘1’ and ‘2’).

Sub-question: *Serve as a strategic guidance document* (total respondents 68). A large majority ranked the contribution as high (‘1’ and ‘2’).

Respondents also specified other contributions that the 7th EAP can make, namely: demonstrate the EU added value to EU citizens, act as an inter-institutional roadmap for environmental policy-making and policy coherence, support NGOs in advocacy, and lastly assist neighbourhood countries to decouple economic growth from environmental degradation and resource depletion.

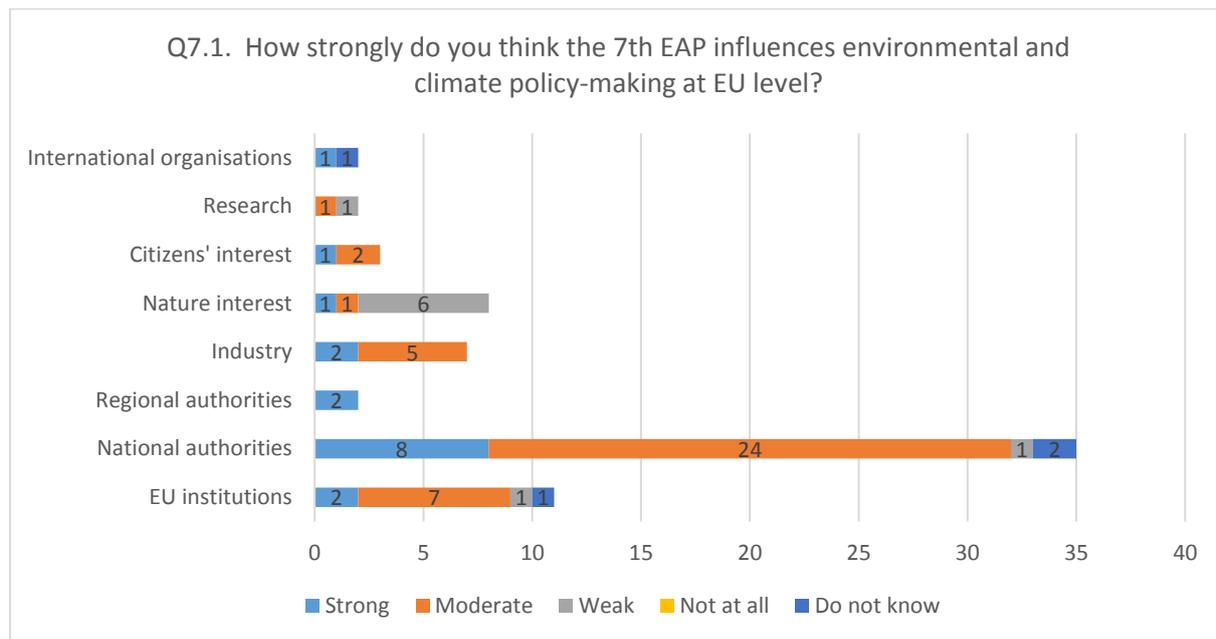
Comments from the survey:

According to BEUC, despite the drawbacks, ‘the 7th EAP serves nonetheless as a strategic guidance document and raises awareness on priority areas. It makes also a high contribution to hold the EU and Member States accountable for their (non-)action. This means that in areas where progress has been achieved, it is unlikely that this would have happened without the 7th EAP. [It] is however somewhat less successful as a tool for implementation and for increasing the predictability of EU policy-making. the influence of vested corporate interests on EU and Member States policymaking is strong and leads to

non-coherent or unambitious outcomes. Consumers suffer considerably from negative health effects of air pollution and chemicals. Unfortunately, transport, chemicals and sustainable product policies are the areas where the programme faces most challenges of implementation.'

Influence of the 7th EAP on EU policy-making in the field of environment and climate change

The question relates to the level of influence (effectiveness) of the 7th EAP on EU policy-making but also indirectly to the level of alignment between the 7th EAP and EU policy-making in the field of environment and climate.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	70	11	35	2	7	8	3	2

The majority of respondents replied that they believed the 7th EAP to have a moderate influence on environmental EU policy-making. A number of respondents thought that this influence was strong while a small number felt that this was weak. One international organisation, one citizen interest support organisation, one nature interest support organisation, two industry network organisations, two regional authorities, eight national authorities and two EU institutions believed the influence of the 8th EAP to be 'strong'. One research stakeholder group, one nature interest support organisation, five industry network organisations, 24 national authorities and seven EU institutions answered that the influence was 'moderate', one research stakeholder group, six nature interest support organisation and one national authorities and one EU institution replied the influence was 'weak'. Four respondents answered 'do not know' (total respondents 70).

Comments from the survey:

One citizen interest support group noted that the 7th EAP has so far not seen significant results, and that politics are driving the Commission which hinders proper implementation of the 7th EAP.

One nature interest support group remarked that the influence of the 7th EAP has been weak, even though it is supposed to identify inter-linkages between the different policy areas that affect our environment and based on that provide a helpful overview that can improve overall integration and implementation of environmental issues at EU and MS level. This is however harder to realise at a day-to-day basis and should be a cause for thought.

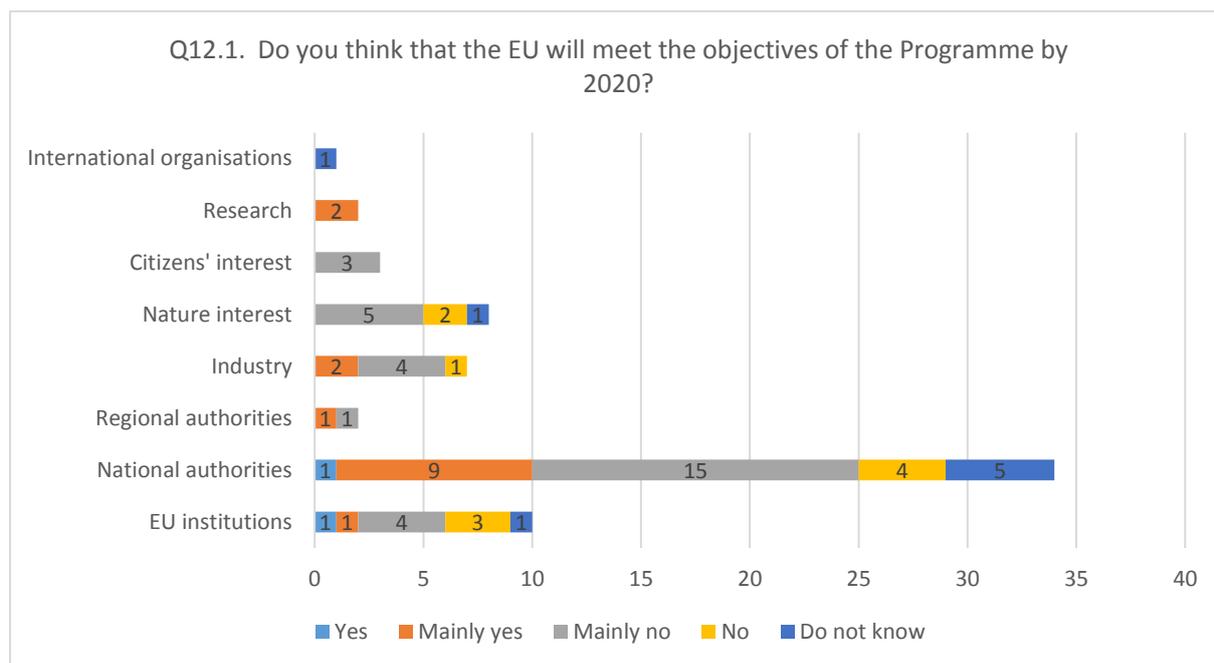
The national authorities and EU institutions that commented had the same point of view.

BEUC in their position paper wrote the following: 'We cannot give an overall appreciation from 'no' to 'strong' influence as ratings differ substantially in the different sectors. However, we believe that the 7th EAP remains in all areas behind its potential to profoundly. Progress is often hindered by poor political will or negative influence from other political agendas such as industrial and international trade policies. Another severe shortcoming is a lack of enforcement of EU legislation at national level. Concrete examples of these drawbacks are the following:

- The EU's focus on 'trade first' has had detrimental effects on other policies, such as the EU chemicals policy.*
- The BREXIT referendum and the Better Regulation Agenda have long delayed pending measures on Ecodesign and Energy Labelling. Under this influence, also the scope for future work and the level of ambition have been lowered compared to when the 6th EAP was implemented.*
- There is insufficient action at all political levels (EU, Member States and regional) around the Dieselgate scandal to achieve cleaner air from transport.*
- There is a lack of political will in the Commission and among Member States to reform the CO2 car label to better inform consumers about the real fuel consumption of their cars.*
- There was a temporary missing support from high level European Commission officials for the EU Ecolabel. This raised concerns among consumer and environmental NGOs about the future of the scheme. In addition, a delay in the REFIT process also significantly delayed good initiatives to make the scheme even stronger.*
- There is a political fight about the right approach to reform the Energy Efficiency Directive among different parties of the European Parliament. Some Member States are lacking political will to adopt a binding 40% energy efficiency target for 2030.*
- Market surveillance of car emissions, limit values for chemicals in consumer products and energy efficiency requirements for products are missing or ineffective'.*

Reaching the 7th EAP objectives by 2020

These are overall questions on the effectiveness of the 7th EAP and whether the objectives will be met by 2020 by the EU and by MS.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	69	10	36	2	7	8	3	2

The majority of respondents replied that they 'mainly' did not think that the EU would meet the objectives of the Programme by 2020.

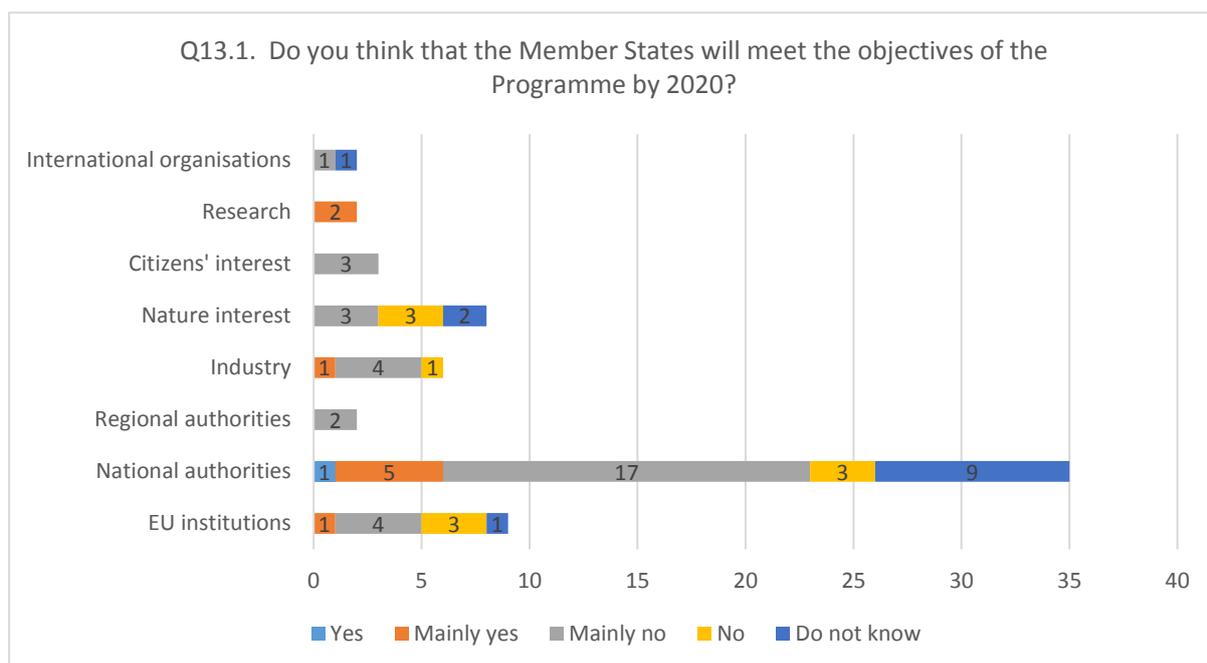
Around ¼ of respondents believed that indeed the objectives would 'mainly' be met. One national authority and one EU institution replied 'yes', two research stakeholder groups, two industry network organisations, one regional authority, nine national authorities and one EU institution answered 'mainly yes'. Three citizen interest support organisations, five nature interest support organisations, four industry network organisations, 15 national authorities and four EU institutions answered 'mainly no'. Eight respondents replied 'do not know' (total respondents 69).

Comments from the survey:

One citizen interest support group and one nature interest groups remarked that several milestones have already been missed, and seeing that 2020 is just around the corner, it is unlikely that the 7th EAP objectives will be met overall.

In BEUCs' view, 'the 7th EAP outlines a long-term vision for developing policies in the field of the environment and climate change. However, it is likely that neither the EU nor Member States will meet the programme's objectives by 2020. The outlined problems related to nature conservation, resource efficiency, pollution and climate change will therefore remain key concerns beyond the year 2020. To turn the tide, much more action needs to be taken by 2020 but also a follow-up programme post-2020 is instrumental to achieve continuity.'

Two EU institutions are however more hopeful and believe that an ambitious plan is the only way forward for the environment as it stands now.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	68	9	35	2	7	8	3	2

A large majority of respondents ‘mainly’ did not think Member States would be able to do this. A few of the respondents were very negative, and a few were more positive. One international organisation, three citizen interest support organisations, four industry network organisations, two regional authorities, 17 national authorities and four EU institutions replied ‘mainly no’. Two research stakeholder groups, one industry network organisation five national authorities and one EU institution replied ‘mainly yes’. Three nature interest support organisations, three national authorities and three EU institutions replied ‘no’. 13 respondents opted for the ‘do not know’ option (total respondents 68).

No noteworthy comments were made.

Difficulties in implementation

This question seeks to uncover where the difficulties lie within the 7th EAP, and thereby how the effectiveness of the Programme could be improved and where it is lagging behind. The question was formulated as the following:

‘Which areas of the 7th EAP do you think face difficulties in implementation at EU and Member State level?’

The comments include more or less all of the objectives, and they seldom refer to at what level, either EU or MS level. As such, the answers to this question are inconclusive.

At EU level: natural capital especially biodiversity (suggested by a citizen interest support organisation), effective integration of environment in other policies (suggested by a national authority), policy coherence (suggested by an industry network organisation), bringing EU policy frameworks in line with the Paris Climate Agreement and

the UNs Sustainable Development Goals (suggested by a nature interest support organisation), better data access (suggested by an EU institution), encouraging further regional cooperation (suggested by a national authority), better overall regulation (suggested by a national authority).

At MS level: improved implementation on the ground (suggested by a citizen interest support organisation), effective integration and alignment between policies (suggested by a national authority), natural capital protection and enhancement (suggested by a national authority), bringing national policies in line with the Paris Agreement and UNs Sustainable Development Goals (suggested by a nature interest support organisation), best practice sharing among MS (suggested by an EU institution), securing better funding opportunities (suggested by a national authority), improving environmental integration and policy coherence (suggested by a national authority).

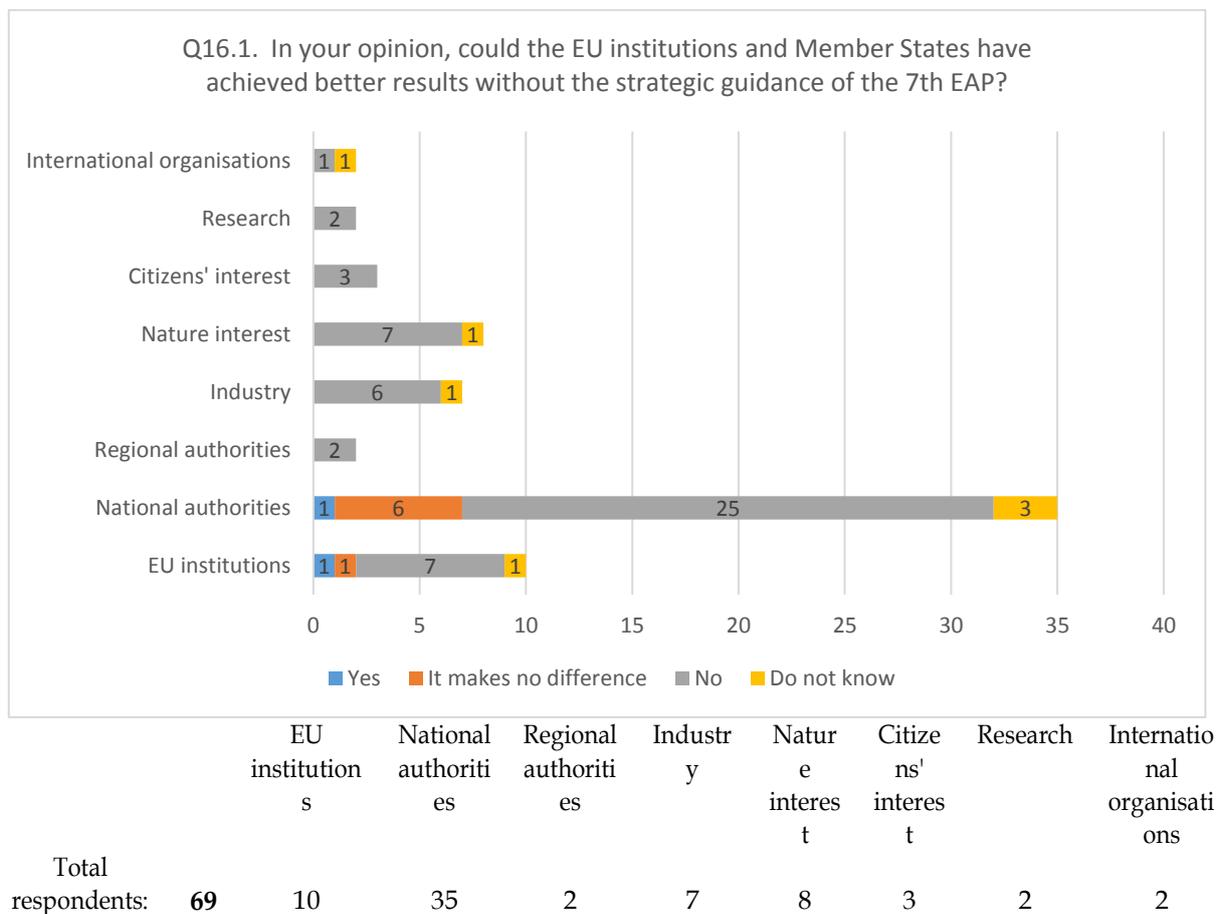
3.1.4 Efficiency

The survey did not include any questions on this criterion. Efficiency could not be assessed in the context of the overall implementation of the 7th EAP, but it has been assessed in the context of each thematic objective. See the Objectives assessments (sections 3.2 - 3.6), as well as section 4 which presents the cumulative assessment of progress under the Programme.

3.1.5 EU added value

Strategic guidance of the 7th EAP as a value added

The question relates to the perceived EU added value of the 7th EAP and whether such results could have been achieved without the Programme.



A large majority of the respondents replied that better results could not have been achieved without guidance from the 7th EAP. The only stakeholder groups that thought better results could have been achieved without the 7th EAP was one EU institution and one national authority. Six national authorities and one EU institution replied that it makes no difference. Seven respondents answered 'do not know' (total respondents 69).

The general message in all the comments made for this question was that the 7th EAP is a good tool to establish more coherence, however, a few noted that the question was hard to answer as results are measured against the Programme and not based on a baseline.

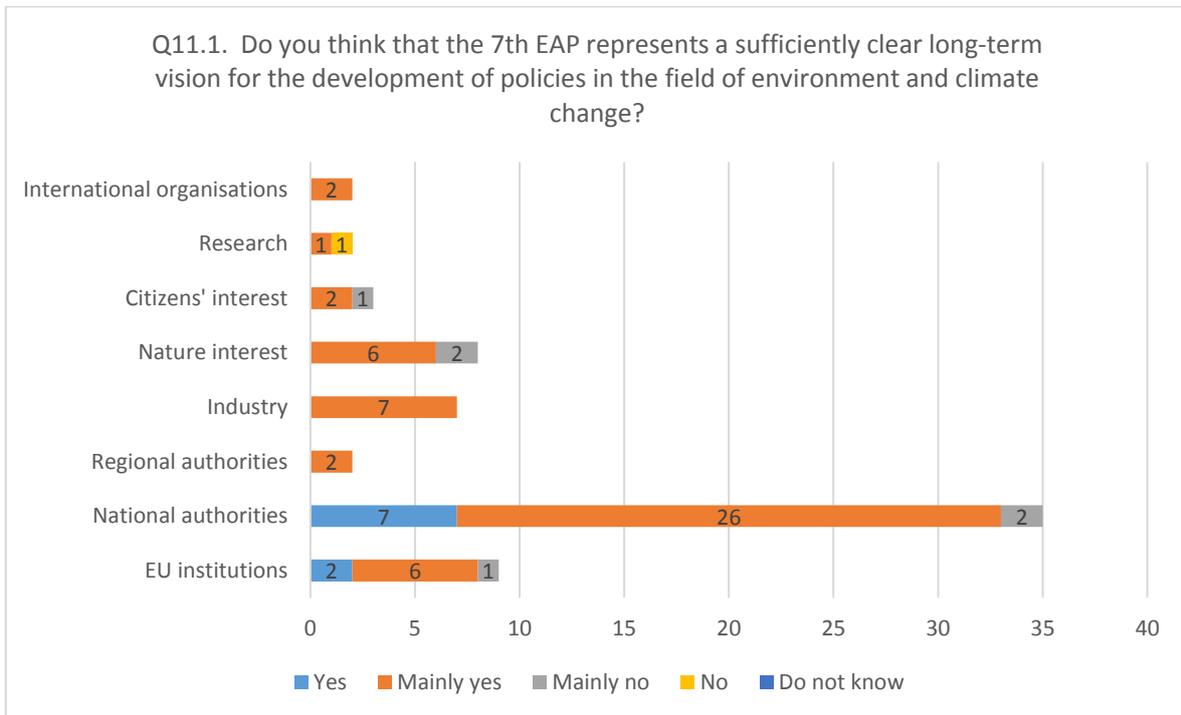
Comments from the survey:

FoodDrinkEurope, commented that it is important to have targets at the policy level that are overarching. An international organisation says that the 7th EAP has been necessary to move things in the right directions, a lot of positive developments have come from it and it has helped MSs to implement a variety of projects, but it has also scattered the efforts too much and needs to be more focused. At national level, there is more scope for turning down legislation than at EU level. So, this can cause bottlenecks in pushing forward environmental legislation. Once EU legislation is there, you have to follow it. The EU is a driver for pushing forward environmentally friendly legislation. NGOs use EU legislation as evidence to push forward national governments to properly implement such legislation.

Cefic added that they believe that the EU added value of the 7th EAP is high. Cefics constituents believe that a vast majority of the legislation is driven by the EU. They mentioned that it is an effective machinery but whether it is the EAP in itself that is pushing things forward is hard to judge, but they recognise the ambition and that this may be in some way having an effect on legislation.

The 7th EAP as a long-term vision for environmental and climate change policies

This question also concerns the effectiveness of the 7th EAP and its long-term vision. The 7th EAP is a strategy until 2020.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
68	9	35	2	7	8	3	2	2

A large majority of respondents replied ‘mainly yes’ to this statement, some were in full agreement, and some were mainly not in agreement. One citizen interest support organisation, two nature interest support organisations, two national authorities and one EU institution replied ‘mainly no’ to this statement, while one research stakeholder replied ‘do not know’. The rest were positive towards the statement, which included all stakeholder categories (total respondents 68).

Comments from the survey:

Some of the nature interest groups note that the 7th EAP runs to 2020, without setting clear, ambitious and specific actions and objectives beyond 2020, which does not provide for a long-term vision. A citizen interest group also stressed that a long-term perspective for a successful transformative change is needed. However, a few nation authorities still find the 7th EAP complementary to other instruments and that the objectives are ambitious thus still relevant beyond 2020.

One organisation representing regional and local authorities notes that the vision could be improved if the level of detail was greater into how objectives will be achieved. The two EU institutions that commented agree with this comment.

Lastly, one national authority remarks that the main problem in the long-term vision of sustainable development, is to define the term “a desirable green economy”.

3.1.6 Recommendations for current EAP

Further improvement of the 7th EAP and its implementation

This section presents respondents suggestions for improving the implementation of the 7th EAP.

The overall message to draw from the comments made for this question is that the 7th EAP is ambitious but should focus more on how to implement these ambitious objectives by detailing them more, so that the goals can be fulfilled. The Programme should continue to have strong horizontal penetration in all sectors. There is also a perceived need for more awareness and pressure on national authorities to take the Programme seriously and to step up enforcement at EU level as well as more political will and better funding opportunities/information on funding.

Comments from the survey:

One international organisation commented that the 7th EAP is a menu of things, but we need to prioritise the objectives which are most pressing such as climate change and biodiversity, and promote these much more. In order to do so the Programme should be made simpler, and only focus on a few objectives and actions. Use of budgetary mechanisms can move things forward, e.g. green public procurement and the use of stakeholder consultation is already a helpful instrument but collaborating further with stakeholders and having their suggestions impact the preparatory work would be even better.

BEUC highlighted several areas for more prominent actions and more ambitious commitments. They state the following: ‘The objectives of the 7th EAP remain crucial for consumers’ health and environmental protection. More action needs however to be taken to implement these objectives, in particular related to sustainable transport, energy, chemicals, sustainable consumption and production and financing a sustainable European economy. To this end, more resources at EU and national level need to be invested including sufficient personnel to develop the policies and legislative proposals. All stakeholders need to play a role to make sure that systemic changes will happen in the way we travel, the way we produce and consume energy and the way we produce and use everyday consumer goods’. ANEC stated that it is important that policies foreseen in the 7th EAP are consistently interlinked and integrated (e.g. sustainable consumption and production policy should penetrate sectorial policies such

as CAP and CFP). They further suggest that SCP policy should enlarge its focus from energy efficiency to other important aspects as resource efficiency, recyclability, re-usability, waste and hazardous chemicals. ANEC recommends that 'resource overconsumption must be tackled by reduction of consumption through regulatory measures to prolong the service life of products: for example by increasing warranty periods, prescription of reuse packaging, etc.' and wants to see 'regulatory action in the first place, complemented by tax incentives'.

Comments from the focus group:

The focus group agrees that there should be a more focused approach for the next EAP. It's difficult to hold MSs accountable as you cannot say exactly what should be achieved under each objective under the Programme. The 7th EAP is a good strategic framework. The framework is perhaps not supposed to be more detailed. Either the details go into a separate attached document or should just not be there. It would become a very large and hard to assess document if all the detail was included. Although it could be more mainstreamed with other relevant policies. They further added that there are issues concerning the lack of political will which cause a barrier to implementation. A strong signal from the Parliament towards what they expect from the Commission is needed. A suggestion is to detail a time-plan for when objectives and actions need to be solved, with an annex on concrete activities where the Commission should give more feedback on how they try to implement (the Action plan on Resource efficiency used this approach). There has been very mixed progress, the energy and transport topic has seen better progress lately however chemicals have not, which comes down to lack of political will. The EEA report shows some progress in the short term, however progress towards 2020 or beyond does not look good. We need to make sure to keep monitoring with more indicators on a regular basis providing this feedback. The feedback also needs to be visible and transparent to the public and policy makers. The 7th EAP is a good document, and we need to make better use of it. Need a stronger signal of political will from the EP.

Role of various actors in improving the implementation of the 7th EAP

This section presents the views of respondents on a question on possible roles of various actors in improving the implementation of the 7th EAP.

Respondents made the following remarks with respect to the roles of various actors:

Role of the EU institutions:

Holding MSs accountable (suggested by a citizen interest support organisation and suggested by nature interest support organisations), better dissemination of targets (suggested by a national authority), enable and monitor policy-makers (suggested by an industry network organisation), improve stakeholder participation (suggested by an industry network organisation), more data sharing (suggested by an industry network organisation), political leadership and lead by example (suggested by an international organisation and a citizens' interest group), key role as coordinators along with MS (suggested by an EU institution), improve implementation (suggested by a nature interest support organisation), support with financing (suggested by a national authority), prioritise consumers' health, inform and interact with consumers and non-governmental organisations such as consumer organisations (suggested by a citizens' interest group), ensure monitoring, verification and enforcement of legislative requirements (suggested by a citizens' interest group)

Role of Member States:

Promote 7th EAP to other governmental bodies on different levels (suggested by a national authority), improve integration of environmental considerations into sectorial policies (suggested by a national authority), improve funding (suggested by a citizen interest support organisation), stronger policies (suggested by an industry network organisation), more enforcement (suggested by a nature interest support organisation), push for political will to reach goals (suggested by a national authority), improve implementation (suggested by a nature interest support organisation), hold business accountable

(suggested by a citizens' interest group), inspire consumer action (suggested by a citizens' interest group)

Role of the regions:

More supervision and inspections (suggested by a citizen interest support organisation), improve integration of environmental consideration into sectorial policies (suggested by a nature interest support organisation), raise awareness of local authorities and support them in their decisions on the environment (suggested by a national authority), improve access to funding (suggested by a national authority), stronger and more clear policies aligned with the 7th EAP objectives (suggested by a national authority), encourage behavioural change, inspire consumer action, integrate knowledge into schooling on sustainable consumer behaviours (suggested by a citizens' interest group)

Role of industries:

Less lobbying for lowest common denominator (suggested by a citizen interest support organisation), more awareness and consideration of environmental action plans (suggested by a nature interest support organisation), better training of staff (suggested by a citizen interest support organisation), improve integration of environmental considerations into new business models (suggested by an industry network organisation and citizens' interest group), promote good practices (suggested by a nature interest support organisation), innovation of technologies and solutions, integrate eco-design principles into products (suggested by a national authority and a citizens' interest group), provide transparency within knowledge, data and products (suggested by an industry network organisation and citizens' interest group), comply with legislation (suggested by an EU institution), demonstrate commitment to develop and provide solutions, engage with decision-makers to inform about solutions and technologies, cease hazardous chemicals with safer alternatives, give only clear, comparable and credible messages about product, avoid 'sharewashing' (suggested by a citizens' interest group)

Researchers/think tanks/experts:

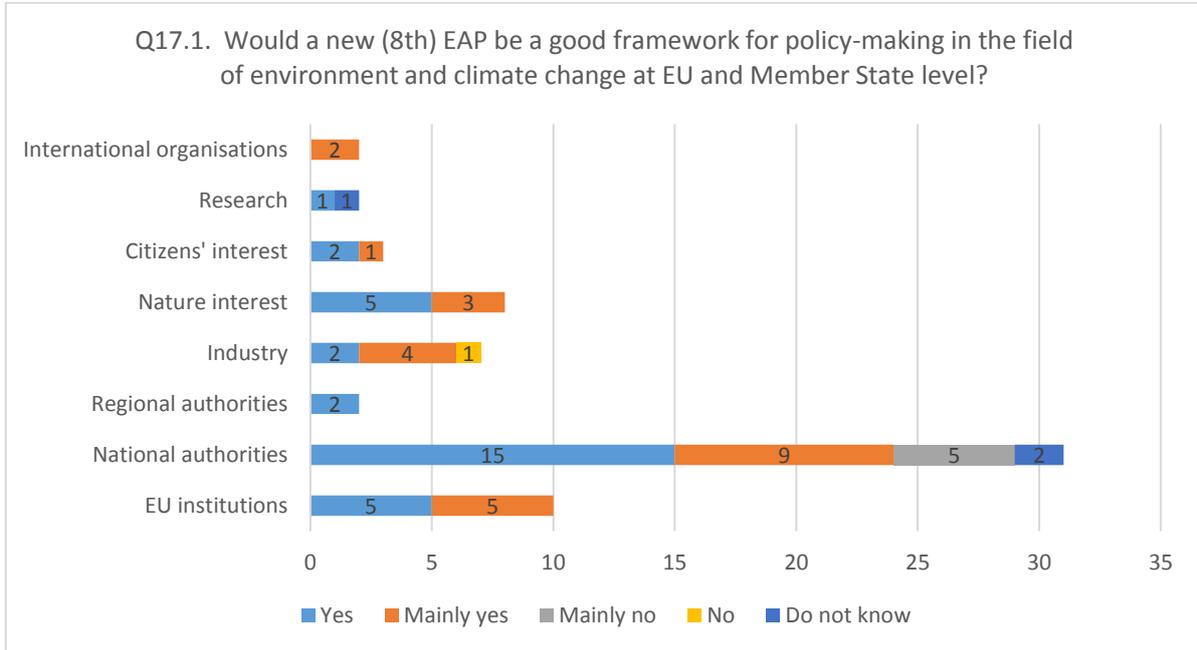
Promote knowledge sharing (suggested by an EU institution), improve knowledge and research (suggested by a national authority), more transparency (suggested by a nature interest support organisation), embed 7th EAP and other policy areas in curriculum (suggested by a national authority), inform on best practices (suggested by a national authority), act as watch-dog (suggested by a nature interest support organisation), continue to support MSs with research (suggested by a national authority), continue to identify environmental problems (suggested by a national authority).

The role of nature and citizens' interest promoting organisations:

Better communication with general public (suggested by a citizen interest support organisation), cooperation with other stakeholders (suggested by a national authority), to collect and analyse information (suggested by a citizen interest support organisation), put pressure on MSs and European Commission (suggested by a national authority), stronger role making in EU institutions (suggested by an EU institution), increase own participation in e.g. stakeholder dialogues, partnerships etc. (suggested by a nature interest support organisation), stronger engagement at lowest level (suggested by a citizen interest support organisation), translate EU objectives into concrete measures and solutions on the ground (suggested by an industry network organisation), better collaboration with rural actors (suggested by a nature interest support organisation).

Towards a new EAP

The question considers the opportunity for a new (8th) EAP, and asks for respondents’ opinions on this matter.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	66	10	32	2	7	8	3	2

A clear majority of respondents either replied ‘yes’ or ‘mainly yes’ to the question if an 8th EAP would be a good framework for policy-making in the field of environment and climate change at EU and MS level. Only five national authorities replied ‘mainly no’, and one industry network organisation replied ‘no’. Three respondents answered ‘do not know’ (total respondents 66).

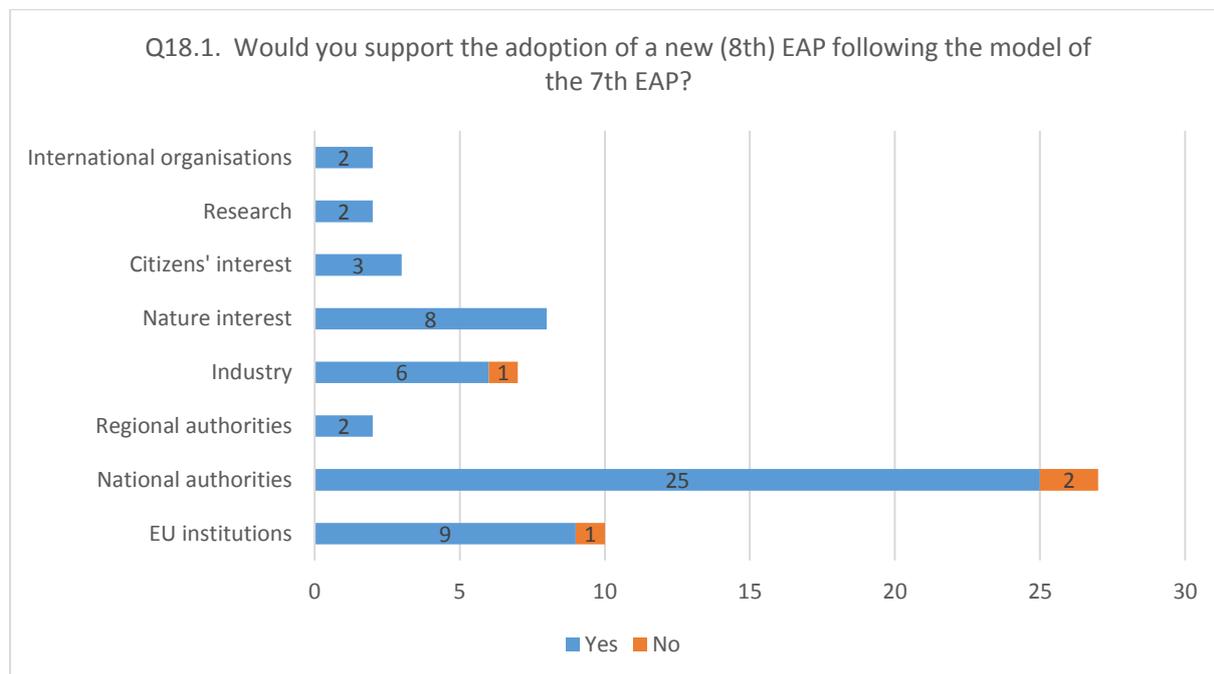
There is general consensus among the nature interest support groups who commented that an EAP is still needed, however, the citizen interest groups believe that this depends entirely on the contents and format, and that progress should be monitored very closely.

An EU institution stresses that the framework needs a vision and clear objectives, and that the continuation with EAP is important, however, first the 7th EAP needs to be finalised and lessons learned need to be made before the 8th is launched.

FoodDrinkEurope commented that targets should be aligned to the new policy frameworks put in place in recent years and should encompass the SDGs and take stock of what the 7th EAP has achieved.

According to BEUC, much more action needs to be taken by 2020 but also a follow-up programme post-2020 is instrumental to achieve continuity. In this sense, BEUC calls for the development of an 8th Environment Action Programme to cover the time after 2020. Simultaneously, BEUC insists that more efforts have to be urgently taken to fully implement the 7th EAP as soon as possible.

In relation to the question above, another question sought to determine the support for an 8th EAP based on the model of the 7th one, in order to provide recommendations for its possible implementation.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	62	10	28	2	7	8	3	2

Almost all respondents replied that they would support the adoption of a new 8th EAP following the model of the 7th EAP. Only one industry network organisation, two national authorities and one EU institution replied 'no' to this question (total respondents 62).

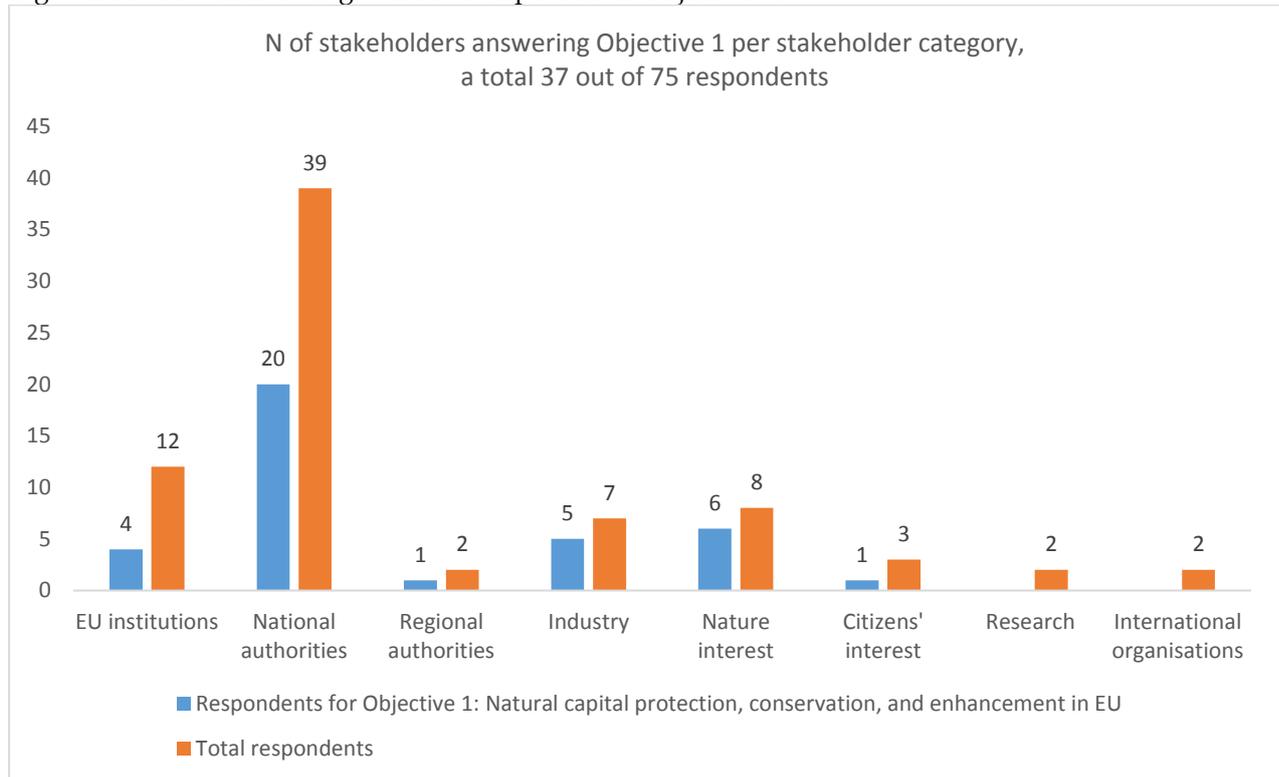
Many of the comments are of the same nature as the comments made for the question above. Additional comments were made that the 8th EAP should be simplified, better communicated at national level, and stakeholders should be more involved with the drafting. It should also reflect the new political landscape.

One international organisation commented that they would recommend including some sub-objectives more specifically related to industry's role in greening the environment, such as the adoption of guidelines on resource efficiency and cleaner production for the industrial sector and the adoption of sustainable industrial waste management practices.

Cefic suggested that if a future 8th EAP would be developed, a more holistic and interlinked approach should be considered. Here they see that they can fulfil a role by providing knowledge on chemical and other industrial topics. They also pointed out that there is a need to have targets of the SDGs more closely linked to the EAP. Cefic is also concerned that citizens are too distant from the policy-makers and that the concerns they might have are therefore not heard. They suggest involving industry and the general public more in any future EAP discussion so as to achieve public acceptance.

3.2 Objective 1: To protect, conserve and enhance the Union's natural capital

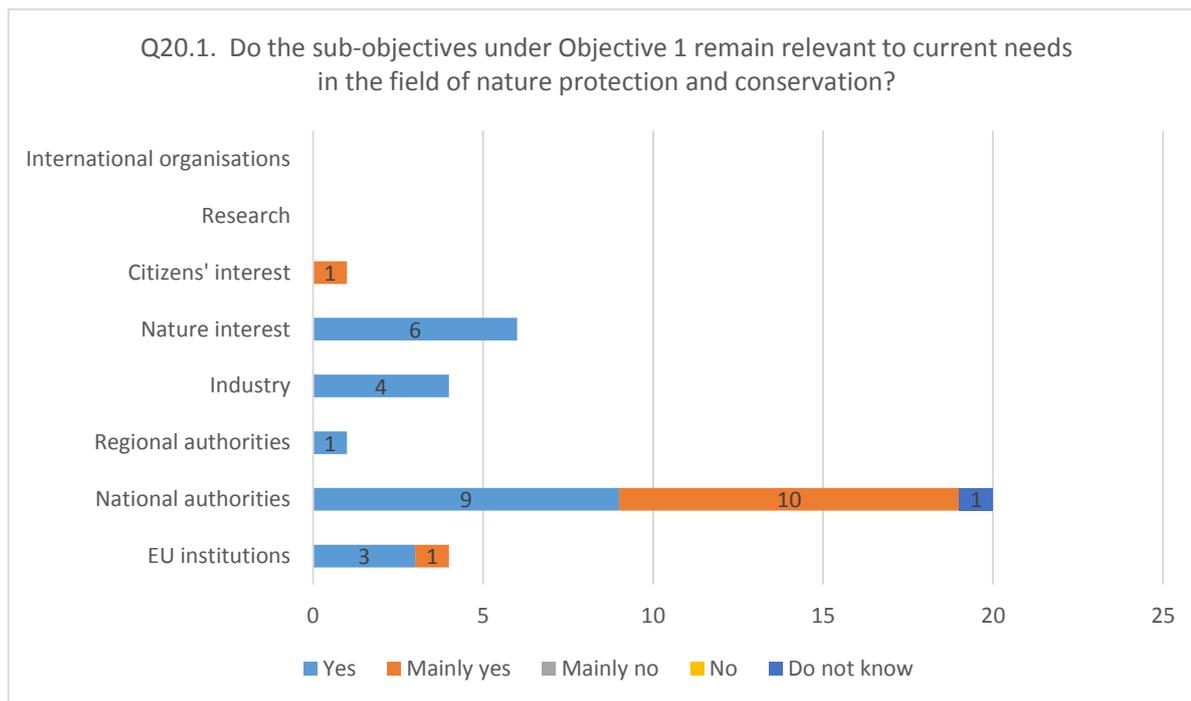
There were 37 respondents for Objective 1, out of a total 75 respondents for the whole survey. For Objective 1, four out of 12 EU institutions, 20 out of 39 national authorities, one out of two regional authorities, five out of seven industry network organisations, six out of eight nature interest support organisations and one out of three citizens' interest support organisation responded. No international organisations or research organisations responded to Objective 1.



3.2.1 Relevance

Relevance of the scoping under Objective 1 to real needs in the area

This question was addressed to all categories of stakeholders and was designed to examine if the sub-objectives under Objective 1 are still relevant to the needs of the nature protection and conservation area.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	36	4	20	1	4	6	1	

Nearly all respondents regardless of stakeholder category answered yes or mainly yes to this question, indicating the high importance and necessity of the Programme, as well as pointing towards the right scoping of the thematic issues that it covers (total respondents 36).

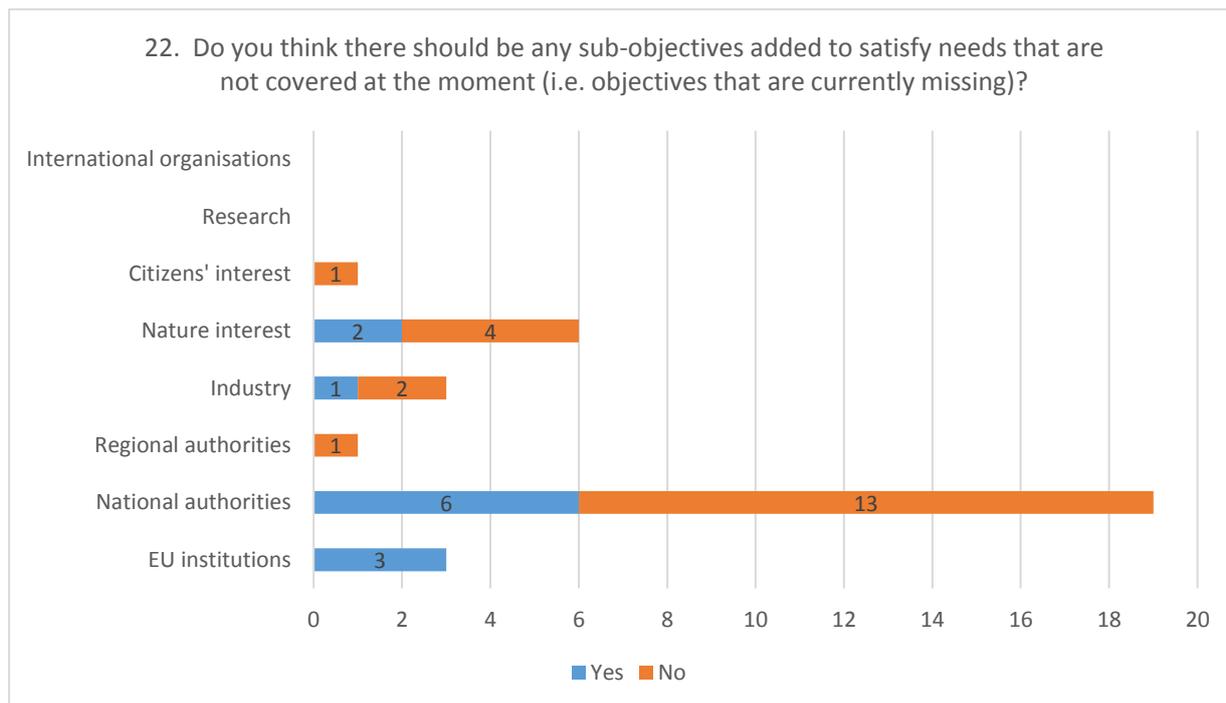
Comments from interviews:

The personal opinion of a representative of the international organisation IUCN is that it is still a very relevant objective. Nature conservation and biodiversity usually come lower in priority within environmental objectives. Natural capital is however gaining momentum, but should be even more prominent.

The personal opinion of an EU institution official is that they still remain relevant. If there was to be an 8th EAP the same objectives would probably go into this one as well.

Gaps in the scoping of Objective 1

This question relates to the relevance of having more sub-objectives to cover gaps that are not filled under the present sub-objectives.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	33	3	19	1	3	6	1	

The majority of respondents indicated that this was not the case. It is interesting to see that two thirds of respondents (one organisation representing regional and local authorities, one citizen interest group, 13 national authorities and two industry network organisations) all answered that there were no objectives currently missing, while the other one third (three EU institutions, six national authorities, one industry network organisation and two nature interest support organisation) all replied that some sub-objectives could be added to satisfy needs not currently covered (total respondents 33).

A number of suggestions on additional sub-objectives to be included under Objective 1 provided by the stakeholders are summarised below.

Comments from the survey:

Several stakeholders from the EU institutions and national authorities suggested to promote more prominently ecosystem services, natural capital, nature-based solutions, natural heritage areas and consider them under the green economy development, as well as for improving people's well-being. Irish Environmental Protection Agency, a national authority, recommended 'Integrating natural capital into national financial reporting models'.

One national authority suggested to enhance the integration/coherence of biodiversity protection, climate change policies and natural resource policies.

CCPIE –CCIM (Belgian Coordination Committee for the International Environment Policy), a national authority, suggested to include the following: Protected area coverage and management, wildlife trafficking, endangered species, biodiversity and agriculture, green infrastructure (including biodiversity in the wider countryside). The added 'More attention should be paid to prevention of soil contamination (cfr. on emerging contaminants after the abortion of the EU initiative on Framework Directive on Soil).

Greenpeace EU, a nature interest support organisation, suggested the following: 'Pay more attention to the overlap of Objective 1, 2 and 9, notably in respect to consumption impacts and the potential for

resource efficiency in the use of biological resources, with the specific sub-objectives of passing legislation to eliminate products that drive deforestation and forest degradation from the EU market, and new provisions to prohibit the use of bioenergy that do not help to decarbonise the energy sector and damages biodiversity. The three institutions – namely through the Council, ENVI and DG Environment – should set out a roadmap for the CAP and budget reforms, based on the 7th EAP and in particular Objectives 1, 2, 3, 6, 7 and 9.’

One nature interest support organisation urges for fossil fuel divestment¹⁰².

3.2.2 Knowledge base

Scientific knowledge and evidence base for nature protection and conservation policies

A set of questions in the survey focused on Objective 1 of the 7th EAP promoting scientific knowledge and an evidence base for policy-making in the context of nature protection and conservation. These questions relate to enabling Objective 5 of the 7th EAP on improving scientific knowledge and evidence for EU environmental policy-making.

Respondents were asked to assess the progress of the knowledge base in the area, the presence of knowledge gaps and the underutilisation of the existing scientific knowledge.

Q36. With regard to improving the scientific knowledge and evidence base for nature protection and conservation policies, do you agree with the following:		EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens interest	Research (n/a)	International Organisations(TOTAL
	Total	4	19	1	3	6	1	0	0	34
There is a progress in better understanding of climate change impact and natural disasters	Yes	1	8	1	1	3				14
	Mainly yes	3	11		1	3				18
	Mainly no				1					1
	No									0
	Do not know						1			1
There is a progress in better understanding of implications of species loss for ecosystem services	Yes	2	3	1	1	2				9
	Mainly yes	1	10		1	3				15
	Mainly no	1	3		1	1				6
	No		1							1
	Do not know		2				1			3
There is a progress in better understanding of environmental thresholds and ecological tipping points	Yes		3	1	1	2				7
	Mainly yes	1	7			2				10
	Mainly no	2	6		2	2				12
	No	1	1							2
	Do not know		2				1			3

The clear majority of the respondents agree that there is progress *in better understanding of climate change impact and natural disasters*. Only one respondent, an industry network organisation was negative on this statement, one respondent answered ‘do not know’ (total respondents 34).

Comments from the survey:

¹⁰² This comment might not be directly relevant to the Objective 1, and it is not possible to get further information or clarification from the respondent.

Greenpeace EU remarked that this has not necessarily resulted in better protection or climate adaptation. In fact, they say, some policy decisions had perverse impacts, e.g. the support for 'climate smart agriculture' which has underpinned industrial farming models with high greenhouse gas emissions, and policies to promote energy efficient engines in fishing boats, potentially increasing overall fishing effort.

With regard to progress in *better understanding of implications of species loss for ecosystem services*, the majority of the respondents are positive about it, while a small minority disagrees with this statement. One EU institution, three national authorities, one industry network organisation and one nature interest organisation replied 'mainly no', one national authority replied 'no', three respondents replied 'do not know', while the rest were positive towards the statement (total respondents 34).

Comments from the survey:

Greenpeace EU commented that the scientific knowledge has been improved but that it has hardly accelerated actions.

Half of the respondents are convinced (fully or mainly) about progress in *better understanding of environmental thresholds and ecological tipping points*, while less than half think otherwise, with the rest having no view on the issues. One EU institution and one national authority replied 'no', two EU institutions, six national authorities, two nature interest groups and two industry network groups replied 'mainly no', three respondents replied 'do not know', while the rest were positive towards the statement (total respondents 34).

Comments from the survey:

An EU institution commented that with regards to nature we have an issue as our ambitions are high but the knowledge available requires long and costly investments which are not cover by anybody. The major instrument Horizon 2020 has largely abandoned the support to nature and biodiversity and anyway it is too little to make up for the knowledge gaps. It is impossible to work on species because it is impossible to identify it and don't know how it behaves. The strive for innovation under Juncker agenda (no criticism attached) has led to loss of interest in areas where a lot of knowledge is needed. The same goes for soil. We need two things – put sufficient money and clear functional link between building the knowledge and using it, research driven by a need rather than disruptive innovation.

Knowledge gap - Understudied areas within Objective 1

Stakeholders were asked if there are any areas within Objective 1 which have been understudied and where evidence is missing. This question also relates to enabling Objective 5 of the 7th EAP on improving scientific knowledge and evidence for EU environmental policy-making.

The responses to this open question suggest that there are still understudied areas in the topics related to nature protection and conservation:

Comments from the survey:

One national authority noted that the biodiversity and economic value of Objective 1 have been understudied. There is a need for better understanding of the interactions between anthropogenic activities and ecosystem responses, including interactions with various drivers and cumulative impacts. Further knowledge on methodologies to be applied to quantify pressures and impacts is also deemed necessary to formulate appropriate policy action. There was also a suggestion that the theme Nature should be more transversal to other EU directives and other policies.

Two other national authorities also agree with the point above and stress that the interaction of land use policies and climate change impacts, ecological compensation, insurance values and nature based solutions have all been missing.

One EU institution stated that matching real trends of species loss and ecosystem service changes with predictions and scenario building of impacts of climate change; ecological tipping points, resilience and recovery weren't evident.

WWF European Policy Office, a nature interest support organisation, believes that while sometimes lack of knowledge might be a problem e.g. to protect certain marine habitats and species, there is in general enough evidence and research showing where action is needed and recommendations on the way forward (e.g. the regular State of Nature¹⁰³ reports showing progress towards the objectives of the Birds and Habitats Directives). However, more resources are needed at Member State level to improve monitoring systems to gather all necessary data to assess the status and trends of species and habitat types.

¹⁰³ The respondent refers to the EEA State of the Environment Report.

Another EU institution identified alien species as one such understudied areas. Very limited resources are available and it remains a hugely underestimated problem which is also invisible.

What knowledge is underutilised?

Respondents were asked if there are areas within Objective 1 where knowledge exists but is not utilised for evidence during policy-making. A number of respondents shared their views on this question.

Comments from the survey:

One national authority said that the evidence for understanding ecological tipping points and thresholds as well as ecosystem services operationalisation are not utilised for policy-making.

European Environmental Bureau, a nature interest support organisation, said that there is a general tendency in EU policy-making and evaluation to give disproportionate weight to perceived or real effects on industry and competitiveness and insufficient weight to the body of evidence that the world is moving close to and passing points of no return. While the 7th EAP has contributed to develop the natural capital accounting tool to integrate the value of ecosystem services in the decision-making process, national authorities are not making proper use of it. They remark that the Commission and Member States should ensure that decision-making processes take full account of all the evidence to help ensure fairer, more efficient and more sustainable use of Europe's natural resources.

The opinion of a nature interest group was that there is a general tendency in EU policy making and evaluation to give disproportionate weight to perceived or real effects on industry and competitiveness and insufficient weight to the body of evidence that the world is moving close to and passing points of no return.

An EU institution commented that response of species and habitats to Climate change pressures is partially known but available knowledge is partially utilised. In Life there are 3-5 projects which explicitly carry actions. In water and air – there is quite a lot of knowledge and it is well-used.

Comments from interviews:

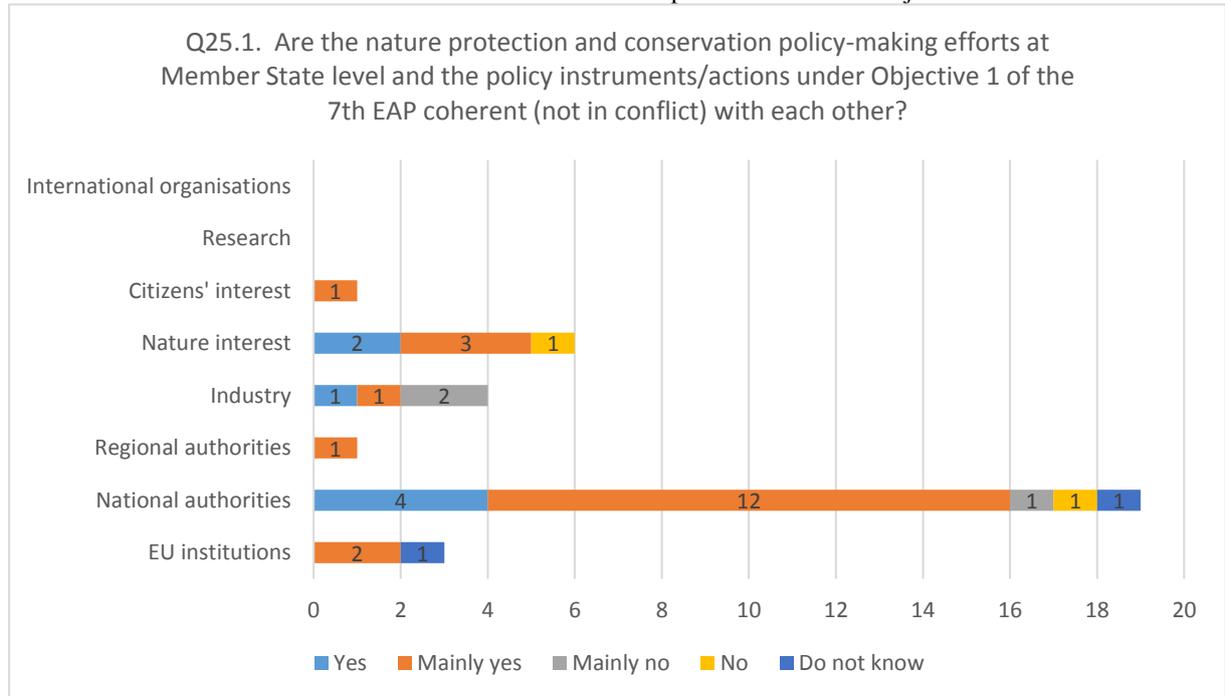
A personal opinion of a representative of the international organisation IUCN added that although there is still a need to improve the knowledge base, there is quite some knowledge on biodiversity, but it's not always being used in policy-making.

An EU institution official answered that it has improved. But the problem is not the amount of knowledge that is out there or the funding of new research, the problem is the gap between the existence of knowledge in research organisations and scientists and those who actually have to implement the knowledge (farmers). So more could be done in this respect, and actually DG AGRI has set up a platform to try to solve this issue. It is called European Innovation Partnership 'Agricultural Productivity and Sustainability'. The idea is to have a bulk of knowledge and instead of the usual linear innovation model, this platform tries to integrate the knowledge into practice by creating groups of stakeholders (e.g. A farmer, a scientist and a machinery producer) who try to tackle the issues together. It has only been running for a few years and therefore there are no final results yet, but an evaluation that was done last year was very positive about the potential of the scheme.

3.2.3 Coherence

Coherence between MS policy-making and Objective 1 actions

The question assesses stakeholder views on the level of coherence between nature protection and conservation efforts at MS level and the actions and instruments promoted under Objective 1 of the 7th EAP.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	34	3	19	1	4	6	1	

The majority consider that these actions and efforts are fully and mainly coherent. A few disagree with the statement.

Regional local authorities, national authorities, citizen interest groups and nature interest groups all answered ‘yes’ or ‘mainly yes’. A few from industry network organisations, one nature interest support group and one national authority answered ‘mainly no’ or ‘no’ (total respondents 34).

Comments from the survey:

The WWF European Policy Office, commented that conservation actions taken by Member States are coherent with the policy instruments provided under Objective 1 of the 7th EAP. However, most of the time these actions are not sufficient to protect our natural capital (e.g. lack of financial support for nature protection).

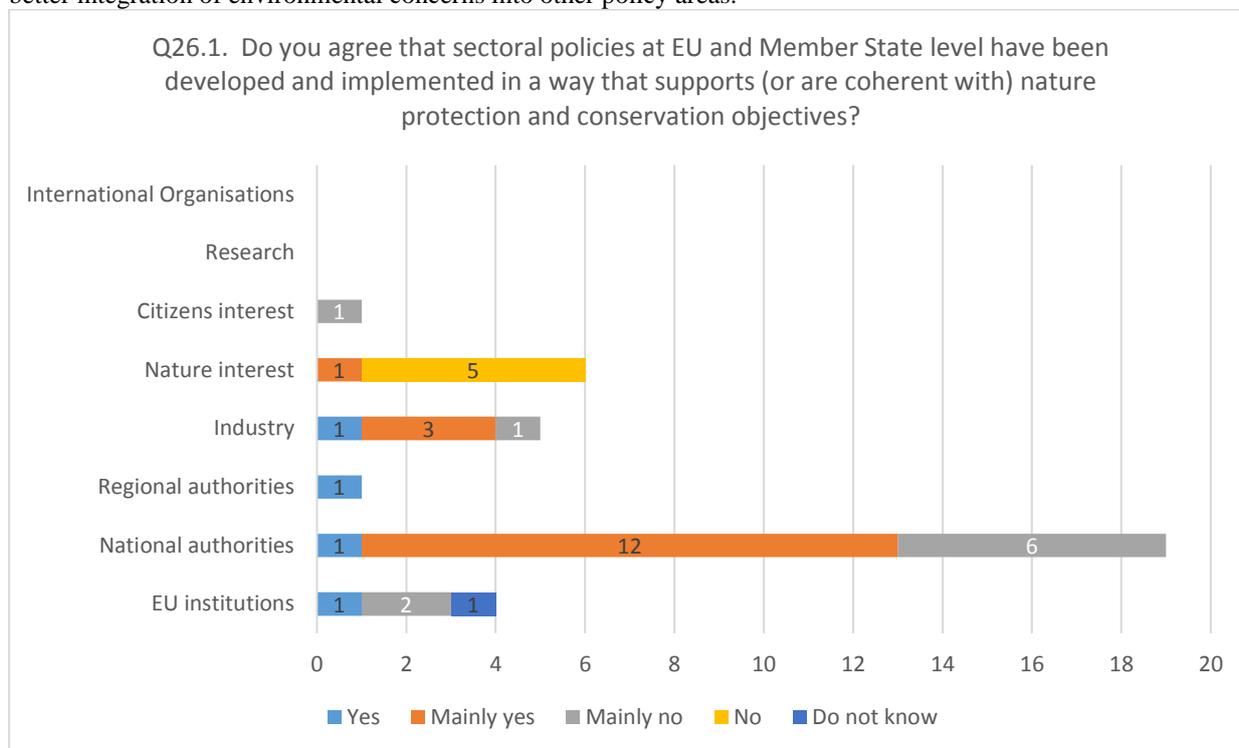
Another nature interest group however stated that nature parks' boundaries are not always respected and there are examples of highways and dam investments pushed by governments and financed with public funding in areas with rich biodiversity.

Comments from the interview:

The personal opinion of a representative of the international organisation IUCN is that the EU biodiversity strategy is a relevant policy tool. However, at EU level there are coherence challenges, e.g. CAP, structural funds. The results of the fitness check of the birds and habitat directives have pointed out coherence as one of the main challenges.

Coherence and integration between the sectorial and nature conservation policies

The question relates to the coherence and effectiveness of sectorial policies at EU and MS level together with the support for nature protection and conservation objectives. This question also relates to Objective 7 addressing better integration of environmental concerns into other policy areas.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	4	19	1	5	6	1		

A slight majority of respondents consider (‘yes’, ‘mainly yes’) that the sectorial policies at EU and Member State level have been developed and implemented in a way that support or are coherent with nature protection and conservation objectives. However, the citizen and nature interest groups, some national authorities and two EU institutions were in (‘mainly’ or total) disagreement with this statement (total respondents 36).

Comments from the survey:

- A citizen interest support group commented that the CAP is hugely problematic in this regard.*
- BirdLife Europe, a nature interest support organisation, agreed with this saying there is evidence that especially the CAP and also the CFP are not coherent with the objectives of the Birds and Habitats Directives or the EU's biodiversity strategy.*
- European Chemical Industry Council (Cefic), an industry network organisation, commented that there is already very strong environmental and chemical legislation in place in the EU and that no further activities are needed.*
- The WWF European Policy Office commented that the most significant pressures on our natural capital come from human induced activities (e.g. agriculture, fisheries, logging) and changes to natural conditions of ecosystems (through e.g. large infrastructure developments). The State of Nature¹⁰⁴ report identified unsustainable agriculture as one of the main drivers of biodiversity loss. Similarly, pressures from hydropower, navigation, flood protection and urban development are leading to physical alterations of our habitats and water bodies (e.g. 40% of rivers are negatively affected by large scale infrastructure). They go on to say that in most of the cases the European Commission and national governments are not*

¹⁰⁴ I.e. the State of the environment report of the EEA which is published every 5 years.

ensuring a proper and coherent integration of conservation objectives across different sectors. And even when sectorial policies do include environmental objectives (as it is the case with the Common Fisheries Policy), proper implementation and enforcement of such objectives is often missing.

Greenpeace EU, remarked that recent fisheries reform has somewhat improved coherence with conservation objectives, but still contains significant policy conflict e.g. in promoting aquaculture. Past CAP reforms have failed to result in policy coherence. They mention that the budget and fiscal policies of the EU are also incoherent with the nature protection and conservation objectives, as are much of the EU's transport and bioenergy policies.

An EU institution commented that energy, including renewables, transport and agricultural policies do not always take into account the needs of nature protection and conservation objectives that are too often considered as obstacles to economic development.

Another EU institution draws the attention to the fact that this is often the case on paper but on the level of implementation – not quite so.

Comments from interviews:

An EU institution official said that on one side it must be consistent as all policies in the EU need to work together, but on the other side CAP has multiple objectives for example, the CAP needs to ensure food security which means it has to promote competitiveness of farmers and as such, there is always room for improvement in creating win-win solutions when it comes to synergies between agricultural and environmental and climate policies.

Integration between key EU policies and nature protection and conservation objectives

The question refers to the extent of the coherence and effectiveness between the key EU policies and nature protection and conservation actions. This question also relates to Objective 7.

Q27. Do you agree that the following EU policies have integrated (or are coherent with) nature protection and conservation concerns and objectives?		EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens interest	Research (n/a)	International Organisations(n/a)	TOTAL
Total		4	18	1	4	6	1	0	0	33
Common Agricultural Policy	Yes		1							1
	Mainly yes		8	1		1				10
	Mainly no	2	7		2		1			12
	No		1		1	4				6
	Do not know	1			1	1				3
Common Fisheries Policy	Yes	1	1							2
	Mainly yes		10		1	3				14
	Mainly no	2	4	1	1	2				10
	No									0
	Do not know	1	3		1	1	1			7
EU Trans-European Networks Policy	Yes									0
	Mainly yes		5		1	1				7
	Mainly no	2	5	1		4	1			13
	No									0
	Do not know	1	4		3	1				9

Q27. Do you agree that the following EU policies have integrated (or are coherent with) nature protection and conservation concerns and objectives?		EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens interest	Research (n/a)	International Organisations(n/a)	TOTAL
Cohesion Policy	Yes									0
	Mainly yes		8		1	2				11
	Mainly no	2	3	1	1	3				10
	No									0
	Do not know	1	4		1	1	1			8
Other, please specify other policy areas of interest to you	Yes	1	4		1	2				8
	Mainly yes									0
	Mainly no		3							3
	No	1	1		1	1				4
	Do not know					1				1

An overall picture shows that the opinions are divided in regard to all key EU policies, with slight dominance towards the negative perception. A notable share of respondents had difficulties to provide an assessment. Only in Common Fisheries Policy one can see slightly more of those with positive perception on policy's coherence with the nature protection and conservation actions. On Cohesion and Common Agricultural Policies only approximately one third of the respondents, and on EU-TEN policies only a minority believed these policies are not in conflict with the nature protection objectives, while the assessment of the majority is rather critical (total respondents 33).

These assessments have been supported by the explanations:

Common Fisheries Policy (CFP):

Comments from the survey:

WWF European Policy Office commented that the new CFP includes measures to halt overfishing and reduce fish discards at sea. Additionally, it introduces an ecosystem based approach to fisheries management with the aim to restore harvested species' populations, and achieve Good Environmental Status for all EU waters, by 2020 at the latest. The CFP provides a unique opportunity for the EU to champion sustainable fisheries management within the EU and at global level. They note that in practice however, the CFP is not yet successfully addressing the EU's environmental goals. Until now, they say, only one Multiannual plan (MAP), the main implementation tool of the CFP that allows for the design of regional fisheries management solutions that are coherent with environmental legislation, has been adopted, the Baltic Sea MAP. In addition, they add, this MAP lacks coherence with the requirements under the CFP and falls short on the integration of the ecosystem approach to fisheries management. Even though small first steps have been made in making the CFP more sustainable there is still major issues: the marine Natura 2000 network is lacking implementation on MS level, on EU level environmental management measures are missing, as well as an ambitious Technical Measures Regulation.

Both a national authority as well as IFOAM EU, an industry network organisation, noted that the implementation of the CFP is where the biggest issue lies.

Cohesion Policy:

Comments from the survey:

WWF European Policy Office notes that the main objective of the Cohesion Policy has traditionally been to reduce economic, social and territorial disparities (the promotion of growth and jobs), where it has often been misguided and damaging, through investments promoting fossil fuel use, carbon-intensive projects or the large-scale infrastructure projects that are harmful to nature. In the latest reforms, however, Cohesion Policy has included a number of environmental considerations, such as the banning of certain types of spending, including oil projects. It further provided funding to directly support the objectives of the Nature Directives. Moreover, the latest reform included the "ex ante" conditionalities, ensuring that some necessary conditions for the effective and efficient use of ESI Funds are in place. This includes complying with certain environmental criteria before receiving such funds. Despite these improvements, they state, Cohesion Policy could better continue to guide investments that are sustainable, innovative and really benefit the public.

An EU institution remarked that bias towards development in less developed areas is done with scarce consideration of nature based solutions.

EU Trans-European Networks Policy (TEN-P):

Comments from the survey:

A citizen interest group stated that strategic planning of TEN-policy is weak to non-existent, i.e. any meaningful impact on the environment of networks is made only on project-level.

WWF European Policy Office also made the point that the EU still has a long way to go to improve cross border collaboration. They suggest that it should establish a new framework for promoting strategic nature restoration in the form of a Trans-European Network for Green Infrastructure (TEN-G), where support for the deployment of green infrastructure and for better connectivity of Natura 2000 sites should be highlighted.

BirdLife Europe stated that TEN-T and TEN-E often are chosen only according to the wish lists of MSs but not on sustainable criteria. For that, huge infrastructure projects listed in the TEN policy like the Fixed Fehmarnbelt Link etc. are often not planned according to the best nature conservation option but only according to the transport or energy need. A proper Trans-European-Network of Green Infrastructure to bridge the gap between Natura 2000 sites is missing.

An EU institution commented that at least in terms of cross-compliance there is a degree of attention in terms of policy.

Common Agricultural Policy (CAP):

Comments from the survey:

According to CCPIE - CCIM (Belgian Coordination Committee for the International Environment Policy, some elements of the CAP focus on biodiversity, landscape and nature protection contributing to making agriculture more environmentally friendly. However, they also note that the nature protection measures are ad-hoc and fail to go into any long-term projects. The greening objectives have also not been very effective and there has been very inefficient integration of soil protection.

BirdLife Europe remarked that the findings of the Fitness Check of the Birds and Habitats Directives shows that current CAP is not coherent with the objectives of the Birds and Habitats Directives. Also the MTR of the EU's biodiversity strategy has the CAP in particular focus for not being delivering on biodiversity.

WWF European Policy Office notes that while the CAP might contain provisions in relation to environmental protection (e.g. greening payments) such provisions are often too limited to satisfy EU environmental protection objectives. However, they seem to be more critical by saying the last CAP reform has almost completely failed in integrating conservation into its objectives and instruments. They note that the current CAP is largely a result of policy priorities and instruments developed for the challenges of the last century; it has strengthened resource intensive farming, increasing pressure on nature and depleting the natural resources that agriculture itself relies upon and that it encourages, for example, over-extraction of water resources, without penalising farmers when they do not comply with the requirements of the WFD. In some cases, the CAP is entirely silent on important environmental objectives or structurally impedes the effective pursuit of such objectives.

Another nature interest support group commented that in particular the last CAP reform has failed almost completely in integrating conservation into its objectives and instruments.

An EU institution commented that the problem is the translation of greening into actual measures.

Comments from the focus group:

A comment coming from the focus group added that the CAP is fundamentally an income support for farmers, and it needs to be coherent with relevant legislation and policies however there is a lack of consistency as this is actual money to cover the costs of farmers, and so there are many on the

ground/local barriers that can prevent e.g. agri-environmental measures. Farmers are fundamentally businesses, so their priority is not always nature. Some MSs already have more demanding requirements (in terms of limiting the environmental impact of agriculture) than others, so why should the EU pay for something that is already being done. The issues of the CAP are well known, and relate to its nature. It has improved over time, though it's still far from ideal. The rules are generally well applied, but there is variation between MSs, for example on how well engaged local land owners are in the Natura 2000 process.

Among other policy areas that lack of coherence with nature protection objectives, respondents listed Urban planning, Chemicals, Climate, Renewable Energy, as well as Energy infrastructure:

Comments from the survey:

CCPIE - CCIM (Belgian Coordination Committee for the International Environment Policy) argues that the biodiversity concerns are not considered appropriately (due to lack of biodiversity expert involvement) in Climate, Renewable Energy, Urban planning and Economy policies. It points that nature based approaches could have been better integrated in climate policies as they are crucial for adaptation and mitigation.

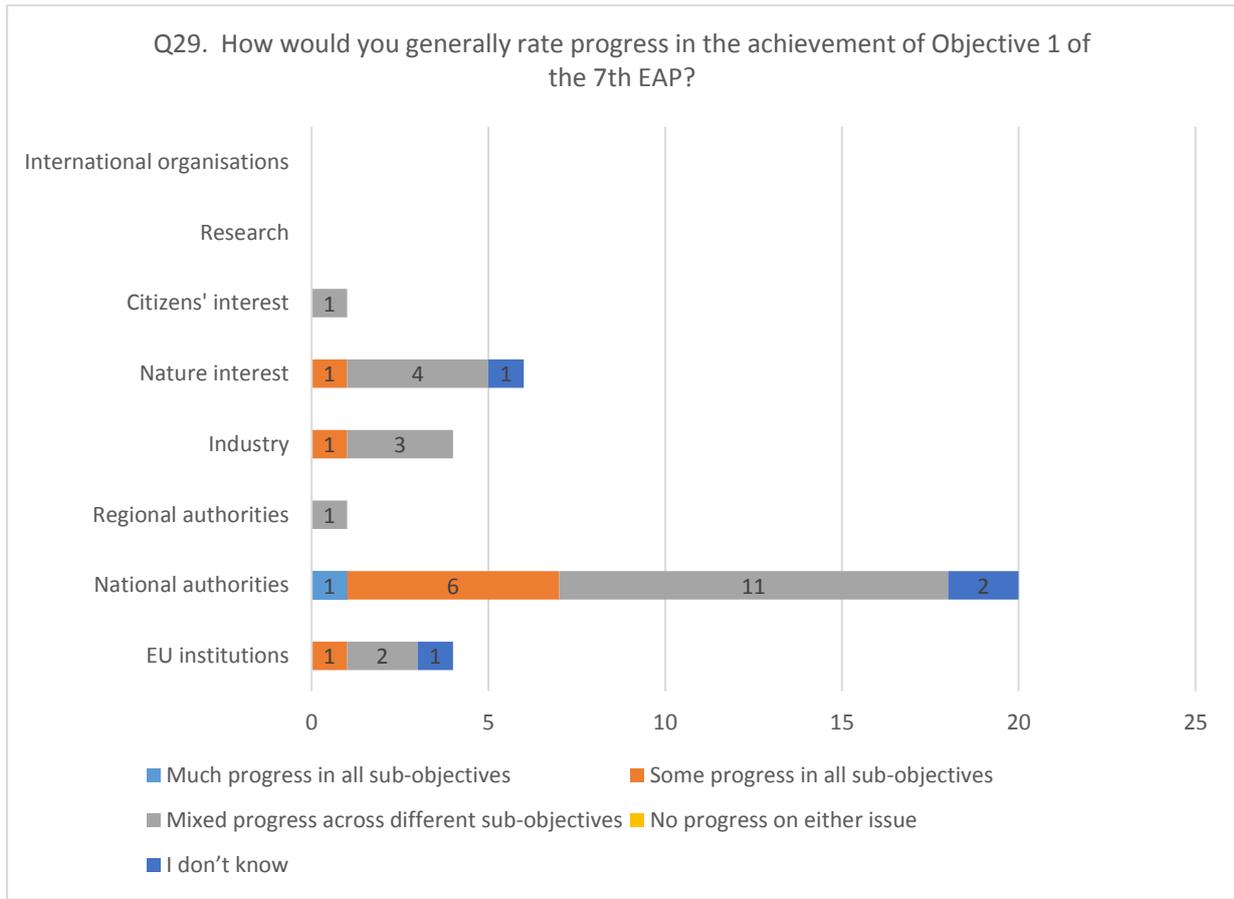
An industry network organisation comments that chemicals policy's lack integration of environmental concerns, and face implementation problems.

WWF European Policy Office presents the case of hydropower as one of the main drivers of hydro-morphological alterations, significantly affecting, among others, the ability of survival of fish populations. They argue that the water ecosystem degradation and loss of biodiversity due to hydro-morphological pressures from hydropower will continue in the future if energy infrastructure developments are implemented without taking full account of the requirements of the water and nature legislation. They insist that the EU must ensure that public subsidies and feed-in tariffs for hydropower are only granted after a thorough screening of risk associated with the planned hydropower facilities. This includes screening risk against deterioration of ecological status and assessment of more suitable alternatives.

3.2.4 Effectiveness

Overall progress in the achievement of Objective 1

This question aimed to assess the overall progress in implementation of all sub-objectives under Objective 1 and seeks to reflect on effectiveness of the implementation.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	4	20	1	4	6	1		

A small majority of the respondents rate the progress as mixed across different sub-objectives. The rest had varied responses, however some believed that some progress has been made on all sub-objectives.

One regional/local authority, one citizen interest groups, two EU institutions, 11 national authorities and three industry network organisations all answered that the progress was mixed. One nature interest group, one industry network organisation, one EU institution and six national authorities responded that some progress has been made, while one national authority believed that much progress had been made (total respondents 36).

Comments from the survey:

European Environmental Bureau, notes that the most important areas where too little progress has been made is that in chemical safety, in particular nano-technologies as well as in the area of soil protection and that implementation and enforcement of existing rules remains a major structural weakness.

One national authority points to the fact that it is difficult to see exactly where the 7th EAP is integrated into national policies and another national authority comments that biodiversity loss and degradation of ecosystems is not halted and pressures continue to grow. They also note that land management preserving biodiversity and soil protection is still insufficient and the impact of unsustainable land use changes.

Cefic sees an issue with the wrong interpretation of Natura 2000 as being incompatible with industrial activities.

This opinion is also shared by CCPIE - CCIM (Belgian Coordination Committee for the International Environment Policy) who goes on to say that the impact of pressures on transitional, coastal and fresh waters (including surface and ground waters) is significantly reduced to achieve, maintain or enhance good status, as defined by the Water Framework Directive. Pressures, especially from agriculture, are not declining and they are even amplified by climate change impacts.

WWF European Policy Office explains that the loss of biodiversity and the degradation of ecosystem services, including pollination, are halted, ecosystems and their services are maintained and at least 15% of degraded ecosystems have been restored. They remark that the Fitness Check of the EU Nature Directives shows that nature legislation is effective when properly implemented and that successes are already evident, with some populations showing recovery and some habitats being saved from irrecoverable destruction. However, they believe that much of Europe's biodiversity is still in decline and the EU will miss its 2020 target of halting the loss of biodiversity and ecosystem services.

An industry network organisation points at chemical safety, in particular when it comes to nano-technologies as well as in the area of soil protection as most important areas where too little progress has been made. Next to that, implementation and enforcement of existing rules across the border remains a major structural weakness in the opinion of this respondent.

This view is also shared by Greenpeace European Unit which describes the progress on most sub-objectives as being sluggish, and lists these examples: lack of implementation and compliance with the marine directive, the habitats and birds directives, possibly slightly more progress on the water framework directive; lack of or slow progress in reducing nutrient loads, air pollution and marine litter; lack of protection of soils and pollinators, to name but some important areas.

An EU institution commented that on a scale of 1 to 10 they would score progress with 5 hence there is mixed progress with the different objectives

Comments from the interview:

The personal opinion of a representative of the IUCN commented that the midterm review of the EU biodiversity strategy has shown that a number of objectives are far from being achieved. We are far from reaching the target. In 2020 will be the final evaluation, also coinciding with the results of art 17 monitoring of the Habitats Directive and art 12 of the Birds Directive (State of Nature Report). But from the mid-term review of the EU Biodiversity Strategy Report, it does not look promising. Overall, we are far from achieving 2020 the targets, which are included in the 7th EAP as well.

Implementation of policy instruments and actions listed in Objective 1

Policy instruments and actions set to achieve the Priority objective 1 in 7th EAP:

- ix) stepping up the implementation of the **EU Biodiversity Strategy** without delay, in order to meet its targets;
- x) fully implementing the **Blueprint to Safeguard Europe's Water Resources**, having due regard for Member States' specific circumstances, and ensuring that water quality objectives are adequately supported by source-based policy measures;
- xi) urgently increasing efforts, inter alia, to ensure that healthy fish stocks are achieved in line with the **Common Fisheries Policy, the Marine Strategy Framework Directive** and international obligations. Combating pollution and establishing a Union-wide quantitative reduction headline target for marine litter supported by source-based measures and taking into account the marine strategies established by Member States. Completing the Natura 2000 network of marine protected areas, and ensuring that coastal zones are managed sustainably;
- xii) agreeing and implementing an **EU Strategy on adaptation to climate change**, including the mainstreaming of climate change adaptation into key Union policy initiatives and sectors;
- xiii) strengthening efforts to reach full compliance with **Union air quality legislation** and defining strategic targets and actions beyond 2020;
- xiv) increasing efforts to reduce soil erosion and increase soil organic matter, to remediate contaminated sites and to enhance the integration of land use aspects into coordinated decision-making involving all relevant levels of government, supported by the adoption of **targets on soil and on land as a resource, and land planning objectives**;
- xv) taking further steps to **reduce emissions of nitrogen and phosphorus**, including those from urban and industrial wastewater and from fertiliser use, inter alia through better source control, and the recovery of waste phosphorus;
- xvi) developing and implementing a renewed **Union Forest Strategy** that addresses the multiple demands on, and benefits of, forests and contributes to a more strategic approach to protecting and enhancing forests, including through sustainable forest management;

xvii) enhancing **Union public information provision**, awareness and education on environment policy.

The question below concerns the assessment of effectiveness of the actions/policy instruments under Objective 1 and their implementation. Respondents were given the possibility to choose between 'sufficient' and 'insufficient'. Not all respondents participating in the survey indicated a response under this question.

Q31. With regard to the following policy instruments/actions under Objective 1 of the 7th EAP, what is your assessment of their implementation?

actions/policy instruments	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research (n/a)	International Organisations (n/a)	TOTAL
	3	15	1	3	6	1	0	0	27
31.1.1. (i) The Biodiversity Strategy									
- At EU level									
not sufficient	3	8		2	4	1			18
sufficient		2	1	1	1				5
- At Member State level									
not sufficient		9		3	4	1			17
sufficient		4	1		1				6
31.2.1. (ii) The Blueprint to Safeguard Europe's Water Resources									
- At EU level									
not sufficient	2	1			3				6
sufficient		7		2	1				10
- At Member State level									
not sufficient		2			3				5
sufficient		7		2	1				10
31.3.1. (iii) Ensuring healthy fish stocks, combating marine litter, completing the Natura 2000 network of marine protected areas, and ensuring sustainable coastal zones management									
- At EU level									
not sufficient	2	8	1		4				15
sufficient		5			1				6
- At Member State level									
not sufficient		11	1	1	4				17
sufficient		4			1				5
31.4.1. (iv) The EU Strategy on adaptation to climate change									
- At EU level									
not sufficient	1	4		1	3				9
sufficient	1	8	1	1	1				12
- At Member State level									
not sufficient		6		2	3				11
sufficient		7	1		1				9
31.5.1. (v) The Union air quality legislation and defining strategic targets and actions beyond 2020									
- At EU level									
not sufficient	1	5		1	3				10

actions/policy instruments	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research (n/a)	International Organisations (n/a)	TOTAL
	3	15	1	3	6	1	0	0	27
sufficient	1	4	1	2	1				9
- At Member State level									
not sufficient		5		1	3				9
sufficient		5		1	1				7
31.6.1. (vi) Reducing soil erosion, increasing soil organic matter, remediate contaminated sites, adoption of targets on soil and on land as a resource, and land planning objectives									
- At EU level									
not sufficient	2	3		2	4				11
sufficient		3	1		1				5
- At Member State level									
not sufficient		4		1	3				8
sufficient		4		1	1				6
31.7.1. (vii) Reduce emissions of nitrogen and phosphorus, better source control, and the recovery of waste phosphorus									
- At EU level									
not sufficient	2	8		1	3				14
sufficient		2		2	1				5
- At Member State level									
not sufficient		9		1	3				13
sufficient		2		1	1				4
31.8.1. (viii) The renewed Union Forest Strategy									
- At EU level									
not sufficient	2	2	1	1	3				9
sufficient		4			1				5
- At Member State level									
not sufficient		3	1	1	3				8
sufficient		3			1				4
31.9.1. (ix) Information provision, awareness and education on environment policy									
- At EU level									
not sufficient	1	3	1		1	1			7
sufficient	1	4			1				6
- At Member State level									
not sufficient		3	1		1				5
sufficient		6			1	1			8

Overall, respondents answered that at both EU level and MS level the implementation of the *Biodiversity Strategy* has been insufficient. Two national authorities, one industry networks organisation, one regional or local authority and one nature interest group found it sufficient at EU level, the rest did not. Four national authorities, one nature interest support group and one regional or local authority found it sufficient at MS level, the rest did not (total respondents 27).

Respondents answered that at both EU level and MS level the implementation of the *Blueprint to Safeguard Europe's Water Resources* has been sufficient. Seven national authorities, two industry network

organisations and one nature interest organisation found it to be sufficient at EU level, the rest did not. Seven national authorities, two industry network organisations and one nature interest organisation found it to be sufficient at MS level, the rest did not (total respondents 18).

Respondents answered that at both EU level and MS level *the implementation of ensuring healthy fish stocks, combating marine litter (under Common Fisheries Policy and the Marine Strategy Framework Directive), completing Natura 2000 network of marine protected areas and ensuring sustainable coastal zone management* has been insufficient. Two EU institutions, eight national authorities, four nature interest groups and one regional or local authority found it to be not sufficient at EU level, the rest did. Four national authorities, and one nature interest group found it to be sufficient at MS level, the rest did not (total respondents 25).

Respondents replied that the EU strategy on implementing *adaptation to climate change* has been mainly sufficient at EU level. One EU institution, eight national authorities, one industry network organisation, one nature interest organisation and one regional or local authority found it sufficient at EU level, the rest did not. At MS level, the respondents believed it to be mainly insufficient. Seven national authorities, one nature interest group and one regional or local authority found it to be sufficient, the rest did not (total respondents 24).

On the question of implementing *Union air quality legislation* and defining strategic targets and actions beyond 2020, respondents replied that at EU level and at MS level they were half and half on the assessment. One EU institution, four national authorities, two industry network organisations, one nature interest group and one regional or local authority found it to be sufficient at EU level, the rest did not. Five national authorities, one industry network organisation and one nature interest group found it to be sufficient at MS level, the rest did not (total respondents 21).

On the question of *reducing soil erosion, increasing soil organic matter, remediate contaminated sites, adoption of targets on soils and on land as a resource and land planning objectives*, respondents mainly thought it to be insufficient at both EU level and MS level. Only three national authorities and one nature interest organisation found it to be sufficient at EU level, the rest did not. Four national authorities, one industry network organisation and one nature interest group found it to be sufficient at MS level, the rest did not (total respondents 21).

Respondents replied that at EU and MS level the *reduction of emissions on nitrogen and phosphorous, better source control and the recovery of waste phosphorous* was mainly not sufficient. At EU level, two national authorities, two industry network organisations and one nature interest group found it to be sufficient, the rest did not. Only two national authorities, one industry network organisation and one nature interest group found it sufficient at MS level, the rest did not (total respondents 21).

A slight majority of the respondents replied that the implementation of the *renewed Union Forest Strategy* at EU level was not sufficient. Only four national authorities and one nature interest group found it to be sufficient, the rest did not. At MS level, the majority of respondents answered that it was not sufficient. Only three national authorities and one nature interest group found it sufficient, the rest did not (total respondents 16).

On the *information provision, awareness and education* on environmental policy, the opinions were more or less split between positive and negative assessments for both, MS and the EU level. One EU institution, four national authorities and one industry network organisation found it to be sufficient at EU level, the rest did not. Six national authorities, one industry network organisation and one citizen interest group found it to be sufficient at MS level, the rest did not (total respondents 17).

Comments from the survey:

EurEau, and industry network organisation, and BirdLife Europe both remarked that 'the most important relevant disparities between MSs are those linked to structural differences in governance and strength of the rule of law.'

The Irish Environmental Protection Agency, a national authority, points to the fact that smaller MSs are clearly at a disadvantage when it comes to getting Human Resources to service wide EU Policy agenda. European Landowners Organisation, a nature interest support organisation, notes that there are obvious disparities across MSs especially when dealing with interpretation of Directives and concrete implementation.

CCPIE - CCIM (Belgian Coordination Committee for the International Environment Policy) noted that what they can answer now, can only be preliminary at this stage. Based on a high-level oversight, it will

be difficult to see whether the 2020 forest objectives, which are the very core of the EU Forest Strategy, will be fully met. However, they believe that there are actions being undertaken to promote sustainable forest management by the Member States (national forest programs; forest legislation is being revisited; approaches for forest management plans; licensing systems) and that the European Union has instruments in place to support this (LIFE+; rural development). They add that although the EU has for several decades, shared a common understanding of the concept of sustainable forest management, there is still lack of a harmonised way in which this common understanding is applied and implemented at the practical field level. It is therefore difficult to form an objective view on the manner in which the EU and the Member States are implementing the EU Forest Strategy. Each MS will have to demonstrate how the objectives have found a place in its own policies and instruments are being implemented to contribute to the 2020 forest objectives. They also note that there are big differences on soil legislation across MSs due to the lack of a binding legal framework at EU level.

An EU institution thinks that they will not meet them overall. Under conservation of natural capital and halting biodiversity loss the answer is definitely no. With regards to the Water Framework Directive MSs will probably manage part of it but not in full. With regards to the Air Quality Directive, it is difficult to give an estimate. However, regions like South Poland, Northern Italy and some others will definitely not meet it. Having in mind the population in these regions this means that for millions of people the quality of air will not be at the required level. Nevertheless, we have to say that the trend is in the right direction. We need to keep in mind that 2020 is a moving target.

Comments from the interview:

The personal opinion of an EU institution official is that for the CAP there is the instrument of cross compliance for farmers who receive direct payments (7 mill out of 11 mill farmers in EU), which covers a set of legislation, including environmental, climate and food safety legislation. Farmers are audited for compliance with this legislation, or they will be sanctioned (will not receive their direct payments). This is very effective and useful. While this system uses sanctions on CAP support, DG ENV has statistics on infringements of some of the environmental legislation. What does that mean for compliance costs among farmers? Farmers usually adapt quickly when changes happen.

Enhancement of the implementation of the legislation in the area of nature protection

This question seeks to understand the effectiveness of the implementation of the legislation for nature protection and conservation. This question also relates to Objective 4.

Q34. With regard to enhancing the implementation of the legislation in the area of nature protection and conservation, do you agree with the following statements:		EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research (n/a)	International organisations	TOTAL
	Total	4	18	1	5	6	1			35
Improving relevant legislation to match real needs has been given top priority	Yes	1	2							3
	Mainly yes	2	13	1	2	2				20
	Mainly no	1	2		3	3				9
	No						1			1
	Do not know		1			1				2
Compliance with legislation in this area has been improved	Yes	2	2			1				5
	Mainly yes	2	12	1	2					17
	Mainly no		2		3	5	1			11
	No									0
	Do not know		2							2
Public access to information on the	Yes	1	2		1	1				5
	Mainly yes	1	13	1	2	1				18

Q34. With regard to enhancing the implementation of the legislation in the area of nature protection and conservation, do you agree with the following statements:		EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research (n/a)	International organisations	TOTAL
implementation or relevant legislation in this area has been improved	Mainly no	2	1			4				7
	No									0
	Do not know		2		2		1			5
Citizens' trust and confidence in the enforcement of relevant legislation has been enhanced	Yes	1	1			1				3
	Mainly yes	3	10	1	2					16
	Mainly no		3		2	5	1			11
	No									0
	Do not know		3		1					4

Respondents have been asked whether the legislation in the area of nature protection and conservation has resulted in the following:

Public access to information on the implementation of relevant legislation in this area has been improved (total respondents 35).

The majority of respondents answered 'mainly yes', some answered 'yes' and again some answered 'mainly no'. Between the different stakeholder categories, two EU institutions, one national authority and four nature interest group were the ones with a negative response, while the rest of the stakeholder groups were mainly positive. Five respondents replied 'do not know'.

Comments from the survey:

WWF European Policy Office pointed out that the correct transposition of the Aarhus Convention on access to environmental information in EU law has contributed to the dissemination of environmental information, although part of this information is still being withheld by EU institutions and national public authorities. Moreover, they note that the European Commission should make the infringement processes concerning environmental breaches more transparent.

Improving relevant legislation to match real needs has been given top priority (total respondents 35).

The majority answered 'mainly yes', a few answered 'yes' and some answered mainly no. Between the different stakeholder categories, one citizen interest group replied 'no', one EU institution, two national authorities, three industry network organisations and three nature interest groups replied 'mainly no', while the rest of the respondents were mainly positive about the statement. Two respondents replied 'do not know'.

Comments from the survey:

European Environmental Bureau remarked that the overall review of existing legislation has been progressing as foreseen, even if ambition has been lacking.

CCPIE - CCIM (Belgian Coordination Committee for the International Environment Policy) notes that there is not enough interest in the soil framework.

WWF European Policy Office commented that relevant legislation for nature protection, marine conservation or clean water already in place offer many of the necessary tools to ensure the required level of protection, and further relevant legislation (e.g. Invasive Alien Species Regulation) was adopted to fill some of the gaps. Nevertheless, they add, addressing the impacts of sectorial policies (e.g. agriculture) on our ecosystems remains an unresolved and urgent task, where a reformed CAP is essential for a transition to a sustainable European agriculture model that preserves our ecosystems and secures sustainable food production for the future.

BirdLife Europe stated that nature legislation is fit for purpose, but incoherent agriculture legislation with derogations on MS level is not yet matching real conservation needs.

Compliance with legislation in this area has been improved (total respondents 35).

The majority answered 'mainly yes', quite a few answered 'mainly no', and a few answered 'yes'. Two national authorities, three industry network organisations, five nature interest groups and one citizen interest group replied

‘mainly no’, while the rest of the respondents were positive towards the statement. Two respondents replied ‘do not know’.

Comments from the survey:

WWF European Policy Office commented that some steps were taken to improve implementation of current legislation, such as the adoption of the Environmental Implementation Review (EIR), which identifies some of the structural gaps in the national implementation of environmental legislation. They note that the EIR fails to provide solutions for root problems as it only provides soft recommendations to MSs instead of taking targeted enforcement actions against those countries that have shown a repeated lack of political will to implement environmental legislation. In addition, they say, the EIR process does not allow stakeholder participation, when civil society can actually be the most reliable source of information on national implementation, since Member States have a tendency to report overly positively on their performance. Overall, they mention that measures taken so far are not enough to reverse current degradation of our ecosystems, and there is still a long way to go to properly implement nature legislation.

BirdLife Europe said that there are ongoing infringements which show compliance is not fine.

Citizens trust and confidence in the enforcement of relevant legislation has been enhanced (total respondents 34).

A slight majority answered ‘mainly yes’, a few answered ‘yes’ and quite a number of respondents answered ‘no’. Three national authorities, two industry network organisations, five nature interest groups and one citizen interest group replied ‘mainly no’. Four respondents replied ‘do not know’.

Comments from the survey:

WWF European Policy Office stated that in July 2015 over 520.000 people spoke up to save the nature laws in the Commission’s public consultation. This was the biggest number ever reached in the history of the EU. Similarly, in February 2017 almost 260.000 people asked for a radical reform of the EU’s broken Common Agricultural Policy in the Public Consultation launched by the Commission. They comment that both numbers show that citizen’s care for our nature and demand enhanced enforcement action. They go on to say that according to the latest Eurobarometer, 52% of Europeans consider that current EU action in the field of environmental protection is insufficient, and 77% consider that national governments are not doing enough to protect the environment.

Promotion of interests of relevant groups

This question seeks opinions on the effectiveness of the implementation of policies promoted under Objective 1 in regards to the protection of interest of citizens, nature (flora and fauna) and economic actors. This question also relates to Objective 4.

Q35.1. Do you think that the implementation of policy instruments/actions under this Objective has led (or are on the good track to leading) to improved protection/satisfaction of the interests of:		EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens’ interest	Research (n/a)	International organisations	TOTAL
	Total	4	18	1	3	6	1	0	0	33
Citizens	Yes	1	2	1	2					6
	Mainly yes	3	12			3				18
	Mainly no		1		1	3	1			6
	No									0
	Do not know		3							3
Nature/flora and fauna	Yes		3	1	1					5
	Mainly yes	3	11		2	3				19
	Mainly no	1	2			3	1			7
	No									0
	Do not know		1							1

Economic actors (businesses, farmers, etc)	Yes		1	1					2
	Mainly yes	2	11		2	5	1		21
	Mainly no	1	1		1				3
	No		1						1
	Do not know	1	4			1			6

Citizens (total respondents 33):

The majority of respondents consider that the interests of citizens have been promoted. Some said 'mainly' no, and some said 'yes'. One national authority, one industry network organisation, three nature interest groups and one citizen interest group replied 'mainly no', the rest were positive towards the statement. Three respondents replied 'do not know'.

Comments from the survey:

European Environmental Bureau and BirdLife Europe noted that where the overall implementation has been done properly, this has improved the interest of all three groups, but this is still happening too slowly and with too little effort. This view was shared by a national authority which stated that much more progress is needed.

WWF European Policy Office wrote that according to the latest Eurobarometer, 93% of Europeans believe that their health and well-being are based upon nature and biodiversity and citizens are therefore well aware that, if properly implemented, environmental legislation directly contributes to the quality of their life and their well-being. But, as they mention, there are still important gaps to achieve proper implementation and enforcement.

Economic actors (total respondents 33):

A large majority agree that the interests of the economic actors, such as businesses and farmers are well protected by the nature protection policies. A few said either 'yes', 'no' or 'mainly no'. One national authority replied 'no', six respondents replied 'do not know', one EU institution, one national authority and one industry network organisation replied 'mainly no', the rest were positive towards the statement.

Comments from the survey:

A nature interest group remarked that conserving our natural capital has provided a basis for a range of sustainable business opportunities, supporting structural adjustment and diversification of rural and regional economies. For example, nature-based tourism and recreation is helping to create sustainable jobs, with clear positive impacts on the broader regional economy. They also noted that an increasing amount of small and medium-sized enterprises are being created around biodiversity-based innovations. Consequently, they note, conserving our natural capital can play an integral role in supporting employment and fostering rural and regional prosperity.

Nature / Flora and Fauna (total respondents 32):

A majority of the respondents are positive about securing the interest of the nature by the Objective 1 policies. One EU institution, two national authorities, three nature interest groups and one citizen interest group replied 'mainly no', while one respondents replied 'do not know'. The rest were positive towards the statement.

Comments from the survey:

WWF European Policy Office commented that scientific evidence demonstrates that nature legislation is effective when properly implemented and successes are already evident, with some populations showing recovery and some habitats being saved from irrecoverable destruction. Yet, they believe, most of the sub-objectives are not going to be achieved, such as halting the loss of biodiversity.

An EU institution pointed to the fact that implementation of actions under this objective improved the protection and satisfaction of all three categories although they might have not felt it.

Impact of the EU law in the area of nature protection and conservation

This question seeks opinions on the impact of the implementation of the EU law on nature protection and conservation in the areas of nature, citizens and economic actors. This question also relates to Objective 4.

Q40. What do you think the overall impact is from the implementation of the EU law in the area of nature protection and conservation on:		EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research (n/a)	International organisations (n/a)	TOTAL
	Total	4	18	1	4	6	1	0	0	34
Citizens	Very negative									0
	Negative									0
	Neutral		2		1					3
	Positive	3	12	1		3	1			20
	Very positive	1	1		3	3				8
	Do not know		1							1
Nature/flora & fauna	Very negative									0
	Negative									0
	Neutral		2							2
	Positive	4	10	1	1	3	1			20
	Very positive		4		3	3				10
	Do not know		1							1
Economic actors (businesses, farmers, etc)	Very negative									0
	Negative	1	1		1	1				4
	Neutral	1	8	1						10
	Positive	1	4		3	1	1			10
	Very positive					3				3
	Do not know	1	3			1				5

Overall assessment across the areas suggests positive views of stakeholders on the impact of the EU nature conservation law.

Impact on Nature (flora & fauna) (total respondents 34):

The majority of respondents agree that the EU law has a positive or very positive impact, while a few think the impact is neutral. Two national authorities were neutral to the statement, one respondents answered 'do not know', while the rest were positive towards the statement. None were negative.

Impact on Citizens (total respondents 33):

The majority of respondents had positive or very positive assessment of the impact, with some considering it to be neutral. Two national authorities and one industry network organisation were neutral, while one respondents answered 'do not know'. The rest were positive, none were negative.

Impact on Economic actors (total respondents 33):

One third of the respondents were positive towards this statement, one third were neutral and the last third dispersed themselves between being negative towards the statement or very positive, but five answered that they did not know. Three nature interest groups were very positive towards the statement.

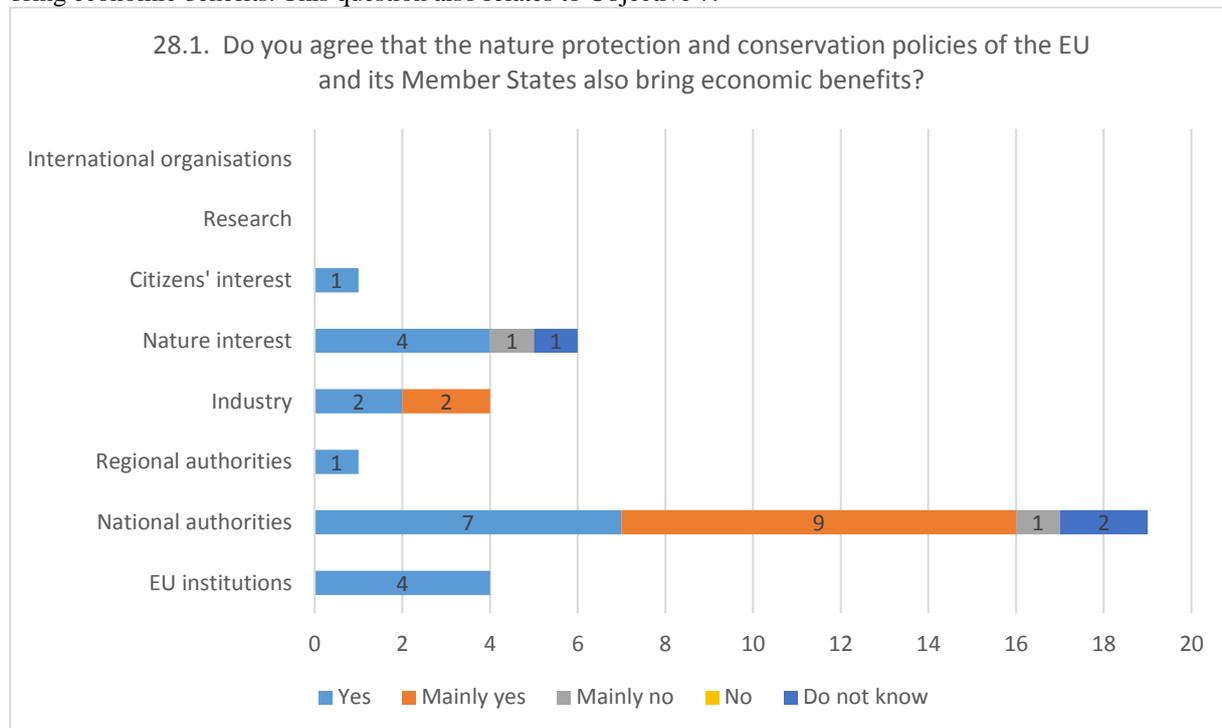
Comments from the survey:

The personal opinion of a representative of the international organisation IUCN commented that the 7th EAP is usually not the main highlighted document in biodiversity policy debates, usually it is the biodiversity strategy, at least on EU level. But without the presence of the 7th EAP, the current picture

might look very different. Therefore, it is important to have the 7th EAP as a backdrop for other policies as an overarching framework.

Economic benefits of nature protection and conservation policies

The statement seeks opinions on whether nature protection and conservation policies in the EU and the MS also bring economic benefits. This question also relates to Objective 7.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	35	4	19	1	4	6	1	

Almost all respondents were in agreement or mainly in agreement with this statement (total respondents 35). One nature interest group and one national authority did not agree with this statement. Three respondents did not know, while the rest were positive.

A few respondents from the national authorities as well as a few from the nature interest organisations did not agree with this statement.

Comments from the survey:

European Landowners Organisation comments that costs are borne by land managers and benefits go to other sectors such as the tourist sector. Only niche markets exist. Public goods from private land should be better acknowledged, notably Cultural Ecosystem Services.

WWF European Policy Office remarked that the cost of not implementing existing environmental legislation is estimated at some EUR 50 billion a year¹⁰⁵. The impact assessment of the CFP revealed that repaired fish stocks would generate an extra €2.7 billion for the EU fishing industry, resulting in a better economic performance and social sustainability. Moreover, the creation of the Natura 2000 network provides a range of benefits worth approximately €200-300 billion per year, which compares favourably with the estimated costs of effectively managing the network of approximately €5.8 billion per

¹⁰⁵ http://ec.europa.eu/environment/enveco/economics_policy/pdf/report_sept2011.pdf

year. They add that if Europe had met its 2015 deadline to achieve good status for all Europe's waters, the total yearly benefits could have reached €20 billion per year on average¹⁰⁶. European Environmental Bureau and BirdLife Europe argue that this is not a matter of opinion but a proven fact, and that there are demonstrated direct and indirect economic and societal benefits, such as human well-being and ecosystem services. Another EU institution highlighted the fact that latest analysis shows that the cost of no-action on one side and the benefit of companies far exceed the costs.

3.2.5 Efficiency

Compliance and enforcement cost related to nature protection legislation

The stakeholders from the national authorities and industry were asked to indicate any pieces of EU legislation in the area of nature protection and conservation that are associated with high enforcement costs for national authorities or high compliance cost for industries (Q 44 and Q 45 that are also related to Objective 6).

In a question related to compliance costs within industries only few responses were registered.

Comments from the survey:

One response was received from a regional/local authority stating that monitoring conservation efforts towards species and habitat and the restoration, structure and function of habitats are very costly for national authorities, especially initiatives such as Natura 2000.

The personal opinion of a representative of the international organisation IUCN mentioned that sometimes compliance costs have been pointed out in relation with the implementation of the Birds and Habitats directives, but the Fitness Check showed that the costs are absolutely not as high as perceived and that actually, the investment needed in nature conservation is usually not incorporated into policy-making and investments either at Member State or at EU level.

Comments from the interview:

An EU institution official answered that this is a good question, which is difficult to answer. While it is necessary to pursue the objectives set in the 7EAP, the question is whether the form is the best one.

An EU institution official replied that this is the case mostly in relation to food safety legislation.

Comments from the focus group:

The focus group agreed that a cost exercise is necessary both for businesses and public administration. Whenever there are recommendations you need to look at what is practical and what is needed, and sometimes costs are overstated. Questions are where to address pressure on nature – demand on resources (e.g. forestry), there is a link to the Circular Economy and the bio-based economy. Enforcement could be improved but there is also lack of finance. Value of not taking action comes down to attribution of costs and benefits where certain sectors are seeing the costs will focus on the marginal costs – which are concentrated on them, but the benefits are much more dispersed, and harder to measure (become abstract numbers to those who benefit). Though in some cases (e.g. air pollution) the costs (of inaction) are becoming clearer and the link is making its way into wider public perception.

Securing funding for nature protection and conservation policies

Respondents were asked to share an opinion on the adequacy and effectiveness of funding for nature protection. The logic here is that the 7th EAP is intended (inter-alia) to help secure this funding. This question also relates to Objective 6.

¹⁰⁶ “Comparative study of pressures and measures in the major river basins management plans in the EU, Task 4 b: Cost & Benefits of WFD implementation”, p. 35-46

Q39. With regard to securing funding for Nature protection and conservation policies, do you agree with the following:		EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research (n/a)	International organisations	TOTAL
	Total	4	17	1	4	6	1			33
Public funding has increased	Yes	1	3							4
	Mainly yes	3	6			1				10
	Mainly no		4	1	3	3				11
	No		1			1				2
	Do not know		3		1	1	1			6
Private funding has increased	Yes				1					1
	Mainly yes	1	3			2				6
	Mainly no	1	7		2					10
	No			1						1
	Do not know	2	6		1	4	1			14
The funding at EU level is adequate for real needs	Yes									0
	Mainly yes		1	1						2
	Mainly no	3	11		3	3	1			21
	No	1	1			3				5
	Do not know		3		1					4
The funding at Member State level is adequate for real needs	Yes		1							1
	Mainly yes		3							3
	Mainly no	2	9	1	3	3				18
	No	1	3			3	1			8
	Do not know	1			1					2

About one third did not know if *public funding has increased*, approximately one third said no or mainly no, and a bit over one third said 'yes' or 'mainly yes'. One national authority and one nature interest authority replied 'no', six respondents replied 'do not know', while one EU institution and three national authorities replied 'yes', three EU institutions and six national authorities replied 'mainly yes', and the rest replied 'mainly no' (total respondents 33).

Comments from the survey:

BirdLife Europe commented "given the failure of the CAP greening, public funding has remained insufficient".

WWF European Policy Office remarked that according to the Fitness Check Evaluation Study of the nature directives, "the availability of public funding has probably had the most influence on implementation. Funding constraints on authorities have adversely affected the establishment of the Natura 2000 network, as well as other important actions, such as stakeholder engagement, management planning, permitting and enforcement measures". They go on to say that although the Directives have undoubtedly increased the availability of EU funding, there is strong evidence to suggest that this is insufficient or difficult to access, and will continue to be a constraint on implementation.

One international organisation said that there is a lack of national funding opportunities.

The majority of respondents replied 'do not know' about the situation with *private funding*. Most of the rest of the responses were negative and a few were positive saying that some new opportunities have opened up. One industry network organisation replied 'yes' to private funding having increased. One EU institution, three national authorities, and two nature interest groups replied 'mainly yes', 14 respondents replied 'do not know' and the rest were negative towards the statement (total respondents 32).

There is clear agreement among stakeholders that the *funding at EU level and MS level is inadequate for real needs* (total respondents 32).

Comments from the survey:

WWF European Policy Office made the point that while there have been some funding opportunities stimulated by the LIFE+ programme and CAP agri-environment measures, the estimated EU co-funding for biodiversity during the 2007-2013 period represented only 9-19% of the estimated financing needs of EUR 5.8 billion/year for managing the Natura 2000 network. They also note "there are many EU funding opportunities for financing conservation policies across different instruments. However, only the LIFE programme provides dedicated support to e.g. biodiversity as a primary objective, whereas other EU funding instruments are primarily targeted to deliver EU goals on rural, regional, infrastructural or social development, and these EU funding instruments do not properly integrate nature goals. The CAP, for example, could contribute much more to the goals of the WFD and Birds and Habitats Directives, especially if Pillar 2 funding was increased and Member States programming better tailored".

A nature interest support organisation highlighted that funding shortages are emphasised across all Member States and are particularly apparent with respect to the ongoing management and monitoring of the Natura 2000 network. Furthermore, they commented that "nature authorities and associated public management bodies are also affected by serious under-financing (e.g. in relation to staff costs). Evidence indicates that this has an impact on implementation, e.g. delays in site designation, management planning and permitting."

An EU institution considers that funding in this area has evolved in a positive way with regards to Life but still it remains the only specific instrument. On paper, it evolved in a positive manner for CAP but in practice – not. There are other policies that pour money but they do not have a visible positive impact. Cohesion policy pours money but the impacts are not visible.

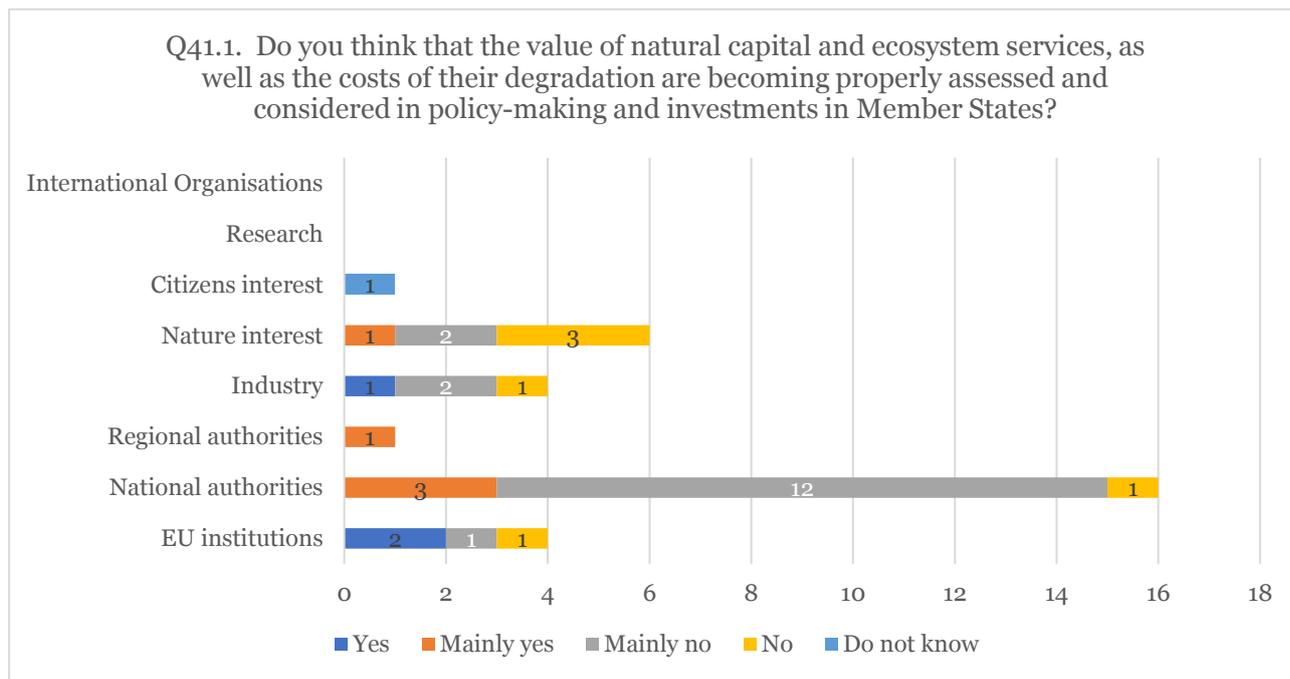
One international organisation commented that there is not enough funding for nature conservation and protection, and the funding opportunities mainly come from the LIFE programme. However, most EU funding has a preference towards large projects which means smaller projects are ignored.

Comments from the focus group:

A comment from the focus group added that the LIFE Programme, the structural funds and CAP schemes are already there. There is however no overview of how much is being spent, which EU needs to know and have a strategy oversight. Although this is moving forward. Monetisation of ecosystem services is important. Also, there is already a lot of funding for NBS as jobs and growth is a priority and in funding there is a definite trend towards NBS.

Natural capital and ecosystem services valuation and cost of degradation in policies

This question seeks to relay the effectiveness of policy-making and investments in Member States in relation to natural capital and ecosystem services. This question also relates to Objective 6.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	32	4	16	1	4	6	1	

A large majority don't think this is the case, or are mainly in disagreement with the question. The nature interest organisations and the national authorities were the stakeholder groups who seemed to drive this negative response. Two nature interest groups, two industry network organisations, 12 national authorities and one EU institution replied 'mainly no', three nature interest groups, one industry network organisation, one national authority and one EU institution replied 'no', one citizen interest group replied 'do not know', while the rest were positive towards the statement (total respondents 32).

Comments from the survey:

An EU institution notes that values are not properly assessed and not sufficiently integrated into policy-making.

European Environmental Bureau stated that these costs remain under-appreciated throughout impact assessment and further decision making. One national authority was in agreement with this and further said that external costs (e.g. on land degradation) for unsustainable practices (e.g. diffuse pollution in the agricultural sector) are not taken into account in policy-making and market regulation.

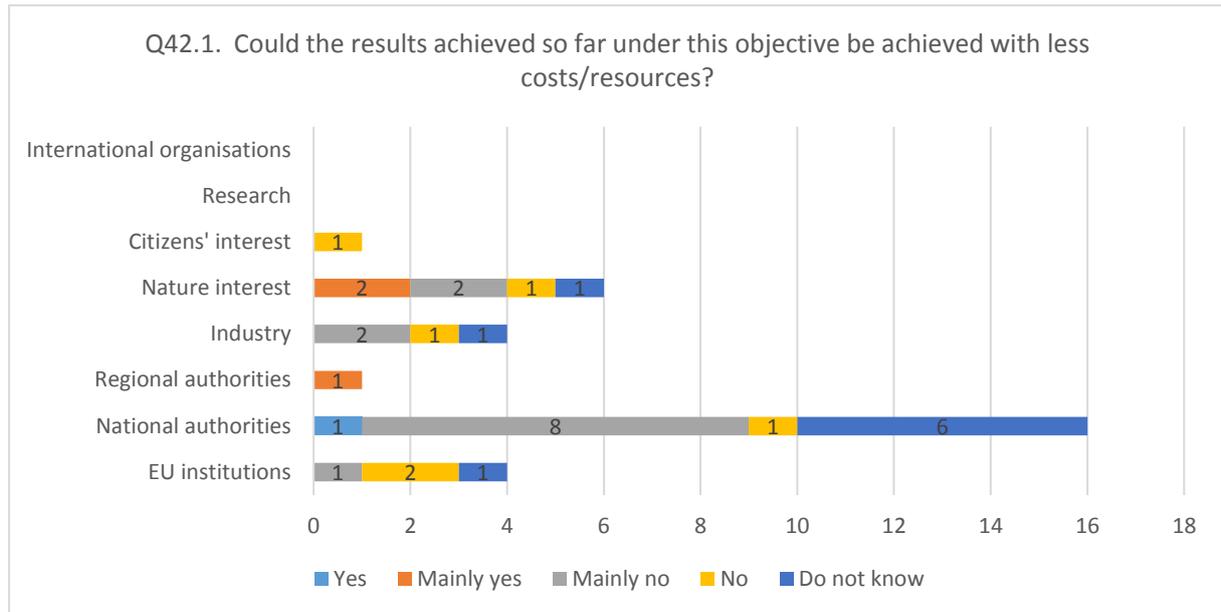
CCPIE - CCIM (Belgian Coordination Committee for the International Environment Policy) also noted that often the proper value of nature and biodiversity for humans, our health, our food system, etc. is not properly taken into account by policy-makers.

WWF European Policy Office says that it is a common practice to evaluate the benefits of a certain project from an economic perspective, giving these projects priority over water and nature protection objectives.

An EU institution commented that in some cases this is the case while in others – it remains a virtual discussion.

Could results be achieved with less cost?

Respondents were asked whether the results achieved so far under this objective could be achieved with less costs/resources. This question seeks opinions on the efficiency of costs under Objective 1. It also relates to Objective 6.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	32	4	16	1	4	6	1	

The majority stated that the results so far could not have been achieved with less resources. Some did not know and a few said 'yes' to this question. One national authority replied 'yes', two nature interest groups and one regional authority replied 'mainly yes', nine respondents replied 'do not know', while the rest were negative towards this statement (total respondents 32).

Comments from the survey:

One nature interest group remarked that we need to do more, gaining more out of it. No examples are known where nature conservation has been handled in a cost-inefficient way.

An EU institution claims this is not the case. Indeed, better use is always possible. We have to also note that for many years to come the protection of natural capital will be paid from public money.

3.2.6 EU added value

Extra contribution of the 7th EAP in nature protection

This is a question related to the EU added value of the 7th EAP both now and in the future. Respondents were asked to share their opinion about extra contribution that the 7th EAP could make towards progress in nature protection and conservation area in comparison to what has been achieved by the Member States if they act on their own.

Comments from the survey:

A citizen interest group remarked that the main benefit of the 7th EAP is that it creates shared political ownership of EU environmental agenda, and sets overall direction in solving problems that Member States will find difficult to solve on their own.

An industry network organisation wants the 7th EAP to clarify the compatibility between Natura 2000 and industrial activities (extraction).

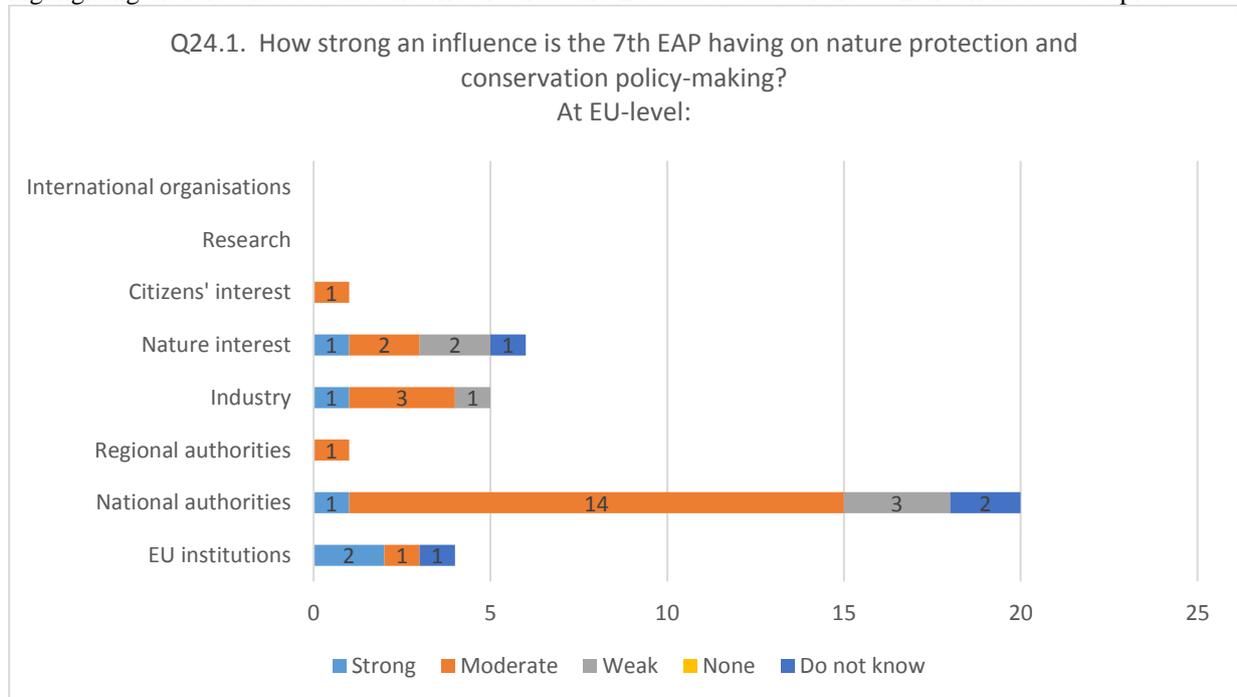
A national authority commented that these processes and frameworks are rather part of each of the EU policies, whereas the 7th EAP gives an overall overview of all environmental objectives.

A national authority and two nature interest organisations observed that the efforts to protect nature in Europe require close collaboration that reflects the cross-boundary nature of the pressures threatening our environment.

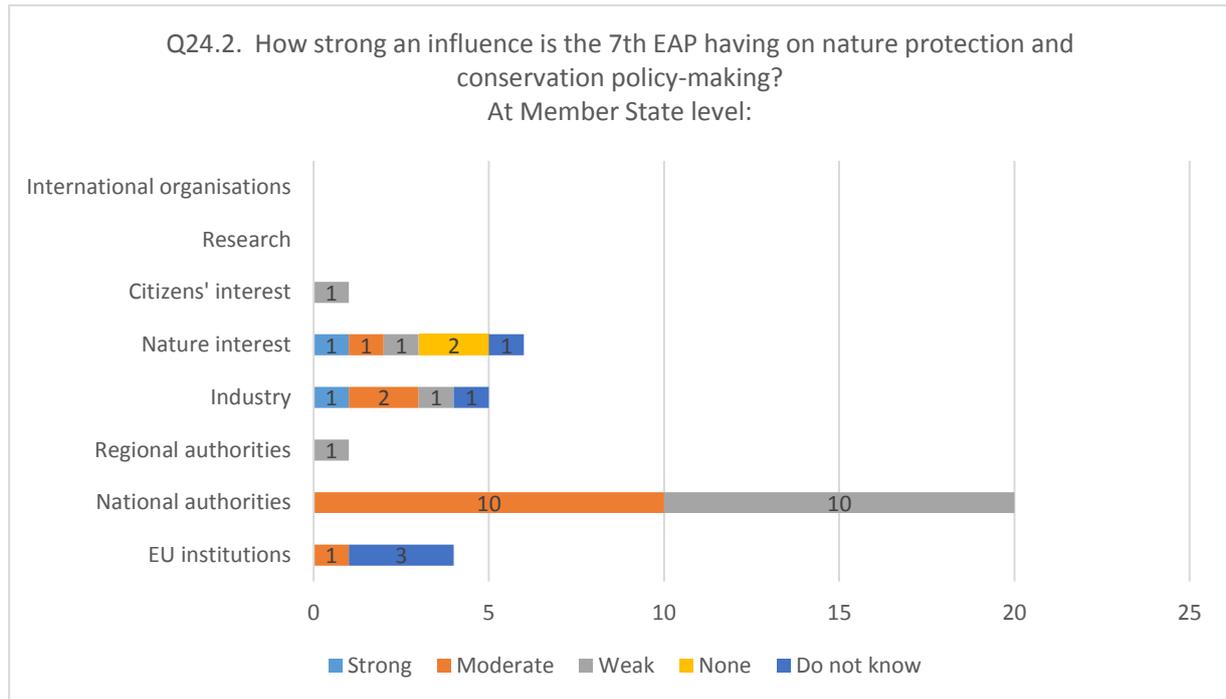
One of the nature interest organisations note that the 7th EAP rightly recognises that environmental related challenges such as water pollution or loss of biodiversity do not stop at country borders and need a concerted approach at EU (and global) level as otherwise actions in one Member State risk being undone by inaction or adverse action by another Member State. In this regard, they note ‘EU action in the area of biodiversity has for example helped to coordinate the creation of a pan-EU network of protected areas. In addition, most of the Member States admit that between 70 and 100% of their national environmental law is derived from EU legislation’. They go on to say that environmental protection is one of the few areas where the EU has sufficient competence to already highlight the tangible and positive impacts the EU can have for the health and living standards of its citizens. Moreover, a strong EAP could set us on the path for long-term environmental action while better integrating nature protection in other relevant policy areas which are of exclusive competence of the EU, such as agriculture. It must be said, however, that the actual impact of the 7th EAP is rather limited.

Influence of the 7th EAP on policy-making in nature protection and conservation

The question relates to the link between the 7th EAP and nature protection and conservation policy-making, highlighting the relevance but also the effectiveness and EU added value of the 7th EAP on those two topics.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	37	4	20	1	5	6	1	



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	37	4	20	1	5	6	1	

In the survey, the question was split between EU and MS level. The majority of the respondents answered that the 7th EAP has a moderate effect on the nature protection and conservation policy-making at EU level. A few have indicated that they think the effect is strong, while around one fifth indicated that the effect is weak (total respondents 37).

A small share of respondents see a positive (but mostly moderate) impact from the 7th EAP on the national policy-making in the field, while the majority indicated the effect as weak and some said it had no effect at all.

At EU level, one citizen interest group, two nature interest groups, three industry network organisations, one regional authority, 14 national authorities and one EU institution all answered that the effect was moderate. One nature interest group, one industry network group, one national authority and two EU institutions replied that they thought the influence was strong. Four respondents answered 'do not know', while the rest were thought it had a weak effect or none effect.

At MS level, one nature interest group, two industry network organisations, ten national authorities and one EU institution replied that the influence of the 7th EAP was moderate. One nature interest and one industry network organisation thought the influence was strong. Four respondents answered 'do not know', while the rest thought it had a weak influence (two nature interest groups believed it to have no influence).

Comments from the survey:

A citizen interest support group commented that the effect is limited, as this issue is dealt with in more depth in the Biodiversity Strategy.

WWF European Policy Office commented that the 7th EAP allows for decision makers and the EU institutions to identify the inter-linkages between the different policy areas that affect our nature and environment. However, they pointed out that it also has a weak direct influence on nature protection and conservation policy-making as it fails to set a path of action and a timeline for the EU in those areas where new actions or more coherence is necessary. They argued that the 7th EAP didn't succeed so far to better integrate nature protection in other relevant EU policies such as energy or agriculture. They made the point that despite billions spent annually under the Common Agricultural Policy (CAP), the state of our countryside's biodiversity and freshwater is generally not getting any better, and the CAP is still playing a major role in the development of a socially and environmentally harmful model of farming.

They go on to say that the 7th EAP works as a framework that builds on existing policy initiatives which, if fully and ambitiously implemented, would significantly contribute to protecting our natural systems and resources and set the EU on a much needed path to sustainability. While the 7th EAP is useful in identifying common challenges of existing policies, it has however not contributed to support the full implementation of existing and relevant EU legislation such as the Birds and Habitat Directives or the Water Framework Directive. Trends such as the continued deterioration of our ecosystems and the over-exploitation of water resources or fish stocks show that the EU lags well behind achieving the objectives and sub-objectives identified in the 7th EAP. Finally, they note that the 7th EAP has contributed little to increase EU enforcement and monitoring actions and, as a consequence, four years after the adoption of the 7th EAP, EU natural capital is not yet being properly conserved or protected.

An EU institution noted that the implementation of EU policies in many MS is weaker than requested by the current status of natural resources.

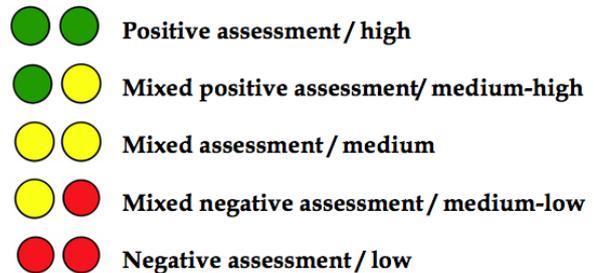
An EU institution highlighted that it recognises the present context in which we operate and acknowledges the focus, reinforces the message of the directives and some targets of the Biodiversity Strategy. It is still relevant, confirmed under the fitness check. However, it has to be coupled with the implementation part.

Comments from the interview:

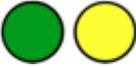
The personal opinion of a representative of the international organisation IUCN is that the 7th EAP has fundamental added value and it is absolutely necessary to have nature conservation as one of its targets.

3.2.7 Assessment of Objective 1

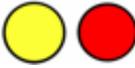
For the overall assessment of the progress in the objectives a colour coding based scoreboard system (as presented on the right-hand side) has been applied to summarise the assessment of *relevance, coherence, effectiveness, efficiency* and *EU added value* criteria. It includes five assessment colour codes, indicating a spectrum between positive and negative assessment:



- Positive assessment or high relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value
- Mixed positive assessment or medium-high relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value
- Mixed assessment or medium relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value
- Mixed negative assessment or medium-low relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value
- Negative assessment or low relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value

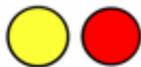
Relevance –Medium-High 

Respondents all agreed that existing sub-objectives under Objective 1 remain relevant to real needs. However, some of the respondents would like to see additional sub-objectives added. Based on this, the overall relevance of the 7th EAP is medium-high.

Knowledge base – Medium-Low 

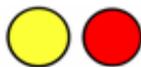
Respondents had in general a clear perception of progress in this field, however some knowledge gaps still remain. Existing knowledge is not always used to its full extent by policy-makers. Overall, however, the knowledge base of the 7th EAP is considered medium-low.

Coherence – Medium-Low



The questions under this criterion relate to Objective 7. The overall assessment of the coherence of Objective 1 of the 7th EAP was mixed and has therefore generated a medium score, but closer towards low, than high. The CAP was mentioned as having many incoherencies and is one of the EU policies that had the most negative responses. The TEN-P received a similar response, where it could also be perceived that respondents had little to no knowledge about the policy. The opinion on Cohesion policy indicate a perception that it has recently included a number of environmental considerations, unlike previous reforms. Fisheries policy received a mixed response. On the one hand, a majority of respondents believe the Common Fisheries policy to be mainly coherent with the 7th EAP, however, there was also a rather large number of respondents who did not know. The budget, fiscal, transport and bioenergy policies are also mentioned as being somewhat incoherent with the nature protection and conservation objectives. Therefore, the overall coherence of Objective 1 under the 7th EAP could be better integrated in order to secure the actions towards nature protection and conservation at EU and MS level.

Effectiveness – Medium-low

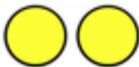


Some of the questions under this criterion relate to Objective 4. The overall assessment of the effectiveness of Objective 1 was mixed. The majority of respondents felt that the rate of progress in achieving Objective 1, was mixed across all sub-objectives. The mixed rate of progress is often pinned down by respondents to be the result of insufficient implementation of policy and actions defined for achieving Objective 1. The progress at national level is particularly weak, according to the respondents' assessment.

With regard to enhancing implementation in the area of nature protection and conservation, public access to information, and improving relevant legislation towards actual needs, was deemed by respondents to have mainly improved. Compliance with legislation and citizens trust in the enforcement has also generally mainly improved, but a large number of respondents also opted for a "mainly no" response to these sub-questions. However, on the question about if the implementation of policy instruments has led to, or will lead to, improved protection and satisfaction of interests of citizens, economic actors and nature, the majority of responses were positive. Respondents were then asked about the overall impacts from the implementation of EU law on nature protection and conservation for nature, citizens and economic actors. The view on the first two was mainly positive, whereas the third had a mixed review. While recognising the policy progress in the nature protection area, stakeholders highlighted that the overall progress in preventing the loss of biodiversity is still weak.

Overall, the effectiveness of Objective 1 of the 7th EAP produces a medium-low score based on the responses for the different questions as well as the nature of comments left by different stakeholders.

Efficiency - Medium



The questions under this criterion also relate to Objective 4 and 6. In a question related to compliance costs within industries only few responses were registered. With regards to another question on enforcement costs for authorities very few responses were noted. It also seems that monitoring conservation efforts towards species and habitat and the restoration, structure and function of habitats are very costly for national authorities, especially initiatives such as Natura 2000. However, a statement was also made that costs are sometimes perceived as higher than they are. As for the question if results could have been achieved with less costs and resources, respondents mostly replied that it could not.

The funding at EU and MS level is viewed as being mainly not adequate for real needs, and the overall assessment of public and private funding was that it is mainly inadequate or that respondents are unaware of the extent of these types of funding, which calls for more transparency in this area especially for private funding opportunities. The CAP is highlighted as being of high potential, but its current performance was generally negatively viewed. According to the respondents the value of natural capital and ecosystems at MS level, is not properly assessed and therefore the cost of degradation is not properly considered in policy-making. The costs seem to remain underappreciated and external costs are difficult to assess and therefore taken into consideration.

EU added value - Medium-Low



At EU level there seems to be a moderate effect of the 7th EAP on policy areas in nature protection and conservation. At Member State level, the influence seems to be less than at EU level. Some respondents feel that public administrations in the different Member States do not always pay attention to documents such as the EAP

and therefore might be hindering themselves in the overall approach towards environmental issues. The positive comments related to the added value of the 7th EAP are that it recognises that environmental related challenges are also cross-border issues and need a concerted approach at EU level otherwise actions taken by a Member State risk being undone by inaction or adverse action by another Member State.

Overall scoreboard for Objective 1

Relevance	Knowledge Base	Coherence	Effectiveness	Efficiency	EU value added
					

3.2.8 Recommendations

This section presents respondents’ recommendations on the role of various actors in improving the implementation progress of Objective 1, which comes as a response to the following open-ended question from the survey and opinions taken from two position papers:

‘What should the role of the following stakeholders be in further improving the progress made towards the achievement of Objective 1?’

Role of the EU:

Stakeholders wanted more guidance at EU level on implementation approaches, effective integration and alignment of EU policies, enforcement to achieve improving environmental quality. Many see a need in stronger role of the European Commission push on the EU level in enforcement of the EU law. Only a few reported breaches of nature-related EU law lead to action by the EC. The Commission should be more pro-active in its enforcement role to ensure the Member States implement the nature legislation properly. Further delays by the Member States concerning the finalisation of the site designation and the development of conservation measures should not be accepted. The EU should also monitor the implementation of management plans and evaluate if the conservation measures defined by the Member States are sufficient to achieve favourable conservation status of species and habitats.

Better communication on EU level about natural capital and nature conservation will improve the understanding of the real value of the nature and ecosystem services. There should also be more recognition and communication of benefits of the EU environmental action for its citizens.

EU should adopt new legislation addressing methane emissions, soil protection, must prohibit products that drive deforestation and forest degradation from the EU market, ban harmful pesticide and GMOs and protect pollinators. It also need to develop concrete instruments within policy reforms (e.g. on the production and consumption of livestock products, the promotion of agro-ecology).

More action in the area of transport are said to be needed in order to be able to tackle the excessive levels of air pollutants that city dwellers are currently often exposed to (leading to severe chronic diseases and premature death). On top of the currently under discussion new legislation that would tighten type approval and market surveillance, much more action needs to be taken such as the introduction of lower limit values for air pollutants in legislation. EU needs to stimulate an efficient public transport together with strong incentives to promote such, necessary to encourage its use over that of private transport in order to reduce the private car fleet and damaging air quality in EU cities.

Some recommend that a clarification of goals and prioritisation are set out and that a translation of the existing guidelines (at EU level) as well as new EU guidelines on specific topics are done.

The budget available EU should adopt new legislation addressing methane emissions, soil protection, must prohibit products that drive deforestation and forest degradation from the EU market, ban harmful pesticide and GMOs and protect pollinators. It also need to develop concrete instruments within policy reforms (e.g. on the production and consumption of livestock products, the promotion of agro-ecology).

is not adequate, there should be higher investments in nature. There is a need for better funding and closing the existing funding gap by ensuring sufficient funding for nature conservation under the post 2020 multiannual

financial framework (MFF). Stakeholders need a future EU budget that is more environmentally friendly, and avoids harmful subsidies.

Role of the Member States:

First of all, Member States should engage in target setting and implementation, increase enforcement and communicate the benefits and EU added value of environmental protection

An effective participation of national administrations is needed to enhance integrated approaches and synergies using good practices and guidance at EU level.

Stakeholders want to see existing legislation is implemented in full, with a particular focus on completing the network of protected areas on land and at sea, restoring ecosystems, recovering biodiversity, promoting rewilding, creating wildlife corridors and connectivity, protecting pollinators and recovering fish and bird populations.

Member States need to complete the designation of Natura 2000 sites and step up efforts to define and implement clear, specific and detailed conservation measures guided by specific conservation objectives.

Despite the clear economic benefits of investing in nature conservation, there is a huge funding gap. Member States need to better target existing funding streams, and close funding gaps for environment. The availability of public funding (or the lack thereof) has probably had the most influence on the implementation of nature legislation.

There is a need to fully ensure the public rights of access to information, public participation and access to justice in environmental matters at national level, by e.g. amending the relevant national legislation to bring it in line with the Aarhus Convention.

Role of the regions:

The regional authorities should integrate Natural Capital actions within regional programming and strengthening the data collection and monitoring’

Role of industries:

Industries should practice taking up responsibilities for effective environmental sustainability as well as to take into account the values of natural resources and sustainably using biodiversity and external costs for using natural capital and ecosystem services. It was also suggested that industry actors should promote the added value of EU environmental protection.

For another perspective, industries should refrain from blocking, delaying or weakening ambitious new regulations and standards.

Role of citizen interest organisations:

The value added of the citizens interest supporting organisations is in more awareness-raising activities and better communication with the general public and helping to change habits and behaviour in consumer patterns. They should tackle issues of universal concern in collaboration in order to enhance understanding of social and environment challenges and increase the success rate. It was noted that ‘a good example of cross-sectorial collaboration is the sustainable development goals (SDG) Watch Europe platform, a cross-sectorial alliance of NGOs from development, environment, social, human rights and other sectors. Its goal is to hold governments to account for the implementation of the 2030 Agenda for Sustainable Development’.

The 7th EAP is said to have missed the opportunity of giving the right value to commitment of private individuals and land owners. It is focused on strategy and policy-making. But it should also address the potential in society of people who would be ready to team up. Examples of new initiatives to address both private individuals and land owners are: (1) European Solidarity Corps which is a specific call for networks under Natura 2000; and (2) setting up a European Land Conservation Network dealing with private land conservation. The idea is ‘to pass the land to kids the way you received it from your father’. People renounce willingly to use it for purposes that would harm it.

Role of nature interest promoting organisations:

The role for nature interest groups are seen in participation in policy planning and implementation, communication on values of biodiversity and how to contribute to conservation policy. Civil society organisations are key providers of environmental data and information from the ground and this role should be maintained. They should also be promoting the mobilisation of public support.

Civil society organisations should vocalise the interest of those not properly represented during the policy-making process. They are also essential in notifying decision-making institutions of critical new issues that should be urgently addressed. Environmental organisations help strengthen environmental legislation by monitoring the efforts of public authorities and compliance with the rules in place. Environmental organisations are mentioned to be the most reliable source of information on national implementation.

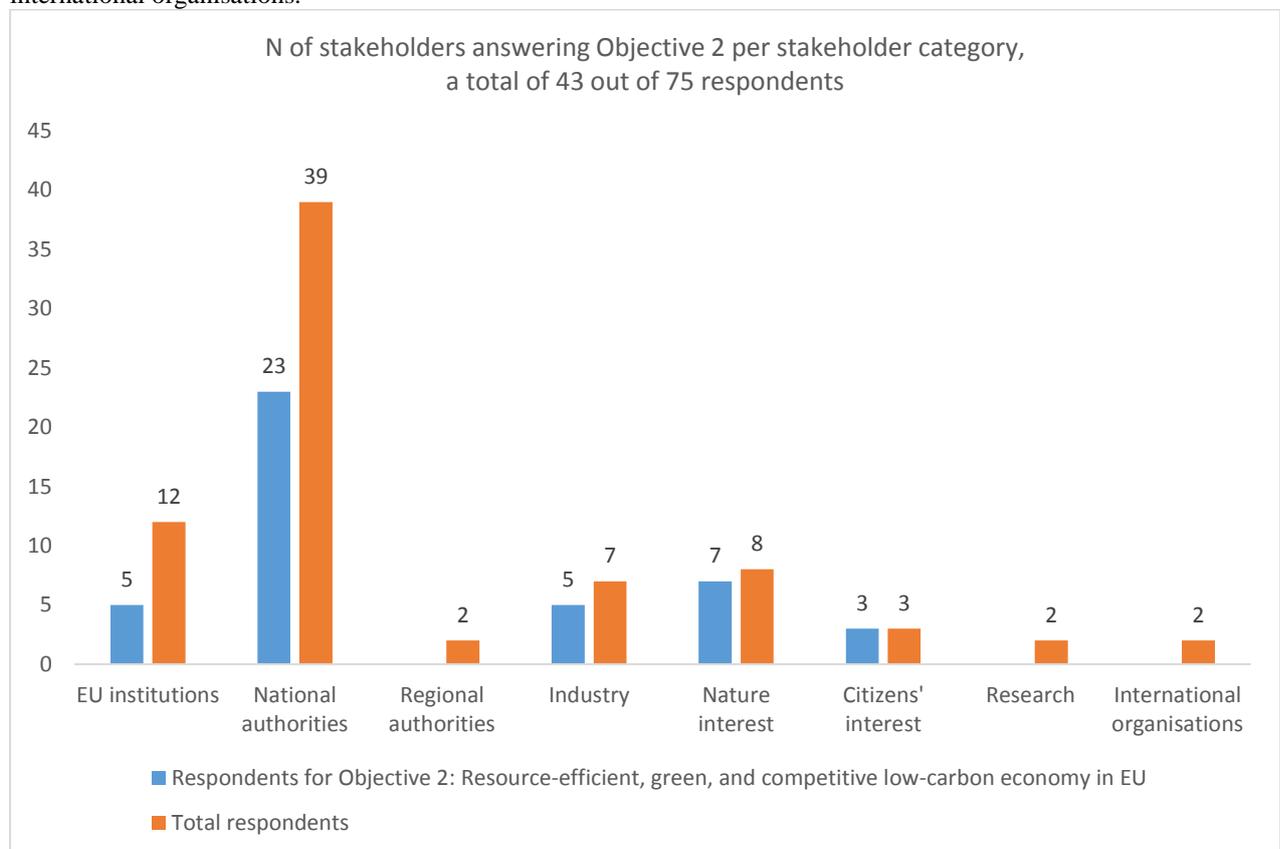
Role of researchers/think tanks/experts:

The role played by scientists and researchers is of utmost importance, as they provide the basis, tools and knowledge for environmental measures. In addition, the role of researchers should be to produce analysis which focuses on the benefits of EU environmental protection.

The price of neglecting their studies or underfunding their work is that they may not be addressing the most serious environmental problems. Evaluating the impacts of current policies and legislation can reveal when and where more stringent rules are needed and what progress is being made, or where policy incoherence is negatively affecting other more progressive policies.

3.3 Objective 2: To turn the Union into resource-efficient, green, and competitive low-carbon economy in EU

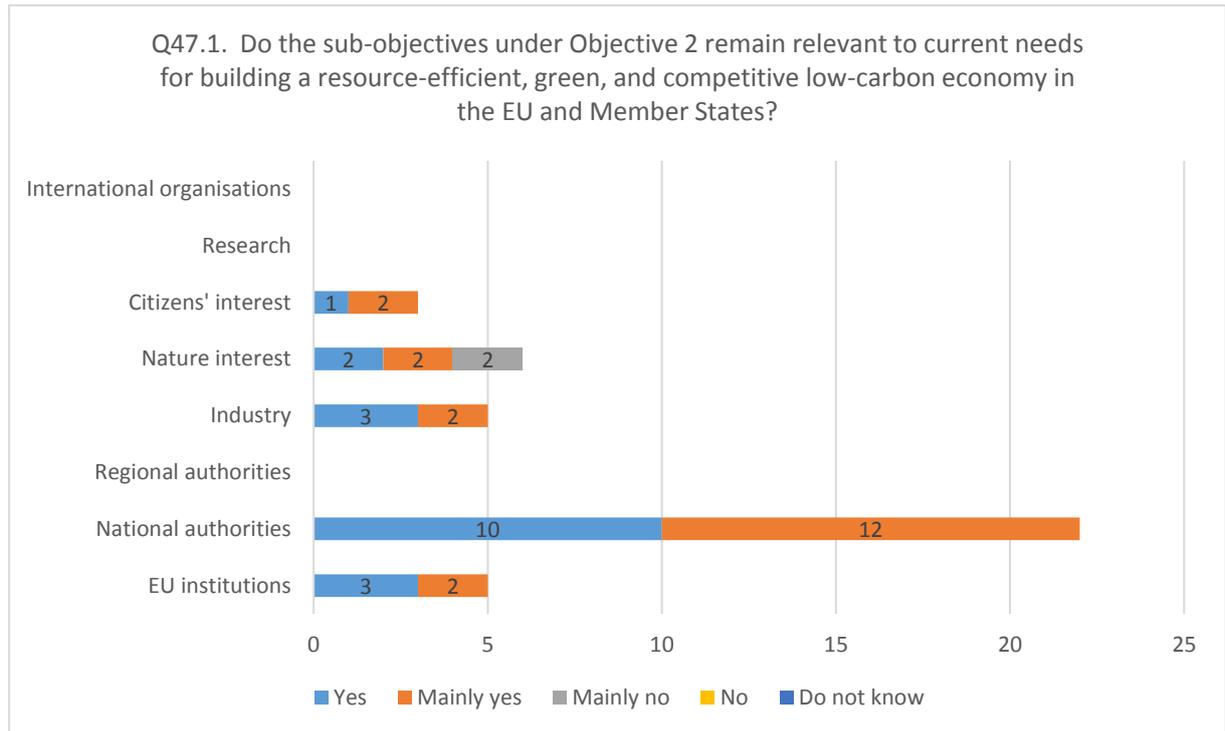
There were 43 respondents for Objective 2 out of a total of 75 respondents for the whole survey. Five out of 12 EU institutions, 23 out of 39 national authorities, five out seven industry network organisations, seven out of eight nature interest support organisations, all three citizens' interest support organisations provided responses for Objective 2 questions. No responses came from regional or local authorities, research organisations and international organisations.



3.3.1 Relevance

Relevance of the scoping under Objective 2 to real needs in the area

Question 47 was addressed to all categories of stakeholders and was designed to examine if the sub-objectives under Objective 2 are still relevant to the needs of a resource-efficient, green and competitive low-carbon economy.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents	41	5	22	5	6	3		

Forty-one respondents replied to this question and the responses were largely positive about the relevance of Objective 2, with only two respondents from nature support organisations replying 'Mainly no'.

Comments from the survey:

Climate Action Network (CAN) Europe, a nature interest support organisation, commented 'the current EU's 2030 climate and energy framework needs to be reviewed in order to meet the Paris Climate Agreements' long-term objectives'.

European Environmental Citizens' Organisation for Standardisation (ECOS), a nature interest support organisation, commented 'The sub-objective 36 (of Obj. 2) is very relevant, but for its proper implementation there needs to be ambition on a product-by-product basis under eco-design, and also a development of appropriate test methodologies for resource-efficiency aspects (durability, reparability, reusability, etc.)'.

Greenpeace European Unit, a nature interest support organisation, commented 'The most noteworthy critique is that Europe's 2020 climate and energy targets are relevant but insufficient to put Europe on track to full decarbonisation within the necessary timeframe. Europe's 2020 and 2030 climate and energy targets are not in line with Europe's commitments under the Paris Agreement, and must be revised. The goal to cut Europe's carbon emissions by 80-95 % by 2050 is also insufficient, particularly given the political understanding that efforts beyond 80 % cuts would be met through offsets. By 2050, Europe must have decarbonised its economy'.

Irish Environmental Protection Agency, a national authority, commented 'Addressing societal values where conspicuous consumption and wastefulness are not discouraged'.

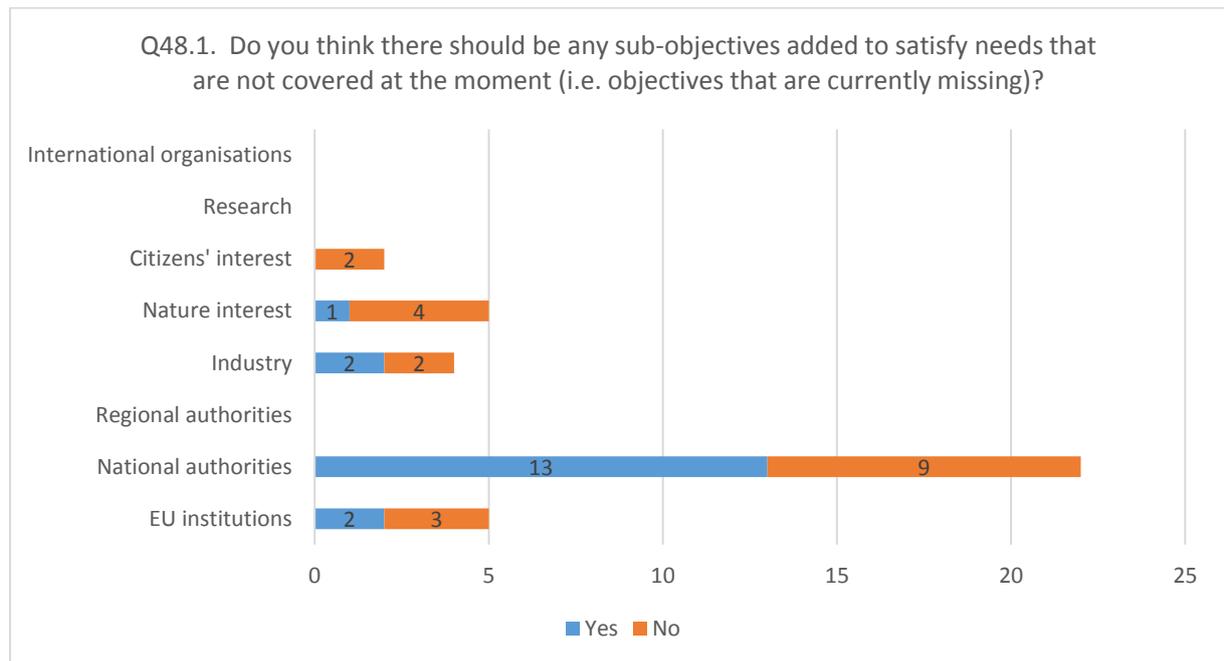
WWF European Policy Office (EPO), a nature interest support organisation, answered 'Mainly no' and commented 'While practically all of the objectives and sub-objectives are still relevant, the climate and energy 2020 targets are now misaligned with new international commitments, i.e. the Paris Agreement. The same is true of the 2050 emissions target of 80-95 % and the international temperature goals, which have changed. Therefore, the sub-objectives should be revised upwards to ensure that they are ambitious enough for the EU to be able to achieve its long-term goals and commitments. Moreover, these sub-objectives should be reinforced and aligned with the Sustainable Development Agenda, especially if we consider that now the EU has the obligation to implement the sustainable development goals through all of its policies and actions, both domestically and internationally'.

Comments from the focus group:

Focus group participants confirmed an importance of the Circular economy agenda prioritised in the EU. However it was noted that 'very often policy focus in circular economy only revolves around waste, instead of the whole bio chain or a product life cycle. Chemicals in products are also very relevant, as you don't want to reuse the recycled products if you do not know what materials were put in the products in the first place. Water reuse is also an important area to have in mind as it is linked to circular economy'.

Gaps in the scoping of Objective 2

This question relates to the relevance of having more sub-objectives to cover gaps that are not filled under the present set of sub-objectives.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	39	5	22	5	5	2		

There was a split in the views towards this question in all the stakeholder groups. Out of 38 respondents, 18 see a need for additional sub-objectives. These included two out of five EU institutions, one-third of the national authorities which responded; two out of four industry organisations; and one out of five nature interest organisations. The rest of the answers were negative. The comments from the stakeholders are listed below:

Comments from the survey:

One national authority suggested 'Promoting responsible lifestyle choices of consumers with regard to two more categories of goods: electronic appliances and textile products. Stimulating consumer demand for environmentally sustainable products and services, not only through policy but mainly through information provision and education'.

Several national authority representatives suggested that 'implementing an EU low-carbon roadmap 2050 and moving towards a circular economy should be added'. One suggested adding focus to 'Textiles, new business models, industrial symbiosis as well as on recycling: e.g. separate systems for drinking water and surface and "grey" water, developing systems to get waste products from the cities (nutrients) free from heavy metals and medical residues back to agriculture'.

In contrast to the above, another national authority commented 'There are other policy actions which cover these and other, additional objectives, namely the 2015 Circular Economy Action Plan'.

The Ministry of the Environment, Finland, a national authority, answered 'Yes' and suggested that SDG targets could be integrated for example:

- *Implement the 10YFP on SCP [the 10 year framework programme on sustainable production and consumption];*
- *By 2030, achieve the sustainable management and efficient use of natural resources; - By 2030, halve per capita global food waste;*
- *By 2020, achieve the environmentally sound management of chemicals and all wastes throughout their life-cycle'.*

The Italian Ministry for the Environment, Land and Sea, a national authority, suggested adding sustainable agriculture objectives.

The Irish Environmental Protection Agency suggested adding 'Incentives and standards for secondary raw materials'.

Greenpeace European Unit commented 'The current (or future) EAP should be amended to include the sub-objective to ensure a fair transition to 100 % renewables as part of the decarbonisation of Europe's energy system. Moreover, the sub-objective on green public procurement could have included clear targets for public sourcing of renewables. The sub-objective on changing consumption patterns should include measures to encourage energy customers to become more active, not just in terms of improved product standards but also in terms of active renewables' generation and demand response'.

The Community of European Railway and Infrastructure Companies (CER), an industry organisation, answered 'Yes' and suggested that 'A dedicated objective for sustainable mobility needed'.

CCPIE-CCIM (Belgian Coordination Committee for the International Environment Policy), a national authority, answered 'Yes' and commented 'The focus should shift away from the end-of-life phase and focus on the whole economy (new cross-sectoral value chains, going beyond recycling, linking it to smart specialisation strategies and clustering policy)'.

European Environmental Citizens' Organisation for Standardisation (ECOS) commented '...it is not so much about adding sub-objectives, but making sure that the existing ones are implemented'.

EurEau (European Federation of National Associations of Water Services), an industry organisation, answered 'No' but commented that there is a need in a 'framework to allow for the circular economy in water: recycling of sewage sludge and production of biogas at the waste water treatment plants'.

BEUC-the European Consumer Organisation, citizens' interest support organisation, in their position paper had several recommendations on the challenges they have identified. They suggested that "Transport must be the priority sector for additional action, such as adopting an ambitious legislative package on low emission cars, strict emission targets for cars and rigorous monitoring of these targets, promotion of electric vehicles, and car labelling". To promote sustainable consumption and production, they also suggested to accelerate progress with the setting Ecodesign requirements for new products, improving product durability, reparability, recyclability and re-useability, better redefine energy labelling and promote ecolabelling.

ANEC, European association for the coordination of consumer representation in standardisation, another citizens' interest support organisation also suggested sustainable transport promotion as an area of high importance. They see a need in strong incentives for public transport to be chosen over private transport. Also in the housing sector, ANEC believes the following important initiatives should be promoted: thermal insulation of the building stock; the extension of service life of buildings and building products; design for recycling and limitation of land use change for new buildings.

One international organisation left more general remarks that industrialisation has lifted millions out of poverty, created jobs, advanced technology and increased social prosperity in countries around the world. However, industry is also one of the largest emitter of greenhouse gases (GHGs), representing almost 30 % of global emissions. Undeniably, it is essential that conventional industrial development patterns be transformed to become more climate-resilient. Climate-resilient industry builds on cleaner and resource-efficient production technologies and practices that de-couple economic growth from unsustainable resource consumption and environmental degradation.

3.3.2 Knowledge base

Scientific knowledge and evidence base for resource-efficient, green and competitive low-carbon economy in the EU

A set of questions in the survey focused on Objective 2 of the 7th EAP promoting scientific knowledge and an evidence base for policy-making in the context of the green economy. These questions relate to enabling Objective 5 of the 7th EAP on improving scientific knowledge and evidence for EU environmental policy-making.

Respondents were asked to assess the progress of the knowledge base in the sector, indicating the knowledge gaps and underutilisation of the existing scientific knowledge.

Q60. With regard to improving the scientific knowledge and evidence base for resource-efficient, green and competitive low-carbon economy policies, do you agree with the following:		EU institutions	National authorities	Regional authorities (n/a)	Industry	Nature interest	Citizens' interest (n/a)	Research	International organisations (n/a)	TOTAL
		5	21	0	5	7	3	0	0	41
There is a better understanding of	Yes		7			1				8
	Mainly yes	5	11		4	3				23

Q60. With regard to improving the scientific knowledge and evidence base for resource-efficient, green and competitive low-carbon economy policies, do you agree with the following:		EU institutions	National authorities	Regional authorities (n/a)	Industry	Nature interest	Citizens' interest (n/a)	Research	International organisations(n/a)	TOTAL
sustainable consumption and production patterns	Mainly no		3				1			4
	No									0
	Do not know				1	3	1			5
There is a better understanding of how the costs and benefits of action and the costs of inaction can be considered more accurately	Yes		4			1	1			6
	Mainly yes	3	11		3	1				18
	Mainly no	2	4		1	3				10
	No						1			1
	Do not know		2		1	2	1			6
There is a better understanding of how changes in individual and societal behaviour contribute to environmental outcomes	Yes		3			1				4
	Mainly yes	5	16		2	3	1			27
	Mainly no		2		2	1	1			6
	No									0
	Do not know				1	2	1			4
There is a better understanding of how Europe's environment is affected by global megatrends	Yes	3	5			1				9
	Mainly yes	1	12		3	2	1			19
	Mainly no		2		1	1	1			5
	No									0
	Do not know	1	1		1	3	1			7

The majority of the 40 respondents agree and mainly agree that there is a *better understanding of sustainable consumption and production patterns*. These responses are mostly coming from the national authorities (18 out of 21), all industry representatives and over half of nature interest organisations. The single citizens interest organisation and rest of the national authorities are rather pessimistic in this respect. Five answered 'Do not know'. Comments from the survey:

The Irish Environmental Protection Agency answered 'Mainly no' and commented 'consumption choice making and values not properly understood or addressed in policy'.

Greenpeace European Unit answered 'Mainly yes' and commented 'But this has not resulted in sufficient policy/legislative responses'.

Over half of 41 respondents positively assess the *understanding of how the costs and benefits of action and the costs of inaction can be considered more accurately*. Among these are two-thirds of the national authorities group, more than half of EU institutions and industry representatives, and minority the nature and citizens' interest group.

Nine answered ‘Mainly no’ including minority of EU institutions, national authorities, industries, three out of seven nature interest organisations. One ‘No’ was scored by a citizens’ interest organisation. Six responded ‘Do not know’.

Comments from the survey:

One EU institution answered ‘Mainly yes’ and commented ‘Environmental Footprint Pilot project will improve this (finalisation 2018)’.

Over two thirds of 41 respondents are positive and mainly positive about progress in ‘better understanding of how changes in individual and societal behaviour contribute to environmental outcomes’. This positive assessment dominated among most stakeholders, except industries and citizens’ interest organisations where views are mixed. Four did not know the answers.

Comments from the survey:

One EU institution answered ‘Mainly yes’ and commented ‘Environmental Footprint Pilot project will improve this (finalisation 2018)’.

Greenpeace European Unit answered ‘Mainly no’ and commented ‘Especially in the food and agriculture sector, EU policy-makers seem unwilling to consider the impact of individual and societal behaviours, and consequently there are few policy instruments that address individual and/or societal choices, with the exception of labelling rules’.

Out of 40 respondents, a clear majority agrees and mainly agrees that there is a better understanding of how Europe’s environment is affected by global megatrends. Namely EU institutions, national authorities, industries and nature interest organisations are positive about it. Citizens interest groups had mixed responses. A minority of five respondents answered ‘Mainly no’, while there was no totally negative answers. Finally, one citizens’ interest organisation also answered that they did not know whether they were (not) positive about the question that there would be a better understanding of how Europe’s environment is affected by global megatrend.

No comments were added by respondents in this part of the survey.

As the survey results show, there seem to be overall mainly positive assessments of the progress in scientific knowledge base in the fields covered by Objective 2. The interview with an international organisation also provided the agreements with the positive assessment across all listed fields.

Knowledge gap – understudied areas

This section presents views of the stakeholders on the following open question_“Are there any areas within Objective 2 which have been understudied and where evidence is missing?”.

Within Objective 2, the following areas have been noted as understudied and have missing evidence:

Comments from the survey:

Circular economy targets, implementation and policy instrumentation, as suggested by one national authority.

‘Potential of sustainable public procurement’, as noted by the Finnish Ministry of the Environment

One national authority noted ‘Data on different material streams – what is and is not reused today and what could be reused and recycled’.

The Italian Ministry for the Environment, Land and Sea noted a lack of knowledge in ‘Cost/benefits of actions and comparability of different scenarios’.

The Irish Environmental Protection Agency suggested that there is a lack of understanding of ‘how to influence sustainable normative behaviour and values and how to address the diversity of societal cohorts’.

CCPIE-CCIM commented ‘There is a need for a real “circular economy science” not limited to technological science. Social and economic sciences therefore play a significant role. The important role of education and training programmes to facilitate this transition should be stressed (lack of internal technical skills is an important obstacle, especially for SMEs)’.

Comments from the interviews

One interviewee that has no official affiliation anymore but used to work for a supranational government agency noted there are several areas with a major knowledge gap. ‘If we really want to understand environmental pressures then we have to look across the economy. Most of our pressure analysis is production-focused. But the consumption perspective is a big gap that should be addressed. But, politically, to address consumption is hard. And, the EU is so dependent on the world for imports; it’s been known as a gap for a long time, but politically, changing consumption patterns is an inconvenient

political message so investing in knowledge in that area is too. What people talk about in transition theory; there are big landscape influences; global megatrends. In the middle levels we have the regimes; that's changing now. The lowest level is niche innovations to try and make changes. These niches should be protected by policy, so they can grow, disrupt and replace the regime. So we move from owning cars to sharing cars, from fossil to electric cars.'

Finally the WWF European Policy Office (EPO) commented 'In most of the cases the problem is not a lack of evidence. It is in a failure by the European Commission, for political reasons, to propose policies that are not in line with scientific evidence. For example, it is clear that the proposals on bioenergy sustainability criteria adopted by the Commission in November 2016 are not remotely consistent with the scientific literature on the subject, including the Commission's own research papers. Similarly, the EU's policies on energy and climate change more generally are not consistent with what the science tells us is necessary to avert catastrophic climate change, and its agricultural policies, based on widely available evidence, are wildly at odds with the stated objectives of the CAP and with any of the EU's environmental goals'.

Comments from the focus group:

What knowledge is underutilised?

Respondents were asked if there are areas within Objective 2 where knowledge exists but is not utilised for evidence during policy-making.

The responses to this open question suggest that there are still understudied areas in the topics related

Comments from the survey:

WWF European Policy Office (EPO) commented 'Structural changes in our production and consumption patterns are not taking place at the pace required, and it's not because of lack of knowledge. As an example, we know that EU consumption of crop and livestock products led to the loss of 9 million hectares of forest over the period 1990-2008, an area the size of Portugal. However with continuing excessive footprint, rapid depletion of natural capital and growing resource dependency, the EU economy is fuelling future crises. Instead of taking steps toward a more sustainable economic path, the EU is however still supporting business as usual. Similarly, scientific evidence tell us that Europe has to reduce its greenhouse gas emissions by at least 55 % by 2030 if it aims to limit the temperature rise well below 2° C and live up to its international commitments. Current proposals however ignore this evidence and propose much lower targets, reducing the chances that the world will succeed in averting catastrophic climate change'.

One national authority noted that 'Policy-making should reflect knowledge about negative externalities and impacts of already-established policies and struggle to amend the policies to exclude such negative externalities (improving certain environmental aspects may deteriorate other environmental aspects or have negative socio-economic impacts – i.e. at international level)'.

According to one national authority, 'externalities and burden shifting when assessing success in policies' is the area where the existing knowledge is underutilised.

The Ministry of the Environment, Finland suggests that the 'link between resource- and material consumption and climate change' is another such area.

CEMBUREAU, the European Cement Association, an industry association, suggested that 'Emissions from sectors other than industry' as another example of such an area.

One national authority commented that 'There is a need for education and supporting infrastructures'.

The Irish Environmental Protection Agency noted that 'GPP (green public procurement) works, but policy has failed to make it mandatory'. Marine plastic was noted as another challenging area.

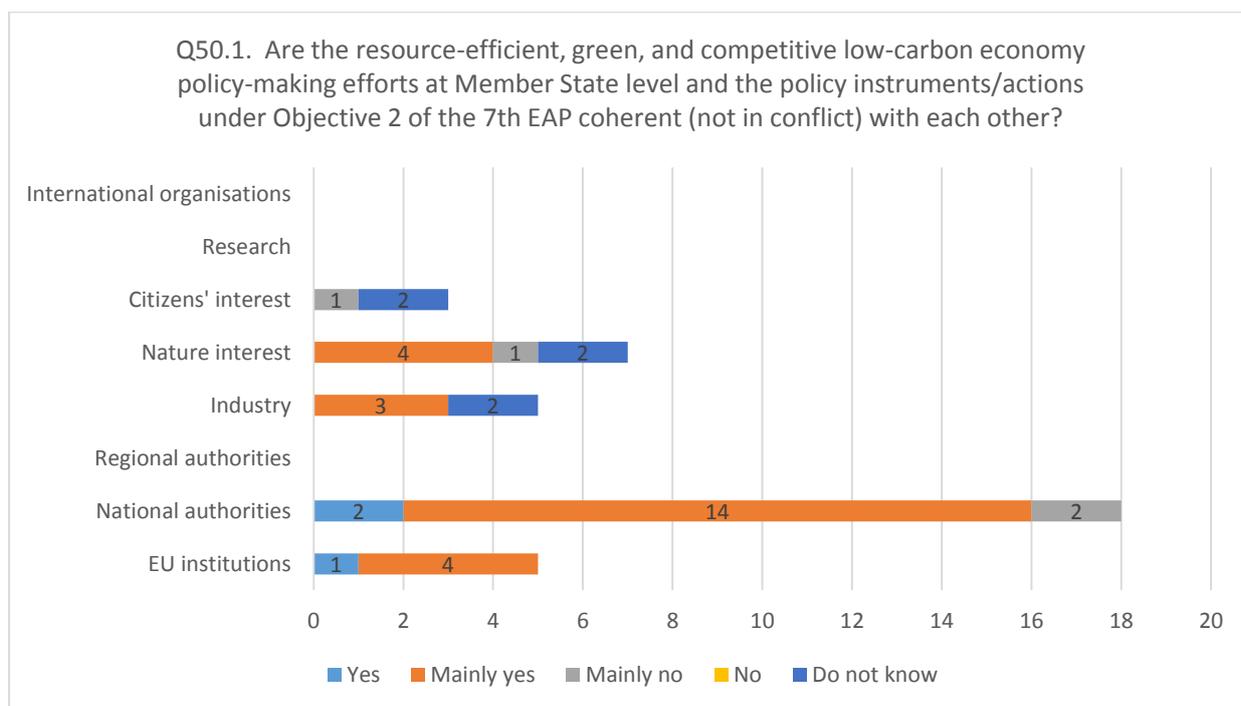
Greenpeace European Unit commented 'In terms of the climate sub-objective, the science clearly points to the need to reduce the production and consumption of livestock products, and shows that the production of bioenergy damages biodiversity and doesn't help decarbonise the energy sector. The consumption of meat and dairy products represents almost 25 % of the environmental impacts caused by the total consumption of all goods and services in the EU-27'.

Community of European Railway and Infrastructure Companies (CER) noted that 'Internalisation of external costs are highly debated. For the transport sector the Commission regularly updates a handbook but so far this has not led to legislation to make internalisation of external costs according to the polluter-pays principle. When it comes to the intermodal comparison of external costs, the Commission is currently running studies. Without further delay, revitalisation of all policies aimed at internalising external costs is needed and the revision of the Eurovignette Directive should make this possible'.

3.3.3 Coherence

Coherence between Member State policy-making and Objective 2 actions

Coherence between Member State policy-making and the 7th EAP objective on building resource-efficient, green and competitive low-carbon economy was addressed in the following question.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	5	18	0	5	7	3	0	0

There were 38 replies to this question. A dominant majority of responses were positive about coherence between policies promoted by the EU within the 7th EAP and policies of MSs. The positive assessment predominantly comes from national authorities, EU institutions, industries and nature interest organisations. Four respondents answered ‘Mainly no’, including two national authorities, one nature interest organisation and one citizens’ interest organisation.

Comments from the survey:

WWF European Policy Office answered ‘Mainly no’ and commented ‘Member States’ policies to promote a low carbon and resource-efficient economy are not only far too weak to achieve the goals of the 7th EAP but are also often not consistent with each other. An example includes the inconsistencies between the EU Emission Trading System, which is not sufficiently strong to give the market signal needed for the dirtiest power generators to get out of the market, at the same time that it does not leave open the space needed by renewables and energy efficiency to enter the market. While these are EU policies, this situation is replicated at national level’.

One national authority answered ‘Mainly yes’ and commented ‘In principle they are, but some wording should be changed to integrate them each other better’.

One national authority answered ‘Mainly no’ and commented ‘e.g. waste policy contradicts with circular economy policy as well as use of hazardous substances’.

CHEM Trust, a citizens' interest support organization, answered 'Mainly no' and commented 'lots of efforts are needed at EU and Member State level to achieve objective 2 (example: clean up supply chains from toxic chemicals to arrive at non-toxic material cycles)'.

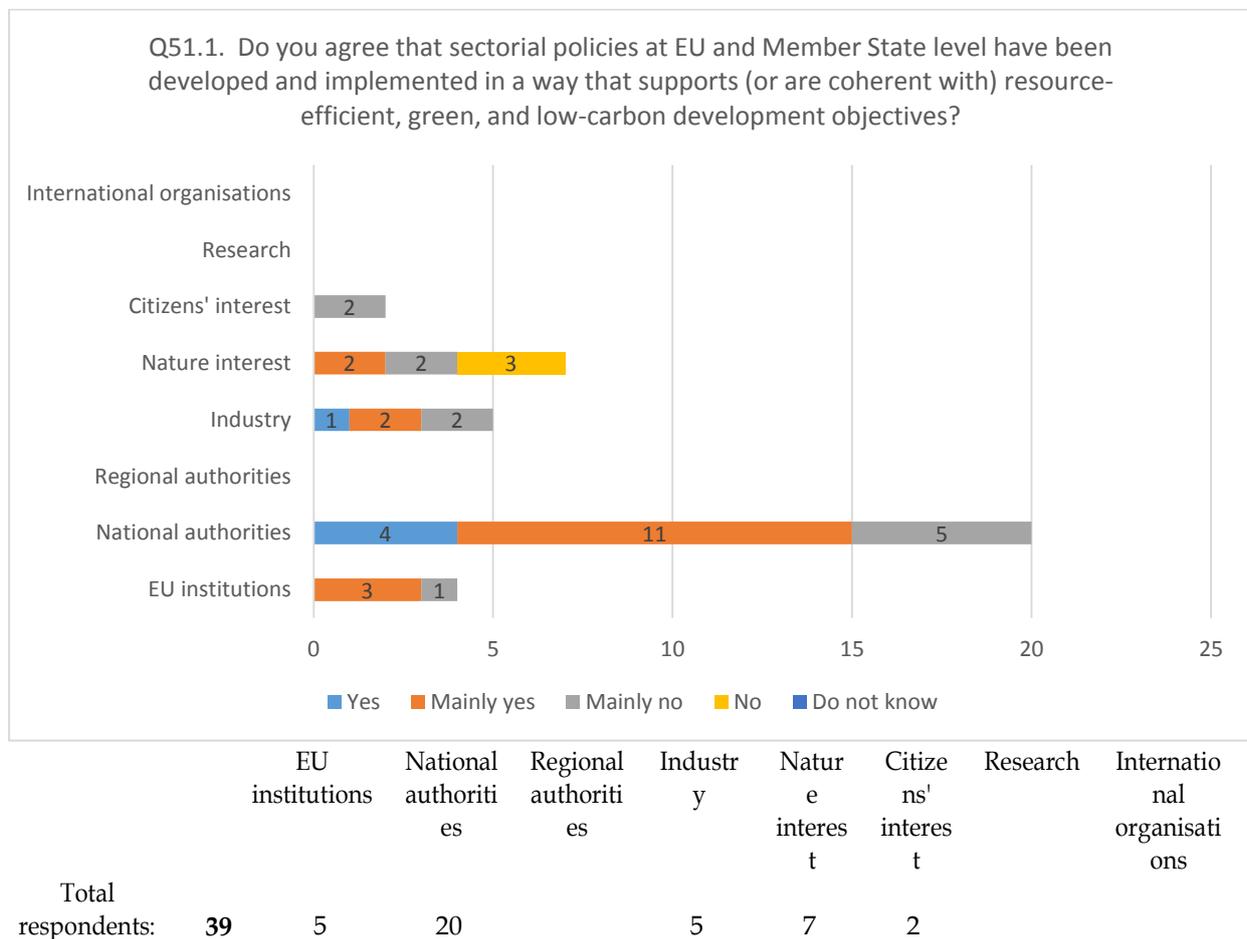
Though a majority agrees that the objectives are coherent, those who do not agree mention energy (ETS) policy and circular economy / waste policy.

Comments from the interviews:

One interviewee from a European institution answered "[The policies] have not been well integrated, but it's hard to apportion responsibility for that. The sectoral policies [policies directed towards specific sectors such as fisheries, agriculture or manufacturing] have most responsibility; the CAP is most negative. If you want to move from 'brown' economy towards green, then agriculture fractures most fundamentally: [there are] logistics, water usage, ecosystem damage. [This holds for] agriculture as well as fisheries."

Coherence and integration between the sectorial and green economy policies

Coherence between EU and Member State sectorial policies and the 7th EAP objective on building resource-efficient, green and competitive low-carbon economy was addressed in the following question.



There were 35 replies to this question and most respondents answered (mainly) positively. Nature interest organisations and national authorities had the largest proportions that were not positive, at about one third. A minority of five respondents answered 'Yes' (national authorities and industrial respondent). A majority of 18 answered 'Mainly yes' (three EU institutions, 11 national authorities, two industries and two nature interest organisations. One third answered 'Mainly no' including one EU institution, five national authorities, two industries, two nature interest and all citizens' interest organisations.

Comments from the survey:

One national authority answered ‘Mainly yes’ and commented ‘Before the circular economy package the situation was not clear, but from now on as we have an action plan with concrete actions, it really is contributing to 7th EAP’.

One national authority noted that there was a great variation between Member States and between policy sectors.

The Ministry of the Environment, Finland commented that ‘more coherence of resource-efficiency policies with climate and biodiversity policies is needed’.

The Irish Environmental Protection Agency answered ‘Mainly no’ and commented that there is ‘no evidence. Slow pace of policy intervention’.

The European Environmental Citizens’ Organisation for Standardisation (ECOS) suggested that ‘at EU level and with regards to eco-design, there needs to be a strong consideration of material efficiency requirements on a product-by-product basis’.

EurEau noted that ‘CAP and chemicals policy (pesticides, pharmaceuticals) are not coherent with the green economy objectives’.

CER answered ‘Mainly no’ and noted that the ‘transport GHG target is still missing’.

Climate Action Network (CAN) Europe answered ‘No’ and commented ‘EU climate and energy targets are insufficiently low. EU funding does not sufficiently provide for financing and incentives to trigger the climate, environmental and natural resources transition’.

CEFIC - European Chemical Industry Council, an industry organisation, answered ‘Mainly yes’ and commented ‘But attention should be paid to carbon leakage risk’.

Comments from the focus group:

One focus group participant stated that “[...] appropriate price on carbon is part of the solution – but should not be the only instrument, [we] need to do more to reduce and remove fossil fuels. Risks of not addressing climate change are so massive that it is not credible to question the ambition.”

Integration between key EU policies and green economy objectives

The question refers to the extent of the coherence and effectiveness between the key EU policies and resource-efficient, green and low-carbon development objectives. This question also relates to Objective 7.

Q52. Do you agree that the following EU policies have integrated (or are coherent with) resource-efficient, green and low-carbon development objectives?		EU institutions	National authorities	Regional authorities(n/a)	Industry	Nature interest	Citizens’ interest	Research (n/a)	International organisations (n/a)	TOTAL
	Total	5	17	0	4	7	3	0	0	37
Common Agricultural Policy	Yes		2							2
	Mainly yes	1	6			1				8
	Mainly no	2	8		1					11
	No	1				5	1			7
	Do not know	1			3	1	2			7
Common Fisheries Policy	Yes		2							2
	Mainly yes	1	4			2				7
	Mainly no	2	4		1	2				9
	No					1				1
	Do not know	2	6		3	2	3			16
	Yes	1	1							2

Q52. Do you agree that the following EU policies have integrated (or are coherent with) resource-efficient, green and low-carbon development objectives?		EU institutions	National authorities	Regional authorities(n/a)	Industry	Nature interest	Citizens' interest	Research (n/a)	International organisations (n/a)	TOTAL
EU trans-European networks policy	Mainly yes		8		1	1				10
	Mainly no	2	3			1	1			7
	No					3				3
	Do not know	2	4		3	2	2			13
Cohesion policy	Yes	2	3							5
	Mainly yes	2	8			4				14
	Mainly no	1	2			1				4
	No					1				1
	Do not know		4		4	1	3			12
Other, please specify other policy areas of interest to you	Yes	3	4		1	1				9
	Mainly yes	1	2							3
	Mainly no	1	2							3
	No		1		1	1				3
	Do not know	1	1				1			3

Common Agricultural Policy (CAP)

Out of 35 respondents, only two national authorities are convinced that the CAP is coherent with the green economy objectives, another six out of 16 national authorities, one out of five EU institution and one out of seven nature interest organisation are mainly positive about it. Roughly half of the respondents mainly or fully disagree. These include most of the EU institutions, half of the national authorities, the only single respondent from the industry and most of the nature interest organisations. Seven respondents did not have an opinion on this matter.

Comments from the survey:

WWF European Policy Office answered 'No' and commented 'The current CAP is largely a result of policy priorities and instruments developed for the challenges of the last century. It has strengthened resource-intensive farming, thereby increasing pressure on nature and climate, and depleting the natural resources that agriculture itself relies upon. While the CAP might contain provisions in relation to environmental protection (e.g. greening payments) the vast majority of the budget is spent on income or production support and the environmental provisions that exist are too limited to deliver resource-efficiency or climate objectives. The CAP is not delivering: It is not fair to farmers, does not adequately mitigate the constant crisis on agricultural markets, drives the continuous decline of Europe's natural resources, and has severe negative impacts beyond Europe's borders. The CAP has not only failed to prevent these problems but in many cases has exacerbated them. EU taxpayers are financing a system that is destroying our natural capital via unsustainable subsidies'

One national authority answered 'Mainly yes' and commented 'In principle, every policy takes into account resource-efficient policy, but better progress could be made.'

Another national authority noted that 'Although greening of CAP took place, there is still space for further enhancement of environment and climate protection. At the same time, enhanced international

dimension of environmental protection with relation to agriculture should be taken into account (imports of plant proteins, etc.).'

Climate Action Network (CAN) Europe answered 'No' and commented 'The EU is bankrolling an intensive, industrialised farming system that is mainly based on high carbon and resource-intensive technology. The current Common Agricultural Policy maintains an unfair system for farmers, a constant crisis on agricultural markets as well as inequitable exploitation of natural resources. It is also failing to deliver on animal welfare while posing longer-term negative public health impacts. The sector contributes over 11 % of the total EU-28 greenhouse gas emissions and 17.3 % of the emissions in the non-ETS (Emission Trading Scheme) sector, and its emissions are projected to increase up to 2030 without further action.'

CCPIE-CCIM criticised by noting that 'the CAP includes a number of climate-related measures, but doesn't structurally integrate the low-carbon roadmap.'

ANEC noted 'It is important that policies foreseen in the 7th EAP are consistently interlinked and integrated. The SCP policy for example should take in hand other community policies that entail unsustainable developments - such as the Common Agricultural Policy and Common Fisheries Policy - and come within the scope of the resource efficiency flagship initiative'.

Common Fisheries Policy (CFP):

Quite a large share of respondents (16 out of 35) did not feel confident to reply to this question. Out of those who replied there was a split in the opinions. Six out of ten national authorities were positive, others were negative about the coherence of CFP with green economy objectives. Two out of three EU institutions were negative, one positive, the only industry representative was mainly negative, and three out of five nature interest organisations were negative about this issue.

Comments from the survey:

WWF European Policy Office (EPO) answered 'Mainly yes' and commented 'In theory, the CFP should deliver such objectives but from the information gathered so far, WWF has reasons to believe that the state of implementation on such measures is lagging behind. For example, article 17 of the CFP (Regulation), which requires Member States to provide incentives to low-impact operations. WWF doesn't have clarity on whether these requirements are being met.'

One national authority answered 'Mainly yes' and commented 'In principle, every policy takes into account resource-efficient policy, but better progress could be made.'

CCPIE-CCIM answered 'Mainly no' and commented 'No real connection with climate mitigation'.

EU trans-European networks policy (TEN-P)

Out of 35 respondents 13 did not know the answer. A slight majority of the rest of the respondents agreed or mostly agreed that TEN-P is coherent with green economy objectives, including most of the national authorities, the only industry organisation, and one out of five nature interest groups. Seven out of 35 mainly disagreed and three fully disagreed in this matter. These are mostly EU institutions, and nature and citizens' interest groups

Comments from the survey:

One national authority answered 'Mainly yes' and commented 'In principle, every policy takes into account resource-efficient policy, but better progress could be made.'

Climate Action Network (CAN) Europe disagreed and commented 'The Connecting Europe Facility (CEF) still heavily supports fossil fuels. In its five calls for projects in the period 2014-2017 it is allocating EUR 1.1 billion of CEF funding to gas projects. This is more than twice as much as electricity interconnection projects have received so far. Transport has seen its greenhouse gas emissions steadily increase over the past two decades while benefitting from wide-scale EU funding. Transport (including aviation and shipping) now emits around 31 % of all the greenhouse gases in Europe'.

CCPIE-CCIM noted that 'Some TEN-T [Trans-European Transport Network] projects support low-emission transport modes such as inland waterways and rail. However, it also includes emission-intensive investments such as air(ports) and road transport. As a consequence, it is not strongly contributing to the low-carbon development objectives'.

Association Justice and Environment, a citizens' interest support organisation, commented 'A big issue is related to strategic planning of TEN-E [Trans-European Energy] networks or to be more exact, lack thereof, leading to a number of projects not being in line with the climate policy objectives'.

Cohesion policy

For the cohesion policy, out of 36 respondents 12 did not know the answer. A significant majority of the answered respondents were positive about its coherence with green economy objectives. Positive answers come from the majority of national authorities, nature interest organisations and two out of the three EU institutions that responded. Other groups of stakeholders did not participate in answering this question.

Comments from the survey:

WWF European Policy Office (EPO) answered 'Mainly yes' and commented 'As the main objective of the cohesion policy has traditionally been to reduce economic, social and territorial disparities (the promotion of growth and jobs), it has often been misguided and damaging, through investments promoting fossil fuel use, carbon-intensive projects or the large-scale infrastructure projects that are harmful to nature. In the latest reforms, however, cohesion policy has included a number of environmental considerations, such as the banning of certain types of spending, including oil projects. It further provides funding to co-finance investments in research, transport and the low-carbon economy. The "thematic concentration" approach introduced for cohesion policy 2014-2020 requires Member States to concentrate funds on priorities related to research and innovation, support for SMEs and the low-carbon economy. Despite these improvements, cohesion policy could better continue to guide investments that are sustainable, innovative and really benefit the public. As research of Member States' Operational Programmes has shown, countries are often continuing to invest in unsustainable projects (<https://bankwatch.org/publications/new-money-old-ideas-how-eu-spending-plans-central-and-eastern-europe-are-selling-short->)'.

One national authority answered 'Mainly yes' and commented 'In principle, every policy takes into account resource-efficient policy, but better progress could be made'.

One EU institution commented 'Cohesion Funds involve ex-ante conditionalities, meaning that the funds are only allowed for projects which meet the requirements of the EU waste management legislation. Dedicated funding to resource efficiency and circular economy projects is envisaged'.

Climate Action Network (CAN) Europe noted that 'Although the cohesion policy funds (Cohesion Fund, European Regional Development Fund and European Social Fund) are contributing to advancing the "shift towards a low-carbon economy", these EU funds are serving multiple and partially contradictory objectives, for example through supporting gas pipelines, "clean" coal and an emissions-intensive transport infrastructure. Member States are planning to spend EUR 930 million of their 2014-2020 Structural Funds on gas infrastructure, while in some regions in Poland and Czech Republic households receive EU funds to replace their old domestic coal boilers with newer coal combustion systems, which is locking households into fossil fuel demand for decades. At the same time, EU funds' potential to accelerate the clean energy transformation remains largely untapped. Member States plan to spend on average a mere 7 % of all their EU 2014-2020 cohesion policy funding on energy efficiency, renewables, electricity distribution, storage and smart grids. The EU cohesion policy funding in the transport sector is heavily biased towards high-carbon transport infrastructure: twice as much is planned to be invested into road infrastructure than in low-emission mobility solutions.'

Other policies

A very few comments and policy examples were provided

Comments from the survey:

One national authority answered ‘Yes’ and commented ‘Circular economy package’.

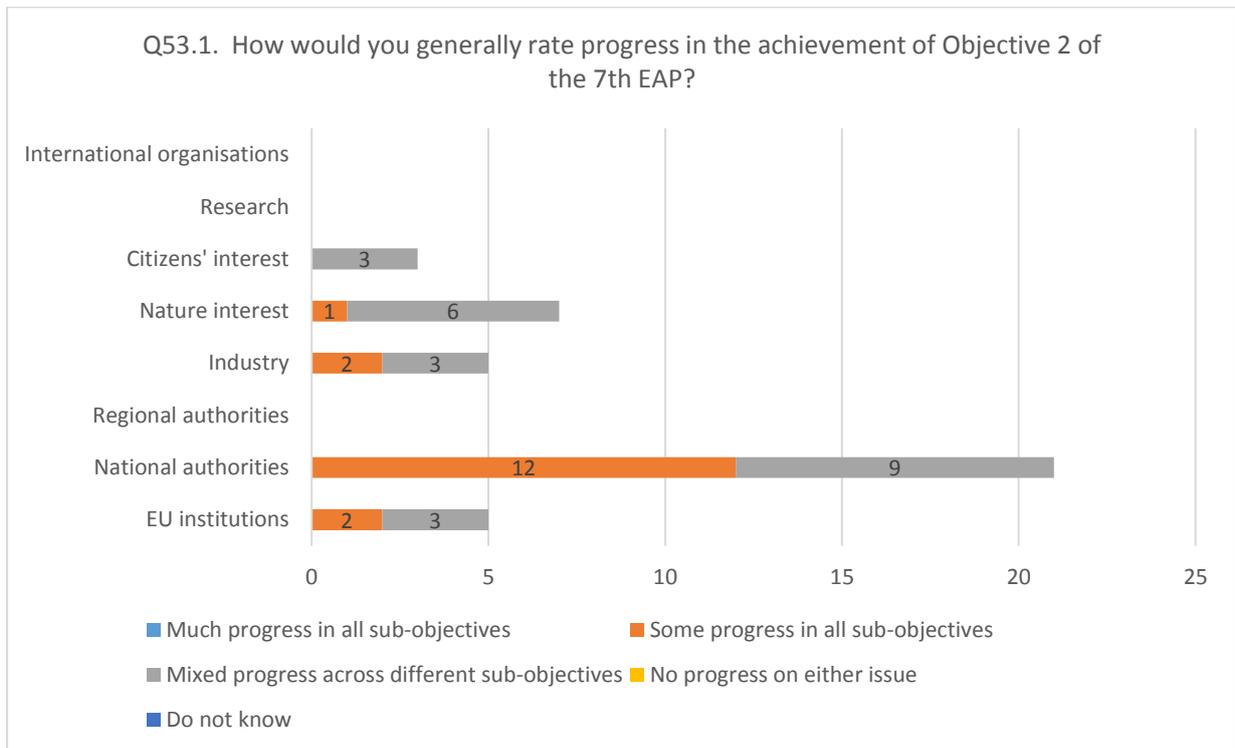
The Italian Ministry for the Environment, Land and Sea answered ‘Mainly no’ and commented ‘Energy policy: with regard to the production of energy from biomass, which [is] waste, there is a conflict with the waste hierarchy and with the low-carbon development objectives. Certain biomass should be composted and returned to soil, instead of being burned for energy production’.

BEUC stressed about better incorporation of the Transport policy into EAP. ‘Transport must be the priority sector for additional action. While emissions from transport are still increasing, the transition to low carbon transport is essential to achieve all objectives of the 7th EAP’.

3.3.4 Effectiveness

What is the overall progress in the achievement of Objective 2 of the 7th EAP?

This question aimed to assess the overall progress in implementation of all sub-objectives under Objective 2 and seeks to reflect on the effectiveness of the implementation.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	41	5	21	5	7	3		

There were 41 replies to this question. It was generally assessed that there is some or mixed progress in achievement of Objective 2 of the 7th EAP. Slightly less than half of the respondents see some progress in all sub-objectives (12 out of 21 national authorities, two out of three EU institutions, two out of five industry

organisations and one out of seven nature interest groups. The remainder, including all three citizens' interest organisations, consider that there is a mixed progress across different sub-objectives.

Comments from the survey:

One national authority pointed out areas that are still problematic: product policy, waste and consumer behaviour.

One EU institution noted 'I am only familiar with resource-efficiency objectives, where important progress was made through the adoption and implementation of the Circular Economy Package (incl. the review of the EU waste legislation, and the upcoming Plastics Strategy).'

The Ministry of the Environment, Finland sees mixed progress across different sub-objectives, but more 'Emphasis (has been) on waste policy and redrafting waste targets'.

The Irish Environmental Protection Agency sees 'very poor progress on product policy (eco-labelling, Life Cycle Analysis, etc.)' and noted that GPP (green public procurement) [is] still not mandatory.

The Health and Environment Alliance (HEAL), a citizens' interest support organisation, sees 'Not enough progress on climate mitigation with actual reductions and on decarbonising the economy'.

European Environmental Bureau, a nature interest support organisation commented that 'Major advances made in area of waste policy, [however] much more to be done in relation to product policy, plastics, ensuring the sustainability of bio-based economy'.

CHEM Trust commented 'In order to achieve the foreseen non-toxic material cycles, more decisive action is needed to guarantee a clean circular economy. See also here: <http://www.chemtrust.org.uk/wp-content/uploads/chemtrust-circcconchems-july17.pdf>'

Further elaborations have been provided by the stakeholders on the negative or mixed assessment of the progress¹⁰⁷:

WWF European Policy Office (EPO) provided the following comments:

'(on sub-objective) a) the Union has met its 2020 climate and energy targets and is working towards reducing by 2050 GHG emissions by 80-95 % compared to 1990 levels, as part of a global effort to limit the average temperature increase below 2 °C compared to pre-industrial levels, with the agreement of a climate and energy framework for 2030 as a key step in this process. While the EU is well on track to surpass its climate and energy objectives for 2020, the 7th EAP has not contributed to setting ambitious EU climate and energy targets for 2030. Current legislative discussions are based on the European Council Conclusions of October 2014 instead of what is required by the Paris Agreement, adopted at the end of 2015. 2030 climate and energy targets have been widely criticised, including by the European Parliament, for their lack of ambition and inconsistency with the global Paris Agreement which seeks to hold the increase in temperature well below 2 °C and pursue efforts to limit the temperature increase to 1.5 °C. WWF believes that EU emissions must be cut by at least 55 % by 2030, through targets of at least 45 % renewable energy and at least 40 % energy savings. This is the minimum level of ambition required if the EU is to live up to its international commitments to prevent dangerous climate change.

'(on sub-objective) c) structural changes in production, technology and innovation, as well as consumption patterns and lifestyles have reduced the overall environmental impact of production and consumption, in particular in the food, housing and mobility sectors. Most of the adopted actions to move towards a resource-efficient economy are restricted in scope and voluntary in nature. Three major shortcomings are identified by WWF: 1) Failure to address sustainable sourcing. No measures have been taken to guarantee that the resources for products that the EU sources are not harmful to the environment and do not lead to the degradation of other ecosystems.'

One national authority commented that on 'Sub-targets 1 and 5¹⁰⁸ [there is] not enough progress [on] climate change and [the] development of long-term targets for greenhouse gases [is] insufficient''

¹⁰⁷ **Question 54:** If you consider that the progress across the sub-objectives is mixed or that there was no progress at all under this Objective, please, list those **sub-objectives/areas that you consider problematic** and briefly explain what the problem(s) is/are.

¹⁰⁸ (1) Fully implementing the Climate and Energy Package and urgently agreeing on the Union's 2030 climate and energy policy framework, with due regard for the most recent IPCC assessment report, taking into account the indicative milestones set out in the Low-Carbon Roadmap, as well as developments within the UNFCCC and other relevant processes; (5) Establishing a more coherent policy framework for sustainable production and consumption including, where appropriate, the consolidation of existing instruments into a coherent legal framework. Reviewing product legislation with a view to improving the environmental performance and resource efficiency of products throughout their lifecycle. Stimulating consumer demand for environmentally sustainable products and services through policies which promote their availability, affordability, functionality and attractiveness. Developing indicators and realistic and achievable targets for the reduction of the overall impact of consumption;

One national authority pointed out that there are 'Still problematic areas (which are) product policy (durability, design), waste (management, shipments) and consumer behaviour (wrong incentives to make consumer choices)'.

The Ministry of the Environment, Slovakia, a national authority, sees a need in 'establishing a more coherent policy framework for sustainable production and consumption including, where appropriate, the consolidation of existing instruments into a coherent legal framework, increasing efforts to reach existing targets and reviewing approaches to green public procurement, fully implementing Union waste legislation'.

The Ministry of the Environment, Finland commented that '... resource efficiency challenges are still big and policies have not had a great effect, (there are still problems) e.g. EU's dependency on imported raw materials, scarce metals, water stress, emphasis on waste-policy and redrafting waste targets'.

The Italian Ministry for the Environment, Land and Sea was also in line with the above and noted that 'sub-objectives on waste are still far from achievement and concerning water stress prevention: more effective measures are needed'.

Another national authority noted a need to progress with an action (viii)¹⁰⁹ i.e. 'fully implementing Union waste legislation in light of circular economy and stimulation of change in behaviour'.

The Irish Environmental Protection Agency also had a related comment: 'too [much] focus on waste (end of pipe) and little focus on changing/influencing societal values to moderate and promote more sustainable consumption and production. [There is a] need [for] taxes on unsustainable and carbon inefficient and single use materials. Conspicuous consumption is still marketed as socially desirable'.

One national authority commented that 'Sustainable consumption is a difficult area. There should be more focus and tools developed for co-existence of/synergies between cities and the rural areas'.

Greenpeace European Unit provided the following comment: 'The EU must urgently adopt policies to reduce the consumption and production of livestock products, particularly meat, to reduce greenhouse gas emissions and "the overall environmental impact of all major sectors of the Union economy" (sub-objective 2b), and to deliver the structural changes in production, technology and innovation, as well as consumption patterns. Lifestyles have reduced the overall environmental impact of production and consumption, in particular in the food, housing and mobility sectors (sub-objective 2c). Also, the EU's 2020 climate targets were unambitious and not in line with climate science. Progress towards the EU's 2020 renewable energy and energy-efficiency targets in particular has been far too slow, not least because they were not backed by a robust policy framework, and in the case of the efficiency target were non-binding'.

European Environmental Citizens' Organisation for Standardisation (ECOS) noted that 'From an eco-design perspective, there is strong industrial resistance to resource efficiency, and this needs stronger leadership from EU institutions'.

EurEau commented that 'The contribution of water to the circular economy was underestimated or not taken into account. In order to be able to recycle sewage sludge we need to put in place a non-toxic environment strategy to limit chemical and pharmaceutical substances entering the water cycle'.

CEMBUREAU, the European Cement Association, an industry organisation, commented that 'Industry remains the low-hanging fruits for air quality legislation, while other sectors like agriculture and shipping are much less constrained'.

¹⁰⁹ (Action viii in Objective 2 at Annex I of Decision 1386/2013/EU laying down the 7th EAP) fully implementing Union waste legislation. Such implementation will include applying the waste hierarchy in accordance with the Waste Framework Directive and the effective use of market-based instruments and other measures to ensure that: (1) landfilling is limited to residual (i.e. non-recyclable and non-recoverable) waste, having regard to the postponements provided for in Article 5(2) of the Landfill Directive; (2) energy recovery is limited to non-recyclable materials, having regard to Article 4(2) of the Waste Framework Directive; (3) recycled waste is used as a major, reliable source of raw material for the Union, through the development of non-toxic material cycles; (4) hazardous waste is safely managed and its generation is reduced; (5) illegal waste shipments are eradicated, with the support of stringent monitoring; and (6) food waste is reduced. Reviews of existing product and waste legislation are carried out, including a review of the main targets of the relevant waste directives, informed by the Roadmap to a Resource Efficient Europe, so as to move towards a circular economy; and internal market barriers for environmentally-sound recycling activities in the Union are removed. Public information campaigns are required to build awareness and understanding of waste policy and to stimulate a change in behaviour

Community of European Railway and Infrastructure Companies (CER) commented 'While objective 33¹¹⁰ underscores the importance of the 2011 Transport White Paper, the progress towards the targets is not satisfactory. CER continues to endorse the modal shift targets of the White Paper. These should remain the guiding principles for EU transport policy-making as they are central to the delivery of Europe's overall goals of cutting GHG emissions, achieving energy security, and relieving congestion. These modal shift targets require appropriate infrastructure to be developed. Furthermore, fair conditions for inter-modal competition have to be secured, which could be achieved with pricing policies i.e. infrastructure pricing, internalisation of external costs and taxation. EU Emissions Trading System [ETS] is the central pillar of EU's climate policy and it is currently being revised. A strong and credible ETS should encourage further decarbonisation of power generation, including electricity used for transport. CER requests a balanced carbon pricing policy across all transport modes as the current ETS Directive does not achieve this. CER's proposal is to use the auction revenues for the further promotion of low-carbon modes. Given Europe's high dependence on imported fossil fuels, increases in fossil fuel taxation should be considered, with revenue recycling in favour of low-carbon transport, including rail. Objective 37¹¹¹ addresses the lifecycle environmental impact of sectors including mobility but no substantial proposals are formulated'.

ANEC noted 'while we welcome resource efficiency has been made a priority by the Commission, the lack of setting targets is the main loophole of the Commission' strategy towards resource efficiency. A weakness of the current EU sustainable product policy is its major focus on energy efficiency. Other important aspects such as resource efficiency, recyclability, re-usability, waste and hazardous chemicals are often left out. These shortcomings ought to be addressed, allowing thus an increase of environmental performance of products and addressing the most relevant environmental aspects for each product category'.

Implementation of policy instruments and actions listed in Objective 2

Policy instruments and actions set to achieve the Priority Objective 2 in 7th EAP:

- (i) fully implementing the Climate and Energy Package and urgently agreeing on the Union's 2030 climate and energy policy framework, with due regard for the most recent IPCC assessment report, taking into account the indicative milestones set out in the Low-Carbon Roadmap, as well as developments within the UNFCCC and other relevant processes;

¹¹⁰ Paragraph 33 of Annex I of Decision 1386/2013/EU laying down the 7th EAP: 'Fully implementing the Union Climate and Energy Package is essential to reaching the milestones identified for 2020 and for building a competitive, safe and sustainable low-carbon economy by 2050. Whereas the Union is currently on track to reduce domestic GHG emissions 20 % below 1990 levels by 2020, meeting the 20 % energy efficiency target will require far more rapid efficiency improvements and behavioural change. The Energy Efficiency Directive is expected to make a significant contribution in this regard, and could be complemented by efficiency requirements for the energy use of products placed on the Union market. A comprehensive assessment of the availability of sustainable biomass is also important in the light of the increasing demand for energy and the on-going debate on the conflict between land use for food and land use for bio-energy. It is also vital to ensure that biomass in all its forms is produced and used sustainably and efficiently over its whole life cycle, so as to minimise or avoid negative impacts on the environment and climate and with due regard for the economic context of the various uses of biomass as a resource. This would contribute to building a low-carbon economy.'

¹¹¹ Paragraph 37 of Annex I of Decision 1386/2013/EU laying down the 7th EAP: 'To set a framework for action to improve resource-efficiency aspects beyond GHG emissions and energy, targets for reducing the overall lifecycle environmental impact of consumption will be set, in particular in the food, housing and mobility sectors. Taken together, those sectors are responsible for almost 80 % of the environmental impacts of consumption. Indicators and targets for land, water, material and carbon footprints as well as their role within the European Semester should also be considered in this regard. The Rio+20 outcome recognised the need to significantly reduce postharvest and other food losses and waste throughout the food supply chain. The Commission should present a comprehensive strategy to combat unnecessary food waste and work with Member States in the fight against excessive food waste generation. Measures to increase composting and anaerobic digestion of discarded food, as appropriate, would be helpful in this regard.'

(ii)	generalising the application of 'Best Available Techniques' in the context of the Industrial Emissions Directive and enhancing efforts to promote the uptake of emerging innovative technologies, processes and services;
(iii)	giving impetus to the public and private research and innovation efforts required for the development and uptake of innovative technologies, systems and business models which will speed up and lower the cost of transition to a low-carbon, resource-efficient, safe and sustainable economy. Further developing the approach set out in the Eco-innovation Action Plan, identifying priorities for incremental innovation as well as system changes, promoting a larger market share of green technologies in the Union and enhancing the competitiveness of the European eco-industry. Establishing indicators and setting realistic and achievable targets for resource efficiency;
(iv)	developing measurement and benchmarking methodologies by 2015 for resource efficiency of land, carbon, water and material use, and assessing the appropriateness of the inclusion of a lead indicator and target in the European Semester;
(v)	establishing a more coherent policy framework for sustainable production and consumption including, where appropriate, the consolidation of existing instruments into a coherent legal framework. Reviewing product legislation with a view to improving the environmental performance and resource efficiency of products throughout their lifecycle. Stimulating consumer demand for environmentally sustainable products and services through policies which promote their availability, affordability, functionality and attractiveness. Developing indicators and realistic and achievable targets for the reduction of the overall impact of consumption;
(vi)	developing training programmes geared towards green jobs;
(vii)	increasing efforts to reach existing targets and reviewing approaches to green public procurement, including its scope, in order to increase its effectiveness. Establishing a voluntary green purchaser network for Union businesses;
(viii)	fully implementing Union waste legislation. Such implementation will include applying the waste hierarchy in accordance with the Waste Framework Directive and the effective use of market-based instruments and other measures to ensure that: (1) landfilling is limited to residual (i.e. non-recyclable and non-recoverable) waste, having regard to the postponements provided for in Article 5(2) of the Landfill Directive; (2) energy recovery is limited to non-recyclable materials, having regard to Article 4(2) of the Waste Framework Directive; (3) recycled waste is used as a major, reliable source of raw material for the Union, through the development of non-toxic material cycles; (4) hazardous waste is safely managed and its generation is reduced; (5) illegal waste shipments are eradicated, with the support of stringent monitoring; and (6) food waste is reduced. Reviews of existing product and waste legislation are carried out, including a review of the main targets of the relevant waste directives, informed by the Roadmap to a Resource Efficient Europe, so as to move towards a circular economy; and internal market barriers for environmentally sound recycling activities in the Union are removed. Public information campaigns are required to build awareness and understanding of waste policy and to stimulate a change in behaviour;
(ix)	improving water efficiency by setting and monitoring targets at river basin level on the basis of a common methodology for water efficiency targets to be developed under the Common Implementation Strategy process, and using market mechanisms, such as water pricing, as provided for in Article 9 of the Water Framework Directive and, where appropriate, other market measures. Developing approaches to manage the use of treated wastewater.

Question below concerns the assessment of effectiveness of the actions/policy instruments under Objective 2 and their implementation. Respondents were given the possibility to assess the effectiveness as 'sufficient' and 'insufficient'. Not all respondents participating in the survey indicated a response under this question.

Q55. With regard to the following policy instruments/actions under Objective 2 of the 7th EAP, what is your assessment of their implementation?¹¹²

¹¹² Stakeholder categories not represented in the table did not provide inputs in this question

actions/ policy instruments	EU institutions	National authorities	Regional authorities (n/a)	Industry	Nature interest	Citizens' interest	Research (n/a)	International organisations (n/a)	TOTAL
	5	17	0	4	6	1	0	0	32
55.1.1. (i) the Climate and Energy Package, agreeing on the Union's 2030 climate and energy policy framework - EU level									
Not Sufficient	1	5		1	4	1			12
Sufficient	3	11		3	1				18
- Member State level									
Not Sufficient	2	8		1	3	1			15
Sufficient	1	7		1	1				10
55.2.1. (ii) promoting innovation and of 'Best Available Techniques' in the context of the Industrial Emissions Directive - EU level									
Not Sufficient	2	5			2	1			10
Sufficient		11		3	2				16
- Member State level									
Not Sufficient	1	8			2	1			12
Sufficient		8		1	1				10
55.3.1. (iii) research, innovation, development and uptake of innovative technologies, systems and business models for low-carbon, resource-efficient, safe and sustainable economy, implementation of the Eco-innovation Action Plan, enhancing the competitiveness of the European eco-industry, establishing indicators and targets for resource efficiency - EU level									
Not Sufficient	1	7			1				9
Sufficient	3	10		4	1				18
- Member State level									
Not Sufficient	2	13			1				16
Sufficient		4		1	1				6
55.4.1. (iv) measurement and benchmarking methodologies by 2015 for resource efficiency of land, carbon, water and material use and inclusion of a lead indicator and target in the European Semester - EU level									
Not Sufficient	3	10			2				15
Sufficient	1	6		2	1				10
- Member State level									
Not Sufficient	2	14			1				17
Sufficient		3			1				4

actions/ policy instruments	EU institutions	National authorities	Regional authorities (n/a)	Industry	Nature interest	Citizens' interest	Research (n/a)	International organisations (n/a)	TOTAL
	5	17	0	4	6	1	0	0	32
55.5.1. (v) more coherent policy and legal framework for sustainable production, consumption and demands, improving the environmental performance of products throughout their lifecycle, developing indicators and targets for the consumption reduction - EU level									
Not Sufficient	1	8		3	4	1			17
Sufficient	1	8		1	1				11
- Member State level									
Not Sufficient	2	11		1	1	1			16
Sufficient		4			1				5
55.6.1. (vi) developing training programmes geared towards green jobs - EU level									
Not Sufficient	3	8		2	1				14
Sufficient		5			1				6
- Member State level									
Not Sufficient	2	12		1	1				16
Sufficient		4			1				5
55.7.1. (vii) enhancement of green public procurement, establishing a voluntary green purchaser network for Union businesses - EU level									
Not Sufficient	4	9		2	2				17
Sufficient		7		1	1				9
- Member State level									
Not Sufficient	3	10			1				14
Sufficient		7			1				8
55.8.1. (viii) fully implementing Union waste legislation in light of circular economy and stimulation of change in behaviour - EU level									
Not Sufficient	2	9		1	2				14
Sufficient	1	8		3	1				13
- Member State level									
Not Sufficient	3	11			1				15
Sufficient									
55.9.1. (ix) improving water efficiency by setting and monitoring targets at river basin level on the basis of the Common Implementation Strategy process, and using market mechanisms - EU level									
Not Sufficient	1	5		1	2				9

actions/ policy instruments	EU institutions	National authorities	Regional authorities (n/a)	Industry	Nature interest	Citizens' interest	Research (n/a)	International organisations (n/a)	TOTAL
	5	17	0	4	6	1	0	0	32
Sufficient	1	6		2	1				10
- Member State level									
Not Sufficient	2	10			2				14
Sufficient		3		1	1				5

Regarding the question on the progress in *the Climate and Energy Package, agreeing on the Union's 2030 climate and energy policy framework*, 32 respondents replied for the EU level (1). A majority (18 respondents, including most respondents from EU institutions and industries, two-thirds of respondents from national authorities and one nature interest organisation) are positive about the progress at EU level. The remainder, a minority of 12, see 'insufficient' progress (these include most of the nature and citizens' interest organisations).

Comments from the survey:

Both the European Environmental Bureau and the Climate Action Network Europe state that there is 'an insufficient level of ambition'.

The Greenpeace European Unit states that progress towards both 2020 and 2030 targets is insufficient. BEUC noted that 'while the Energy Union has great potential to make energy markets more sustainable, we believe that more ambition will be needed on setting binding energy efficiency targets. Better rules are also needed to ensure that consumers who invest in renewables will enjoy security of investments'.

As for the progress at Member State level, out of 28 respondents a majority of 16 see 'insufficient' progress (two out of three EU institutions, eight out of 15 national authorities, one out of two industry organisations, and the majority of nature and citizens' interest organisations). The remaining 12 think there is 'sufficient' progress in this area.

Comments from the survey:

One national authority noted for both EU and Member State levels that the framework is still under negotiation.

On the question on the progress *promoting innovation and of "Best Available Techniques" in the context of the Industrial Emissions Directive*, 27 respondents replied for the EU level. The majority (16) answered 'sufficient' (11 out of 16 national authorities; all three industry organisations, and two out of four nature interest organisations). A minority of 11 disagreed, including both participating EU institutions, the only citizens' interest organisation, along with a few national authorities and nature support organisations.

Comments from the survey:

The WWF European Policy Office elaborated on their answer stating: 'Not sufficient. Many European plants are responsible.'

BEUC noted that 'in the transport area, the pending reform of type approval and market surveillance rules needs to be finalised to ensure that car emissions will reliably be tested before cars are sold. The EU needs also to adopt additional ambitious limit value for CO2 emissions and to better inform consumers about such emissions'.

On the progress at Member State level, the opinions of 22 respondents were split. Just under one half answered 'sufficient' (half of the national authorities, the only industry organisation and one out of three nature interest organisations). The other half of the national authorities, two nature interest and the only citizens' interest organisation and EU institution gave a negative assessment.

Comments from the survey:

The European Environmental Bureau elaborated on their answer stating: 'Insufficient since too many loopholes sought.'

On the progress in *promoting research, innovation, development and uptake of innovative technologies, systems and business models for low-carbon, resource-efficient, safe and sustainable economy, implementation of the Eco-innovation Action Plan, enhancing the competitiveness of the European eco-industry, establishing indicators and targets for resource efficiency*, a large majority of 18 out of a total of 28 answered positively about the progress. These include the majority of EU institutions, ten out of 17 national authorities, all the industry organisations and one out of two nature interest groups. The remaining minority had an opposite view on this issue. No comments were provided.

On the progress in Member States, 23 respondents replied. A large majority of 17 answered 'insufficient' (all the EU institutions, 13 out of 17 national authorities and one out of two nature interest organisations). The remaining six had a positive assessment. No comments were provided.

On the progress in *measurement and benchmarking methodologies by 2015 for resource efficiency of land, carbon, water and material use and inclusion of a lead indicator and target in the European Semester at EU level*, 15 out of 28 responses, a majority, were negative. These included most of the EU institutions, ten out of 16 national authorities, and two out of three nature interest organisations. At the same time both the industry organisations that responded to this question were positive about the progress, along with one EU institution, one nature interest group and the remaining national authorities.

Comments from the survey:

One EU institution which sees 'insufficient' progress stated that: '... only some have been delivered'.

The Ministry of the Environment, Finland stated that 'This was (also) discussed in the circular economy package'.

Regarding progress at Member State level, 17 out of 22 respondents (a large majority) answered 'insufficient' (all the EU institutions, 14 out of 17 national authorities, one of the two nature interest organisation). The remaining four respondents were more optimistic about the progress at national level. No comments were provided.

On the progress in building *more coherent policy and legal framework for sustainable production, consumption and demands, improving the environmental performance of products throughout their lifecycle, developing indicators and targets for the consumption reduction*, slightly over half of the 31 respondents gave a negative assessment in contrast to the remainders positive answers. Opinions of the EU institutions and national authorities were equally split on this matter. The majority of industries and nature and citizens' interest organisations had negative views.

Comments from the survey:

The Greenpeace European Unit answered 'insufficient' and gave the examples 'food, bioenergy & hazardous substances' as problematic areas.

One EU institution stated that it is 'to be delivered in 2018 under the Circular Economy [package]'.

BEUC provided the following comment: 'While we strongly welcome the renewed mandates for Ecodesign and the EU Ecolabel as well as the recent reform of the Energy Label, more action needs to be done to implement these tools with ambitious product policies. More action will also be needed on resource efficiency, product durability and reparability'.

More negative assessment is seen on the progress at Member State level. Only five out of 21 see positive developments (four out of 15 national authorities and one nature interest organisation). The vast majority (16), including all EU institutions, 11 national authorities, the only industry and one nature and one citizens' interest organisations, see insufficient progress at national level on the above matter. No comments were provided.

Regarding the progress in *developing training programmes geared towards green jobs* at both EU and national levels, the assessments were quite similar. A large majority see 'insufficient' progress, including most or all respondents from all groups. Those who were positive in their assessment included a small minority of national authorities and one nature interest organisation. No comments were added by respondents.

On the question about the progress in *enhancement of green public procurement, establishing a voluntary green purchaser network for Union businesses* at EU level, 26 respondents replied. A minority of nine answered 'sufficient' (seven out of 16 national authorities, a minority of industry and nature interest organisations). Seventeen out of the 26 answered 'insufficient' (all four EU institutions, nine out of 16 national authorities, two industry and two nature interest organisations).

Comments from the survey:

The Greenpeace European Unit gave an example: Public procurement of renewable energy is still a difficult case.

At Member State level, there were 23 respondents. A minority of eight answered 'sufficient' (seven out of 17 national authorities and one of two nature interest organisations), and a majority of 14 answered 'insufficient' (all three EU institutions, ten out national authorities and one of two nature interest organisations).

Comments from the survey:

One national authority commented that ‘in the area of green public procurement, there are great differences between the “old” and “new” Member States’.

In assessing the progress in *fully implementing Union waste legislation in light of circular economy and stimulation of change in behaviour* at EU level, there was a split among the 27 respondents. There were slightly less positive assessments among all groups except for industries.

Comments from the survey:

The Ministry of the Environment, Finland noted that the ‘Negotiations (are) ongoing in the waste package’.

At Member State level, there were more negative assessments among all groups except for the industry one (the only participant from industries was positive about the progress).

Comments from the survey:

The CCPIE–CCIM (Belgium) noted that progress is different across the Member States.

The Ministry of the Environment and Energy, Sweden noted that progress is ‘Mostly sufficient for waste. Not for chemicals’.

One national authority answered ‘sufficient’ on both EU and Member State levels and sees it as an outcome of the adoption of the Circular Economy package.

Regarding the question on the progress in *improving water efficiency by setting and monitoring targets at river basin level on the basis of the Common Implementation Strategy process, and using market mechanisms* at EU level, slightly more than half of respondents are positive about the progress. The split is seen in all groups of stakeholders which answered this question (EU institutions, national authorities, industry organisations and nature interest organisations). No comments were provided.

At the Member State level assessment, there are more negative views (14 against five). Those which are positive are three out of 13 national authorities, the only industry organisation, one of the three nature interest organisation. All respondents from the EU institutions gave a negative assessment to the progress at national level. No comments were provided.

Additional insights and comments provided by the stakeholders in the survey in regard to this question were the following:

One national authority commented ‘We consider it very important to unify approaches of different Member States to statistics in the field of waste management. Legal definitions in the field should also be unified and harmonised, including formulation of “secondary raw materials” definition.’

One EU institution noted ‘large disparities in terms of the implementation of waste legislation’.

The Ministry of the Environment, Finland suggested ‘The differences in the form and volume of natural resources ought to be discussed. Regarding natural resources policies one size doesn’t fit all. Different types of natural resources should be dealt with separately. More attention should be paid to the differences of various materials and their related problems.’

The Irish Environmental Protection Agency commented ‘IE produces milk and beef with the lowest carbon footprint in the EU, yet still is noted as bad.’

European Landowners Organisation (ELO), a nature interest support organisation, noted about disparities across Member States’ progress in all listed areas.

Enhancement of the implementation of the legislation in the area of green and low-carbon economy

This question seeks to understand the effectiveness of the implementation of the legislation under Objective 2. This question also relates to Objective 4.

Q58. With regard to enhancing the implementation of the legislation in the area of resource-efficient, green and competitive low-carbon economy, do you agree with the following statements:		EU institutions	National authorities	Regional authorities(n/a)	Industry	Nature interest	Citizens’ interest	Research (n/a)	International organisations (n/a)	TOTAL
	Total	5	20	0	5	7	2	0	0	39
	Yes	2	1		1	1				5

Q58. With regard to enhancing the implementation of the legislation in the area of resource-efficient, green and competitive low-carbon economy, do you agree with the following statements:		EU institutions	National authorities	Regional authorities(n/a)	Industry	Nature interest	Citizens' interest	Research (n/a)	International organisations (n/a)	TOTAL
Improving relevant legislation to match real needs has been given top priority	Mainly yes	2	15		3	2				22
	Mainly no	1	3		1	3	2			10
	No									0
	Do not know		1			1				2
Compliance with legislation in this area has been improved	Yes		2		1	1				4
	Mainly yes	4	14		3		1			22
	Mainly no		2		1	4	1			8
	No									0
	Do not know		2			2				4
Public access to information on the implementation of legislation in this area has improved	Yes	1	2		2	1				6
	Mainly yes	4	12		2	1				19
	Mainly no		3			3	1			7
	No									0
	Do not know		3		1	2	1			7
Citizens' trust and confidence in the enforcement of legislation in this area has been enhanced	Yes		1			1				2
	Mainly yes	3	10		3					16
	Mainly no	2	4			3	1			10
	No		1							1
	Do not know		4		2	3	1			10

On whether *improving relevant legislation to match real needs has been given top priority*, the majority (27 out of 39) of respondents were mainly positive or positive in their answers. In general, the majority of EU institutions, national authorities and industry organisations were positive. Nature and citizens' interest organisations showed more negative or mixed responses. Two respondents lacked an opinion.

Comments from the survey:

The WWF European Policy Office (EPO) answered 'Mainly no' and commented 'While actions have been adopted to move towards a resource-efficient economy, these are restricted in scope and voluntary in nature, failing to address sustainable sourcing and adopt resource-efficiency targets. Concrete and more binding measures that would complement industry action are needed, e.g. regulatory measures in supporting deforestation-free commitment by business and industry. Moreover, legislative proposals to move towards a low-carbon economy are not ambitious, and are inconsistent with the global Paris Agreement of holding the increase in temperature well below 2 °C and pursue efforts to limit the temperature increase to 1.5 °C.'

One EU institution answered 'Yes' and commented 'in waste area'.

European Environmental Citizens' Organisation for Standardisation (ECOS) answered 'Yes' and commented 'Eco-design regulations have to be improved to better account for resource-efficiency considerations'.

European Environmental Bureau answered 'Mainly yes' and commented 'But only after a storm of protest against withdrawal of first Circular Economy Package'.

BEUC - The European Consumer Organisation, a citizens' interest support organisation in their position paper highlighted a persisting challenge with regulating emission in transport area. They suggest that '...the pending reform of type approval and market surveillance rules needs to be finalised to ensure that car emissions will reliably be tested before cars are sold. The EU needs also to adopt additional ambitious limit value for CO2 emissions and to better inform consumers about such emissions.'

Similar to the above, the majority of 38 respondents agree or mainly agree that *compliance with legislation in this area has been improved*. The positive views mostly came from EU institutions, national authorities and industry organisations. Nature and citizens' interest organisations showed more negative or mixed responses. Four answered 'Do not know'.

Comments from the survey:

The Irish Environmental Protection Agency answered 'Mainly no' and commented 'because very little real legislation exists'.

The European Environmental Citizens' Organisation for Standardisation (ECOS) noted that, implementation of eco-design regulations should also be improved, including better market surveillance'.

Again, there were largely positive views (25 out of 39) on the question of whether *public access to information on the implementation of legislation in this area has improved*. Similar to the above, the positive views were mostly coming from EU institutions, national authorities and industry organisations. Nature and citizens' interest organisations showed more negative responses. Seven answered 'Do not know'.

Comments from the survey:

The WWF European Policy Office (EPO), along with its negative assessment commented that 'Correct transposition of the Aarhus Convention on access to environmental information in EU law has contributed to disseminate environmental information. Part of this information is however still being withheld by EU institutions and national public authorities. Some public authorities at national level often reject petitions on disclosure of environmental information on the basis that there is not an overriding public interest in providing such information. Moreover, the European Commission should make the infringement processes concerning environmental breaches more transparent.'

One EU institution sees the increase in access to 'statistics on waste management online, Stakeholder Platform on Circular Economy running from fall 2017'.

The Irish Environmental Protection Agency answered 'Mainly no' and commented 'little legislation of any real ambition other than some take-back rules'.

ECOS stressed that 'we need more information and data on performance of products with regards to resource efficiency'.

There were 39 replies to the question on whether *citizens' trust and confidence in the enforcement of legislation in this area has been enhanced*. Around two thirds were positive about the progress (mainly national authorities and industries). Nature and citizens' interest organisations had negative assessments and EU institutions provided mixed views. Ten respondents had no opinion.

Comments from the survey:

The WWF European Policy Office answered 'Mainly no' and commented 'In February 2017, almost 260 000 people asked for a radical reform of the EU's broken Common Agricultural Policy in the Public Consultation launched by the Commission, asking to be aligned with resource-efficient and climate concerns. This number shows that citizens care for our environment and demand enhanced enforcement action. Moreover, according to the latest Eurobarometers, 96 % of Europeans say it is important for them that Europe uses its resources more efficiently, and 87 % think their country generates too much waste. Furthermore, 77 % are concerned that overuse of water in agriculture has an impact on the quality and quantity of water. Only 7 % believe the EU's current measures are enough to address water problems in Europe. These numbers show that citizens ask for more legislation and better enforcement.'

Promotion of interests of relevant groups

This question seeks opinions on the effectiveness of the implementation of policies promoted under Objective 2 in regard to promotion of interests of the citizens, nature and economic actors.

Q59. Do you think that the legislative activities under this Objective have led (or are on the good track to leading) to improved protection/satisfaction of the interests of:		EU institutions	National authorities	Regional authorities (n/a)	Industry	Nature interest	Citizens' interest (n/a)	Research	International organisations	TOTAL
	Total	5	20		5	7	2			39
Citizens	Yes	2	4		1	1				8
	Mainly yes	3	10		4	2	1			20
	Mainly no		4			4	1			9
	No		1							1
	Do not know		1							1
Nature/flora & fauna	Yes	2	3		1	1				7
	Mainly yes	1	11		4	3				19
	Mainly no	2	3			2	1			8
	No		2							2
	Do not know						1			1
Economic actors (businesses, farmers, etc.)	Yes	3	3							6
	Mainly yes	2	12		5	3				22
	Mainly no		4			1	1			6
	No									0
	Do not know		1			2	1			4

Citizens (total respondents: 39)

A majority (28) of respondents were positive about the progress in relation to citizens' interests. EU institutions, national authorities and industries are largely positive about it, while nature and citizens' interest organisations have mixed opinions. One respondent had no view on this issue.

Comments from the survey:

The WWF European Policy Office (EPO) answered 'Mainly no' and referred to the 'latest Eurobarometer (survey), showing that 96 % of Europeans believe that supporting an economy that uses fewer resources and emits less greenhouse gases is important for the EU, 86 % think more efficient resource use would have a positive impact on their quality of life, and 80 % that this would have a positive impact on economic growth. EU citizens therefore agree that action towards a resource-efficient economy will have positive impacts on their life, but EU policies have only had modest impacts on these issues and are not on track to address some of the most pressing, such as climate change (see previous answers).'

The Irish Environmental Protection Agency answered 'No' and commented 'little information on products to influence choices (bar some electrical goods)'.

ECOS answered 'Mainly no' and commented 'Consumers request more resource-efficient, durable and repairable products'.

The Ministry of the Environment, Finland answered 'Yes' and noted that the 'Importance of circular economy has been raised. The emphasis has also been on PEF-/ OEF-piloting (development of methodology for product and organisation environmental footprint)'.

Nature/Flora and Fauna (total respondents: 37)

In this category, there is also a dominance of positive assessments (26 positive against 10 negative), contributed mainly by national authorities and industries. EU institutions and nature interest support organisations gave mixed responses, while the only citizens' interest support organisation gave a mainly negative assessment. Interestingly, among a minority of 5 national authorities, 2 had strictly negative assessments of this issue.

Comments from the survey:

The WWF European Policy Office (EPO) answered 'Mainly no' and commented 'WWF's Living Planet Report 2016 confirms that humanity is using the Earth's resources unsustainably, at significant cost to

natural ecosystems. The consequences of this overconsumption include diminishing resource stocks, declining biodiversity, increasing water scarcity and very serious risks of catastrophic climate change. Legislative activities to move towards a resource-efficient and low-carbon economy must properly and urgently address this problem, as we do not have yet the required measures to guarantee that EU production/consumption patterns are not harmful to the environment.'

One national authority sees 'some improvement with resource efficiency, but still large incoherence with gaining biodiversity-targets'.

The Ministry of the Environment, Finland called for more coherence between resource efficiency and biodiversity policies and goals.

CCPIE-CCIM (Belgian Coordination Committee for the International Environment Policy) answered 'Mainly no' and commented 'In a circular economy the impact on biodiversity and ecosystem services must be considered at every stage of the value chain, in coherence to the applicable European and international biodiversity targets. The potential of nature-based solutions and green infrastructure in the circular economy should get more attention. They can tackle some of the most pressing challenges, can be cost-effective and provide economic and social and environmental benefits.'

The Irish Environmental Protection Agency also agrees with the above and noted that the 'role of natural capital in circular economy [is] not appreciated and not accounted for in product pricing'.

Economic actors (total respondents: 38):

The assessment of this topic is also dominated by positive points. Twenty-six out of 28 respondents agree or mainly agree with the progress of this issue. All the EU institutions, the dominant majority of national authorities, all industry representatives and the larger part of the nature interest organisations gave positive assessments. The only citizens' interest support organisation said 'mainly no' along with a few respondents from other groups. Four respondents had no firm opinion.

Comments from the survey:

The WWF European Policy Office answered 'Mainly yes' and commented 'While climate action was once perceived by businesses as a sacrifice, today the deployment of clean energies and the promotion of a resource-efficient economy are providing a basis for a range of sustainable business opportunities. For example, decline of renewable prices is creating a huge buyer's market, and almost 90 % of the continent's new power capacity came from renewable sources in 2016. In addition, many economic actors are embracing this transition and setting goals for reducing their footprint and helping their suppliers to do the same. The WWF's Climate Savers programme and WWF's joint Science Based Targets initiative are two examples of business taking part in concrete actions to reduce emissions. However many progressive companies and investors are worried about the level of political support beyond 2020, and the majority of economic actors are either not yet on a low-carbon pathway or in some cases (the fossil fuel industry, the biomass and biofuels industry, farming lobbies, etc.) are actively working to frustrate progress on environmental issues such as climate change. EU policy-makers still have to provide the right signals that give all market actors the confidence they need to invest in the transition to a low-carbon and resource-efficient economy. Moreover, major private actors have also pledged to eliminate deforestation from their supply chains and investments. Examples include the Consumer Goods Forum's zero net deforestation by 2020 initiative, the Banking Environment Initiative to provide deforestation-free financing, or numerous commitments by individual retailers. Amongst these actors and initiatives are some of the largest EU retailers, importers, processors, producers and banks. A number of them also engage in stopping the conversion of other ecosystems. As a major trading bloc, the EU must rise to the challenge and reinforce private sector efforts through policies and regulatory measures creating a common baseline for all companies and levelling the playing field. This would boost pledges, generate trust and make the companies more accountable to their commitments.'

One national authority answered 'Mainly yes' and commented that the promotion of interest still 'could be superficial'.

The Ministry of the Environment, Finland answered 'Mainly yes' and pointed towards the supporting economic actors through encouraging an 'efficient use of natural resources'.

The Irish Environmental Protection Agency answered 'Mainly yes' but noted a 'very slow drive of businesses to undertake LCA [life cycle assessment], or Green Procurement'.

CCPIE-CCIM had a mainly negative view and thinks that 'Some sectors will have to adapt (to strengthening legislative requirements)'.

Impact of the implementation of EU policy and legislation in the area of green economy

This question seeks opinions on the impact of the implementation of the EU policy and legislation in the area of the green economy on nature, citizens and economic actors. This question also relates to Objective 4.

Q64. What do you think the overall impact is from the implementation of EU policy and legislation in the area of resource-efficient, green and competitive low-carbon economy on:		EU institutions	National authorities	Regional authorities (n/a)	Industry	Nature interest	Citizens' interest	Research (n/a)	International organisations (n/a)	TOTAL
	Total	5	21	0	5	6	3	0	0	40
Citizens	Very negative									0
	Negative									0
	Neutral		8				1			9
	Positive	4	12		4	3	2			25
	Very positive	1	1		1	3				6
Nature/flora & fauna	Very negative									0
	Negative		2							2
	Neutral	1	2		1		1			5
	Positive	2	15		3	4	2			26
	Very positive	2	2		1	2				7
Economic actors (businesses, farmers, etc.)	Very negative									0
	Negative		2		1					3
	Neutral		6		1	1	2			10
	Positive	4	12		3	4	1			24
	Very positive	1	1			1				3

Impact on citizens (total responses: 40)

No 'negative' assessments were provided, only a few (9 out of 40) had 'neutral' assessments; most of the assessments were 'positive' or 'very positive'.

Comments from the survey:

The WWF European Policy Office noted 'If ambition is increased and legislation properly implemented, the overall impact would be extremely positive'.

Greenpeace European Unit answered 'Very positive' and commented that this is 'Both in terms of their general well-being and their living costs'.

Comments from the Focus group:

Focus group participants stated that: "concern over chemicals in products could be clearer on the issue in the 7th EAP. [The] risk for the circular economy of toxic chemicals being in recycled products [exists] – [this is a] consumer trust issue. [There is a] need to take the chemicals out of products in the first place to remove this barrier."

Impact on nature/ flora & fauna (total responses: 40)

Only two negative assessments were recorded, which came from national authorities. A few neutral assessment were provided, while dominant majority were "positive" or mainly positive about the impact of policy developments on flora and fauna.

Comments under the survey:

WWF repeatedly commented 'If ambition is increased and legislation properly implemented, the overall impact would be extremely positive'.

CCPIE-CCIM agrees with the point that 'Less impact on the environment, reduction of GHG emissions, ...' but notes that more can be done.

Impact on economic actors (total responses: 40)

Again mainly positive assessments have been noted. Only three out of 40 respondents had a 'negative' assessment (two from national authorities and one from industry). Ten answered 'neutral'. The remaining respondents had 'positive' or 'very positive' assessments. Overall, the industry groups had mixed views in contrast to others that were dominated by positive assessments.

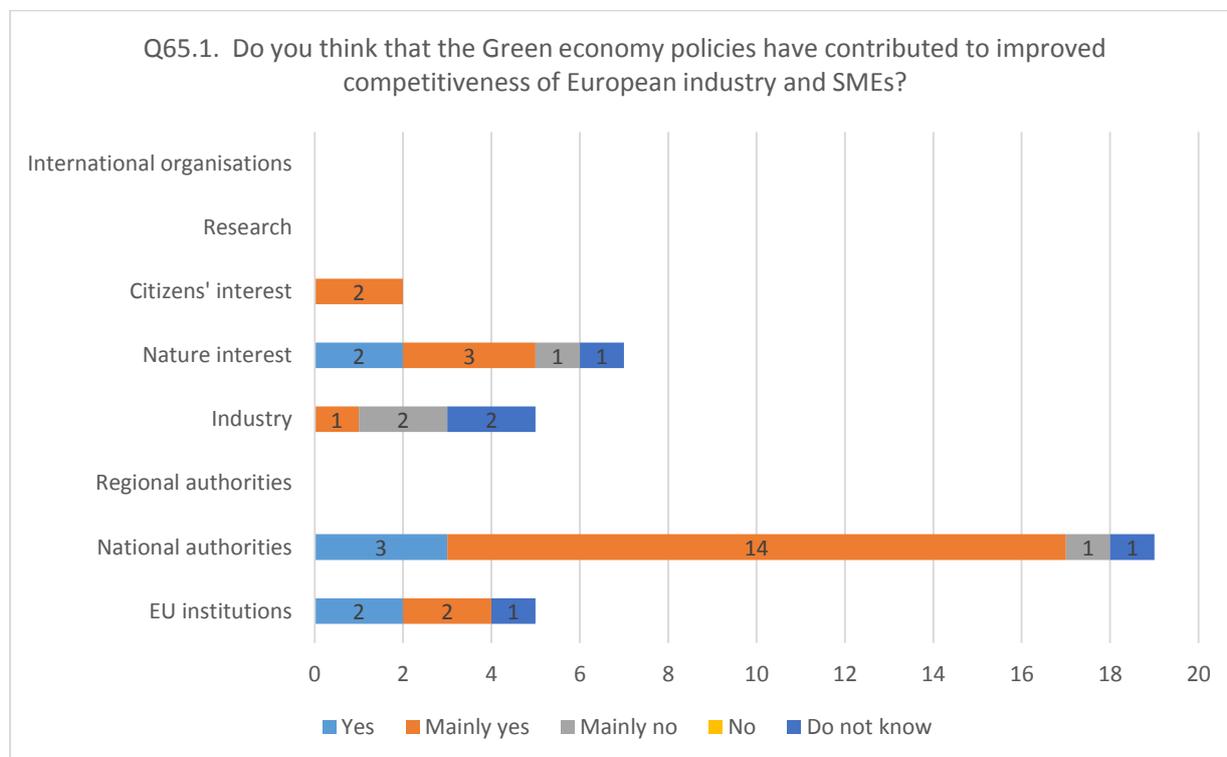
Comments from the survey:

WWF again stated that 'If ambition is increased and legislation properly implemented, the overall impact would be positive'.

CCPIE-CCIM sees negative impact 'for specific sectors which need adaptation to the new model of economy'.

Green economy policies' contribution to the competitiveness of European industry and SMEs

This questions seeks to assess the impact of the green economy policies on the competitiveness of the EU industries and small and medium-sized enterprises (SMEs)



EU institutions National authorities Regional authorities Industry Nature Citizens' Research International

					interes t	interes t	organisati ons
Total respondents:	39	5	20	5	7	2	

More respondents answered positively on the question about the contribution of green economy policies to improved competitiveness of European industry and SMEs. Out of a total of 38 respondents, 29 answered 'Yes' or 'Mainly yes' (EU institutions, national authorities, the majority of nature interest and all citizens' interest organisations). There were rather mixed responses from the industry groups. Other groups did not take part in answering this question.

Comments from the survey:

One national authority answered 'Yes' and commented 'These companies, who have included green economy into their businesses, have been more successful than others'.

The Irish Environmental Protection Agency suggested that 'If GPP was mandatory then it might further assist'.

ECOS commented 'Yes, but there is potential for more ambitious policies that can still lead to further improvement'.

CCPIE-CCIM noted 'A greening of the economy brings major economic benefits in terms of jobs and competitiveness for innovative business models, industry and SMEs. Certainly, if you look at developing new sectors like sustainable energy, circular economy of electrical vehicles'.

3.3.5 Efficiency

Compliance and enforcement cost

The stakeholders from public authorities and industries were asked to indicate any pieces of EU legislation in the area of resource-efficient, green and competitive low-carbon economy that are associated with high enforcement costs for national authorities or high compliance cost for industries.

The survey solicited no response from industry groups regarding the compliance costs.

In regard to the enforcement costs for national authorities, a few answers were collected. Several of them noted that the circular economy, waste management, renewable energy and emission control-related legislations pose high implementation costs.

Comments from the survey:

One national authority noted that 'Waste management policies need resources to set up the infrastructure and will set solid surface for circular/green economy. Also product policies need a lot of resources.'

The Irish Environmental Protection Agency pointed at 'regulation around use of secondary raw materials' separate collections in highly distributed population areas'.

According to another national authority 'BAT [best available techniques], monitoring and data gathering and analysis' [under the Industrial Emissions Directive] are associated with high enforcement costs'.

The Ministry of the Environment, Slovakia noted that enforcing the 'low carbon economy measures-related legislation is burdensome'

CCPIE-CCIM highlighted the 'Effort Sharing Regulation, Renewable Energy Directive' as the ones with high enforcement cost.

Securing funding for green economy activities

Respondents were asked to share an opinion on the adequacy and effectiveness of funding for promoting the resource-efficient, green and low-carbon economy. The logic here is that the 7th EAP is intended (*inter alia*) to help secure this funding. This question also relates to Objective 6.

Q63. With regard to securing funding for resource-efficient, green and competitive low-carbon economy policies, do you agree with the following:		EU institutions	National authorities	Regional authorities (n/a)	Industry	Nature interest	Citizens' interest	Research (n/a)	International organisations	TOTAL
	Total	5	21	0	5	7	7	0	0	41
Public funding has increased	Yes	2	1							3
	Mainly yes	3	17		1	3	1			25
	Mainly no		1		2	2				5
	No									0
	Do not know		2		2	1	2			7
Private funding has increased	Yes		2		1					3
	Mainly yes	2	15		2	3	1			23
	Mainly no	1	1		1	1				4
	No									0
	Do not know	2	3		1	2	2			10
The funding at EU level is adequate to meet the needs	Yes	1	1							2
	Mainly yes		7		1	1				9
	Mainly no	3	9		2	3	2			19
	No		1		1	3				5
	Do not know	1	3		1		1			6
The funding at Member State level is adequate to meet the needs	Yes									0
	Mainly yes		7		1	1				9
	Mainly no	2	11		3	3	2			21
	No	1	1			2				4
	Do not know	2	2		1	1	1			7

Public funding (total responses: 40)

Out of the 40 respondents to the question on whether the public funding has increased, a majority (28) gave positive answers. These were EU institutions, national authorities and a citizens' interest organisation. The industry organisation and nature interest organisations gave mixed answers, including five negative responses. Seven respondents could not provide an answer due to lack of information.

Comments from the survey:

The WWF answered 'Mainly yes' and commented 'The EU is progressive [in their] commitments to spend at least 20 % of its 2014-2020 budget on climate-related projects and policies. In addition, the European Commission has proposed that 40 % of resources under EFSI 2.0 are earmarked for projects aiming to fulfil COP21 objectives. National promotional banks are also at the forefront of this market movement. However, cash that should be flowing into projects that boost environmental sustainability is instead fuelling outdated carbon-intensive projects like motorways, airports and fossil-fuel infrastructure, according to a 2016 report on Europe's investment plan. The report analyses projects approved by the European Fund for Strategic Investments (EFSI) in its first year of operation. The fund should catalyse EUR 315 billion in new investment, and play an important role in the fight against climate change.'

However, during its first year an additional EUR 1.5 billion was earmarked for fossil fuel infrastructure, and 68 % of transport investment is destined for carbon-intensive projects. Deep reforms are necessary if the fund is to guide a sustainable energy transition.'

BEUC sees sustainable finance as an important instrument to achieve environmental sustainability and calls for increase in public funding in systemic changes in industrialised and developing countries, while ceasing fossil fuel subsidies. It also welcomes that the European Commission set up in autumn 2016 a High Level Group on Sustainable Finance. BEUC suggests that the financial system needs further regulatory initiatives and different supervisory structures to make sure sustainable and ethical investments become the rule and the big role should be played by the EU and MS policy makers.

Private funding (Total responses: 40)

Similarly to the above question, there is a dominant perception that the private funding has increased for resource-efficient, green and competitive low-carbon economy. All groups that replied to this question had largely positive answers. A small minority (one from each: EU institutions, national authorities, industry, and nature interest organisations) thought that the funding mainly did not increase. Ten respondent had no opinion.

Comments from the survey:

The WWF European Policy Office answered 'Mainly yes' and commented 'WWF analysis on how EU investors behave shows that the EU's biggest investors are partly aligned with the Paris agreement's climate target of keeping global warming well under 2 °C but still invest too much in coal. WWF's report shows that 30 of Europe's major asset owners, mainly pension funds, have already implemented changes to bring their public equity portfolios more in line with the well under 2 °C climate goal. Although some asset owners are showing leadership, there is still significant misalignment with the 2 °C scenario for coal mining, coal power and renewable power. This requires urgent attention from asset owners to set investments on track for 2020. Private capital also has to be mobilised to fund sustainable investment. The Paris climate agreement marked a watershed in global commitments to tackling climate change. It put finance at the heart of this policy. Investor demand for sustainable projects is driving rapid growth of green bond markets. It is also spurring financial sector interest in the pooling and packaging of energy-efficient mortgages. However, much more is needed from the private sector to redirect the capital flows into sustainable finance.'

One national authority noted that 'technology development has been boosting'.

CEFIC commented that 'Joint technology initiatives like BBI (Bio Based Industries) and SPIRE (Sustainable Process Industry through Resource and Energy Efficiency) have so far leveraged much needed funding in these areas and resulted in remarkable flagship and demo projects. The programme must continue beyond 2020/2021'.

BEUC calls for promoting sustainable finance and stopping the private sector's unethical investments.

Funding at EU level (total responses: 41)

A slight majority of the respondents (25) think that the funding at national level is not adequate to meeting the needs to build the green economy. Very mixed opinions came from the national authorities (eight positive and ten negative). Other stakeholders (EU institutions, industry, nature and citizens' interest groups) were more negative on this aspect. Seven respondents had no opinion.

Comments from the survey:

The WWF answered 'No' and commented 'To make the transition to a low-carbon economy, the EU would need to invest an additional EUR 270 billion (or on average 1.5 % of its GDP annually) over the next four decades'.

ECOS answered 'Mainly no' and commented 'Number of market surveillance for Eco-design needs to be better financed'.

Funding at Member State level (total responses: 41)

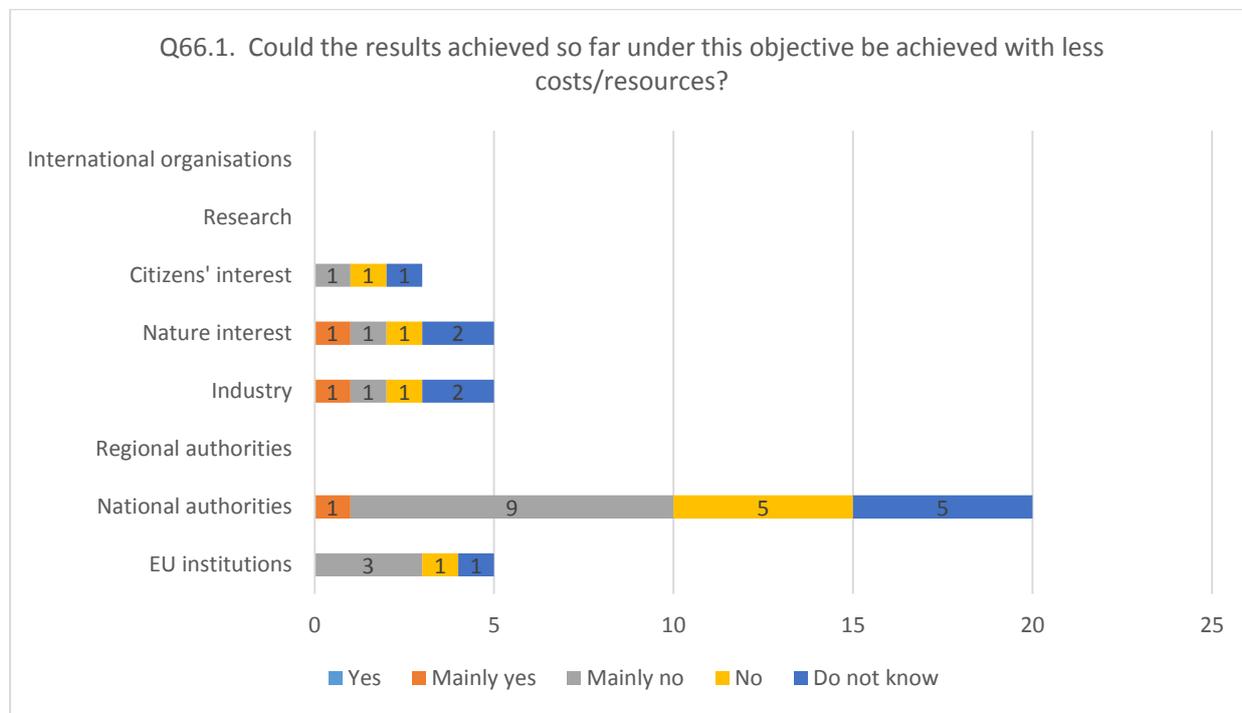
A larger proportion of the respondents (24) think that the funding at EU level is not adequate to meeting the needs in the area of the green economy. Nine respondents think the situation is positive. More than half of the national authorities gave a negative assessment. Other stakeholders (EU institutions, industry, nature and citizens' interest groups) were more negative on this issue. Six respondents had no opinion.

Comments from the survey:

ECOS answered 'Mainly no' and suggested that 'Market surveillance for Eco-design needs to be better financed'.

Could results be achieved with fewer costs?

Respondents were asked whether the results achieved so far under this objective could be achieved with fewer costs/resources. This question seeks opinions on the efficiency of costs under Objective 2. It also relates to Objective 6.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	38	5	20	5	5	3		

In total there were 38 replies to the question on whether the results achieved so far under this objective could be achieved with fewer costs/resources. Apart from 11 respondents who gave no answer, and three respondents (from a national authority, industry and a nature interest organisation) who had positive opinions on this, the majority thought it was mainly not possible to reach results with fewer resources. All stakeholder groups were thus mostly in agreement on this point.

Comments from the survey:

WWF European Policy Office commented 'While lack of funding is currently one of the main gaps for a sustainable transition, the longer we wait the more costly it's going to be to achieve the objectives of the 7th EAP. It's important to take quick investment action to ensure an efficient use of our public resources whilst at the same time re-directing funding from harmful subsidies. Consistency of policy direction is also important – investors need certainty as to the long-term direction of travel. So setting an EU 2050 GHG target for example would tend to reduce cost of capital for low-carbon investment.'

One national authority argues that 'The transition to green/circular economy needs resources and there is need for even more of them. So [where] there would have been less resources, the results would have been even worse'.

CER answered 'Mainly yes' and suggested to focus on 'using taxation (carbon pricing, ETS, internalisation of external costs)' rather than on direct investments.

3.3.6 EU value added

Extra contribution of the 7th EAP in green economy developments

Respondents were asked in an open question as to what further contribution the 7th EAP could make towards progress in resource-efficient, green and competitive low-carbon economy area in comparison to what could be achieved by the Member States if they acted on their own.

Comments from the survey:

The WWF European Policy Office gave the following comment: 'Turning the Union into a resource-efficient and low-carbon economy will require joint efforts of all EU countries to reflect the cross-boundary nature of the pressures threatening our climate and environment. The 7th EAP rightly recognises that environmental and climate-related challenges do not stop at country borders and need a concerted approach at EU (and global) level as otherwise actions in one Member State risk being undone by inaction or – even worse – adverse action by another Member State. In this regard, the 7th EAP can contribute to identify environmental pressures related to resource and material use and put forward a strategy and an action plan on how to translate environmental and social challenges into meaningful context-specific policies. The 7th EAP also has the potential to promote a holistic and integrated approach to sustainable development, through strengthened institutional coordination between different ministries at national level and Directorates-General of the European Commission and European External Action Service at EU level. Joint action is also necessary as the EU needs to address its ecological footprint and the impact of its policies globally (for example, policies in the areas of trade, security or agriculture) to support the delivery of sustainable development in other countries. In addition, most of the Member States admit that between 70 % and 100 % of their national environmental law is derived from EU legislation (Ludwig Krämer, EU Enforcement of Environmental Laws: From Great Principles to Daily Practice – Improving Citizen Involvement, p.4). In this regard, the systems and procedures that the 7th EAP could contribute to [are] put in place to ensure that Member States respect the rules they agreed, [and] bear positive consequences for our environment across the continent. The European Commission could also support Member States' implementation efforts through issuing recommendations, sharing best practices and promoting peer reviews. The strategy should be the primary vehicle for setting Europe on the path to sustainable development and encompass the big picture of all integrated efforts. It must be said, however, that the actual impact of the 7th EAP is rather limited. Generally, public administrations in Member States do not pay enough attention to documents such as the 7th EAP and only take the necessary steps to turn the Union into a resource-efficient and low-carbon economy when legally binding instruments are in place nationally or strong enforcement actions are taken.'

One national authority thinks that the EU through the 7th EAP is 'Setting too expensive a horizontal framework for single Member States'.

Another national authority thinks that the value added is in 'Evaluation of policies on international, EU and global levels – setting the broad perspective'.

The Ministry of the Environment, Slovakia thinks that the 7th EAP 'provides strategic direction for action'.

The Ministry of the Environment, Finland has a similar insight and thinks that 'EU sets the direction. And EU is more effective than Member States'.

The Italian Ministry for the Environment, Land and Sea see the 7th EAP as provider of the ‘long-term policy vision’.

The Irish Environmental Protection Agency sees it as an ‘integrated European product policy’.

One national authority sees value added in the ‘development of EU policies implemented by Member States. More resources to research. Coordination and dissemination of good examples’. Another national authority adds that ‘it is hard to act on their own without support’.

Health and Environment Alliance (HEAL) also thinks that ‘Member States cannot solve climate mitigation or other transboundary problems by themselves’.

CHEM Trust commented ‘The 7th EAP provides the overall guiding framework for advancing to a resource-efficient, green and competitive low-carbon economy. The joint project is to secure a healthy EU environment and well-being for all EU citizens which is the basis for any economic activity’.

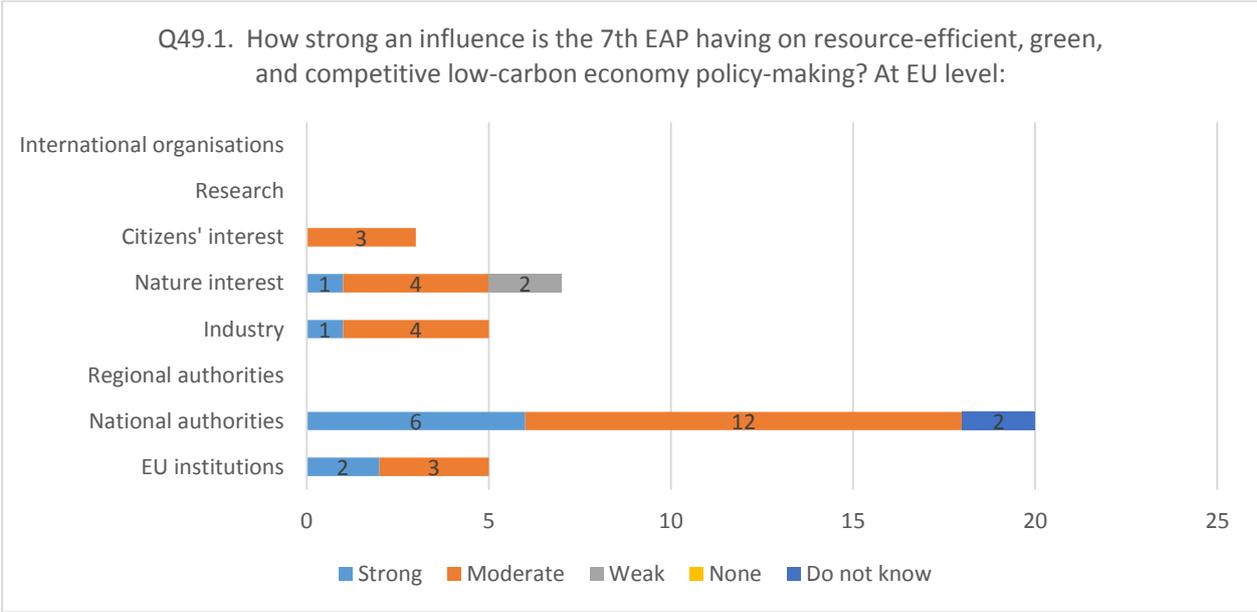
CCPIE-CCIM thinks ‘It brings a EU general vision and a strategic guidance’.

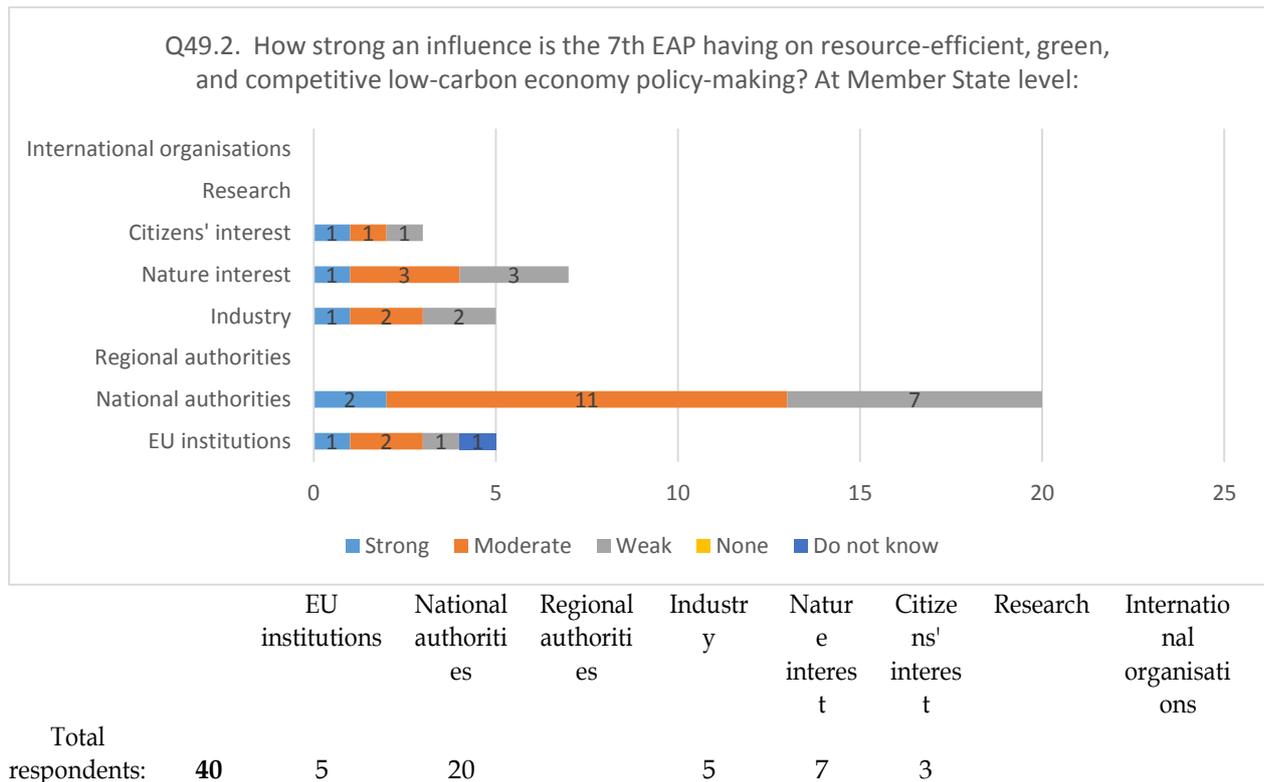
Comments from the interviews:

One interviewee from a European organisation answered: “EAP is a good EU initiative; they can decide on common approaches that have more value in overall terms compared to 28 separate approaches. But the devil is in the details; we have no systems to measure its implementation as compared to the Water Framework Directive. It’s not monitored, so ... What I would do is make it more coherent internally; add the sustainable development goals; spend more time on how it joins together. Whatever we put down for EAP8, consider how we can understand if it’s being successful; [for example by] evaluation by parliament and commission.”

Influence of the 7th EAP on policy-making

The questions here relate to the link between the 7th EAP and green economy policy-making, highlighting the relevance but also the effectiveness and EU added value of the 7th EAP on those two topics.





It appears that there is a more positive and moderated assessment on the influence of the programme at the EU level than at national level. In the case of the EU level, out of 40 respondents only two (nature interest organisations) thought the influence was weak and another two (national authorities) had no opinion. The remainder had positive views (roughly 25 %) and ‘Moderate’ being the most popular view among citizens’ and nature interest groups, industry and national authorities.

Comments from the survey:

The WWF answered ‘Weak’ and commented ‘The 7th EAP contributed to the policy debate on how we are using our natural resources in a moment in which EU consumption and production patterns largely exceed sustainable levels. Its broad objective of achieving a resource-efficient economy possibly has influenced the adoption of the Circular Economy Package in December 2015, which contains a number of meaningful measures, such as the eco-design regulation, energy labelling, revision of the eco-label, green procurement, measures on water re-use and the reduction of food waste. These alone are however not sufficient to achieve the objectives set in the 7th EAP. Most of the adopted actions to move towards a resource-efficient economy are restricted in scope and voluntary in nature. Three major shortcomings are identified by WWF: (1) failure to address sustainable sourcing, (2) lack of a binding EU-wide resource-efficiency target, and (3) no attention for sustainable food consumption. Moreover, the impact of the 7th EAP in promoting a low-carbon economy is negligible. The use of energy from renewable sources and efficiency of energy use were already addressed through different directives before the adoption of the 7th EAP, and the EU climate target for 2020 was already achieved in 2014. Furthermore, the 7th EAP is not contributing to setting ambitious EU climate and energy targets for 2030. Current legislative discussions are based on the European Council Conclusions of October 2014 instead of what is required by the Paris Agreement, adopted at the end of 2015. The 7th EAP should have set a clearer path of action, with ambitious long-term proposals. It has however failed to provide a coherent system of targets and indicators to guide overall developments. It has also failed to provide orientation for key policy decision such as the extension of binding commitments to improve energy efficiency, renewables and reduction of greenhouse gas emissions. Furthermore, the Mid-term review of the implementation of the 7th EAP could have been more flexible so as to allow for the inclusion of future agreements, such as the Paris Agreement or the 2030 Sustainable Development Agenda.’

One national authority answered ‘Moderate’ and commented ‘The 7th EAP sets [a] good framework. However, more emphasis should be put linking 7th EAP with other strategic documents’.

One EU institution answered ‘Moderate’ and commented ‘Circular Economy Action Plan, partly meant to implement the 7th EAP, has to an extent taken over its role in this respect’.

The Ministry of the Environment, Finland answered ‘Moderate’ and commented ‘The effectiveness has not been measured, and would require introduction of a set of indicators’.

EurEau answered ‘Moderate’ and commented ‘CAP and chemicals policy should be more [aligned with] resource-efficient and green policies’.

CCPIE-CCIM answered ‘Moderate’ and commented ‘Most influent policies at EU and Member State levels: EU Circular Economy Action Plan, resource efficiency roadmap. Regarding the competitive low-carbon economy, a number of other EU regulations, directives and roadmaps have significant influence: Effort Sharing Directive (2020) and Regulation (2030), LULUCF [Land Use, Land Use Change and Forestry] Regulation, Energy Efficiency Directive, ETS, etc.’.

In assessing the influence of the 7th EAP on policy-making at Member State level, out of a total of 40 respondents, 6 (representing small minorities from all the stakeholder groups that responded) gave a strong positive assessment. A ‘Moderate’ assessment was provided by close to half of all respondent, which also included representatives of all groups. A third of respondents covering all groups of stakeholders consider the influence to be ‘Weak’. One respondent did not have an opinion.

Comments from the survey:

The WWF answered ‘Weak’ and commented ‘On the one hand, the 7th EAP reinforces the commitments of existing policy initiatives, and it has had some positive impact, e.g. on the implementation of waste policies, including recycling and recovery requirements. In other policy areas, however, progress is not so clear. The application of Best Available Techniques, for example, has not been generalised, and still more than half of the coal power plants in Europe have “permission to pollute” beyond the limits set in the Industrial Emissions Directive. Generally, public administrations in Member States do not pay enough attention to documents such as the 7th EAP and only take the necessary steps to turn the union into a resource-efficient and low-carbon economy when legally binding instruments are in place nationally or strong enforcement actions are taken.’

Comments from the focus group:

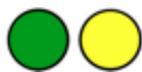
One focus group participant stated on the Council conclusions vs. 7th EAP: *“Legally the 7th EAP should be worth more. Council conclusions have a different function.”*

3.3.7 Overall assessment of Objective 2

In the overall assessment of the progress in the objectives, a colour coding-based scoreboard system (as presented on the right-hand side) has been applied to summarise assessment on *relevance, coherence, effectiveness, efficiency* and *EU added value* criteria. It distinguishes five assessment colour codes indicating spectrum between positive and negative assessment:

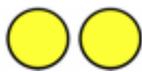
	Positive assessment / high
	Mixed positive assessment/ medium-high
	Mixed assessment / medium
	Mixed negative assessment / medium-low
	Negative assessment / low

- Positive assessment or high relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value
- Mixed positive assessment or medium-high relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value
- Mixed assessment or medium relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value
- Mixed negative assessment or medium-low relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value
- Negative assessment or low relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value

Relevance – Medium-high

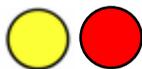
Most respondents argue that Objective 2 of the 7th EAP is highly relevant, with some arguing that an update since the Paris agreements and the UN sustainable development goals is necessary. Respondents mention that ambitions could be raised, especially in the ETS (emission trading scheme) targets but also in (financial) support for low-carbon energy production.

Some gaps are said to exist in product policies. The Circular Economy and, specifically within that paradigm, consumption patterns are not effectively targeted. Many suggest that sustainable procurement is an effective way to motivate industry. Considering these, the relevance of Objective 3 is scored as medium-high

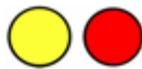
Knowledge base – Medium

In general, the (scientific) knowledge base has increased as judged by most respondents, on all areas ranging from production and consumption patterns to Europe's place in the environmental, global megatrends and costs and benefits. Interestingly, though an increasing understanding of how changes in individual and societal behaviour can contribute to environmental outcomes, it seems that this knowledge fails to meet the relevant policy- and decision-makers, as respondents also indicate that there is still some knowledge gap. This gap is most present in the Circular Economy paradigm, but also comes up when policy-makers set targets for future CO₂ emissions.

On the under-utilisation of knowledge, a most pressing issue is that of food consumption. Some mention that policy-makers lack the political willpower to address our consumption patterns and that notably the consumption of livestock products has been long since known to have a negative impact without any action following suit. Knowledge base therefore is scored as medium.

Coherence – Medium-low

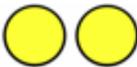
Internal coherence of the green economy objective of the 7th EAP is mainly high, but the integration between sectorial and green economy policies at EU and Member State levels could be better. The Common Agricultural Policy harvests many critiques as a wasteful, outdated instrument that is in contradiction with the EAP's targets. Besides the CAP, the fisheries and trans-European network policies also receive critiques. The fisheries policy is said to lack sufficient implementation, and the TEN and Structural Funds do not prohibit investments in carbon-intensive technologies or practices. Considering rather critical assessments the coherence of Objective 2 is scored as medium-low.

Effectiveness – Medium-low

Majority of respondent see mixed progress in the achievement of Objective 2. The main barriers for effective policies are gaps in implementation and a lack of ambition. The implementation is assessed as mostly insufficient for all instruments and actions but the one related to Climate and Energy Package. One must note that, in general, the EU is seen as more ambitious than the individual Member States. The EU receives the good appraisals on research and development (R&D) and innovation policy for environmental technologies.

Circular economy (CE) policy is too much focused on end-of-life (waste) options and recycling rather than changing consumption and production patterns. As a specific topic in the CE, water receives too little attention. Despite comments on coherence, the EAP was said to cause some improvements in legislation, but there is still a need for more ambitious legislations according to some respondents. It seems that the EAP is regarded by most respondents as rather successful in furthering the interests of industry, then flora/fauna and finally citizens. More

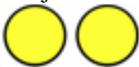
respondents, from industry and NGOs alike, suggest that green economy policies have improved the competitiveness of European industry and SMEs, as such policies spur innovation. Overall, the effectiveness of Objective 2 of the 7th EAP is assessed as medium-low based on the assessment of responses for various questions as well as the comments left by different stakeholders.

Efficiency – Medium 

While the funding to support greening the economy has increased both at EU level and national level, this funding is still not adequate to meet all needs, according to the majority of respondents.

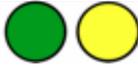
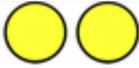
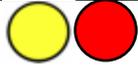
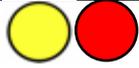
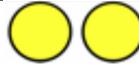
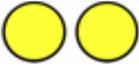
Though effectiveness is lacking in some cases, almost all respondents argue that the results achieved already could not have been achieved at lower costs. Some mention that enforcement costs for Member State governments is mostly in the waste management, while the separate collection of household waste is deemed expensive in the rural areas.

A number of regulations that are subject to Objective 2 pose high compliance cost on Member States, including the circular economy and waste regulation, as well as renewable energy and emission control-related regulations. Therefore, the efficiency under Objective 2 can be rated as medium.

EU added value – Medium 

The EU is the logical level of policy-making for environmental issues, as they defy borders *and* EU policy ensures a unified market. The influence of the EAP on European policy-making is assessed as moderate by a majority, some mention that the EAP may have had an influence on the circular economy package. However, the actual influence remains hard to assess as most points in the Commission’s Action Plan have no clear pathway for realisation or indicators that go with it. EU added value under Objective 2 can be rated as medium.

Overall scoreboard for Objective 2

Relevance	Knowledge Base	Coherence	Effectiveness	Efficiency	EU added value
					

3.3.8 Recommendations

This section presents respondents’ recommendations on the role of various actors in improving the implementation progress in Objective 2, which come as a response to the following open-ended question from the survey, as well as interviews and position papers submitted by stakeholders:

“What should the role of the following stakeholders be in further improving the progress made towards the achievement of Objective 2?”

Role of the EU institutions:

In general, the EU could provide further concrete assistance in implementation, mostly by more clearly defining actionable items and targets based on the plan, while raising ambitions on most notably the energy and climate targets in order to align them with current commitments. Also, more efforts towards the circular economy are deemed necessary: too much landfilling still takes place while critical raw

materials get lost. Targets for repair and reuse could be introduced and more monitoring is necessary. A harder nut to crack but at least as important is to adjust agricultural and fisheries policies to reflect current knowledge on their impact on the climate and biodiversity. This relates to politically challenging topics ranging as far as our diets. Sustainable procurement could be addressed, as well as making sure that EU policies no longer stimulate carbon-intensive investments through, for example, the Trans-Europe Networks and the Structural Funds. Here too, long-term frameworks are of outmost importance, requiring the use of Best Available Technologies and adopting emission performance standards.

Role of the Member States:

Member States are criticised. Most Member States base their environmental legislation on European legislation, but often this seems more because they are forced to do so rather than that they are actually willing. Member States seem protective of their industrial sectors and fear high costs, despite the fact that environmental policies spur innovation and can count on ample support from citizens. To improve progress towards Objective 2, Member States should be able to integrate their already-existing policies to increase coherence; stop funding carbon-intensive activities (i.e. stop subsidising household or transport fuel and investing that money in clean technology), and embrace popular support for at least some parts of the circular economy, such as reshaping tax incentives towards repair and reuse. In terms of choosing policy instruments to reduce unsustainable consumption and production, stakeholders want to see regulatory action in the first place, complemented by tax incentives.

Member States could support the development of EU measures to address the EU's negative footprint abroad and undertake measures at national level, empower citizens, for example by benefitting people from using less energy by ensuring clear retail price signals that accurately and transparently reflect the state of the power system. Also, they could fully ensure the public rights of access to information, public participation and access to justice in environmental matters at national level, by, for example, amending the relevant national legislation to bring it in line with the Aarhus Convention.

Water reuse and efficiency should be more harmonised across Member States.

Role of the regions:

Regions have a pivotal role to play in the circular economy paradigm and are perhaps the only group with mandate and information on local waste and product flows. As such they should take the lead in transforming production-consumption systems. As they are close to their audience and the food production systems, they can also provide well-tuned information on how to consume food or livestock more sustainably. A message from the city council to use local products, for example, may be better received than a similar message about what to consume from the EU. As with the Member States, the regions should cease investing in carbon-intensive activities and use their procurement power to change consumption and production patterns.

Regions can better focus on nutrient recycling, support the maintenance of existing jobs and the creation of new green jobs with local knowledge, and implement green growth policies at regional level, thus actively participating in policy-making.

Further integration of resource-efficient consideration into sectorial policies and better use of financial opportunities is necessary (Horizon 2020, etc.).

Role of industries:

Industries play a crucial role in this landscape. As emitters of large amounts of CO₂ and other wastes, as well as consumers of resources and other natural services, they are the primary targets of many regulations. As market players, they cannot be expected to voluntarily place themselves out of the competition by investing in technology to reduce emissions while their peers do not. Therefore, their outcry for more stable, long-term (2050) regulation that covers the whole sector is just and could be given more weight. With such a united voice, they can remove the policy-makers' argument that industry does not want more or stricter regulation.

In such a setting, they can start to see the environment as an opportunity for the future (green jobs, energy efficiency, natural capital, etc.) and develop new business models for a successful transition to a green, resource-efficient and low-carbon economy. This then goes further than the much-needed corporate social responsibility and leading by example that only some companies currently display.

The role of nature and citizens' interest promoting organisations:

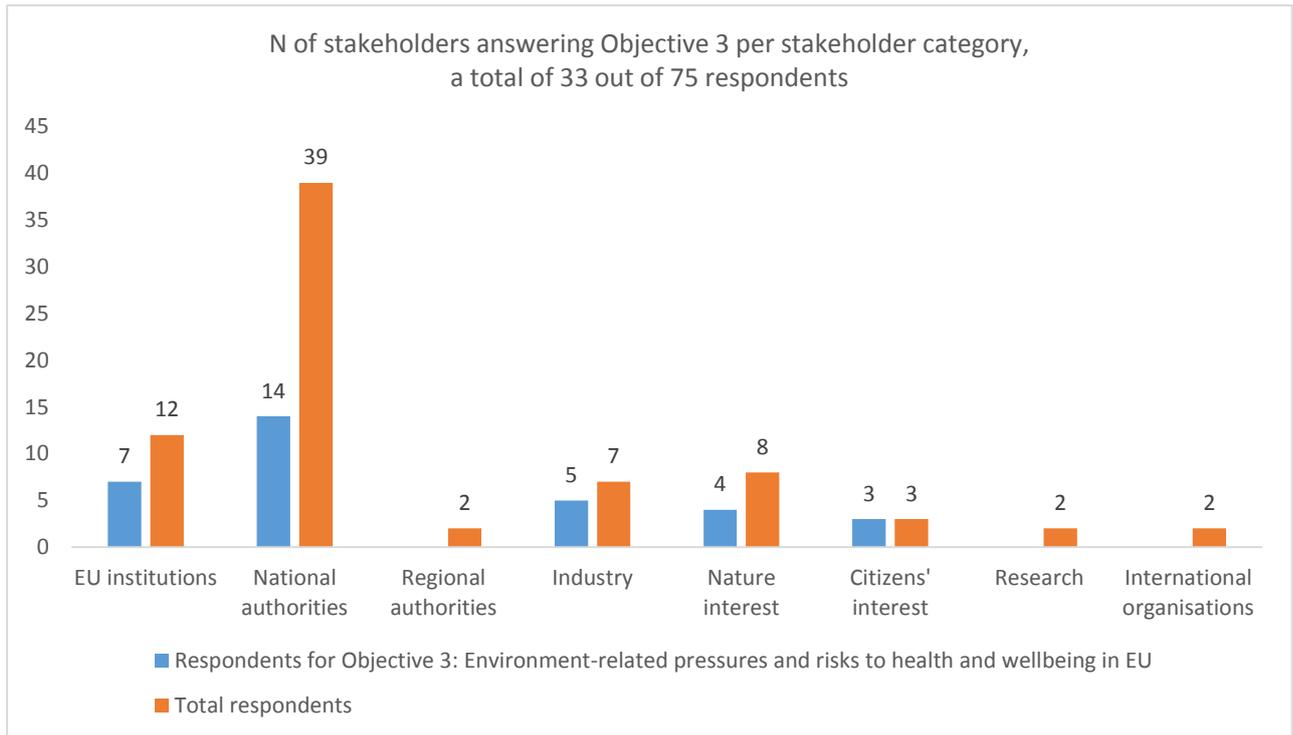
The role of nature interest promoting organisations can more effectively fill the knowledge gap and inform citizens and industry about issues that are currently not addressed sufficiently by policy-makers, for example consumption patterns. They should inform and even participate in policy-making and raising awareness, and mobilise stakeholders to influence policy-makers. In addition, they can monitor policy-makers' efforts and their results. The role of civil society and nature organisations is crucial to collect, disseminate and analyse information and to put the pressure on policy-makers.

Researchers/think tanks/experts:

Researchers/think tanks/experts should keep industry, civilians and NGOs up to date with the latest insights on sustainability. More effort could be invested by sociologists and psychologists to see what drives people to make environmentally unbeneficial decisions, then determine how best to get the message across and convince the public to change consumption patterns. They should research policy effectiveness and report on where (not enough) progress is being made, provide an effective evidence base and participate in the monitoring.

3.4 Objective 3: To safeguard the Union's citizens from environment-related pressures and risks to health and well-being

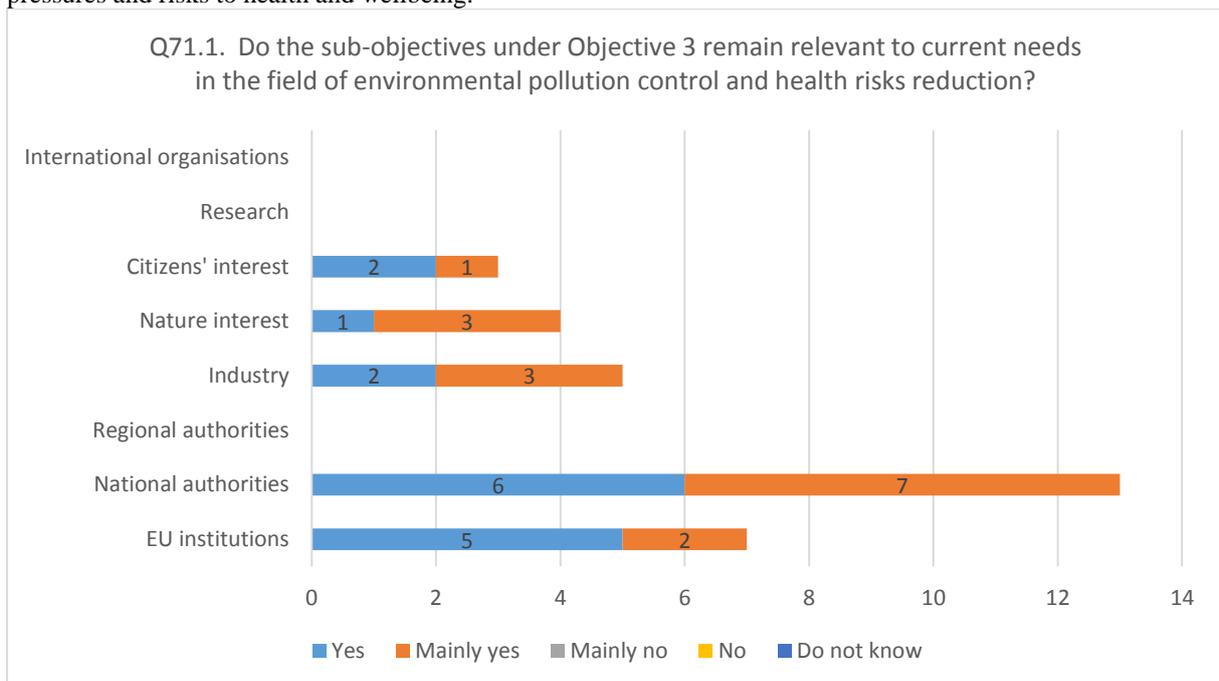
There were 33 respondents for Objective 3, out of a total of 75 respondents for the whole survey. For Objective 3, seven out of 12 EU institutions, 14 out of 39 national authorities, five out of seven industry network organisations, four out of eight nature interest support organisations, all three citizens' interest support organisations responded. No regional authorities, research organisations, or international organisation responded to Objective 3.



3.4.1 Relevance

Relevance of the scoping under Objective 3 to current needs

The goal of this question is to seek opinions on whether the sub-objectives that are detailed under Objective 3 are relevant and adapted to the real needs related to safeguarding the Union’s citizens from environment-related pressures and risks to health and wellbeing.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	32	7	13	5	4	3		

Half of the respondents (16 answers) responded 'yes', while the other half responded 'mainly yes'. There were no respondents who thought that the sub-objectives under Objective 3 are irrelevant to real needs. Six out of 13 national authorities, two out of five industry organisations, and one out of four nature interest organisations responded 'yes', leaving the majority of these stakeholders expressing slight doubts about the relevance of the sub-objectives. The majority of citizen interest organisations and EU institutions were very positive, where two out of three and five out of seven responded 'yes', respectively. However, some note that although progress has been made under some sub-objectives, the relevance still remains unquestionable.

There are concerns about sub objective (iv) on the implementation of REACH (and CLP). It is believed that there should be more efforts in asking the industry to provide better information about the substances used, as well as a better recognition of their responsibility is needed in order to achieve the main objective of protecting EU citizens' health.

Comments from the survey:

One European institution thinks that 2020 goals in chemicals legislation will not be fully achieved and that more time is needed.

The European Environmental Citizens' Organisation for Standardisation (ECOS), a nature interest support organisation, believed that the challenges remain relevant.

Comments from the interview:

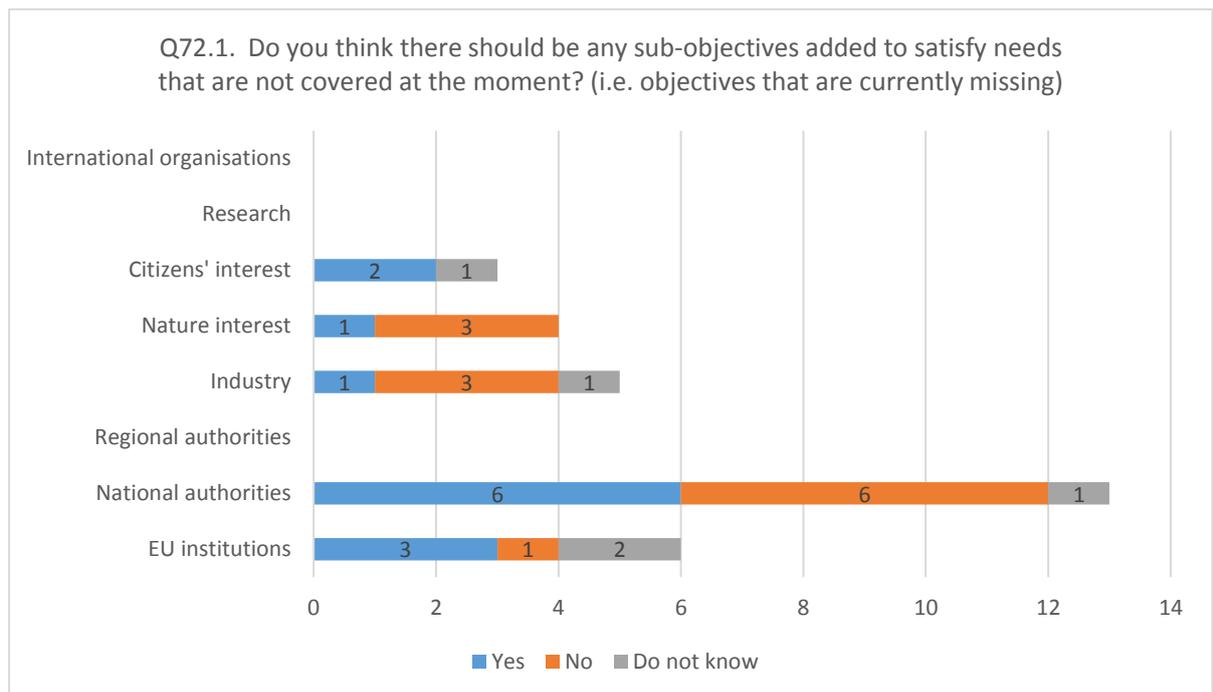
The personal opinion of an EU institution official is that there is of course the continuous challenge to reduce the risks imposed by chemicals. The objective details some of the issues, however, some of them have clearly changed since the programme was discussed and agreed upon. When you fix an agenda like the 7th EAP, there will always be a shift in importance over the years. But overall, the issues there are still relevant (such as combination effects and endocrine disruptors).

Comments from the focus group:

A comment from the focus group remarked that the responses submitted for this objective relating to chemicals are dependent on the institution who sent in the response. At EU level the chemical area is divided across different EC services, and depending on the angle everybody sees it differently thus providing different answers. For some MS the chemical issues under Objective 3 are a high priority, and in other MS it is not. In some MS where it is not such a high priority it is due to the areas being under different ministries. REACH has been a big achievement, but the legislation was approved before the document. In general chemicals policies have a bad rating.

Gaps in the scoping of Objective 3

This question aims at checking whether the sub-objectives currently present under Objective 3 are sufficient or if new ones should be added to effectively satisfy real needs related to protecting citizens' health and wellbeing.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	31	6	13	5	4	3		

Less than half of the respondents (13 respondents out of 31) believe it is necessary to add new sub-objectives. These respondents come from citizen interest organisations (two), nature interest groups and industry organisations (one from each), national authorities (six) and EU institutions (three). The same number of respondents (13 respondents) do not think new objectives should be added. These respondents include nature interest organisations (three out of four), industry (three out of five), national authorities (six out of 13) and EU institutions (one out of six). Five respondents did not know the answer to this question. International organisations, research organisations and regional authorities did not answer this question.

There are several new sub-objectives suggested by the respondents as explained below.

Comments from the survey:

- A national authority thinks that the green infrastructure to support human health and wellbeing on both mental as well as physical side should be emphasised with a sub-target of its own (infrastructure policy), and that there is also the lack of Marine policy.
- The European Food Safety Authority - Scientific Committee and Emerging Risks Unit, an EU institution, outlined that legislation is sectorial and addresses hazards by sector, in isolation. However, in the environment, hazards are multiple in nature and therefore there is a need for legislation to reconsider assessments in a more transversal (cross-sectorial) and holistic manner (problem of co-exposures).
- A national authority mentioned addressing pharmaceuticals' effects on human health and the environment.
- The European Food Safety Authority - Pesticides Unit, an EU institution, thinks better integration of the different objectives with the overall contribution to a good environmental status could be highly beneficial.
- The European Public Health Association (EUPHA), an industry organisation, thought more coherent EU-wide spatial planning (providing more health based tools) nano-waste measures differentiating to agricultural air pollution including infectious diseases should be added.

- *CHEM Trust, a citizen interest organisation, believes a special emphasis on harmful chemicals in food packaging should be given*
- *CCPIE–CCIM (Belgian Coordination Committee for the International Environment Policy), a national authority, thought that we need to ensure that newly identified risks to human health and the environment can be identified and timely action taken to reduce those risks. According to them, we need to take measures to prevent adverse impacts on human health and the environment (i.e. consumer/workers exposure to endocrine disruptors and other harmful substances should be prevented), to protect all vulnerable groups (pregnant women, elderly, children), to protect human rights and to provide assistance to victims.*
- *The Health and Environment Alliance (HEAL), a citizen interest organisation, would add healthy buildings and energy poverty.*
- *The Irish Environmental Protection Agency, a national authority, would add better urban design to foster healthier and more sustainable cities.*
- *The Italian Ministry for the Environment, Land and Sea, a national authority, would like to see more adequacy regarding the topic of environmentally persistent pharmaceutical pollutants.*
- *An EU institution thinks positive benefits of nature and green economy for people's health and well-being, and access to drinking water and sanitation should be added as sub-objective.*

Comments from the interview:

- *The personal opinion of an EU institution official is that developing chemicals policy also for vulnerable groups (children and elderly) and introducing safety margins should be made a priority, for example how chemicals in products interfere with unborn babies. Nano materials are not so much a priority anymore. There is still a lack of product information for consumers about chemical composition. And there is the issue of switching from one 'bad' substance, to another that seems less 'bad' but only due to the fact that not all effects of the substance are well-known yet, and might potentially be as bad or even worse than the substance used prior (often called 'regrettable substitution')-. Overall, priorities have become more concrete, and this should be reflected in the programme.*

Comments from the focus group:

- *The focus group mentioned these issues: air pollution, lack of information to consumers or lack of transparency, combination effects, noise pollution, lack of implementation and coherence at national level and 'non-toxic environment' as*

In addition, comments from position papers received:

- *The European Association for the Co-ordination of Consumer Representation in Standardisation (ANEC), a citizens interest support organisation, considers that the chemical requirements that are provided in the legislation lack ambition. The current European legal framework regarding chemicals in products insufficient in ensuring an appropriate level of safety to consumers and the environment and states that the 7th EAP should focus strongly on hazardous chemicals in consumer products including nanomaterials and endocrine disrupters.*
- *The European Consumer Organisation (BEUC), a citizen interest support organisation, wrote that EU laws fail to consider or regulate the cumulative chemicals exposure from daily use of multiple consumer products, i.e. the 'cocktail effect'. Instead, the current EU approach to risk assessment tends to evaluate exposure and safe use on a chemical-by-chemical basis.*

3.4.2 Knowledge base

Scientific knowledge and evidence base for policies in the area of environmental pollution control and health risks reduction

A set of questions in the survey focused on Objective 3 of the 7th EAP promoting scientific knowledge and an evidence base for policy-making in the context of safeguarding the Union’s citizens from environment-related pressures and risks to health and well-being. These questions relate to enabling Objective 5 of the 7th EAP on improving scientific knowledge and evidence for EU environmental policy-making.

This question assesses effectiveness of the policies under this objective related to information and scientific knowledge.

Q85. With regard to improving the scientific knowledge and evidence base for policies in the area of environmental pollution control and health risks reduction, do you agree with the following statements		EU institutions	National authorities	Regional authorities (n/a)	Industry	Nature interest	Citizens' interest	Research (n/a)	International Organisations (n/a)	TOTAL
		Total	7	14	0	5	2	3	0	0
There is a better understanding of the health and environmental implications of endocrine disruptors	Yes		1				1			2
	Mainly yes	4	8		3	1	1			17
	Mainly no	2	1		1	1				5
	No	1								1
	Do not know		4		1		1			6
There is a better understanding of the health and environmental implications or toxicity of the combined effect of chemicals	Yes									0
	Mainly yes	2	2		2	1				7
	Mainly no	4	6		2	1	2			15
	No	1	2							3
	Do not know		4		1		1			6
There is a better understanding of the health and environmental implications or toxicity of certain chemicals in products	Yes	1	1				1			3
	Mainly yes	2	7		3	1	1			14
	Mainly no	3	2		1	1				7
	No	1								1
	Do not know		4		1		1			6
There is a better understanding of the health and environmental implications of certain nanomaterials	Yes	1					1			2
	Mainly yes		3		1	1				5
	Mainly no	5	6		3	1	1			16
	No									0
	Do not know	1	5		1		1			8

Respondents were asked to assess whether there is a *better understanding of the health and environmental implications of endocrine disruptors* (total respondents 31). A large majority of respondents replied positively, namely ‘yes’ or ‘mainly yes’. Less than a quarter replied ‘mainly no’ and one respondent replied ‘no’.

National authorities, industries and citizens’ inters organisations were more positive in their answers. Four out of seven EU institutions thought there is a better understanding of this topic and answered ‘mainly yes’, while two

thought ‘mainly no’ and one ‘no’. One nature interest organisation ‘mainly’ agreed, and one ‘mainly’ disagreed that there is a better understanding of the health and environmental implications of endocrine disruptors.

Comments from the survey:

CHEM Trust wrote that regarding endocrine disruptors, most awareness raising has been done by civil society and by some national authorities (France, Sweden, Denmark). However, in other EU countries, there are still huge knowledge gaps.

An EU institution mentioned that the main problem is the lack of political will to significantly progress on these issues in the EU. It also pointed out that despite a better understanding of EDs in general, the lack of relevant data prevents a full assessment of their impacts.

Another EU institution felt that there is a better understanding of endocrine disruptors’ effects on human health, but that the effects on the environment have not been studied enough yet.

One national authority commented that testing guidelines are still lacking and that unknown effects are likely to be found in the future.

A dominant majority of the 31 respondents mainly or fully disagree that *there is a better understanding of the health and environmental implications or toxicity of the combined effect of chemicals*. Less than a quarter replied ‘mainly yes’ and no respondent replied ‘yes’. Six responded ‘do not know’.

The critical assessments were more common among EU institutions, national authorities and citizens’ interest organisations. Opinions in the industry and nature interest groups were divided. Two industry respondents out of five ‘mainly’ agreed, two ‘mainly’ disagreed and one did not know. One nature interest organisation ‘mainly’ agreed, and one ‘mainly’ disagreed.

Out of the three other areas presented in this question, the understanding of the combined effects of chemicals appears to be the most problematic one for stakeholders, as this is the area that received the highest number of ‘no’ or ‘mainly no’ answers. The comments from the respondents were relatively similar to those on endocrine disruptors.

Comments from the survey:

The national authorities commented that on the issue of combined chemicals effects, information mainly comes from civil society organisations and that if the understanding had improved regarding health effects, environmental implications are not clear yet. It was also mentioned that knowledge about which exposure combinations are really dangerous is lacking.

One EU institution wrote that “despite the fact that combined effects have been mentioned as a problem for many decades now, there is still no significant discussion initiated on how to tackle this in the context of chemicals regulation, that is in principle focussed on allowing marketing and use by individual companies, who in general cannot be held responsible for what other actors do. Relatively simple solutions have been proposed (such as additional safety factors to account for combined effects) but these have not yet been seriously discussed”.

A slight majority of 31 respondents replied ‘yes’ (three) or ‘mainly yes’ (14) to the question if there is *a better understanding of the health and environmental implications or toxicity of certain chemicals in products*. Around one quarter replied ‘mainly no’ and one respondent replied ‘no’. Six responded ‘do not know’. Positive assessment were dominant among national authorities, industries and citizens’ interest organisations. Mixed responses came from EU institutions: one out of seven EU institutions thought there is a better understanding of this topic and answered ‘yes’, two answered ‘mainly yes’, while three replied ‘mainly no’ and one replied ‘no’. One of two nature interest organisation ‘mainly’ agreed, and another ‘mainly’ disagreed.

Comments from the survey:

The EU institution that answered ‘no’ added that this issue represents one of the main gaps in our knowledge and that the situation has not improved significantly with the introduction of the new legislation. The respondent insisted on the fact that urgent action is needed as this knowledge is one of the cornerstones for building a significant non-toxic environment strategy and a key to a successful implementation of a circular economy.

One national authority believes that knowledge on this problem has improved generally, but at the consumer level.

A clear majority of 31 respondents does not see improvement in *understanding of the health and environmental implications of certain nanomaterials*: more than half of the respondents replied ‘mainly no’. Less than a quarter replied ‘mainly yes’ and two respondents replied positively (‘yes’). Compared to other areas, this was the one for which there was the highest rate of ‘do not know’ responses (eight).

Five out of seven EU institutions did not think there is a better understanding of this topic. Out of 14 national authorities responding to the question, three ‘mainly’ agreed, six mainly disagreed, and five did not know. One

industry respondent out of five ‘mainly’ agreed, three ‘mainly’ disagreed and one did not know. Assessments of the nature and citizen interest organisation were mixed.

After the combined effect of chemicals, this was the issue on which the understanding has the least progressed, according to stakeholders’ responses.

Comments from the survey:

One national authority argued that there have been a number of projects on nanomaterials performed at both EU and OECD levels that contributed to a better understanding of nanomaterials.

One EU institution recognised that some progress has been made but that there are still major gaps in the knowledge on the potential impacts of nanomaterials.

The answers to this question are likely to reflect the current state of knowledge on the four topics. Two of the topics, toxicity and endocrine disruptors, seem to have been heavily discussed while for the other two topics, knowledge gaps are apparent. However, it is not clear to what extent the 7th EAP has contributed to this result and to what extent other policies/ programmes/ industry have.

Knowledge gap - Understudied areas within Objective 3

Stakeholders were asked if there are any areas within Objective 3 which have been understudied and where evidence is missing. This question also relates to enabling Objective 5 of the 7th EAP on improving scientific knowledge and evidence for EU environmental policy-making.

From stakeholders’ responses, the recurring areas presented as under-studied are endocrine disruptors, nanomaterials and the combined effects of chemicals. The latter two are in line with the answers under the previous question, while endocrine disruptors seemed to have been sufficiently studied.

Comments from the survey:

A national authority and an industry network organisation pointed out problems in hazards assessment methods and legislation. They state that it is very difficult to accurately assess progress towards the goal of minimising risks to the environment and health associated with the use of hazardous substances only by looking at the decline in the production of chemicals that are hazardous to health. Indeed, EU production volumes of chemicals that are hazardous to health is a weak indicator because production volumes are not directly related to actual human and environmental exposure to chemicals. Therefore, new methods must be adopted for a better evaluation of risks related to hazardous substances.

An EU institution mentioned the fact that legislation is generally sectorial and addresses hazards by sector, in isolation. However, in the environment, hazards are multiple in nature and therefore there is a need for legislation to reconsider assessments in a more transversal (cross-sectorial) and holistic manner (problem of co-exposures).

A national authority commented that legislation needs to be adapted to nanomaterials and the Commission has still not presented a proposal on revision of the annexes to REACH regarding information requirements in the registration of nanomaterials.

Another national authority mentioned that hazardous chemicals in imported articles, nanomaterials, endocrine disruptors and combined effects of chemicals, and also pharmaceuticals in the environment are still a cause for concern.

Comments from interviews: *The European Chemical industry Council (CEFIC), an industry network organisation, notes that for chemical safety, REACH and CLP are the core legislation to refer to. Both regulations give plenty of opportunity for the scientific community to be involved, provide new knowledge continuously and thereby improve implementation of regulations.*

What knowledge is underutilised

Respondents were asked if there are areas within Objective 3 where knowledge exists but is not utilised for evidence during policy-making.

The responses to this open question suggest that there are still understudied areas in the topics related

Comments from the survey:

Several stakeholders said that despite a lot of research in the area of pharmaceuticals during the past 20 years, an EU strategy is still missing. Regarding chemicals, the European Food Safety Authority, Pesticides Unit said that realistic environmental exposures to mixtures (other than intentional mixtures and simultaneous emissions like effluents) and their ecological consequences should be assessed. Based on the already available information collected under REACH, and the pesticides and biocides regulations, a mapping of environmental risk and impacts at EU level is needed. Regarding chemicals

and water, an EU institution mentioned that despite available knowledge, there is not enough cooperation across institutions to prioritise substances for monitoring.

A national authority wrote that endocrine disruptors criteria could have been more clearly set out and more ambitious, and that enough was known about nanomaterials to have come forward with REACH Annex revision years ago and with a more detailed catalogue of nanomaterials in cosmetics.

Another national authority commented that criteria for endocrine disrupting substances for plant protection products and biocidal products has been delayed (deadline 2013) and criteria for decision making is lacking in other chemicals legislation (i.e. toys and cosmetics). The EU process for restricting hazardous substances is too slow. Microplastics is an emerging issue that needs immediate action. COM's strategic approach on pharmaceuticals in the environment is delayed by more than 2 years.

Comments from the interview:

The personal opinion of an EU institution official is that knowledge gathering is very much an ongoing exercise where REACH has been and continues to be a very important knowledge gathering tool. Knowledge gathering institutions/programmes include EEA, Eurostat, H2020. Monitoring such as early warning systems for new chemicals was for example influenced by the 7th EAP. On understanding endocrine disruptors, there is a better understanding. Regarding combined effect of chemicals, there is some progress but it is slow.

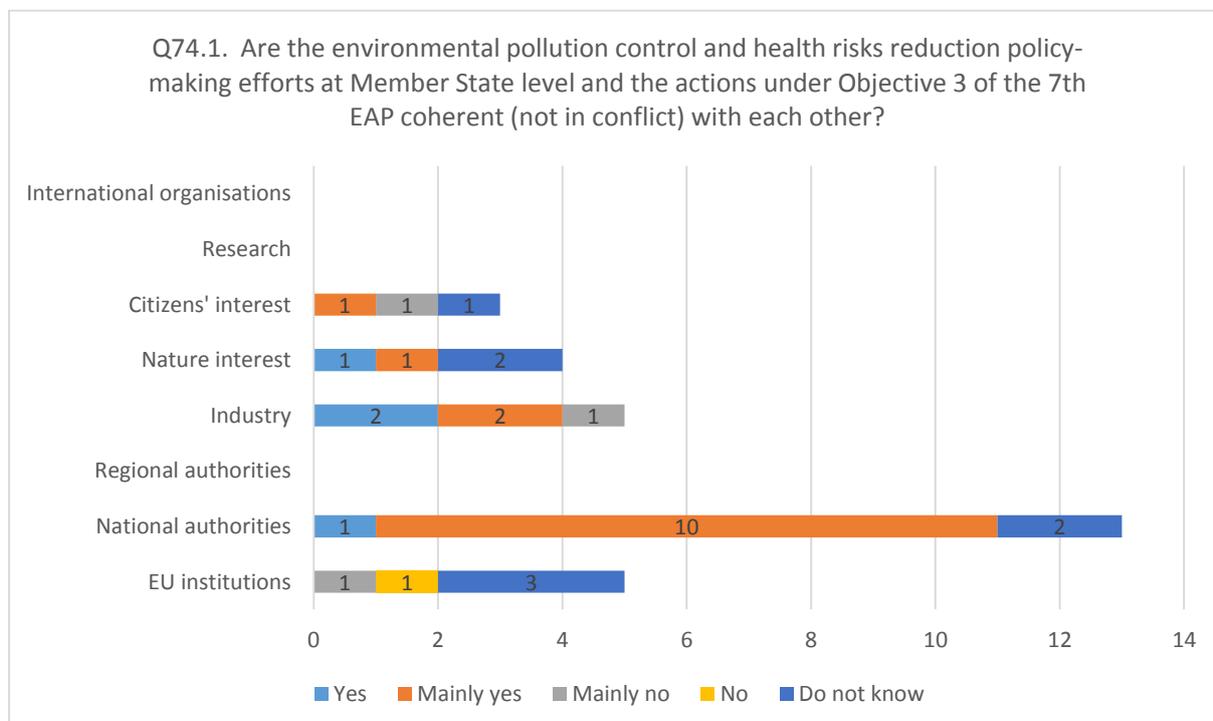
Comments from the focus group:

The focus group agreed that scientific knowledge has improved in some areas but it is not being used in political making, in a sense knowledge doesn't trickle down into policies.

3.4.3 Coherence

Coherence between policy-making at national level and actions under Objective 3

This question aims to shed light on whether there are any inconsistencies between the environmental pollution control and health risks reduction policy goals and actions taken at MS level, and those under Objective 3 of the 7th EAP.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	30	5	13	5	4	3		

A large majority of respondents, 18 in total out of 30, thinks such goals are coherent between policy making at MS level and as stated under Objective 3 of the 7th EAP (four respondents answered 'yes' – one nature interest, two industry organisations and one national authority, and 14 answered 'mainly yes' – one citizen interest, one nature interest and two industry organisations, and ten national authorities). Only a minority of respondents (four) thought actions under Objective 3 were in conflict with national policy-making in the same field, one EU institution respondent answered 'no', and one EU institution, one citizens interest and one industry organisation answered 'mainly no'. National authorities, which are the most directly concerned group, responded massively (and as could be expected) 'mainly yes'. Eight organisations said that they do not know (one citizen interest, two nature interest organisations, two national authorities and three respondents from EU institutions). International organisations, research and regional authorities did not respond to this question.

Comments from survey:

Health and Environment Alliance (HEAL), a citizen interest organisation, suggested that it is more Member States' actions that contradict environmental actions set at EU level. Member States would act according to their own interest and sometimes ignore the EU's guidelines. The European Food Safety Authority brought the example of risk assessment for bees and wrote that while the European Commission has set restrictions due to an identified risk, several Member States have avoided the restrictions with exceptional authorisations of products.

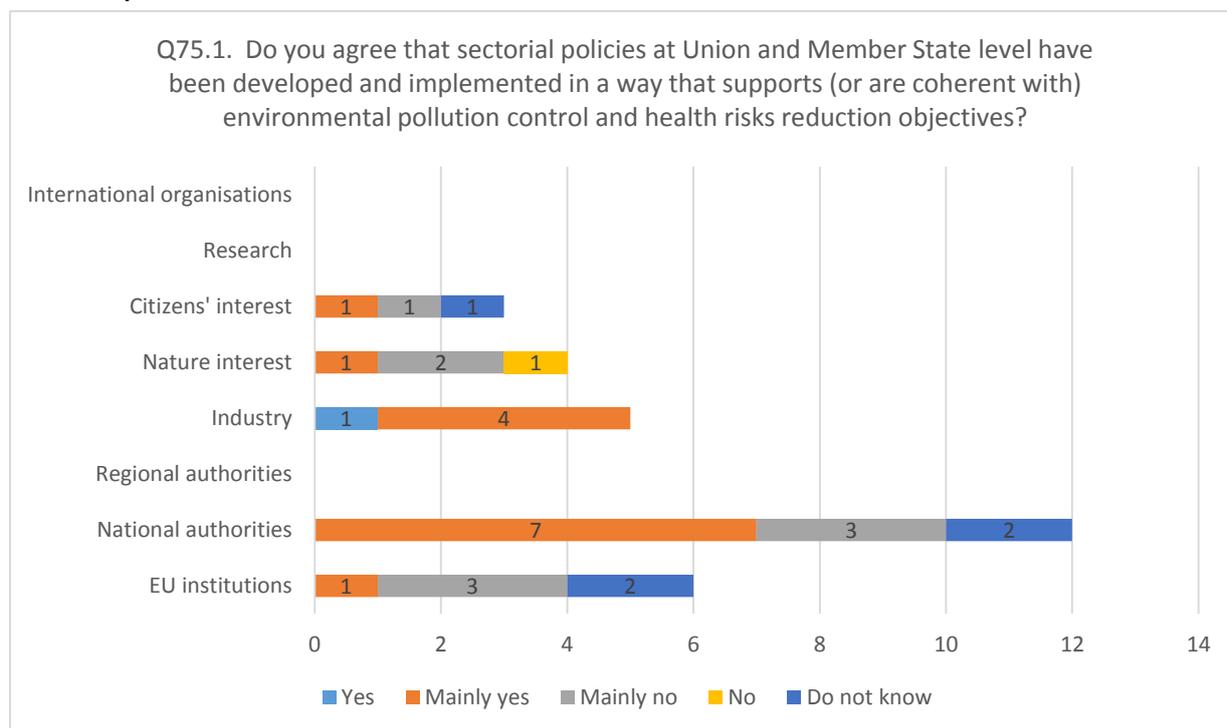
Comments from the interview:

The personal opinion of an EU institution official is that there is a very strong drive from EU legislation for actions to be made (Single Market). However, there is a bit of a strain of issues when Member States want to move ahead on something and act on their own. However, the 7th EAP does not play a major role. An example of incoherence might be pesticides vs chemicals.

Additional comments from position papers:

According to ANEC, there are flaws in the current European legislation (e.g. Toy Safety Directive, REACH, GPSD), showing that there is no community approach to address chemicals in consumer products in a consistent systematic manner. REACH for example cannot serve this purpose due to inherent shortcomings of this legislation (e.g. lengthy procedures, substance-by-substance approach, no positive lists of allowed substances). Moreover, many requirements of REACH do not apply to imported articles.

Coherence and integration between the sectorial and environmental pollution control and health risks reduction policies



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	31	6	13	5	4	3		

This question aims at highlighting potential inconsistencies or contradictions between European and national sectorial policies with respect to environmental pollution control and health risks reduction objectives. This question also directly links with enabling Objective 7 of the 7th EAP on improving environmental integration and policy coherence with respect to sectorial policies at EU and MS levels.

Respondents were divided on this question. Only one respondent, from industry, replied ‘yes’ to this question, and 14 responded ‘mainly yes’ (one citizen interest, one nature interest organisations, four industry representatives, seven national authorities and one representative of EU institutions) out of 31 responses. The positive answers outweigh those who responded ‘no’ (one nature interest organisation) or ‘mainly no’ (nine in total – one citizens interest, two nature interest organisations, three national authorities and three representatives of EU institutions). Five responding ‘do not know’ (one citizen interest organisation, two national authorities and two representatives of EU institutions).

This makes nature interest organisations the most critical stakeholder group as they responded with a large majority negatively to the question. On the other hand, industry was positive as all respondents responded ‘yes’ or ‘mainly yes’.

Comments from the survey:

The European Food Safety Authority - Pesticides Unit pointed out weaknesses in sectorial policy assessment methods, and that a realistic integration is lacking, the implementation is still sector by sector and even stressor by stressor. Current methodological developments allow the development of more integrated tools, where sector and stressor assessment could provide a direct value for informative impact and status assessment at EU level. This was not feasible a few years ago but now we have the knowledge and the tools.

The Irish Environmental Protection Agency thought sectorial policies were not developed and implemented in ways that support environmental pollution control and health risks reduction objectives

because negative externalities were usually not assessed through policy impact assessment, and that no ex-post analysis to review success or failures was conducted.

One national authority said that sectorial policies could potentially be in contradiction with circular economy objectives.

HEAL believed that overall, sectorial policies development was in accordance with Objective 3, but that policies have not been ambitious enough to reach pollution control and health risks reduction goals.

Cefic added that implementation needs to be harmonized and effective among MS.

Integration between key EU policies and environmental pollution control and health risks reduction objectives

This question adds to the previous one and seeks to identify which key EU policies are in accordance with environmental pollution control and health risks reduction objectives and which are potentially in contradiction.

Q76. Do you agree that the following EU policies have integrated (or are coherent with) environmental pollution control and health risks reduction concerns and objectives?		EU institutions	National authorities	Regional authorities (n/a)	Industry	Nature interest	Citizens' interest	Research (n/a)	International organisations(n/a)	TOTAL
	Total	6	13	0	5	4	3	0	0	31
Common Agricultural Policy	Yes					1				1
	Mainly yes	1	5							6
	Mainly no	3	3		1		1			8
	No	1	1			3	1			6
	Do not know	1	3		4		1			9
Common Fisheries Policy	Yes					1				1
	Mainly yes		2							2
	Mainly no	3	3			2	1			9
	No									0
	Do not know	2	8		5	1	2			18
EU Trans-European Networks Policy	Yes					1				1
	Mainly yes		4		1					5
	Mainly no	1				1	1			3
	No					1				1
	Do not know	4	9		4	1	2			20
Cohesion Policy	Yes					1				1
	Mainly yes	3	5				1			9
	Mainly no					2				2
	No									0
	Do not know	2	8		5	1	2			18
Other, please specify other policy areas of interest to you	Yes		2			1	1			4
	Mainly yes									0
	Mainly no		2							2
	No					1	1			2
	Do not know	2			3					5

Common Agricultural Policy (CAP) (total respondents 30):

The CAP was evaluated positively or negatively by more than two-third of the respondents and assessed by a vast majority (those that had a view) as incoherent with Objective 3. Looking at the different stakeholders' responses, the CAP was identified as the policy in the suggested list that was the most in conflict with pollution and health risk reduction objectives. One nature interest organisation responded that CAP is in line with Objective 3, and five national authorities and one EU institution representative replied 'mainly yes'. Eight respondents in total answered 'mainly no' (three EU institutions representatives, three representatives of national authorities, one industry and one citizen interest organisations), and six respondents do not think CAP is in line with Objective 3 (one representative of EU institutions, one of national authorities, one of citizens' organisations and three nature interest organisations. Nine responded 'do not know'.

Comments from the survey:

On the CAP, the European Food Safety Authority, Pesticides Unit mentioned that there is almost no link between this policy and the legislation on pesticides, when both should be fully connected. Irish Environmental Protection Agency, a national authority also said that environmental pollution control and health risks reduction objectives were integrated in the CAP, mainly through food quality standards.

Common Fisheries Policy (total respondents 30):

The Common Fisheries Policy was the second policy respondents were the most critical about (in absolute numbers). One nature interest organisation thinks the policy is in line with Objective 3, and two national authorities representatives think it is 'mainly' in line. Nine out of 12 who gave an opinion deemed it mainly did not integrate Objective 3's requirements. There was no respondent who thinks it is not in line with Objective 3. 18 responded 'do not know'.

EU Trans-European Networks (total respondents 30):

On EU Trans-European Networks policy, the stakeholders were split but the vast majority of respondents did not know the answer to this question. One nature interest organisation was of the opinion that the EU TEN is in line with Objective 3, and five respondents indicated that it is 'mainly' so (four national authorities and one industry). Three respondents (one EU institution, one nature interest and one citizen interest organisation) indicated the policy is 'mainly' not in line with Objective 3 and only one nature interest organisation indicated it is conflicting. 20 respondents out of 30 did not know the answer.

Cohesion Policy (total respondents 30):

Cohesion policy was regarded as the policy that is the most in accordance with the aforementioned objectives, as ten out of 12 respondents who had an opinion answered 'yes' (one nature interest) or 'mainly yes' (nine respondents – one citizen interest, three EU institutions and five national authority's representatives). 18 respondents did not know the answer.

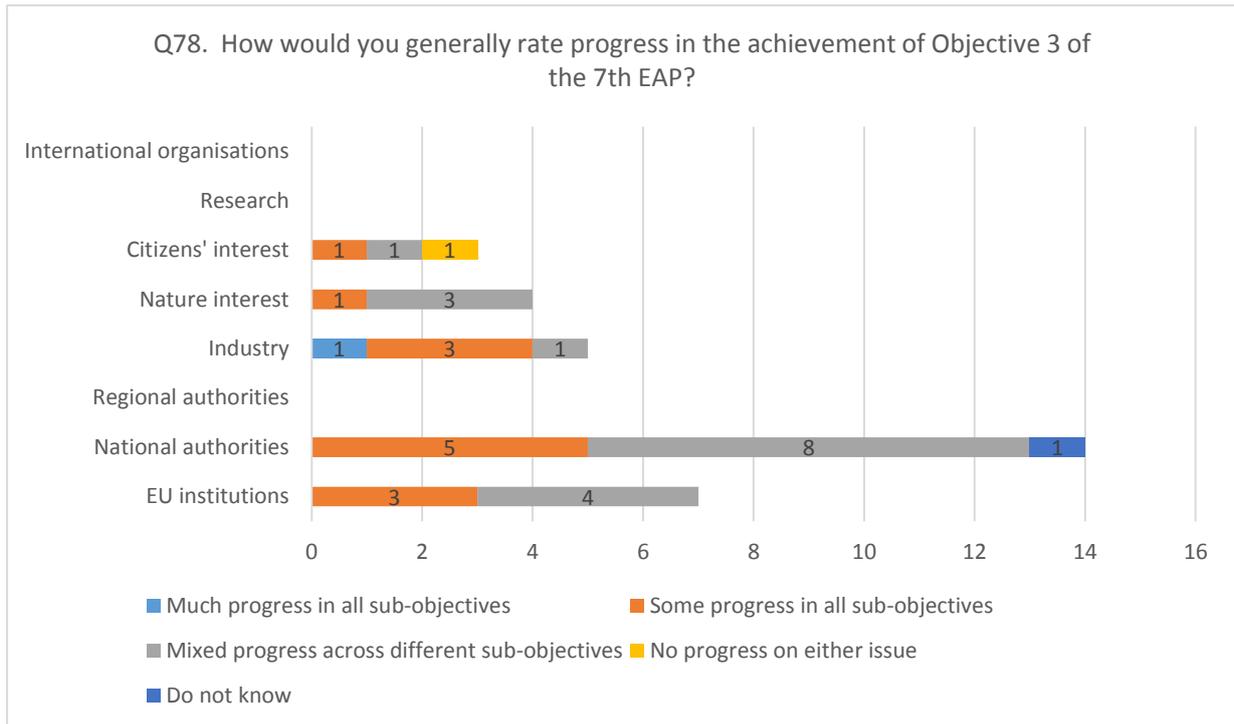
- Other (total respondents 14):

The main other policies that were outlined as not integrating these objectives are chemical policies (European Environmental Citizens' Organisation for Standardisation (ECOS) and energy policies (HEAL). On the contrary, policies that were put forward as being in accordance with the objectives are the air quality legislation and the Healthy Europe Strategy (Irish Environmental Protection Agency).

3.4.4 Effectiveness

Overall progress in the achievement of Objective 3

This question relates to the 7th EAP's effectiveness in reaching its objectives. It aims at assessing the progress that has been made so far regarding the achievements of goals under Objective 3.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	33	7	14	5	4	3		

From the answers it can be implied that at least some progress has been made on at least some objectives. Half of the respondents (17 out of 33) said there was ‘mixed progress across all different sub-objectives’ and more than a third (13 out of 33) said there have been ‘some progress in all the sub-objectives’. Those that answered ‘mixed progress’ included eight national authorities, four representatives of EU institutions, three nature interest and one citizens interest organisations and one industry representative. The ones answering ‘some’ progress included five representatives of national authorities, three EU institutions representatives, three industry, one citizen and one nature interest organisations. One industry representative was of the opinion that much progress in all sub-objectives have been made, one representative of citizens interest organisation that no progress on either issue has been made and one national authority replied ‘do not know’. International organisations, research institutes and regional authorities did not provide a reply.

Comments from the survey:

The European Environmental Bureau, a nature interest support organisation, estimates that Objective 3 is where the least progress has happened.

Four respondents who thought that there were ‘mixed progress across all different sub-objectives’ or ‘no progress on either issue’ and who wrote a comment to justify their answers said that no sufficient progress has been achieved under sub-objective (d) relating to the combination effects of chemicals, and to endocrine disruptors. Among the stakeholders commenting on these issues, there are four national authorities, and one citizen interest organisation.

There were several mentions of the definition of endocrine disruptors criteria having been delayed for too long. Two organisations, a national authority and an EU institution, both put forward the fact that chemical assessment under REACH is not informative enough. One of them, CCPIE –CCIM (Belgian Coordination Committee for the International Environment Policy) argued that the indicator on the production of chemicals that are hazardous to health does not provide specific insights on endocrine disruptors, risks to children’s health, nanomaterials, chemicals that impact only on the environment or hazardous chemicals contained in imported products and combination effects.

The Irish Environmental Protection Agency also noted that hazardous waste/chemicals take-back schemes are still not in place for agricultural chemicals, or animal and human medicines.

CHEM Trust, the only stakeholder that believes there has been ‘no progress on either issue’ said that even though the deadline set for taking action in the field of nanomaterials, endocrine disruptors and combination effects of chemicals was set for 2015, there has still been no significant progress on these issues.

Two other stakeholders (one national authority and one nature interest organisation) pointed out the lack of progress in sub-objective (f) on nanomaterials. Some others mentioned air, noise and water pollution (sub-objectives a, b, c) as still being very problematic. In particular, HEAL said that outdoor air policies are not ambitious enough and that updates on noise and indoor air quality have been delayed. EurEau, the European Federation of National Associations of Water Services, an industry organisation, said that nitrates and pesticides are still widely detected in European water resources.

An EU institution commented that the management of chemicals in terms of their toxicity and exposure of people to low doses are problematic.

Comments from the interview:

The personal opinion of an EU institution official is that an ongoing programme is useful to lead the way by setting objectives and actions to meet targets. However, in the case of chemicals, actions are not determined by the 7th EAP per se. There are many other things influencing the chemicals scene. The 7th EAP was adopted under the old Commission, and in so priorities might have shifted. For example, the new Commission put a lot of emphasis on the Better Regulation Agenda. Moreover, the circular economy package is now a priority under the new Commission. Both have strong overlaps with the 7th EAP.

The following comment has been extracted from a position paper submitted by BEUC: ‘Market surveillance of car emissions, limit values for chemicals in consumer products, and energy efficiency requirements for are missing or ineffective. BEUC deplores the Commission’s approach to chemicals policy lacks action and ambition. Although some advances in tackling harmful chemicals have been made in recent years, overall, the pace on achieving the goals set out in the 7th EAP remains slow. Next to that, although endocrine disrupting chemicals (EDCs) are in theory regulated by several EU laws, in practice, implementation of these laws falls short as the EU still lacks concrete criteria that define what an ‘endocrine disruptor’ is. Moreover, current risk evaluation methods largely overlook a chemical’s possible endocrine disrupting properties’.

Comments from Focus group:

Considering the effectiveness of the programme and seeing that the majority of respondents gave a slightly negative response on that, it is key to look into the reasons for the 7th EAP being less effective than foreseen or desired. This mainly has to do with the lack of political will, mainly at member states level, to drive action in order to reach the 7th EAP goals for 2020. The 7th EAP is also less effective in priority area 3 because there have been important delays, e.g. the establishment of horizontal measures to tackle EDCs by 2015, and other delays.

Implementation of policy instruments and actions listed in Objective 3

Policy instruments and actions set to achieve the Priority objective 3 in 7th EAP:

- (i) implementing an updated **Union air quality policy**, aligned with the latest scientific knowledge, and developing and implementing measures to combat air pollution at source taking into account the differences between the sources of indoor and outdoor air pollution;
- (ii) implementing an updated **Union noise policy** aligned with the latest scientific knowledge, and measures to reduce noise at source, and including improvements in city design;
- (iii) increasing efforts to implement the **Water Framework Directive, the Bathing Water Directive (65) and the Drinking Water Directive (66)**, in particular for small drinking water supplies;
- (iv) continuing to implement **REACH** in order to ensure a high level of protection for human health and the environment as well as the free circulation of chemicals within the internal market while enhancing competitiveness and innovation, while being mindful of the specific needs of SMEs. Developing by 2018 a **Union strategy for a non-toxic environment** that is conducive to innovation and the development of sustainable substitutes including non-chemical solutions, building on horizontal measures to be undertaken by 2015 to ensure: (1) the safety of manufactured nanomaterials and materials with similar properties; (2) the minimisation of exposure to endocrine disruptors; (3) appropriate regulatory approaches to address

	combination effects of chemicals and (4) the minimisation of exposure to chemicals in products, including, inter alia, imported products, with a view to promoting non-toxic material cycles and reducing indoor exposure to harmful substances;
(v)	monitoring the implementation of Union legislation on the sustainable use of biocidal products and plant protection products and reviewing it, as necessary, to keep it up to date with the latest scientific knowledge;
(vi)	agreeing and implementing an EU Strategy on adaptation to climate change , including the integration of climate change adaptation and disaster risk management considerations into key Union policy initiatives and sectors.

This question seeks stakeholder’s opinion on the implementation of the six actions/ policy instruments under Objective 3. This gives us an insight of perceptions on whether or not the concrete actions that have been proposed to reach the different broader sub-objectives have progressed, both at the EU and Member State level.

Q80. With regard to the following policy instruments/ actions under Objective 3 of the 7th EAP, what is your assessment of their implementation?

actions/policy instruments	EU institutions	National authorities	Regional authorities (n/a)_	Industry	Nature interest	Citizens' interest	Research (n/a)	International Organisations (n/a)	TOTAL
total	5	9	0	3	4	2	0	0	23
80.1.1. (i) the Union air quality policy, measures to combat air pollution at source - At EU level									
Not Sufficient	1	6		1	2	3			13
Sufficient	2	3		3	1				9
- At Member State level									
Not Sufficient	1	3		2	2	3			11
Sufficient	1	4		1	1				7
80.2.1. (ii) the Union noise policy, measures to reduce noise at source									
- At EU level									
Not Sufficient	1	3		2	1	3			10
Sufficient	1	3		2	1				7
- At Member State level									
Not Sufficient	1	3		2	1	3			10
Sufficient	1	3		1	1				6
80.3.1. (iii) the Water Framework Directive, the Bathing Water Directive and the Drinking Water Directive									
- At EU level									
Not Sufficient	1			1	2	1			5
Sufficient	2	8		3	1				14
- At Member State level									
Not Sufficient	1	1		2	2	1			7
Sufficient	1	7		1	1				10
80.4.1. (iv) implementation of REACH for protection for human health and the environment, and enhancing competitiveness and innovation. Developing by 2018 a Union strategy for a non-toxic environment									
- At EU level									

actions/policy instruments	EU institutions	National authorities	Regional authorities (n/a)	Industry	Nature interest	Citizens' interest	Research (n/a)	International Organisations (n/a)	TOTAL
total	5	9	0	3	4	2	0	0	23
Not Sufficient	4	4		1	2	2			13
Sufficient	1	4		2	1				8
- At Member State level									
Not Sufficient	3	4		1	2	2			12
Sufficient		4		1	1				6
80.5.1. (v) the Union legislation on sustainable use of biocidal products and plant protection products									
- At EU level									
Not Sufficient	1	4		2	3	2			12
Sufficient	2	3		2	1				8
- At Member State level									
Not Sufficient	2	4		2	2	2			12
Sufficient	1	3		1	1				6
80.6.1. (vi) EU Strategy on adaptation to climate change, integration of climate change adaptation considerations into key Union initiatives									
- At EU level									
Not Sufficient	1	2		2	1				6
Sufficient	2	4		2	1				9
- At Member State level									
Not Sufficient	2	3		3	2				10
Sufficient	1	4			1				6

In respect to the implementation of the *Union air quality policy*, 13 respondents think the implementation in this field at EU level is not sufficient, while nine think it is. At Member State level, the majority of respondents believe implementation is not sufficient. All three opinions of nature interest support organisations think the implementation is not sufficient at EU and MS level. The other stakeholder categories were split in their opinion. There are views that with regard to air quality, Member States differ with respect to average pollution levels of air pollutants, which may be an obstacle to move EU air quality standards closer to levels recommended by the WHO. On the implementation of the *Union noise policy*, 10 stakeholders think it is not sufficient at both EU and the national levels, while seven think it is sufficient at EU level and six think it is sufficient at MS level. All three citizen interest support organisations think it is insufficient at both EU and MS level. The other stakeholder categories are split in their opinion. Community of European Railway and Infrastructure Companies (CER), an industry stakeholder, thinks that the noise sensitivity due to the aforementioned aspects varies considerably in the EU member states. Therefore, a wide variety of laws, regulations and funding programmes exist for each Member State. The EU Strategy, which is currently being reviewed should continue to set the frame, bringing together knowledge of climate change and knowledge of appropriate actions. The EU-strategy had the focus on initiating national strategies and action plans. The review of strategy will assess the implementation.

In regard to implementation of the *Water Framework Directive*, the *Bathing Water Directive* and the *Drinking Water Directive*, stakeholders' perception suggest that the situation is sufficient (vast majority is positive – 14 positive opinions at EU level and ten at MS level against five and seven negative opinions at EU and MS level, respectively). All national authorities indicated 'sufficient' implementation of the legislation on EU level and all

but one indicated also sufficient at MS level. Three out of four industry organisations indicated ‘sufficient’ at EU level and only one out of four indicated ‘sufficient’ at MS level. The one citizen interest organisation that responded indicated ‘not sufficient’ implementation.

The majority of respondents, think implementation of *REACH* for protection of human health and the environment and developing a *Union strategy for a non-toxic environment* are insufficient at EU and the national levels, respectively. Both citizen interest organisations that responded think it is ‘insufficient’ at EU and MS level, half of national authorities think it is ‘insufficient’, the other half think it is ‘sufficient’, both at EU and MS level. Majority of representatives of EU institutions think the implementation of REACH is ‘insufficient’ at EU level, and all think it is ‘insufficient’ on MS level.

The *Union legislation on sustainable use of biocidal products and plant protection products* is not sufficiently implemented at EU and national levels, according to over half of respondents, respectively. Both citizen interest organisations who responded think so (at EU and MS level), and four out of seven national authorities (both at EU and MS level). Eight out of 20 and six out of 18 respondents think the implementation is ‘sufficient’ at EU and MS level, respectively. These positive answers came from three national authorities’ representatives, two EU institution representatives, two from industry network organisations and one from a nature interest organisation.

The opinions on the implementation progress of *EU Strategy on adaptation to climate change* at the EU level is split between nine positive answers and six negative answers. The positive answers are slightly more common among EU institutions, national authorities. Opinions in the rest of stakeholder are equally split. On MS level ten respondents are not satisfied with the progress, while only six are satisfied. The ones who were satisfied are one representative of EU institution (out of three), four national authorities (out of seven) and one nature interest organisation (out of three).

Enhancement of the implementation of the legislation in the area of environmental pollution control and health risks reduction

This question assesses stakeholders’ views on the extent of the implementation and enforcement of relevant legislation falling under Objective 3. The question is also directly linked to enabling Objective 4 of the 7th EAP on improving the implementation of EU environmental legislation.

Q83. With regard to enhancing the implementation of the legislation in the area of environmental pollution control and health risks reduction, do you agree with the following statements	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens’ interest	Research (n/a)	International	TOTAL
Total	7	14	0	5	4	3	0	0	33
Improving relevant legislation to match real needs has been given top priority	Yes		2						2
	Mainly yes	5	7		4	1			17
	Mainly no	2	1		1	2	2		8
	No					1	1		2
	Do not know		4						4
Compliance with legislation in this area has been improved	Yes	2				1			3
	Mainly yes	4	9		4		1		18
	Mainly no	1	2		1	1	2		7
	No					1			1
	Do not know		3			1			4
Public access to information on the implementation of legislation in this area has improved	Yes	1	2			1			4
	Mainly yes	5	7		2				14
	Mainly no	1	1		2	2	1		7
	No								0
	Do not know		4		1	1	2		8
Citizens’ trust and confidence in the	Yes					1			1
	Mainly yes	3	2		2				7

Q83. With regard to enhancing the implementation of the legislation in the area of environmental pollution control and health risks reduction, do you agree with the following statements		EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research (n/a)	International	TOTAL
enforcement of legislation in this area has been enhanced	Mainly no	3	3		1	1	2			10
	No					1				1
	Do not know		8		2	1	1			12

Respondents have been asked whether the legislation in the area of environmental pollution control and health risks reduction has resulted in the following:

Improving relevant legislation to match real needs has been given top priority (total respondents 33):

Overall, there are 19 positive vs. ten negative answers, which implies that respondents think improving relevant legislation to match real needs has been given top priority. Positive views are more common among EU institutions, half of national authorities, industries. Eight respondents answered 'mainly' no (two out of three citizens' organisations, two out of seven EU institutions, one out of 14 national authorities, one out of five industries and two out of four nature interest organisations). Only two respondents do not agree with this statement (one nature interest and one citizen interest organisation). Four respondents do not know.

Comments from the survey:

One nature interest organisation said that in this area, too much attention is given to reducing regulatory costs for industry which is why improvement of the legislation remains sub-optimal. A European institution pointed out that EU assessments are still focusing on the sectorial legislation requirements instead of contributing to a broader environmental assessment, therefore, preventing effective legislation improvement. A nature interest organisation outlined that legislation on chemicals, endocrine disruptors and nanomaterials remains unsatisfactory.

Compliance with legislation in this area has been improved (total respondents 33):

This statement received the most positive answers, three 'yes' and 18 'mainly yes'. The 'yes' answers came from two EU institutions and one nature interest organisations. The 18 'mainly yes' answers came from majority of national authorities, EU institutions and industries and one out of three citizens organisations. Only one nature interest organisation does not think compliance has improved. This statement is the most positively assessed from the four statements showing that improvements with respect to compliance with relevant legislation has taken place.

Comments from the survey:

The European Environment Bureau (EBB), which replied 'mainly no' mentioned that small improvements could however, be noticed in REACH implementation. Comments from the interview: The personal opinion of an EU institution official is that an ongoing programme is useful to lead the way by setting objectives and actions to meet targets. However, in the case of chemicals, actions are not determined by the 7th EAP per se. There are many other things influencing the chemicals scene. There is also interference with Better Regulation agenda, which is also an agenda setting exercise based on a systematic evaluation of potential priorities. They run in parallel.

Public access to information on the implementation of legislation in this area has improved (total respondents 33):

More than half of the respondents answered 'yes' or 'mainly yes' to this statement. The 'yes' answers came from one EU institution, two national authorities, and nature interest organisation. Approximately a quarter replied 'do not know'. Nature as well as citizens' organisations were more critical than other stakeholders on this point, where two out of four, and one out of three citizen interest organisations said 'mainly no'. In general, it can be implied that the assessment of this statement is positive.

Citizens' trust and confidence in the enforcement of legislation in this area has been enhanced (total respondents 31):

More than a third of respondents answered 'do not know' to this statement. This is not surprising as this information would have to come from a public survey and not all stakeholders are familiar with it. The rest of respondents rather disagreed than agreed with it, with 10 'mainly no', one 'no' answers against one 'yes' and seven 'mainly yes' answers. EU institutions and national authorities were split between 'mainly yes' and mainly

no’, nature interest organisations and citizens’ interest organisations were ‘mainly’ negative. Overall, it could be implied that citizens’ trust and confidence in the enforcement of legislation in this area has not been enhanced.

Promotion of interests of relevant groups

This question aims at assessing if legislative activities linked to Objective 3 are effective, in the sense that they meet the interest of different groups of stakeholders who are directly affected by them. This question also links to Objective 4 on improving implementation of the EU environmental legislation.

Q84. Do you think that the legislative activities under this Objective have led (or are on the good track to leading) to improved protection/ satisfaction of the interests of:		EU institutions	National authorities	Regional authorities (n/a)	Industry	Nature interest	Citizens' interest	Research (n/a)	International organisations(n/a)	TOTAL
	Total	7	14	0	5	4	3	0	0	33
Citizens	Yes	1				1				2
	Mainly yes	4	11		4	1	2			22
	Mainly no	2	2		1	2	1			8
	No									0
	Do not know		1							1
Nature/flora & fauna	Yes	1				1				2
	Mainly yes	3	10		3	1				17
	Mainly no	3	2		1	1	2			9
	No									0
	Do not know		1		1	1				3
Economic actors (businesses, farmers, etc.)	Yes									0
	Mainly yes	2	9		2	2				15
	Mainly no	2	1		2		1			6
	No									0
	Do not know	1	2		1	2	2			8

The majority of respondents agree or mainly agree with the idea that legislative activities have improved the protection and the satisfaction of the interest of all three categories.

Citizens (total respondents 33)

In particular, ‘citizens’ was the category that was thought of as benefiting the most from legislative work in this field, including from the point of view of citizens’ organisations. Two third of respondents answered ‘mainly yes’, which included significant majority of national authorities, industries, citizen interest organisations and over half of EU institutions, and one EU institutions and one nature interest organisation answered ‘yes’ on the impact of legislation in this field on citizens. Remaining respondents representing small minorities of all stakeholders saw impact as ‘mainly’ negative on citizens. There was no respondent who thought the impact was negative.

Nature / Flora and Fauna (total respondents 31)

With respect to the impact on nature/ flora and fauna actors, the overall impact is also assessed rather positively, with two positive answers and 17 out of 31 respondents replying ‘mainly yes’. Dominant majority of national authorities, industries and nature interest organisations, as well as three out of seven EU institutions contributed with positive assessments. Nine respondents were ‘mainly’ negative including all citizen interest groups, and minorities from other stakeholders’ groups. There was no fully negative answer, while three respondents replied ‘do not know’.

Economic actors (total respondents 29)

Approximately one third of respondents did not know if legislative work in this area was improving or not the interests of economic actors. Economic actors is the category all stakeholders were the most uncertain about. There was no respondent who replied 'yes' or 'no' to this question, but there were 15 respondents who were 'mainly' positive. Majority of national authorities were positive, while other stakeholders had mixed assessments.

Comments from the survey:

One EU institution wrote that Nature/ flora & fauna is better protected, but still less than the level achieved for the protection of citizens. One industry organisation said that even though the promotion of industries' interests is not the objective of the 7th EAP, but some may have benefitted from it.

One national authority commented that hazardous chemicals in imported articles, nanomaterials, endocrines and combined chemicals effect may still cause concern.

Impact of the EU law in the area of environmental pollution control and health risks reduction

This question relates to the previous question as it assesses the impact of relevant EU policies and legislation on the three categories of stakeholders. It also relates to Objective 4 on improved implementation of environmental legislation.

Q89. What do you think the overall impact is from the implementation of EU policies and legislation in the area of environmental pollution control and health risks reduction on:		EU institutions	National authorities	Regional authorities (n/a)	Industry	Nature interest	Citizens' interest	Research (n/a)	International organisations(n/a)	TOTAL
	Total	6	14	0	5	4	3	0	0	32
Citizens	Very negative									0
	Negative	1								1
	Neutral		1		1	1	1			4
	Positive	4	12		4	2	2			24
	Very positive	1				1				2
	Do not know		1							1
Nature/flora & fauna	Very negative									0
	Negative	1								1
	Neutral	1	2			1	1			5
	Positive	4	10		3	2	1			20
	Very positive					1				1
	Do not know		1		1		1			3
Economic actors (businesses, farmers, etc)	Very negative									0
	Negative		1							1
	Neutral	4	2		3	2	1			12
	Positive	1	6		2		1			10
	Very positive					1				1
	Do not know	1	4			1	1			7

Citizens (total respondents 32):

Results are similar to the results for the previous question. Three quarter of respondents said the impact of these policies on citizens is 'positive' and two said 'very positive'. The 'positive' answers more common among national authorities, EU institutions, industry and nature and citizens interest organisations. Only four respondents qualified this influence as 'neutral', and only one (EU institution) thought it was negative. One national authority replied 'do not know'.

Nature/flora & fauna (total respondents 30):

Regarding nature/ flora & fauna, the same trend applies as for the impact on citizens, as over two-third of respondents estimate the impact of these policies to be ‘positive’ (20 out of 30) or ‘very positive’ (one nature interest organisation). The positive answers were given by majority of national authorities, EU institutions and industries, half of nature interest and one interest organisation. Only one respondent, EU institution representative, thought the impact on this actor was negative.

Economic actors (total respondents 31):

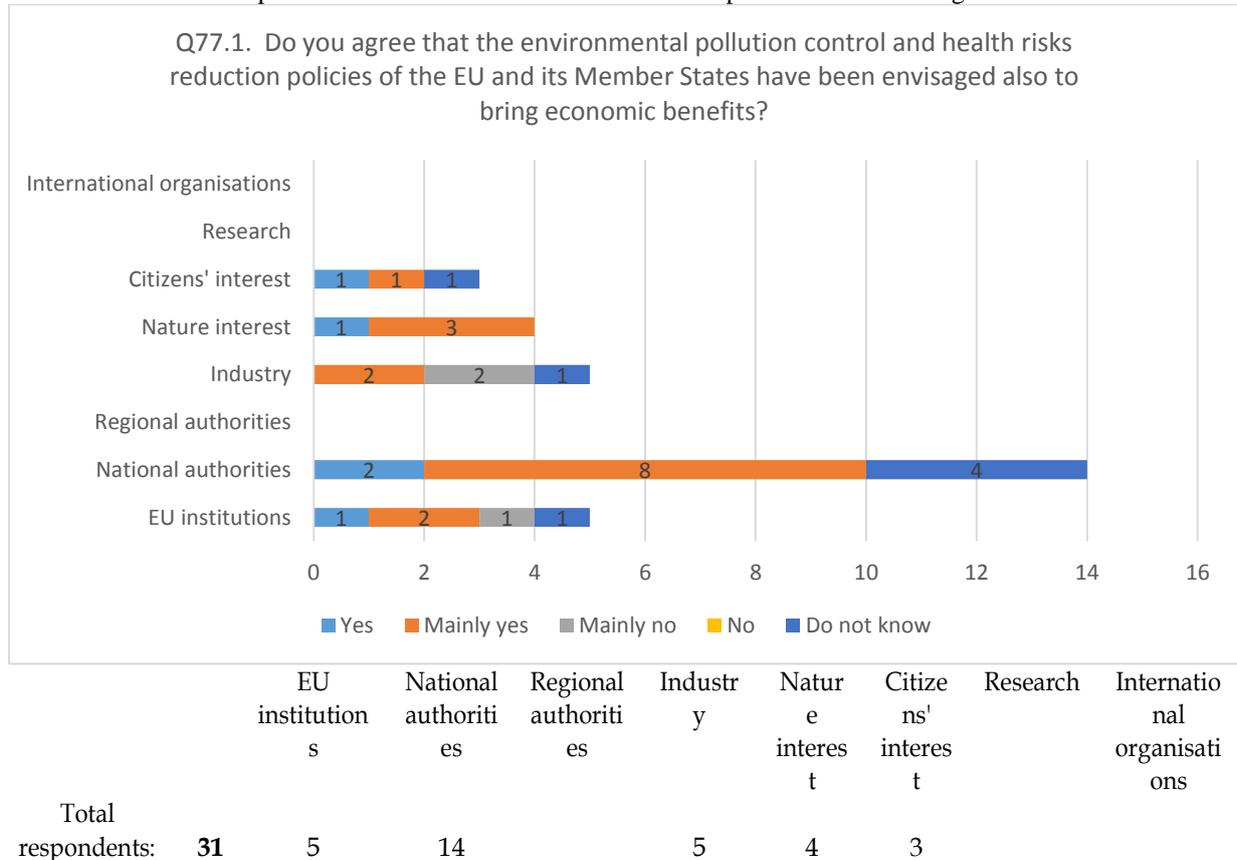
Finally, only around one-third of respondents said the impact of environmental pollution control and health risks reduction policies on economic actors was ‘positive’ or ‘very positive’ (1/31 – one nature interest organisation). 12 respondents, the biggest group, were neutral and one national authority was negative. Two industry respondents thought the impact was positive, while the other three industry respondents were neutral. Six national authorities thought the impact was positive, while two were neutral. This reflects that environmental pollution control and health risks reduction policies are still seen as negatively impacting economic actors. Seven respondents did not know the answer to this question.

Comments from the interview:

The personal opinion of an EU institution official is that the new Commission had a wish to not create new legislation but rather evaluate existing legislation. Compliance with legislation in the area of chemicals has therefore been improved to some extent, but only marginally. The enforcement of legislations is still a role for the Member States to fulfil, but the efforts vary across the different countries. It is especially difficult with chemicals, as it is hard to test all substances. There are some enforcement projects in place right now that are useful, however, at the same time there seems to be a reduction of resources which makes it harder to follow-up on issues.

Economic benefits of environmental pollution control and health risks reduction policies

The purpose of this question is to see if stakeholders believe that receiving economic benefits has been integrated into the environmental pollution control and health risks reduction policies as one of its goals.



To this question, a very large majority of respondents answered ‘yes’ or ‘mainly yes’. Those who answered ‘yes’, receiving economic benefits has been integrated in the Objective 3 policies include one citizens interest, and one

nature interest organisations, two national authorities and one EU institution representative. The ‘mainly yes’ answers came from over half of national authorities, less than half of EU institutions, industry, majority of nature interests and one-third of citizens interest organisations. This implies that all four nature interest organisations thought the economic benefits are integrated in the current policies related to Objective 3.

It is interesting to note that the only respondents who felt that such policies were ‘mainly’ not designed to bring economic benefits come from the industry stakeholder group (2/5), and one EU institution. There was no respondent who thought that economic benefits are not integrated at all in these policies. Seven respondents did not know how to answer this question. It can be implied that the majority of respondents believe such policies can bring (or were designed to bring) economic benefits.

Comments from the survey:

Three of four comments stressed the fact that economic benefits will result from pollution and health risks reduction policies because such policies, by taking necessary actions, will avoid health-related costs (European Food Safety Authority - Scientific Committee and Emerging Risks Unit, HEAL, Irish Environmental Protection Agency) and costs of inaction. By taking measures against activities or products that are harmful to human health now, substantial medical expenses will be avoided in the future.

These policies will also foster sustainable product innovation (Irish Environmental Protection Agency), which can be beneficial to the European economy.

One EU institution mentioned that it is difficult to assess the economic benefits and that more incentives are needed for business.

Environmental impact observed as result of Objective 3 activities

This question relates to the effectiveness of policies under Objective 3 with respect to their environmental impacts.

Q90. Do you agree that the activities under this priority objective have improved the situation with respect to:		EU institutions	National authorities	Regional authorities (n/a)	Industry	Nature interest	Citizens' interest	Research (n/a)	International organisations(n/a)	TOTAL
	Total	7	12	0	5	4	3	0	0	31
Air quality in urban areas	Yes		1		1					2
	Mainly yes	3	8		3	2	2			18
	Mainly no		2		1	1	1			5
	No					1				1
	Do not know	1	2							3
Air pollution emissions	Yes		1		1					2
	Mainly yes	3	9		2	2	2			18
	Mainly no		1		2	1	1			5
	No					1				1
	Do not know	2	2							4
Quality of bathing waters	Yes	1	4		1	1	1			8
	Mainly yes	4	5		3	2				14
	Mainly no						1			1
	No									0
	Do not know		3		1	1	1			6
Climate changes adaptation	Yes	1	1							2
	Mainly yes	2	4		3	2				11

Q90. Do you agree that the activities under this priority objective have improved the situation with respect to:		EU institutions	National authorities	Regional authorities (n/a)	Industry	Nature interest	Citizens' interest	Research (n/a)	International organisations(n/a)	TOTAL
	Mainly no	1	3		1	1				6
	No	1								1
	Do not know		4		1	1	3			9
Environmental noise	Yes		1							1
	Mainly yes	3	2		3	1				9
	Mainly no		4		1	3	3			11
	No		1							1
	Do not know	2	3		1					6
Use of hazardous chemicals	Yes		1		1					2
	Mainly yes	3	6		2	2	1			14
	Mainly no	3	2		1	1	1			8
	No					1				1
	Do not know	1	2		1		1			5
Use of pesticides	Yes		1							1
	Mainly yes	3	7		3	2	1			16
	Mainly no	3			1		1			5
	No					2				2
	Do not know		3				1			4
Other, please specify	Yes		1							1
	Mainly yes									0
	Mainly no									0
	No									0
	Do not know		1				1			2

Air quality in urban areas (total respondents 29):

A majority of respondents from EU institutions, national authorities, industries and citizens' interest organisations thought that the activities under Objective 3 have improved the situation of air quality in urban areas, with two replying 'yes' and close to two-thirds replying 'mainly yes'. Around one fifth of respondents thought the situation did not improve or 'mainly' did not improve. Two nature interest organisations 'mainly' agreed, one 'mainly' disagreed and one disagreed. Three responded 'do not know'. It can be implied from the answers that in overall the air quality in urban areas is perceived to have improved due to the activities under Objective 3 of the 7th EAP. Comments from the survey:

However, CCPIE – CCIM (Belgian Coordination Committee for the International Environment Policy) wrote in the survey that even if air quality has improved and emissions have gone down, significant problems remain with for example air quality in urban areas due to the NOx diesel problem and fraud with ad blue and soot filters. A focus on enforcement of legislation is needed, as WHO limits are not yet met.

Air pollution emissions (total respondents 30):

Similarly, a large majority of respondents thought that the activities under Objective 3 have improved the situation of air pollution emissions, with two replying 'yes' and over half replying 'mainly yes'. Around one fifth of

respondents thought the situation did not or ‘mainly’ did not improve. Four responded ‘do not know’. It can be implied from the answers that in overall the air pollution emissions is perceived to have improved due to the activities under Objective 3 of the 7th EAP.

Three out of five EU institutions thought the situation ‘mainly’ improved, and two did not know. Majority of 12 national authorities thought the situation improved or ‘mainly’ improved, one ‘mainly’ disagreed and two did not know. Two industry respondents out of five ‘mainly’ agreed that situation improved, one agreed and two ‘mainly’ disagreed. Two nature interest organisations ‘mainly’ agreed, one ‘mainly’ disagreed and one disagreed. Two citizen interest organisations ‘mainly’ agreed with this statement, and one mainly disagreed.

Quality of bathing waters (total respondents 29):

Almost three-quarter of respondents answered ‘yes’ or ‘mainly yes’ when asked if the activities under this priority objective have improved the quality of bathing waters. This is the statement which received the highest number of positive answers. Positive assessments are dominant among all stakeholders except for the citizens’ interest group, where it is mixed. Only one respondent thought the quality ‘mainly’ did not improve, there was no respondent who thought it did not improve at all. Six responded ‘do not know’. It can be implied from the answers that in overall the quality of bathing waters is perceived to have improved due to the activities under Objective 3 of the 7th EAP.

Climate change adaptation (total respondents 29):

On climate change adaptation, a large percentage (about one-third) of respondents ‘did not know’ whether the situation improved due to the activities under Objective 3 of the 7th EAP. There was a higher share of respondents replying positively, ‘yes’ or ‘mainly yes’ than ‘no’ or ‘mainly no’. Nine responded ‘do not know’. It can be implied from the answers that in overall climate change adaptation is perceived to have improved due to the activities under Objective 3 of the 7th EAP but that many respondents did not know the answer.

Three out of five EU institutions thought the situation improved or ‘mainly’ improved, one mainly disagreed and one did not know. Four out of 12 national authorities thought the situation ‘mainly’ improved, one thought it improved, three mainly disagreed and four did not know. Three industry respondents out of five ‘mainly’ agreed that situation improved, one mainly disagreed and one did not know. Two nature interest organisations ‘mainly’ agreed, one mainly disagreed and one did not know. All three citizen interest organisations did not know.

Environmental noise (total respondents 28):

Environmental noise was the area that received the most negative responses, with 11 ‘mainly no’ and one ‘no’ answer to the question whether environmental noise has improved due to the activities the 7th EAP. Only one respondent answered ‘yes’ and nine responded ‘mainly yes’. Six responded ‘do not know’. It can be implied that in overall environmental noise is perceived not to have improved much.

Three out of five EU institutions thought the situation ‘mainly’ improved, and two did not know. Four out of 11 national authorities thought the situation ‘mainly’ did not improve, one thought it did not improve, one thought it did improve, two thought it mainly improved and three did not know. Three industry respondents out of five ‘mainly’ agreed that situation improved. Three nature interest organisations ‘mainly’ disagreed, and one mainly agreed. All three citizen interest organisations thought the situation mainly did not improve.

Comments from the survey:

CCPIE – CCIM (Belgian Coordination Committee for the International Environment Policy) wrote that activities under this priority objective have not reduced environmental noise, but rather raised the awareness of the population.

Another national authority said EU policy on this issue is rather weak in the sense that it does not introduce standards but rather procedural rules, which is not enough to effectively protect EU citizens.

Use of hazardous chemicals (total respondents 31):

On the use of hazardous chemicals, the slightly above over half of respondents was positive and replied ‘yes’ or ‘mainly yes’. Around one third of respondents thought the situation did not or ‘mainly’ did not improve. Five responded ‘do not know’. It can be implied from the answers that in overall the use of hazardous chemicals is perceived to have improved due to the activities under Objective 3 of the 7th EAP.

Opinions are mixed in all stakeholders’ groups, but in the largest group – the national authorities, as well as among industries there are more positive views, one in others there is equal split.

Comments from the survey:

A national authority remarked that a large number of hazardous substances are not well regulated.

Use of pesticides (total respondents 28):

The picture on use of pesticides is also positive for the majority of stakeholders, where one stakeholder agreed that the situation improved, over half indicated they ‘mainly’ agreed, five mainly disagreed, two disagreed and four did not know.

Three out of six EU institutions thought the situation ‘mainly’ improved, and three mainly disagreed. Dominant majority of national authorities thought the situation improved, or ‘mainly’ improved, and three did not know. Three industry respondents out of four ‘mainly’ agreed that situation improved, and one ‘mainly’ disagreed. There is a split in views in the nature and citizens’ interest organisations ‘..

Comments from the survey:

The European Environmental Citizens' Organisation for Standardisation (ECOS) noted that national and regional bans have gone further than EU processes.

A national authority commented that more work is needed on the risk mitigation usage of pesticides.

This shows that there are specific environmental areas where Objective 3 of the 7th EAP was perceived as effective, such as the quality of bathing waters, air quality and air pollution, while in other areas, it has been assessed as less effective, such as environmental noise.

3.4.5 Efficiency

Compliance and enforcement cost

Respondents were asked if there were any particular pieces of EU environmental pollution control and health risks reduction policy and legislation that are associated with high compliance costs for industry and enforcement costs for national authorities.

Comments from the survey:

Cefic, noted that REACH as well as the Industrial Emission Directive were associated with high compliance costs for industry.

A national authority mentioned air and water quality as being very costly.

Another national authority said that urban wastewater collection and treatment, water status maintenance and improvement, measures to reduce air polluting emissions from transport, industry and agriculture and overall monitoring and data gathering and analysis was very costly.

Comments from the interview:

The personal opinion of an EU institution official is that food safety legislation has high compliance costs.

Securing funding for environmental pollution control and health risks reduction

This question relates to effectiveness of Objective 3 in terms of reaching its objectives via increased and sufficient funding. The logic here is that the 7th EAP is intended to help increase funding by giving a high-level statement of general environmental objectives that should help policy-makers justify expenditure. This question also relates to enabling Objective 6 of the 7th EAP on securing investment/ funding for achieving environmental goals.

Q88. With regard to securing funding for policies in areas of environmental pollution control and health risks reduction, do you agree with the following:		EU institutions	National authorities	Regional authorities (n/a)	Industry	Nature interest	Citizens' interest	Research (n/a)	International organisations(n/a)	TOTAL
	Total	5	13	0	5	3	3	0	0	29
Public funding has increased	Yes		1							1
	Mainly yes		5		1	1				7
	Mainly no	3	4		3	2	1			13
	No	1	1							2

Q88. With regard to securing funding for policies in areas of environmental pollution control and health risks reduction, do you agree with the following:		EU institutions	National authorities	Regional authorities (n/a)	Industry	Nature interest	Citizens' interest	Research (n/a)	International organisations(n/a)	TOTAL
	Do not know	1	2				2			5
Private funding has increased	Yes									0
	Mainly yes	1	4		2	1				8
	Mainly no	2	3		2	1	1			9
	No									0
	Do not know	2	6			1	2			11
The funding at EU level is adequate for the needs	Yes									0
	Mainly yes		2		1	1				4
	Mainly no	4	3		3	1				11
	No				1	1	2			4
	Do not know	1	6				1			8
The funding at Member State level is adequate for the needs	Yes									0
	Mainly yes		3		1	1				5
	Mainly no	3	7		3	1				14
	No	1	1		1	1	2			6
	Do not know	1	1				1			3

Public funding (total respondents 28):

Regarding public funding, the slightly over half of respondents thought that it had not increased. Around one third replied it has 'mainly' increased and one respondent thought it did increase. Five responded 'do not know'.

Three out of five EU institutions thought public funding has 'mainly' decreased, one thought it had decreased, and one did not know. One out of 13 national authorities agreed that public funding has increased, five 'mainly' agreed, four 'mainly' disagreed, one did not agree and two did not know. Three industry respondents out of four 'mainly' disagreed, and one 'mainly' agreed. One nature interest organisation 'mainly' agreed, and two 'mainly' disagreed. One citizen interest organisation 'mainly' disagreed, and two did not know.

Private funding has increased (total respondents 28)

Regarding private funding, the statement received the highest number of 'do not know' answers out of the four statements (11 out of 28). Those that provided a positive or a negative answer were split almost equally with eight respondents mainly agreeing and nine respondents mainly disagreeing.

One out of five EU institutions thought private funding has 'mainly' increased, two thought it had 'mainly' decreased, and two did not know. Four out of 13 national authorities 'mainly' agreed that private funding has increased, three 'mainly' disagreed, and six did not know. Three industry respondents out of four 'mainly' disagreed, one disagreed and one 'mainly' agreed. One nature interest organisation 'mainly' agreed, one 'mainly' disagreed and one disagreed. Two citizen interest organisations disagreed, and one did not know.

Funding at EU level is adequate for the needs (total respondents 27):

A large majority of respondents said that funding at EU level was not adequate for the needs, with 11 respondents answering 'mainly no' and four answering 'no'. Only four replied the funding at EU level is 'mainly' adequate. No respondents thought it is adequate. Eight responded 'do not know'.

Four out of five EU institutions thought funding at EU level is 'mainly' inadequate to the needs, and one did not know. Two out of 11 national authorities thought that funding at EU level is 'mainly' adequate, three thought it is

‘mainly’ inadequate, and six did not know. Three industry respondents out of four thought the funding is ‘mainly’ inadequate, one thought it is inadequate and one thought it is ‘mainly’ adequate. One nature interest organisation thought it is ‘mainly’ adequate, one ‘mainly’ inadequate and one thought it is inadequate. Two citizen interest organisations thought funding at EU level is inadequate and one did not know.

Comments from the survey:

An EU institution mentioned that the 2018 budget of EU agencies is decreasing.

The Ministry of Environment in Finland commented that lack of funding is a concern for research activities and administrative capacity.

Funding at MS level is adequate for the needs (total respondents 28):

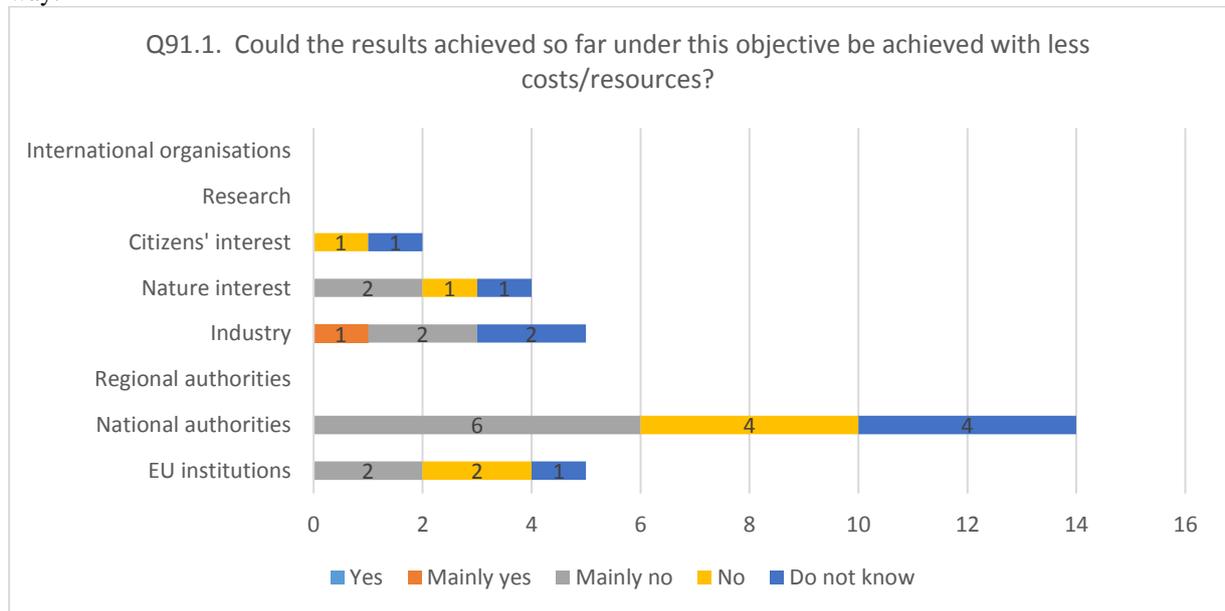
As for the previous statement, a large majority of respondents said that funding at MS was not adequate for the needs, with over two thirds answering ‘mainly no’ or ‘no’. This statement was rated even more negatively than the previous one on funding at EU level. Only five replied the funding at MS level is ‘mainly’ adequate. No respondents thought it is adequate. Three responded ‘do not know’.

Three out of five EU institutions thought funding at MS level is ‘mainly’ inadequate to the needs, one thought it is inadequate and one did not know. Three out of 12 national authorities thought that funding at MS level is ‘mainly’ adequate, rest thought otherwise. Majority of industry respondents, citizens’ and nature interest organisations thought the funding is inadequate or ‘mainly’ inadequate, while a few from these groups thought it is mainly inadequate.

Overall, it is apparent that the perception is that public and private funding at EU and MS level has not increased and/or is not sufficient for the needs, i.e. to achieve the environmental goals under this Objective of the 7th EAP.

Could results be achieved with less cost?

Respondents were asked whether the results achieved so far under this objective be achieved with less costs/resources. This question relates to the efficiency of policy measures that have been set up to reach Objective 3’s goals. The aim is to assess to what extent the benefits generated from this objective could be achieved with less costs. This question also relates to Objective 6 (a) of the 7th EAP on achieving the objectives in a cost-effective way.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	32	6	14	5	4	3		

A large majority of respondents replied ‘no’ (eight out of 32) or ‘mainly no’ (12 out of 32) to this question, and around a third of them replied ‘do not know’. Those who think that the results could have been achieved with less

costs or resources are a clear minority – only one respondent, industry, answered ‘mainly yes’. There was no clear ‘yes’ answer. This shows that the resources to reach the Objectives 3 of the 7th EAP were perceived as being spent efficiently by the majority of respondents.

Two out of five EU institutions thought the results could not have been achieved with less costs/ resources, two others mainly agreed with this, and one did not know. Four out of 14 national authorities thought the results could not have been achieved with less costs/ resources, six ‘mainly’ agreed with this, and four did not know. One industry respondent out of five thought the results could have been achieved at less costs/ resources to some extent (‘mainly yes’), two ‘mainly’ disagreed and two did not know. Two nature interest organisations ‘mainly’ agreed that the results could not have been achieved at less cost, one fully agreed and one did not know. One citizen interest organisation agreed with this statement, and one did not know.

Comments from the survey:

CHEM Trust stated in the survey that the clean-up costs for society from pollution are currently huge and more decisive prevention measures are needed.

3.4.6 EU value added

Extra contribution of the 7th EAP in environment-related pressures and risks to health and well-being.

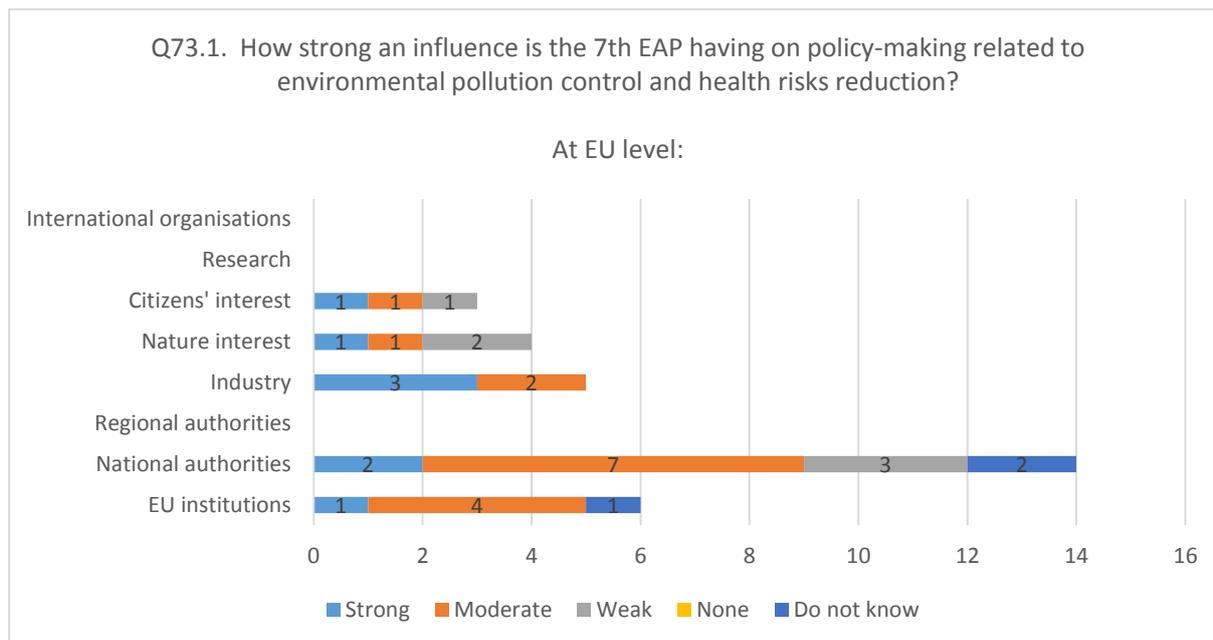
An open question has been asked about what extra contribution could the 7th EAP make towards progress in environmental pollution control and health risks reduction in comparison to what has been achieved by the Member States acting on their own. This question seeks to find what is the EU added value to environmental pollution control and health risks reduction policies, compared to what Member States are already doing in this field.

Comments from the survey:

One recurring comment is that the EU’s role is to design harmonised policies across Member States and deal with transboundary effects (Ministry of the Environment in Finland, Italian Ministry for the Environment, land and sea, Health and Environment Alliance (HEAL), Cefic and CHEM Trust). They agree that the EU’s added value lies in its capacity to create binding regulations for Member States, to make enforcement more constraining. The EU should support harmonised research and monitoring activities in Member States and allows cost reduction and expertise sharing between Member States.

Influence of the 7th EAP on policy-making in environmental pollution control and health risks reduction

This question aims at assessing what the different stakeholders think about the impact that the 7th EAP has on policy-making related to environmental pollution control and health risks reduction, both at EU and at Member State level. The answers reflect the Programme’s effectiveness in influencing policy-making in the field of environmental pollution control and health risks reduction. The level of influence could potentially reflect the level of effectiveness of the 7th EAP.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	32	6	14	5	4	3		

At EU level, a quarter of the respondents believes the influence of the 7th EAP on policy-making is strong and half of them think it is moderate. Six out of 32 think it is weak. Three stakeholders did not know the answer.

When looking at the answers of stakeholder types, one out of six EU institutions thought the influence is strong at EU level, four thought it is moderate and one did not know. Two out of 14 national authorities thought the influence at EU level is strong, seven thought it is moderate, three thought it is weak and two did not know. Three industry respondents out of five thought the influence is strong, and two thought it is moderate. One nature interest organisation thought the influence is strong, one thought it is moderate and two thought it is weak. One citizen interest organisation thought the influence is strong, one thought it is moderate and one thought it is weak.

Comments from the survey:

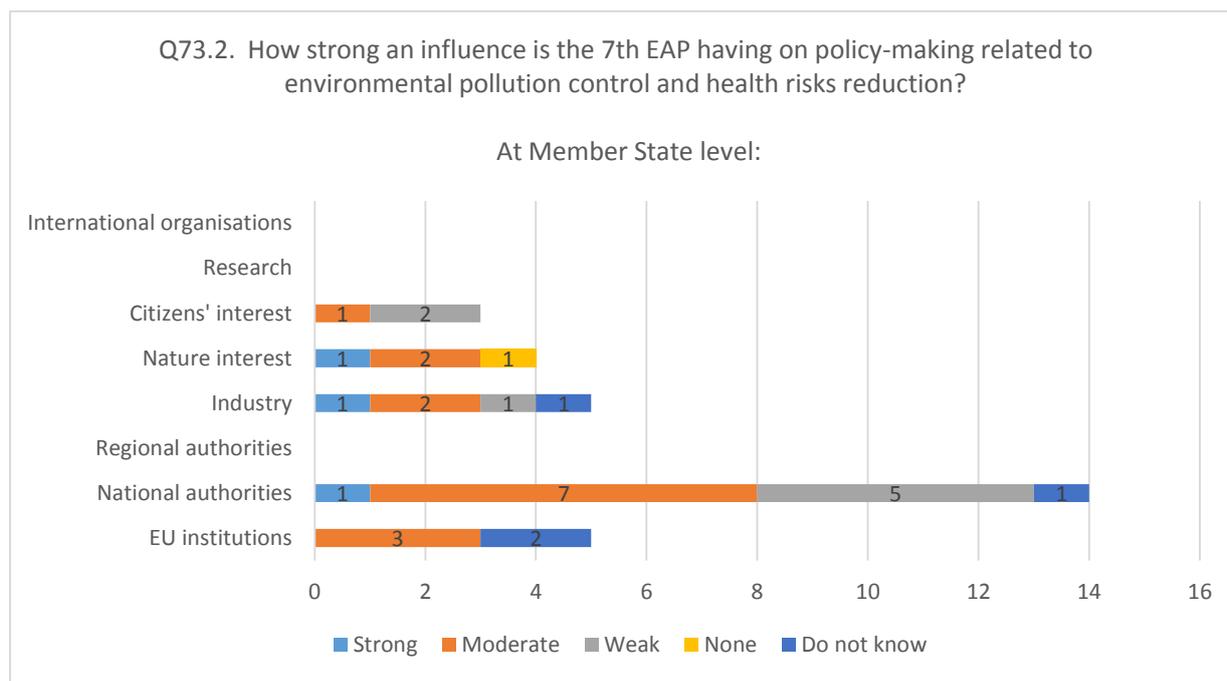
With regard to the 7th EAP's influence on policy-making at EU level:

The Irish Environmental Protection Agency, a national authority mentioned that on water and air quality standards, the WHO's requirements were still the main driver for policy-making in pollution and health risks reduction.

One national authority, mentioned that nanomaterial legislation is lagging behind.

The European Environmental Citizens' Organisation for Standardisation (ECOS), outlined that despite clear 7th EAP objectives, the European Commission (DG GROW specifically) has either not delivered or inadequately delivered work on combination effects of chemicals, endocrine disruptors, chemicals risk and nanomaterials.

Finally, the European Food Safety Authority - Pesticides Unit, pointed out coherence issues that may hamper the 7th EAP's impact, for example the fact that Plant Protection Products and most Biocides are assessed at Member State level instead of EU level, or that risks are not re-assessed following the decisions by Member States.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	31	5	14	5	4	3		

At MS level, very few respondents three out of 31 believe the influence of the 7th EAP on policy-making is strong and almost half think it is moderate. Third of the respondents think it is weak. One stakeholder thought it is none (nature interest organisation) and four stakeholders did not know the answer.

When looking at the answers of stakeholder types, three out of five EU institutions thought the influence is moderate at MS level and two did not know. One out of 14 national authorities thought the influence at MS level is strong, seven thought it is moderate, five thought it is weak and one did not know. One industry respondents out of five thought the influence is strong, two thought it is moderate, one thought it is weak and one did not know. One nature interest organisation thought the influence is strong, two thought it is moderate and one thought it is none. One citizen interest organisation thought the influence is moderate and two thought it is weak.

It can be implied that the Programme is perceived as being more effective in influencing EU policy-making than MS level policy-making in the field.

Comments from the survey:

CHEM Trust, a citizen interest organisation, thought the influence on MS level depends on the country, e.g. France, Sweden and Denmark have started national action plans on endocrine disrupting chemicals (EDCs).

European Environmental Citizens' Organisation for Standardisation (ECOS), a citizens' organisation shared the opinion and believed that the 7th EAP has helped to support Member State activities, for example, on national nano-registers, or on contributions to REACH activities on endocrine disruptors. One national authority assessed the influence as moderate but specified that problems around dioxins, neonicotinides, mercury and other regional issues should be considered.

3.4.7 Overall assessment of Objective 3

In overall assessment of the progress in the objectives a colour coding based scoreboard system (as presented on the right-hand side) has been applied to summarise assessment on *relevance, coherence, effectiveness, efficiency* and *EU added value* criteria. It distinguishes five assessment colour codes indicating spectrum between positive and negative assessment:

	Positive assessment / high
	Mixed positive assessment/ medium-high
	Mixed assessment / medium
	Mixed negative assessment / medium-low
	Negative assessment / low

- Positive assessment or high relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value
- Mixed positive assessment or medium-high relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value
- Mixed assessment or medium relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value
- Mixed negative assessment or medium-low relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value
- Negative assessment or low relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value

Relevance – **Medium**

Respondents all agreed that the existing sub-objectives under Objective 3 are relevant. However, less than half of the respondents believed that new objectives need to be added. It shows that although respondents feel that the relevance of sub-objectives under Objective 3 is good, many believe that it could be improved by adding additional sub-objectives to cover other issues in this field, as for example pharmaceutical effects on human health, effects on endocrine disruptors on vulnerable groups. The relevance of Objective 3 is therefore scored as medium.

Knowledge base - **Medium-low**

The understanding of health and environmental implications of certain chemicals in products and of endocrine disruptors has scored some improvement for stakeholders. However, the knowledge about impact of certain nanomaterials and of the combined effects of chemicals needs to be improved. During the focus group, it was discussed that the knowledge is there but it is not always used in policy-making process up to its potential. The score therefore ends up being medium-low.

Coherence – **Medium-low**

Overall, respondents thought that general policy-making at Member State level and the goals under Objective 3 were not in conflict. However, approximately one third of the respondents believed that European and national sectorial policies were at odds with environmental pollution control and health risks reduction targets under Objective 3. When asked if specific European sectorial policies were coherent with Objective 3, the majority of stakeholders were not able to provide an answer. Nonetheless, the Common Agricultural Policy and the Common Fisheries Policy were identified as the European sectorial policies that are the most in contradiction with pollution and health risk reduction goals. The coherence of Objective 3 with other policies at Member State and EU level is scored as medium-low.

Effectiveness - **Medium-low**

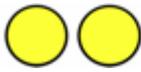
Overall, the vast majority of respondents seem to recognise some progress in general implementation of the Objective 3 activities, but that it is not uniform across the different fields. Approximately half of the respondents

think the implementation of relevant legislation has been to some extent improved, and around one third believes this has not been the case.

When asked about the level of implementation of activities/instruments/actions under Objective 3, the general trend shows that implementation both at EU and Member State level is insufficient. Nevertheless, a larger share of respondents believed that overall the activities under Objective 3 have mainly improved the quality of bathing waters and air, and limited hazardous chemicals and pesticides use. There was uncertainty on whether they also improved climate change adaptation or other policies, while they are not believed to have improved environmental noise.

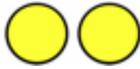
A majority also believe that the implementation of pollution control and health risk reduction policies and legislation had a positive influence on citizens, nature interest organisations and economic actors and promoted their interests. The policies were generally envisaged as positive for citizens, a bit less but still positive for nature interest organisation and even a bit less for economic actors.

Overall, the effectiveness of Objective 3 of the 7th EAP is assessed as medium-low based on the assessment of responses for various questions as well as the comments left by different stakeholders

Efficiency – Medium 

Respondents widely agreed that the results achieved so far in the field on environmental pollution control and health reduction could not have been reached with less costs or resources. Some open questions on enforcement and compliance costs of certain policy/legislation under Objective 3 for national authorities and industry did not receive many answers, therefore it is difficult to know whether respondents thought there were no particular costs or if they were simply not able to answer the question. Overall, stakeholders recognize as a fact that such policies are necessarily costly and that the current result could not have been achieved with significantly less resources or costs.

The majority of stakeholders think that funding, both at EU and national level, is not adequate for Objective 3 needs, most particularly at Member State level. There is discontent regarding the lack of available funds for environmental pollution control and health risks reduction policies. Therefore, the efficiency under Objective 3 can be rated as medium.

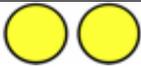
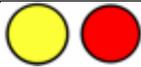
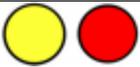
EU added value - Medium 

Many responses emphasised that the EU added-value lies in the capacity of the EU to design harmonised and constraining policies across all Member States. Some responded that in the field of air pollution in particular, EU action is necessary because it is a transboundary problem that cannot be solved by national policies only. The capacity to create binding legislation and to make enforcement more constraining was also outlined as an EU-specific characteristic. However, it was noted that water and air quality standards, the WHO’s requirements were still the main reference.

Majority of respondents found the influence of the 7th EAP on pollution and health risk reduction policies to be moderate, a few think it is strong and few think it is weak. There is still a criticism on inadequately delivered work at EU level on combination effects of chemicals, endocrine disruptors, chemicals risk and nanomaterials. However, it should be noted that the influence of the 7th EAP on Member State policy-making was judged weaker than on EU policy-making.

In overall, the EU added value in the field of pollution control and health reduction is assessed as medium.

Overall scoreboard for Objective 3

Relevance	Knowledge Base	Coherence	Effectiveness	Efficiency	EU value added
					

3.4.8 Recommendations

This section presents respondents' recommendations on the role of various actors in improving the implementation progress of Objective 3, which comes as a response to the following open-ended question from the survey and opinions taken from two position papers:

'What should the role of the following stakeholders be in further improving the progress made towards the achievement of Objective 3?'

Role of the EU institutions:

Many respondents think the role of EU institutions is to produce regulations, guidelines for common policies in different fields and set standards by revising EU laws. EU institutions should improve the implementation of current EU laws such as REACH restrictions, application of EDC [endocrine disrupting chemicals] criteria under biocides and pesticides laws. They should review how enforcement works, promote interoperability of systems for cross-checking information, merge agencies (e.g. EFSA/ECHA).

There are thoughts that the EU's role is to come up with stronger legislative and policy initiatives to curb noise pollution, and ensure that more health data included. EU institutions should create more EU-wide emission reduction regulations and move air quality standards closer to WHO recommended levels.

Stakeholders also see the role of the EU in developing an ambitious strategy for a non-toxic environment, collecting and improving access to environmental and human exposure data, promoting and supporting the development of innovative recycling techniques that allow decontamination of waste contaminated with chemicals of concern, ensuring tracking of chemicals throughout their lifecycle including in imported products and waste, as well as in supporting harmonized research and monitoring on EU-level.

There should be no further delays from EU institutions for pressing environmental matters.

ANEC states in a position paper that generic safety provisions in product legislation such as the GPSD [General Product Safety Directive]-need to be complemented by clear cut restrictions (limit values) to substances of concern. A new European horizontal legal approach for chemicals in products is needed which ensures that consumers will only consume products which are safe.

BEUC stated in their position paper that more research and funding is needed to support mixture testing and to better assess how cumulative exposure impacts consumers and the environment and calls on EU leaders to draw up an ambitious agenda on regulating EDCs [endocrine disrupting chemicals] in all consumer goods with clear objectives and observable deadlines. A precautionary approach should be applied in all consumer-relevant legislation to reduce exposure to EDCs. This approach needs to include overarching principles on how to reduce EDC exposures, combined with targeted strategies for all product categories, from cosmetics to food contact materials, textiles and toys. Where health concerns are raised in one sector or for one product, it should automatically trigger risk evaluation across legislative 'silos'. REACH in particular should require industry to take account of possible combination effects in their registration dossiers. Testing requirements should further be updated to fully assess the impact of total chemicals exposures and of cumulative impacts, corresponding to the reality of our exposure. The REACH regulation should be revised to adequately regulate nanomaterials. The EU needs to introduce a definition of nanomaterials, a provision to ensure that nanomaterials are considered as new substances to be registered independently of any corresponding bulk substances, and lower tonnage thresholds. In parallel, a compulsory nano-register needs to be implemented at the EU level to ensure transparency for consumers and traceability of nanomaterials in the supply chain.

Role of the Member States:

What comes out of different organisations' answers is that the respondents feel that Member States should be politically more committed to take ambitious measures (HEAL, ECOS), to allocate resources for environmental issues and enforce and implement EU laws consistently and with the shortest delay possible (two EU institutions). They should also support the EU in improving standards and better implement EU directives. For example, Member States should implement producer responsibility schemes for hazardous consumption residues, ban certain home heating fuels or eliminate environmentally harmful subsidies. Member States should also carry out monitoring as well as research activities.

Role of the Regions:

From the different answers, the role of regions would be to support EU activities and make them more ambitious on the ground. Regions should implement EU policies) while giving more attention to specific fields such as air pollution and environmental protection (another national authority). Regions have ability to better manage transport and urban noise through urban planning.

Several stakeholders agree that ‘regions should apply rules and monitor’ meaning they should participate in policy-making processes and carry out monitoring and research.

Role of industries:

According to the responses, the role of industries should be to conduct research and develop activities in order to create sustainable innovations. It was also suggested that industries should develop eco-labelling and set up take back schemes. They should develop new business model reducing the volume of hazardous chemicals being used.

Industries should be more transparent, disclosing data on product composition. They should co-operate more, with legislators, but also with different actors along the value chain. Finally, industries should comply earlier with a more stringent legislation.

Role of citizens’ interest support organisations:

The role identified for citizens’ interest support organisations is to act as watchdogs and to raise awareness among citizens. At the same time, it was stressed that awareness rising activities should be based on more science based and solid knowledge.

Citizens’ organisations should also participate more in policy-making, through consultation or submission of proposals for example, as well as push EU institutions to create more ambitious policies and measures.

The role of nature interest promoting organisations:

Responses from participants show that the role that nature organisations should play is very similar to citizens’ interest organisations. Indeed, they often made the same comments for both types of organisations. They should therefore identify potential environmental concerns and raise awareness, disseminate science based knowledge in the society, and participate more to policy and proposing more ambitious policies.

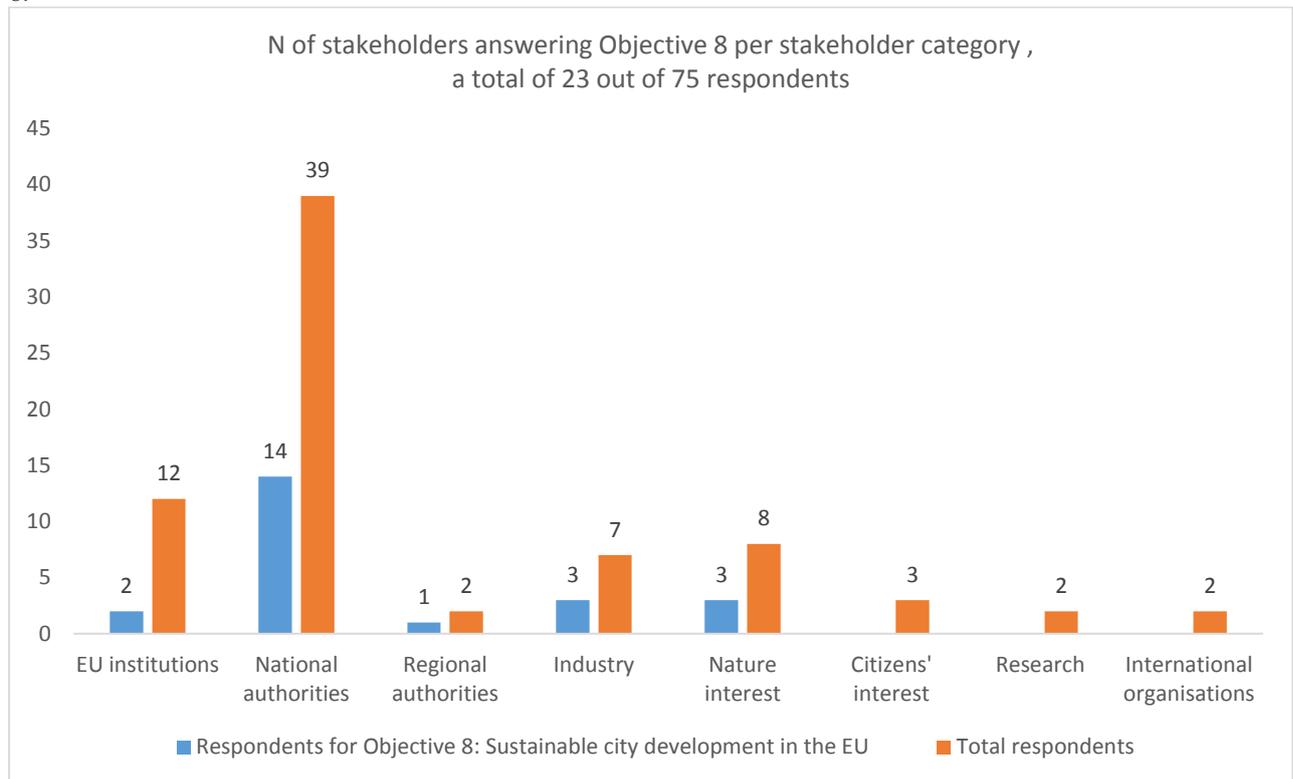
Role of researchers/think tanks/experts:

The role identified for these organisations is to improve knowledge, promote and share scientific concepts and research, for example by providing data about quantifying the health effects of different air pollutants or by assessing environmental and health impacts of new sustainable materials. More specifically, research organisations should focus on understanding the potential exposures that might arise from recycling waste that are contaminated with chemicals of concern.

Finally, research organisations should also participate in the legislative preparation and in implementation.

3.5 Objective 8: To enhance the sustainability of the Union's cities

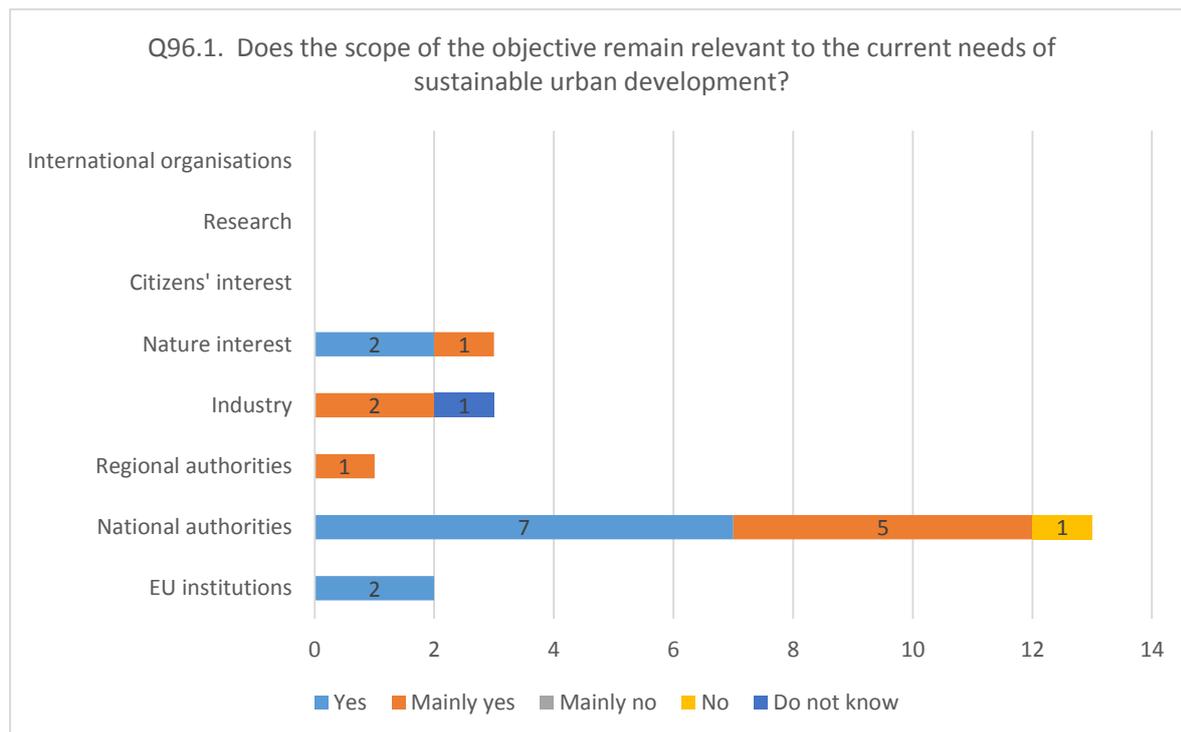
There were 23 respondents for Objective 8, out of a total of 75 respondents for the whole survey. For Objective 8, two out of 12 EU institutions, 14 out of 39 national authorities, one out of two regional authorities, three out of seven industry network organisations and three out of eight nature interest support organisations responded. No research organisations, citizens' interest support organisations or international organisation responded to Objective 8.



3.5.1 Relevance

Relevance of the scoping under Objective 8

The question was designed to check if the objective and the sub-objectives and actions within it remain relevant to the policy context that has evolved since the adoption of the 7th Environment Action Plan (EAP).



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	2	13	1	3	3	0	0	0

Around half of the respondents of all categories (who submitted answers under Objective 8) have answered that the scope of the objective is fully relevant to the needs of sustainable urban development. The other half consider that the scope remains ‘mainly relevant’ but that important issues are missing and there are opportunities for improvement. The 2 EU institutions answered that the scope is fully relevant.

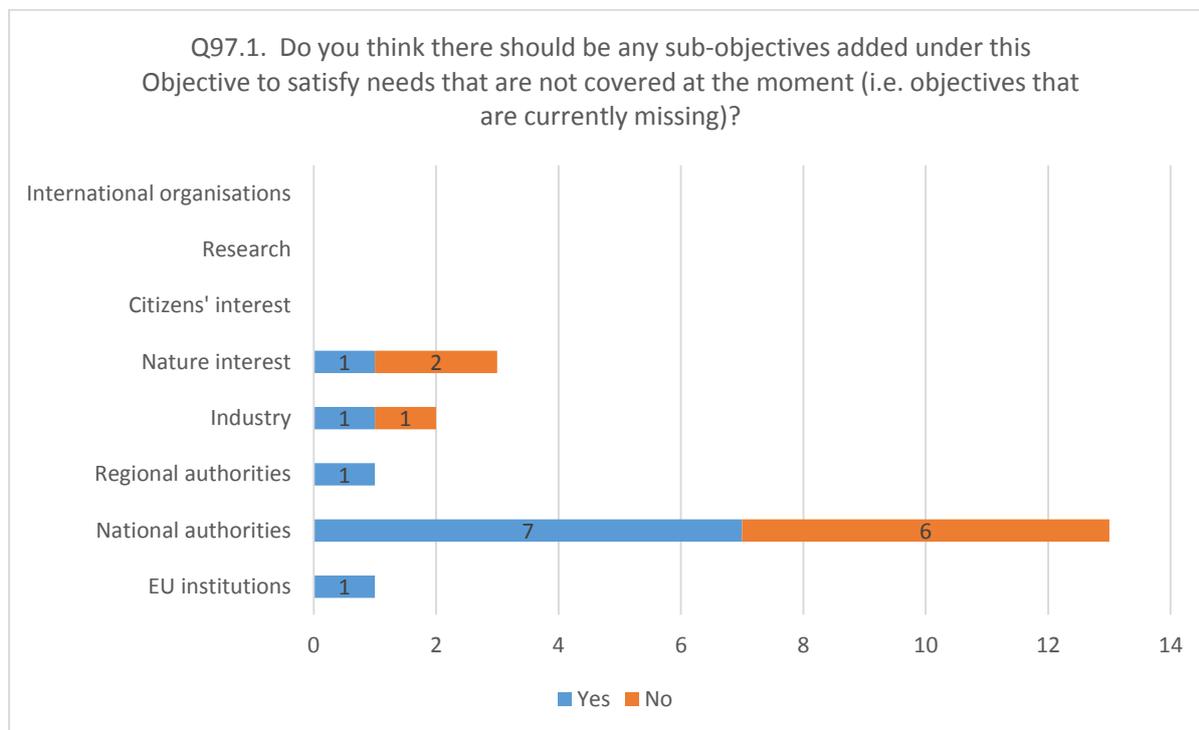
Comments from the survey:

One national authority suggests that developing a set of criteria to assess the environmental performance of cities should be increasingly linked with the Sustainable Development Goals (SDGs). Despite the fact that many of the European cities are frontrunners in sustainable urban development, the question remains how to address the wide range of cities that are not frontrunners. The same respondent acknowledged that integrated urban planning remains the core concept for sustainable urban development.

One national authority considers that the objectives need to be updated and aligned with other relevant international agreements in addition to the SDGs.

Gaps in scoping Objective 8

The questions aim to collect ideas on missing sub-objectives under Objective 8 of the current programme.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	20	1	13	1	2	3		

Comments from the survey:

One nature interest support organisation points to the fact that 'climate change adaptation and mitigation in cities has not been mentioned and should be added.'

According to one organisation representing regional and local authorities, 'there is little focus on environmental challenges at city level. Additionally, there is no recognition that it is the local level of governance that implements a large part of the EU environmental legislation.'

The Directorate General for the Territory of Portugal noted that 'further consideration of territorial diversity and polycentric development would be needed; also that the circular economy, food and urban-rural relations should be included in the future.'

The Belgian Coordination Committee for the International Environment Policy (CCPIE-CCIM), a national authority, and one organisation representing regional and local authorities consider that the objective is lacking concreteness and that some specific topical sub-objectives that constitute a challenge for cities should be integrated, such as waste, noise, air quality, energy, climate and the circular economy.

One nature interest support organisation suggests 'ensuring climate change adaptation of European cities by promoting integrated urban planning considering green infrastructure measures and nature-based solutions'. These recommendations somehow defy the overall logic of the programme, which is to remain at a relatively high level.

CCPIE-CCIM single out the most common city-level actions, such as sustainable urban transport, brownfield redevelopment, green infrastructure and actions to improve air quality. Not all of these actions are included in the 7th EAP and we can make the conclusion that, because of their frequency, they should be added to the next EAP.

In addition, according to one organisation representing regional and local authorities, ‘the objective should also delve into the support that can be extended to cities to help them with the implementation, including links to funding mechanisms.’ The organisation reiterates the links that need to be made with the SDGs and especially with the environmental dimension mentioned in the SDG 11 ‘Cities and Sustainable communities’.

One national authority proposed increasing the focus on cities and resilience (namely on resilient urban infrastructure), to consider green infrastructure (including green public open spaces) and to make additional links to human health and well-being.

Greenpeace European Unit, a nature interest support organisation, suggests increasing the focus on sustainable urban mobility and to include one additional topic that is missing entirely: sustainable local food production. The Community of European Railway and Infrastructure Companies (CER), an industry organisation, also highlights the relevance of including carbon-free urban transport.

Some additional topics are also recommended by the Italian Institute for Environmental Protection and Research – ISPRA, a national authority. In addition to topics already raised by other respondents, they suggest including ‘policies which prevent soil sealing and which incentivise the restoration of agricultural and brownfield land. There is also a need to tackle the need to solve air pollution in a more integrated way. More solid links should be established with the social pillar of sustainable development, including social exclusion and poverty.’ The respondent also mentioned the need to reduce electromagnetic pollution – a topic that is rarely discussed in an environmental context.

One EU institution insists on ‘better integration of urban and regional development and planning, better consideration of climate change adaptation and resilience, and integration into decision-making processes.’

Comments from the focus group:

The focus group participant suggested that a better link could be made between agriculture, food policies, the shortened supply chain and urban dimensions.

3.5.2 Knowledge base

Knowledge gap – understudied areas

A set of questions in the survey focused on Objective 8 of the 7th EAP promoting scientific knowledge and an evidence base for policy-making in the context of sustainable urban development. These questions relate to enabling Objective 5 of the 7th EAP on improving scientific knowledge and evidence for EU environmental policy-making.

The open question was designed to collect stakeholders’ perspectives on missing knowledge (or not sufficiently studied areas) with regards to Objective 8 of the 7th EAP. Several respondents identified areas which have been understudied and where evidence is missing.

Comments from the survey:

It has been pointed out by CCPIE-CCIM that ‘the social aspect of sustainability is rarely mentioned in Flanders. For example, there is the question of whether the no-diesel zones are punishing the poor as only a few people can afford electric cars.’

One national authority considers that ‘further research is also needed on nature-based solutions for urban development and integrated planning to support the EAP targets and implementation.’

One organisation representing regional and local authorities mentioned that ‘criteria for sustainable urban development (such as water, waste, air quality, energy, climate, noise and biodiversity) can be further explored.’ In addition, there is a need to further study the crucial role of cities in implementing

environmental legislation. There is also a need to make the objectives within Objective 8 sharper as they are considered to be relatively vague.

Respondents also pointed to the insufficient understanding of cost-effectiveness for cities implementing climate change adaptation measures such as green infrastructure. The reason for that is that policymakers, urban planners and politicians need further knowledge and tools with regards to integrating climate change adaptation in urban planning. This includes the provision of open public spaces.

One national authority noted that 'the interrelations between cities and their hinterland (rural areas) need to be given more attention, including identifying interdependencies and improving sustainable urban and regional development (supply and disposal interdependencies, food and commuter flows, etc).'

One EU institution highlighted that 'there is not sufficient knowledge on the impact of greening cities on the environmental, health and climate objectives.'

Comments from the focus group:

It was noted by the focus group participant that the collection of data on the city level had been improving.

Knowledge which exists but is underutilised

Respondents were asked if there are areas within Objective 8 where knowledge exists but is not utilised for evidence during policy-making. A number of respondents shared their views on this question.

Comments from the survey:

One environment and agriculture ministry identified that one such area is sustainable urban planning and design, covering mobility, buildings, recreational areas, etc.

One national authority shared that 'a profound transportation of the fiscal system is needed to achieve significant improvements. Knowledge often exists but there are often barriers to implementing it in practice. Among others, such barriers include regulatory requirements, lack of human resources and access to funding for integrated planning. Hence, there is a need to strengthen local capacities in order to remove these barriers.'

ISPRA identified additional areas where there is sufficient knowledge but integration in policymaking is lagging behind. These include: air and noise pollution; urban and food waste; electromagnetic pollution; soil sealing and loss of fertile land; social exclusion, poverty and civil engagement.

One national authority shared that as a more efficient take-up of funding at local level is needed, it is necessary to strengthen the use of better regulation mechanisms and technical resources.

CER underlined that 'the potential for electrified public transport is not exploited sufficiently. Rail-based electrified public transport, if massively expanded and efficiently combined with private electric road vehicles, could enable cities to achieve the aims of Objective 8. In order to make this possible, intermodal framework conditions need to be fair.'

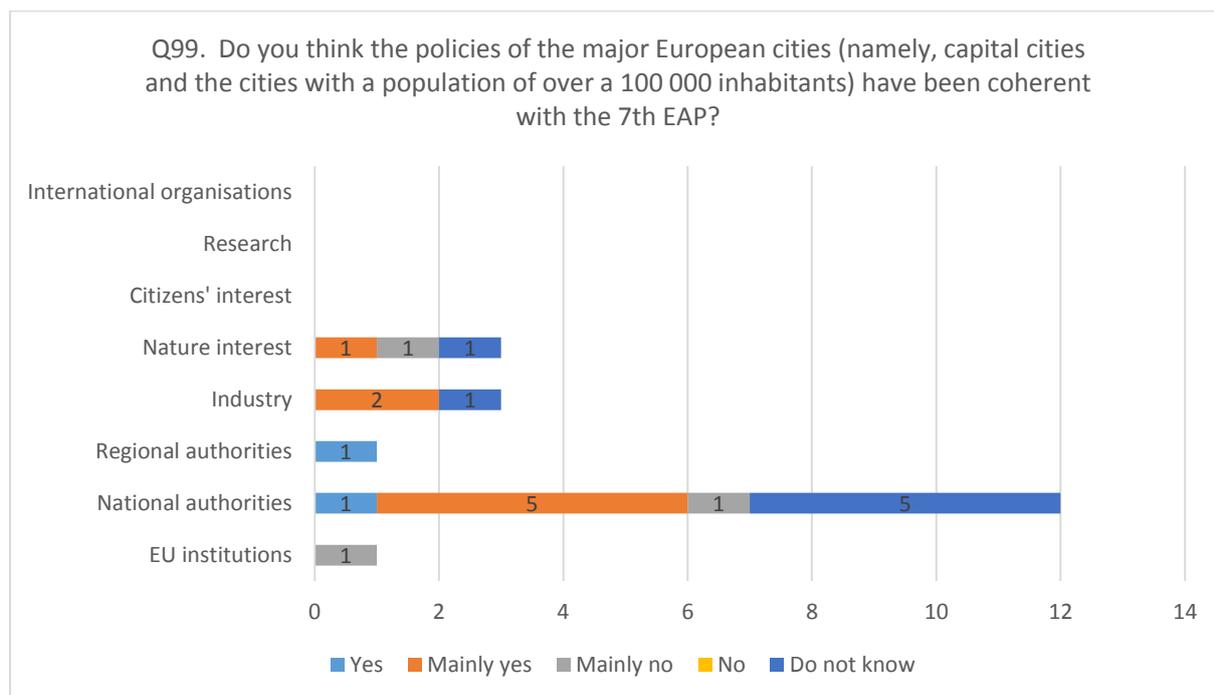
According to an EU institution, 'there are a number of modelling and decision-support tools available that could be better exploited for policymaking.'

According to the Ministry of the Environment and Energy of Sweden, a national authority, 'knowledge exists but is underutilised in the fields of smart city concepts and digitalisation, research and innovation, waste management and air quality, and local politicians' knowledge and influence.'

3.5.3 Coherence

Coherence between the 7th EAP and the major city policies

The question was designed to test to what extent major urban policies are in line with the 7th EAP objectives.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	21	1	13	1	3	3		

More than half of the respondents think that the policies of major European cities have been coherent with the 7th EAP, although only two think that the coherence is strong. Close to half of the respondents consider that they are mostly coherent, thus maintaining a slight doubt. A large portion of the respondents have difficulties in assessing policy coherence, which is not surprising given the heterogeneity of cities and policies. One regional authority considers that there is coherence while the EU institution thinks that there isn't. It is interesting to note that half of the national authorities think that there is coherence, but almost all of the remainder do not have an opinion, which is probably linked to the low awareness of regional authorities of the 7th EAP.

Given the complexity of the question one may assume that respondents make their judgements mainly based on their knowledge of the cities they live in or are close to.

Comments from the survey:

The CCPIE-CCIM confirms that cities are not always aware of the 7th EAP but they think city actions are in coherence with the 7th EAP.

EurEau, the European Federation of National Associations of Water Services, an industry organisation, considers there are big differences in the coherence between city-level actions and the 7th EAP 'depending on the investment capacity and political leadership at local level.'

One organisation representing regional and local authorities draws attention to the fact that some of the large cities in the EU have been developing environmental strategies that are many times more ambitious than the ones at Member State level. While this brings little information as to the coherence of city-level action and the 7th EAP, it points to the fact that cities are the right size and have the right scale to create an impact and deliver implementation.

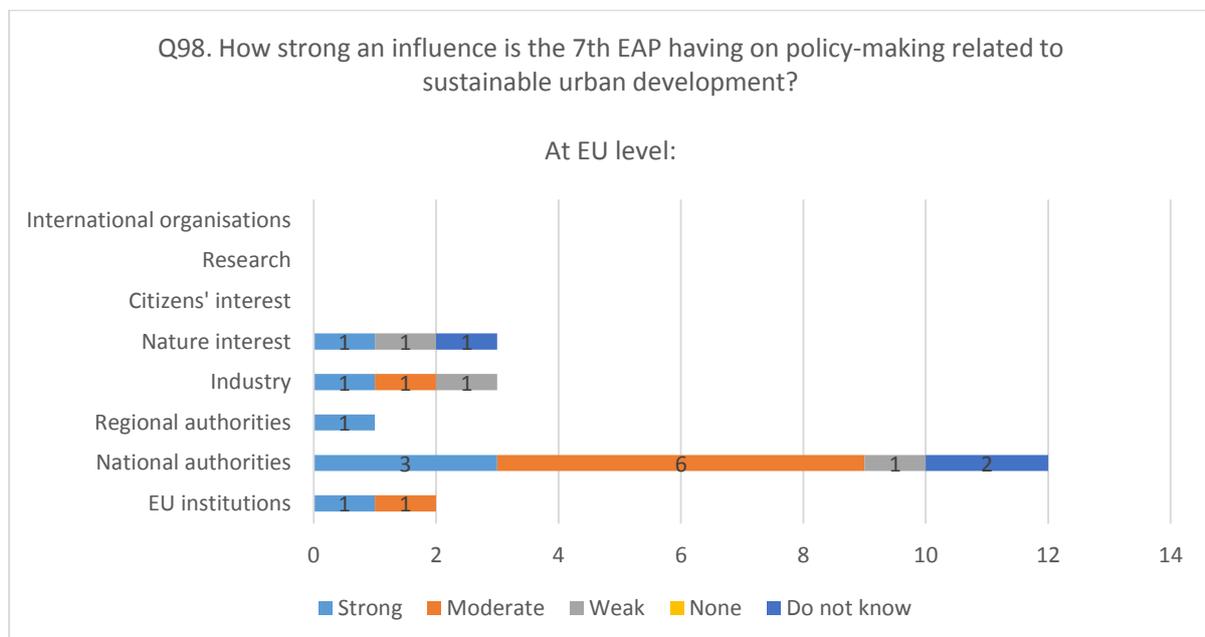
One national authority suggests that 'integrated urban planning is the guiding concept for many European cities and the sharing of best practice is supported by many actors/stakeholders at the European and international levels.'

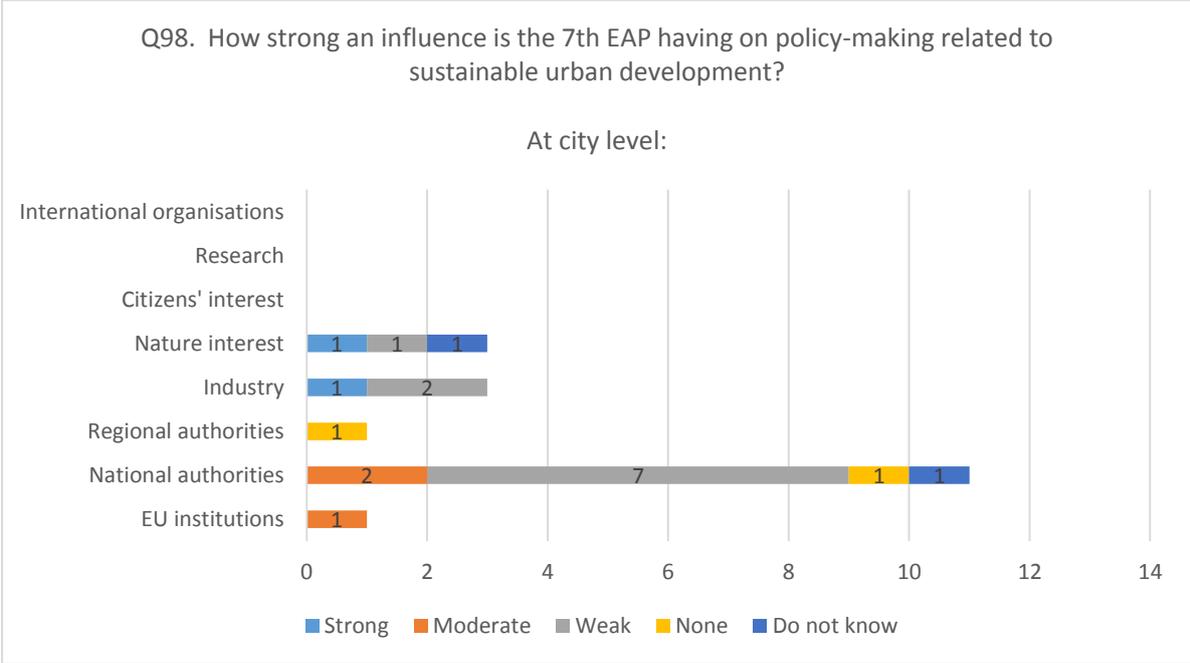
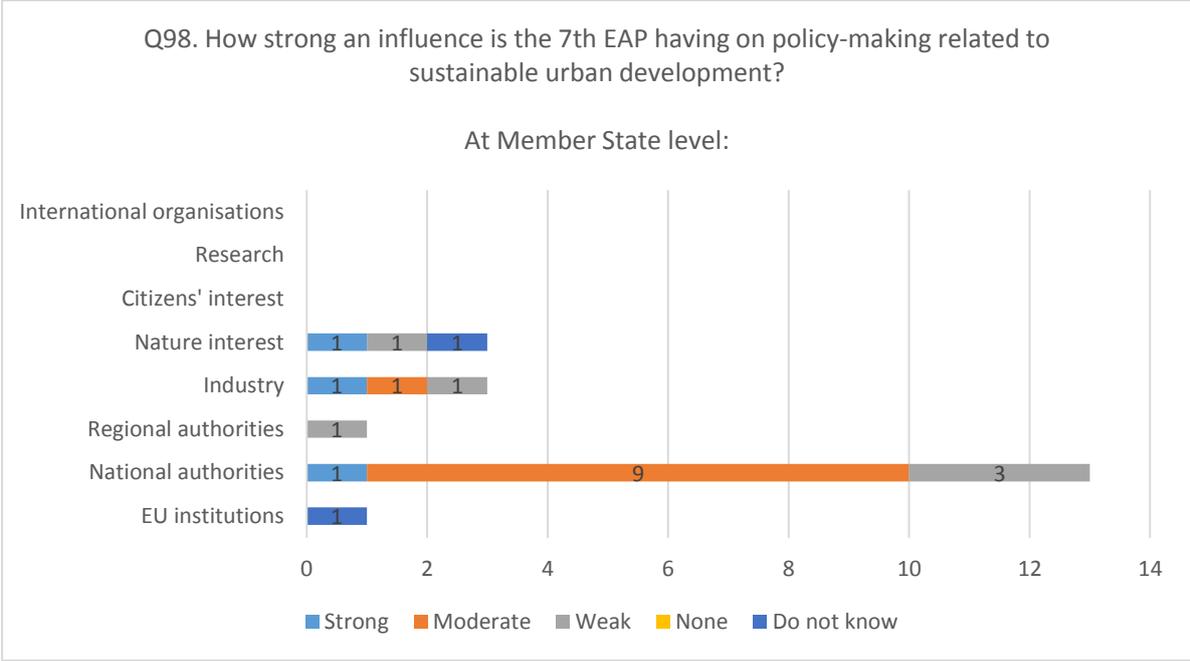
ISPRA considers that policies in Italian cities have been coherent with the 7th EAP but without much result.

The Ministry of the Environment of Finland, a national authority, considers that major city policies are coherent with the EAP but that the scope and weight of each objective and sub-objective varies between cities.

Influence of 7th EAP on policymaking related to sustainable urban development

The question aims to explore what the impact of 7th EAP is on policymaking related to sustainable urban development on three different levels: EU level, Member State level and city level.





	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	22	2	13	1	3	3		

With regards to *impact at EU level*, the answers from nature interest support organisations and EU institutions are split equally between a moderate and strong influence. However, around two-thirds of the national authorities that expressed an opinion consider that the influence is moderate. The trend is even more pronounced at *Member State level* where a quarter of the answers of national authorities claim

that the influence is weak. With regards to the urban level, around half of all respondents and two-thirds of national authorities think that the influence is weak. Only two the respondents think that the 7th EAP has no influence whatsoever at *city level*. The results clearly show that as policymaking moves from the more general, high level to the more concrete level its impact and influence decrease and policymakers make fewer and weaker links with 7th EAP.

Comments from the survey:

One national authority made an interesting observation that although the influence of 7th EAP on the city level is weak it is in line with city activities on sustainable urban development and not vice versa. This raises the issue of coherence and cause and effect.

ISPRA considers that 'the influence on policymaking varies depending on the policy field and depending on whether there are normative thresholds or not.'

The CCPIE-CCIM draws attention to the fact that 'the influence on city level is low because of a lack of awareness of the existence of the 7th EAP due to the lack of communication.'

The Ministry of the Environment of Finland noted that the 7th EAP is not directly referred to in the territorial and urban policy fora within the Council and the Commission (DG Regional policy) but the actions within the EAP are implemented and are relevant.

3.5.4 Effectiveness

Overall progress of EU cities in implementing sustainable development policies

The question was designed to collect the stakeholders' opinions on the progress in different areas relevant to the sustainable urban development, including energy efficiency, sustainable urban transport, sustainable urban planning and design, and sustainable buildings.

Q100. How do you assess the overall progress of EU cities in implementing policies on the following:		EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest (n/a)	Research (n/a)	International organisations (n/a)	TOTAL
	Total	2	13	1	3	3	0	0	0	22
Sustainable urban planning and design	Much progress									0
	Some progress	2	7	1	1	2				13
	Mixed progress		4			1				5
	None				1					1
	Do not know		1		1					2
Sustainable public transport and mobility	Much progress			1						1
	Some progress	2	10		1	1				14
	Mixed progress		2		2	2				6
	None									0

Q100. How do you assess the overall progress of EU cities in implementing policies on the following:		EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest (n/a)	Research (n/a)	International organisations (n/a)	TOTAL
	Do not know									0
Sustainable buildings	Much progress		1	1						2
	Some progress	2	7		1	1				11
	Mixed progress		2		1	2				5
	None		1							1
	Do not know		1		1					2
Energy efficiency	Much progress		2							2
	Some progress	2	7	1	1	2				13
	Mixed progress		3		2	1				6
	None									0
	Do not know									0
Urban biodiversity conservation	Much progress									0
	Some progress	2	5		1	1				9
	Mixed progress		3	1	1	2				7
	None									0
	Do not know		4		1					5

With regards to sustainable urban planning and design, more than half of the respondents think that 'some progress' has been made. This includes the two EU institutions, more than half of the national authorities, one industry and two nature interest support organisations. One industry representative considers that no progress has been made whatsoever.

With regards to sustainable public transport and mobility, over three quarter of the respondents think 'some progress' has been made, including the two EU institutions, majority of the national authorities, and one out of three industry and nature interest support organisations. The progress has been evaluated as 'mixed' by two national authorities and one out of three industry and nature interest support organisations.

Concerning sustainable buildings, one national authority and one organisation representing regional and local authorities consider that 'much progress' has been made, while half of the respondents see only 'some progress'. These include the two EU institutions, above half of the national authorities and one out of three industry and nature interest support organisations. 'Mixed progress' has been assigned by a small minority of the national authorities, one out of three industry representatives and two out of three nature interest support organisations. One national authority thinks no progress has been made and five respondents do not provide an answer.

'Much progress' has only been identified by two national authorities as far as energy efficiency is concerned and by one national authority for sustainable buildings. Most of the answers (including the

EU institutions) indicate that there has been ‘some progress’ in all fields. Between half and three quarter of national authorities have chosen ‘some progress’ for the different areas.

With regards to urban biodiversity conservation, only a third of the respondents think that ‘some progress’ has been made, including the two EU institutions and close to half of the national authorities. One third of respondents think there has been mixed progress while almost a quarter of the respondents have no opinion.

Comments from the survey:

According to one organization representing regional and local authorities, with regards to sustainable urban planning, there are cultural differences across different geographic areas in the EU.

According to a national authority, ‘sustainable urban planning has received much attention in some countries. Examples of pioneering cities and best practices provide evidence for progress, although not nationwide and not in all topics within this issue.’

ISPRA has highlighted the fact that providing a judgement on implementing sustainable urban planning policies is impossible or difficult as ‘no measurable targets have been defined and imposed.’

With regards to sustainable public transport and mobility, CCPIE-CCIM pointed out that initiatives such as the European Mobility week or the Civitas Forum have contributed to the implementation of the policies.

According to an organisation representing regional and local authorities, ‘progress with implementation is relatively good as making public transport more sustainable is a priority for many cities. Some cities go as far as limiting or phasing out the use of cars and increasing alternative modes of transport.’

One national authority pointed out that ‘in some countries certain cities are conducting comprehensive activities in public transport and mobility. Significant progress is associated mainly with those cities that have implemented an integrated sustainable urban mobility plan, invested in public transport and in an attractive and safe infrastructure for active mobility such as walking and cycling.’

ISPRA reiterated that there has been some progress but it is not able to define how much progress as no measurable targets have been defined and imposed.

One organisation representing regional and local authorities has identified some development in the field of sustainable buildings but the old stock remains a problem.

According to one organisation representing regional and local authorities, ‘with regards to energy efficiency, there have been many developments in the area of buildings and energy but the north-south divide remains very pronounced.’

According to one national authority, in some countries there are examples of pioneering cities which set out rules, e.g. for low-carbon buildings in public spaces.

The urban biodiversity conservation issue has been perceived as the most problematic, with the lowest progress.

CCPIE-CCIM considers that the ‘integration of biodiversity issues in urban planning remains a challenge’, and according to one organisation representing regional and local authorities, ‘more efforts need to be made in this area to ensure that biodiversity conservation becomes a priority.’

Implementation of actions under Objective 8

The question was designed to collect stakeholders' opinions on different areas relevant to the sustainable urban development, including energy efficiency, sustainable urban transport, sustainable urban planning and design, and sustainable buildings.

Actions set to achieve the Priority objective 8 in 7th EAP^[1]:

- (i) agreeing on a set of criteria to assess the environmental performance of cities, taking into account economic, social and territorial impacts;
- (ii) ensuring that cities have information about, and better access to, financing for measures to improve urban sustainability;
- (iii) sharing best practice between cities at Union and international level in relation to innovative and sustainable urban development;
- (iv) in the context of ongoing Union initiatives and networks, developing and promoting a common understanding of how to contribute to improved urban environments by focusing on the integration of urban planning with objectives related to resource efficiency, an innovative safe and sustainable low-carbon economy, sustainable urban land-use, sustainable urban mobility, urban biodiversity management and conservation, ecosystem resilience, water management, human health, public participation in decision-making and environmental education and awareness.

Q101. With regard to the following actions under Objective 8 of the 7th EAP, what is your assessment of their implementation?		EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest (n/a)	Research (n/a)	International organisations (n/a)	TOTAL
		Total	1	14	1	3	3	0	0	0
(I) Agreeing on a set of criteria to assess the environmental performance of cities, taking into account economic, social and territorial impacts	Strong				1					1
	Moderate		4		1	1				6
	Weak	1	6	1	1					9
	None					1				1
	Do not know		2			1				3
(II) Ensuring that cities have information about, and better	Strong	1								1
	Moderate		10	1	2	1				14
	Weak		2		1	1				4

^[1] full version of the text can be seen in Annex A

Q101. With regard to the following actions under Objective 8 of the 7th EAP, what is your assessment of their implementation?		EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest (n/a)	Research (n/a)	International organisations (n/a)	TOTAL
access to, financing for measures to improve urban sustainability	None									0
	Do not know		1			1				2
(III) Sharing best practice between cities at Union and international level in relation to innovative and sustainable urban development	Strong	1	1		1	1				4
	Moderate		12		1	2				15
	Weak			1	1					2
	None									0
	Do not know									0
(IV) Integration of urban planning with objectives related to resource efficiency, low-carbon economy, sustainable urban land-use, sustainable mobility, urban biodiversity management, ecosystem resilience, water management, human health, public education and participation in decision-making	Strong		2							2
	Moderate	1	7	1	2	2				13
	Weak		3		1	1				5
	None		1							1
	Do not know									0

With regards to *criteria for assessing environmental performance of cities* only one industry representative considers implementation as being 'strong'. About a third of the respondents consider it is moderate and half of them think it is either 'weak' (half of the national authorities, one regional authority and one industry representative) or absent (one nature interest support organisation).

Comments from the survey:

CCPIE-CCIM consider the implementation as weak although there is better monitoring and important agreement about principles such as the EU urban agenda and the new (global) urban agenda. They drew the attention to the fact that even though the EC has developed a tool for cities to assess their environmental performance this tool remains unknown by the majority of cities.

According to the ISPRA, 'it would be hard to define such criteria at the European scale with the great variety of urban areas. This is due to the diversity of themes and because the optimal integration of all environmental, social and economic aspects is still missing.'

One organisation representing regional and local authorities thinks 'implementation is not sufficient as one set of criteria is not yet available in the EU and, most importantly, it is not clear how these criteria will lead to greater implementation.' They suggest that the criteria could be linked to future funding.

The Ministry of the Environment of Finland considers that implementation is not sufficient. 'This is because the law does not require a systematic environmental performance assessment from cities and therefore assessment is optional and varies from city to city.'

With regards to *information about access to financing*, some two-thirds of the respondents think that cities have enough information (including dominant majority of national authorities, one regional authority, two out of three industry representatives and one out of three nature interest support organisations). One-fifth of the respondents

consider access to information about financing as weak (one-fifth of national authorities and one out of three industry and nature interest representatives).

Comments from the survey:

While CCPIE-CCIM thinks information is available, they consider that ‘the capacity of cities to apply for funds should be improved and that the role of cities in cohesion policy should be strengthened.’

According to one local authority association, ‘the information is sufficient but it can be further improved. There is also a need to move beyond the information availability and better understand the barriers to the uptake on the ground. More resources should be spent on capacity building and funding needs to be more mainstreamed.’

According to the Ministry of the Environment of Finland, ‘there is funding available at different levels of governance, from the EU to local governance, and cities are aware of it.’

With regard to *sharing best practices between cities*, only around one-fifth of the respondents think implementation has been strong (one from each category of respondents). Some two-thirds (mainly national authorities and nature interest support organisations) of the respondents see the level of sharing as moderate while about one-tenth consider it as weak (one regional authority representative and one industry representative).

Comments from the survey:

According to CCPIE-CCIM and one organisation representing regional and local authorities, the sharing of best practices occurs mainly through networks (ACR+, Eurocities, ICLEI, Urbact network, Urban development network) and not through EU efforts. However, they point to a need to reinforce networks in topical areas.

The Ministry of Environment of Finland thinks there are sufficient fora where cities meet and share best practices.

When commenting on the *integration of urban planning with objectives related to resource efficiency, the low-carbon economy, etc.*, only two national authorities think implementation of actions has been strong. Almost two-thirds of the respondents (above half of the national authorities, one regional authority and two out of three industry representatives and nature interest support organisations) think it has been implemented moderately. One-quarter of the respondents think integration is weak or not happening, including a quarter of the national authorities and a third of industry and nature interest representatives.

Comments from the survey:

According to CCPIE-CCIM, integration is sufficient as ‘most of these principles come back in the Reflection Paper on the Future of EU Finances published in June 2017.’

According to one nature interest support organisation, the level of ambition for integration is not sufficient and adaptation to climate change should be considered to a much larger extent. The reason for that is that climate change is likely to exacerbate existing pressures facing European cities, such as overcrowding, aging infrastructure and increased pollution from transport and industry. In addition, urban areas are affected by city-specific climate change impacts that are generated by the process of urbanisation itself.

According to an organisation representing regional and local authorities, the level of ambition on integration is sufficient but it is very vague and lacks detail. One ministry of environment thinks that it is sufficient but the level of ambition varies according to sector.

According to the Ministry of the Environment of Finland, the objectives are implemented into planning law.

Impact of Objective 8 activities on citizens, nature and economic actors

The question is designed to probe the stakeholders’ perception of the EU urban sustainability policies (related to the 7th EAP) on different stakeholder groups.

Q105. What do you think the overall impact is from the implementation of EU urban sustainability policies (including sustainable urban planning and design, regulations) on:		EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest (n/a)	Research (n/a)	International organisations (n/a)	TOTAL
	Total	2	13	1	3	3	0	0	0	21
Citizens	Very negative									0
	Negative									0
	Neutral									0
	Positive	2	10		3	2				17
	Very positive		2	1		1				4
Nature/flora & fauna	Very negative									0
	Negative									0
	Neutral	1	3							4
	Positive	1	8		3	3				15
	Very positive		1	1						2
Economic actors (businesses, farmers, etc.)	Very negative									0
	Negative									0
	Neutral		3		2	1				6
	Positive	1	8	1	1	2				13
	Very positive		1							1

All of the respondents consider that the impact on citizens is either ‘very positive’ (one-fifth) or positive (four-fifth). All EU institutions and the industry representatives as well as dominant majority of national authorities and two out of three nature interest support organisations think that the overall impact on citizens is ‘positive’. One-fifth of the national authorities, the regional authority and one nature interest support organisation consider the impact as ‘very positive’.

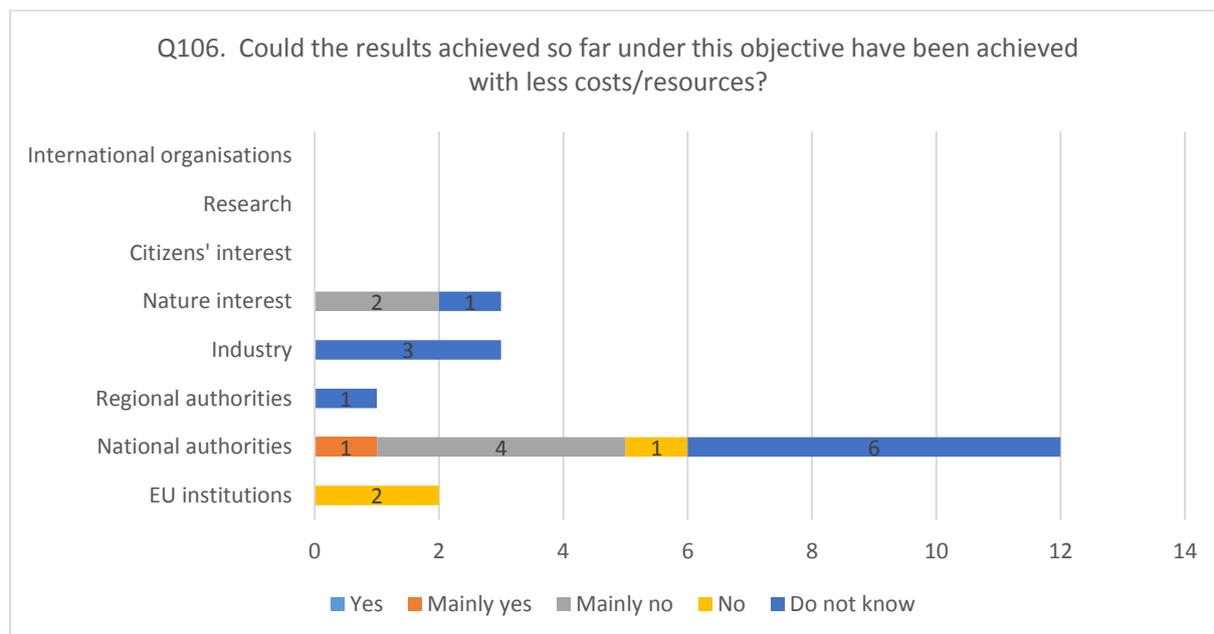
The impact on nature is positive for most respondents (around three-quarters to two-thirds of the national authorities, one EU institution and all the industry and nature interest representatives), very positive for around one-tenth of the respondents (one national and one regional authority). One-fifth of the respondents consider the impact as neutral (one-third of the national authorities and one EU institution).

The impact on economic actors has been considered as positive by two-thirds of the respondents including one EU institution, two-thirds of the national authorities, one regional authority, one out of three industry representatives and two out of three nature interest support organisations. The impact on economic actors has been considered as neutral by a quarter of the national authorities, two out of three industry representatives and one out of three nature interest support organisations.

3.5.5 Efficiency

Could results have been achieved with less cost?

The goal of the question is to explore the perception of the relationship between the level of available funding and the results.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	2	12	1	3	3	0	0	0

When asked about efficiency considerations for this objective, almost half of the respondents consider that similar results could not have been achieved with fewer resources. Less than one-third of the respondents consider that similar results could have been achieved in a more efficient manner. More than half of the respondents do not have an opinion on the issue. The two EU institutions think that this is not the case.

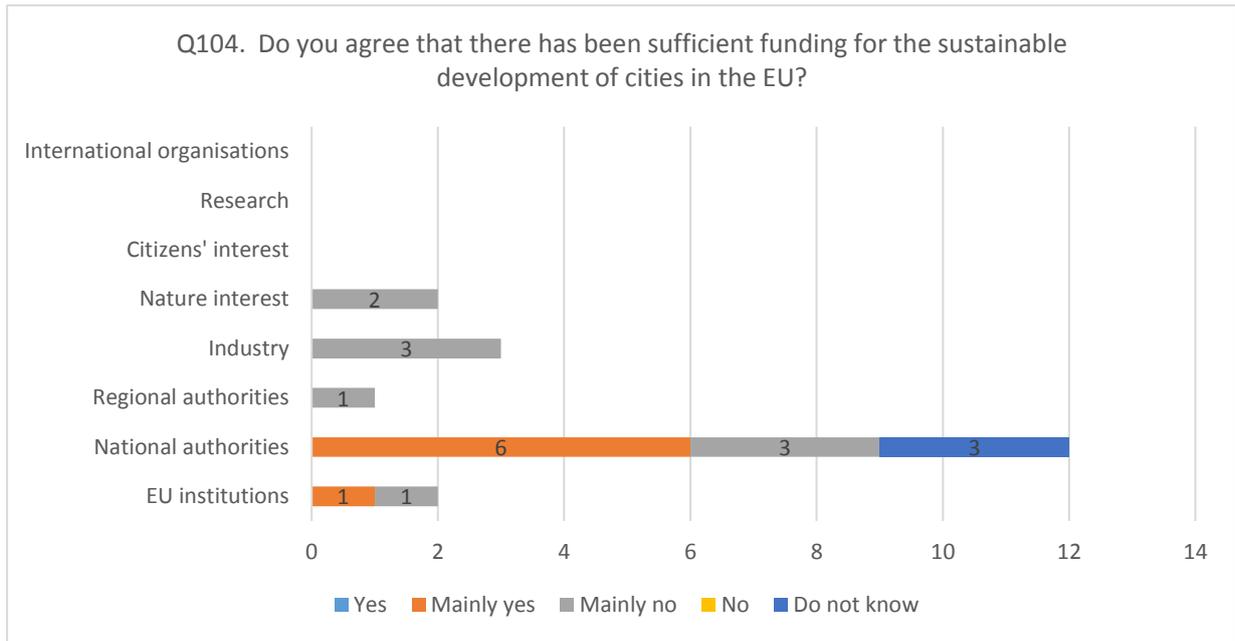
Comments from the survey:

For example, according to CCPIE-CCIM, 'resources could have been more efficient if they would have been better streamlined'.

According to a nature interest support organisation, it has been mentioned that the focus on effectiveness and efficiency should remain and that it is key in the long term.

Securing funding for sustainable development of cities in the EU

The question was designed to explore the perception of the stakeholders with regards to the availability of funding for sustainable urban development.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	21	2	13	1	3	2		

Only around one-third of all respondents consider that there has been ‘mainly’ sufficient funding for the sustainable development of cities in the EU, while half of them considered it was ‘mainly’ insufficient. However, it is interesting to note that half of the national authorities perceive the funding as ‘mainly’ sufficient while all respondents from nature interest, industry and regional authorities see it as insufficient. One of the two EU institutions has answered positively while the other answered negatively.

Comments from the survey:

According to CCPIE–CCIM, ‘there are many funding or financial engineering opportunities but funding is far too scattered and hence not fully effective. In addition, there is low capacity for proposal writing at the city level’. Therefore, according to one organisation representing regional and local authorities, ‘local authorities need to invest in training their employees in proposal writing.’

According to one national authority, ‘there has been a lot of project funding but securing constant funding for sustainable development remains a problem for many cities.’

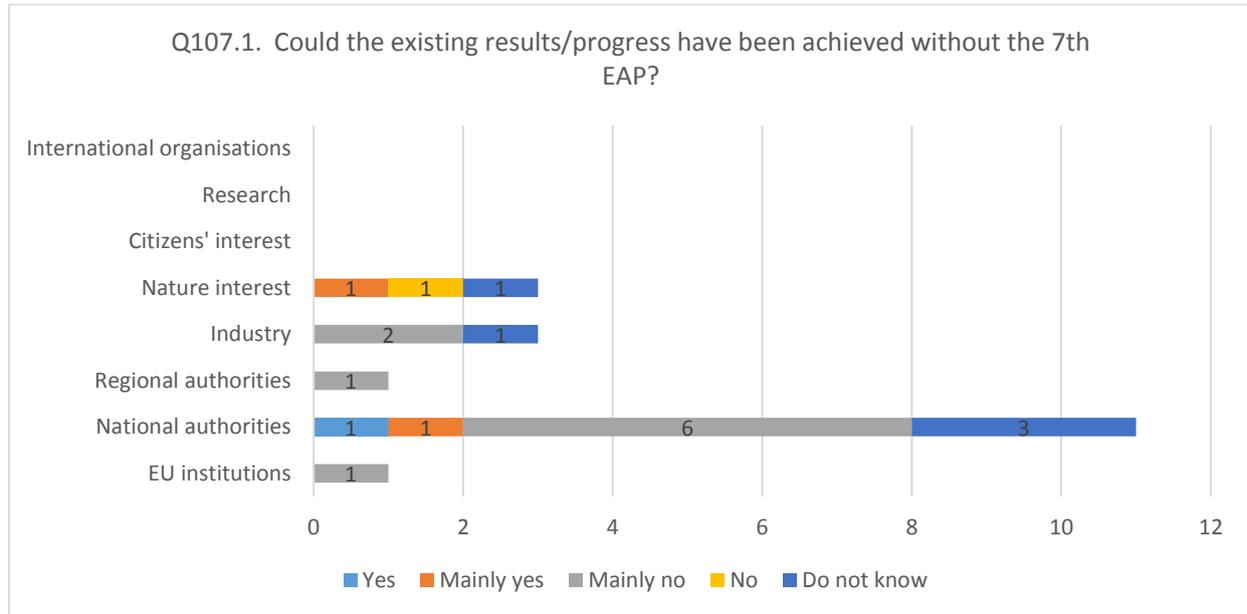
One national authority considers that ‘funding could be more, as cities play such a key role in either enhancing or not enhancing environmental issues.’

According to the Ministry of the Environment of Finland, ‘although new funding for cities has been made available within the EU (i.e. ERDF, ESIF, Urban Innovative Action), more ambitious funding that offers greater encouragement should be available.’

3.5.6 EU added value

Extra contribution of the 7th EAP in achieving current results in sustainable urban development

The question explores as to whether stakeholders think that the progress achieved would have been there even if the 7th EAP did not exist.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	19	1	11	1	3	3		

More than half of the respondents think that the 7th EAP was necessary and that it played a role in achieving the existing results in urban sustainability. This includes more than half of the national authorities, the EU institution, the regional authority, two out of three industry representatives and one-third of the nature interest support organisations. A quarter of the respondents do not have an opinion.

Comments from the survey:

According to CCPIE-CCIM, 'a large part of the results came from and were more related to other policies, e.g. cohesion policy. A good EAP was very important to steer these policies in a sustainable direction.'

One organisation representing regional and local authorities has also acknowledged the importance of having 'an overall strategy and guidance document to drive agendas at national and EU level.'

According to the Ministry of the Environment of Finland, 'objectives are achieved at lower levels of governance within the Nordic countries, despite the EU. However, the EAP is still relevant in addressing the issues across the EU.'

3.5.7 Overall assessment of Objective 8

In an overall assessment of the progress in the objectives, a colour-coded scoreboard system (as presented on the right-hand side) has been applied to summarise assessment on *relevance, coherence, effectiveness, efficiency* and *EU added value* criteria. It distinguishes five assessment colour codes indicating the spectrum between positive and negative assessment:

	Positive assessment / high
	Mixed positive assessment / medium-high
	Mixed assessment / medium
	Mixed negative assessment / medium-low
	Negative assessment / low

- Positive assessment or high relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value
- Mixed positive assessment or medium-high relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value
- Mixed assessment or medium relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value
- Mixed negative assessment or medium-low relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value
- Negative assessment or low relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value

Relevance – **Medium**

Respondents agree that the scope of Objective 8 remains relevant but it is clear that certain issues are missing and need to be included in a future EAP if it is to be fully relevant to the issues at stake at city level. For example, there are issues linked to climate change adaptation at city level, making links with the SDGs or paying special attention to the problems of those EU cities that are not frontrunners. Additional concrete issues which might be added include waste, water, noise, air, land grabs and the circular economy. Given that cities are the target of this objective, increasing the concreteness of the objectives and hence the relevance for them should be one direction for improvement.

Knowledge base – **Medium-low**

Respondents have identified a number of understudied areas with missing evidence such as social aspects of sustainability; nature-based solutions for urban development; and the cost-effectiveness of climate change adaptation measures at the urban level. Attention has been aimed at some areas of underutilised knowledge, such as sustainable urban planning and design, air and noise pollution, urban and food waste, soil sealing and loss of fertile land, smart cities, etc.

Coherence – **Medium-high**

Respondents think that Objective 8 is mainly coherent with EU city policies. It has to be noted that making a judgement on this is very difficult because of the diversity of EU cities and the ambition of their sustainability policies. No respondent has singled out Objective 8 issues that clash with EU city policies. However, there are issues such as sustainable urban transport, the fight against air pollution, brownfield development and green infrastructure which, while being vital for cities, are not part of Objective 8. Additionally, coherence is also seen to depend on the financial capacities of the cities. What is more, some cities are much more ambitious than the 7th EAP. It is interesting to note that almost half of the national authorities do not have an opinion on the issue of coherence. With regards to the impact of the 7th EAP on policymaking at different levels and its associated coherence, respondents note that the higher the policymaking level, the higher the impact and the more coherent the 7th EAP is to respective policies.

Effectiveness – **Medium**

The questions asked under the effectiveness heading are twofold. Firstly, respondents were asked to assess the implementation of the main policy actions under Objective 8. While their answers indicate that the actions on

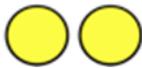
sharing best practices, integration of sustainability issues in urban planning, and on information on funding sources have had a rather **moderate** level of implementation, this is less the case with the sub-objective on agreeing on a set of evaluation criteria.

Secondly, respondents were also asked to assess the overall progress of EU cities in implementing policies in different sustainability fields. **Some progress** is mainly associated with energy efficiency, sustainable public transport and mobility, and sustainable urban planning and design, while **slightly less progress** has been linked to sustainable buildings and urban biodiversity conservation.

It has to be kept in mind that the judgement on progress in Objective 8 implementation is extremely difficult due to both the high diversity of cities and the lack of objective evaluation criteria.

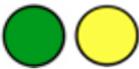
Respondents perceive the impact of EU urban sustainability policies on different stakeholders as overall positive. The impact has been deemed to be highest on citizens and slightly less so on the nature. The impact on economic actors is considered to be more moderate.

Overall, the effectiveness of Objective 8 of the 7th EAP is assessed as medium based on the assessment of responses for various questions as well as the comments left by different stakeholders.

Efficiency – Medium 

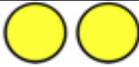
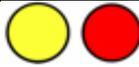
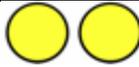
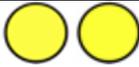
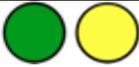
The efficiency of the 7th EAP has been assessed as high to medium. Only one of the respondents thinks that the results achieved under Objective 8 could have been achieved with less costs and resources. A note of caution has been made on the need to better streamline the objectives in order to achieve higher efficiency. Additionally, it has been noted that the focus on effectiveness and efficiency should remain in the future.

Funding for sustainability has been assessed as insufficient by half of the respondents. Two main issues linked to the funding are the lack of capacity for proposal writing and the difficulty in securing constant funding for sustainable urban projects as opposed to one-off funding.

EU added value – Medium-high 

Respondents, in an overwhelming majority, think that the 7th EAP has played a fairly important role in achieving the current urban sustainability results. Indeed, it has been noted that the results could be more directly associated with other policies such as cohesion policy. Also, in some countries and cities objectives are achieved at lower levels of governance, despite the EU. However, the importance of having an overall strategy driving the EU and national urban sustainability agenda has been acknowledged.

Overall scoreboard for Objective 8

Relevance	Knowledge Base	Coherence	Effectiveness	Efficiency	EU value added
					

3.5.8 Recommendations

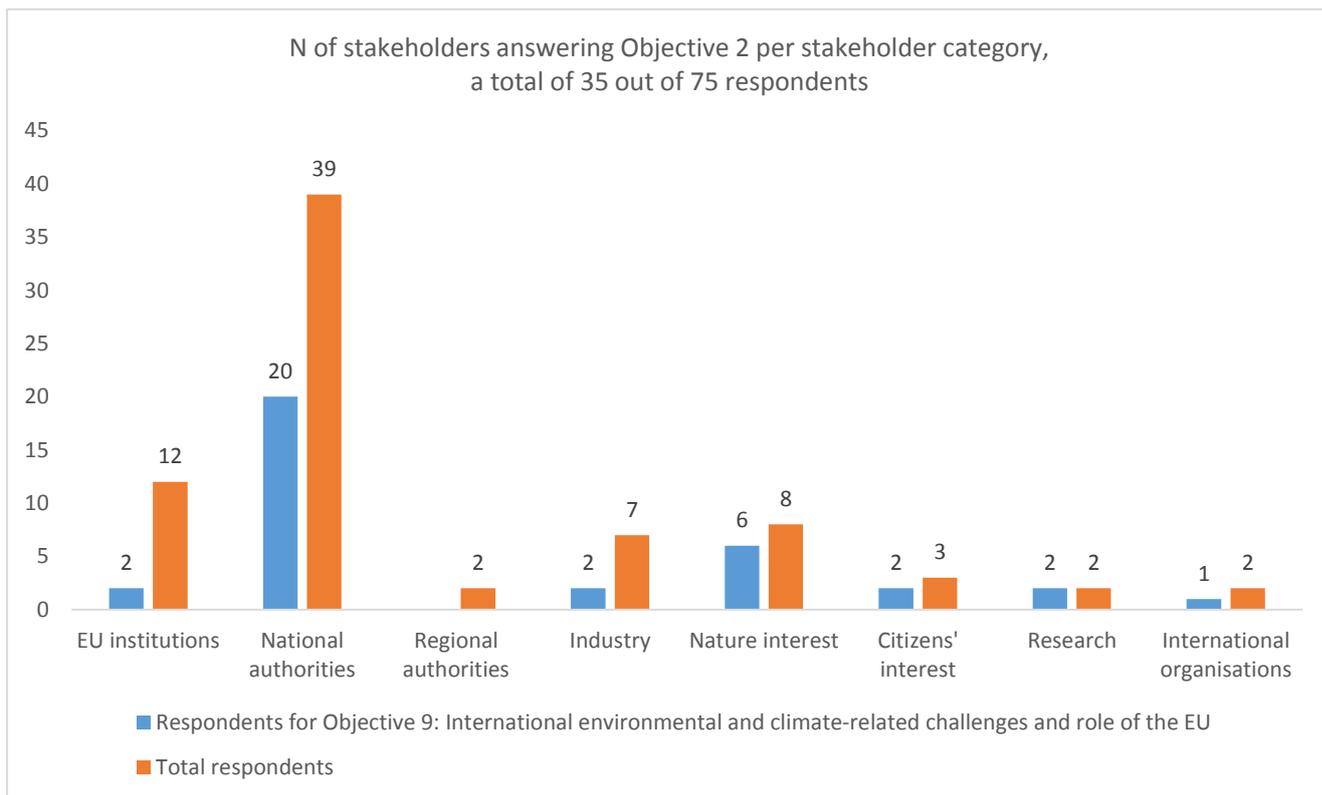
The recommendations are written based on the following: the overall answers and comments, a special question on possible extra contributions from the 7th EAP towards sustainable urban development across the EU, and on the stakeholder focus group. These are in addition to the objectives and actions that are already included in the 7th EAP and the overall need to continue implementing them.

- Respondents acknowledged that the 7th EAP recognised the crucial role of cities in environmental policymaking and that city-related objectives were incorporated in it. However, these objectives could have been more specific, which would make the evaluation of progress easier.
- The strong role of cities with regards to environmental policy implementation can be recognised still further. The EAP should promote the current good practices such as the Covenant of Mayors, the European Green Capital award or the mayors for water initiative, where the European Commission works directly with the local authorities.

- Respondents identified numerous gaps in terms of thematic coverage of the objective. They suggested a better integration of climate change issues, resilience and green infrastructure; circular economy issues including all material flows; air quality, noise, soil sealing, etc. These issues also need to be better reflected in the decision-making process and the urban planning. Naturally, stakeholders have suggested the inclusion of those issues that are close to their activities but here we are confronted with the question of priorities and whether a high-level strategy such as the 7th EAP needs to include all issues of relevance or whether it should concentrate on the most important ones.
- It has also been noted that a better link with the environmental SDGs and other recent international agreements could also give an additional impetus to the 7th EAP to deliver on sustainable cities.
- One interesting insight that kept coming up is that cities in Europe are different, have developed from different cultural backgrounds and that the 7th EAP needs to acknowledge this better. Cities have different financial capacities and while some of them are frontrunners in many areas, others lag behind and therefore have different priorities. Cities also not only differ in terms of ambition and the associated political will but also in terms of their capacities to apply for funds. Therefore the 7th EAP needs to make a differentiation between several types of cities and avoid the 'one-size-fits-all approach'.
- The issue of funding requires a number of improvements in the 7th EAP. Many of the respondents thought that EU funding was scattered and insufficient and, what is more, that the links between sub-objectives and financial sources (such as Horizon 2020, cohesion policy and LIFE) is missing. The complementarity of EU, national and local funding is also an important issue. Securing a constant stream of funding as opposed to one-off project-based funding is also an important concern. In addition, it has been noted that the focus on efficiency in the EU should be preserved as this is a major factor for long-term success.

3.6 Objective 9 International environmental and climate-related challenges and role of the EU

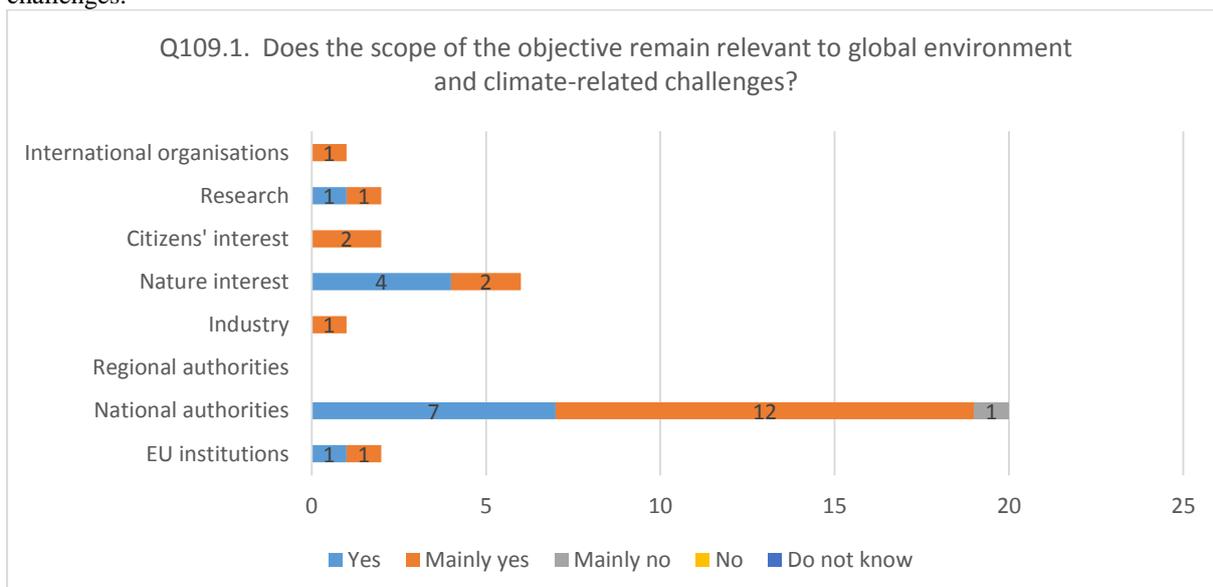
There were 35 respondents for Objective 9, out of a total of 75 respondents for the whole survey. For Objective 9, two out of 12 EU institutions, 20 out of 39 national authorities, two out of seven industry network organisations and six out of eight nature interest support organisations, two out of three citizens' interest support organisations, both research organisations and one of two international organisations responded. No regional authorities provided responses.



3.6.1 Relevance

Relevance of the scoping under Objective 9 to current needs

The question is related to the relevance of Objective 9 towards global environmental and climate-related challenges.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	34	2	20	1	6	2	2	1

The majority of respondents were positive towards this statement.

One national authority answered 'mainly no', the rest of the respondents either answered 'yes' or 'mainly yes' (total respondents 34).

Comments from the survey:

An international organisation remarked that more action is needed than just "assessing, promoting, engaging, supporting etc." They go on to say that the EU needs to make more concrete actions including measures (e.g. travel reduction (incl. EU itself); less food transport across the globe (e.g. stimulating local processing).

A national authority commented that the Rio+20 continues to be relevant but it should be contextualised within Agenda 2030 for sustainable development. The prospective should be on a post-2020 implementing strategy.

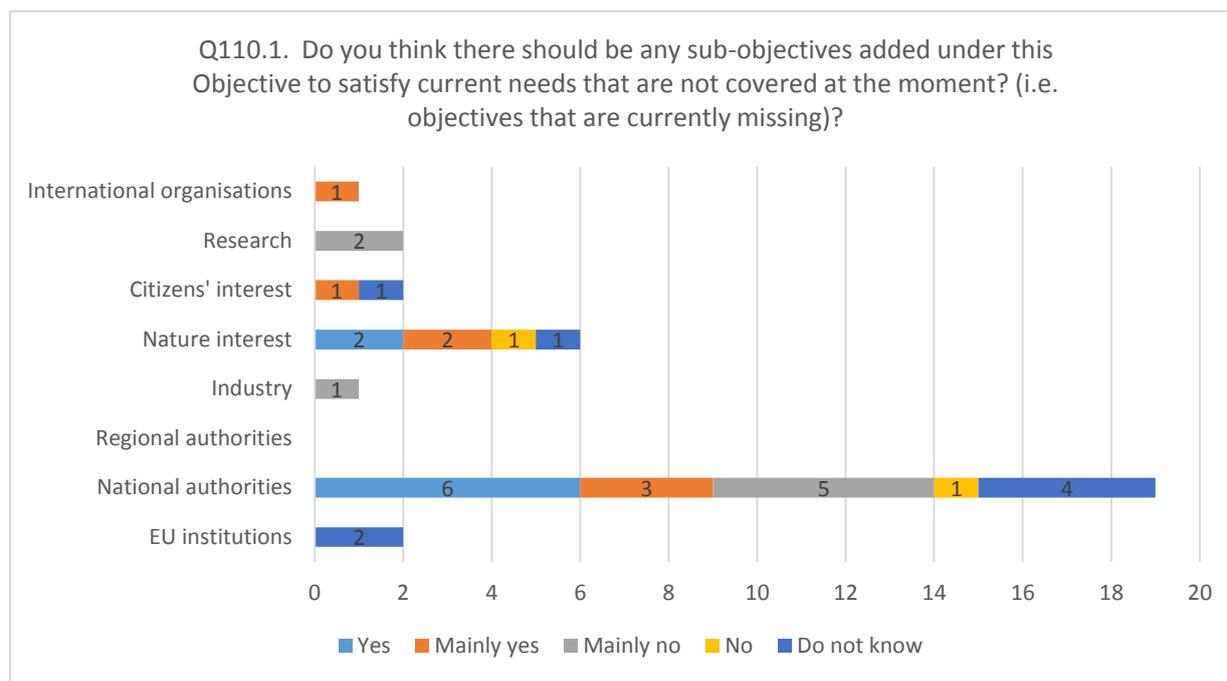
Another international organisation remarked that EU, as a global actor, has a key role in the international system to promote sustainable development globally. In fact, being one of the largest markets in the world, the Union's policies and approaches have the potential to improve the international environment. With the General Union Environment Action Programme to 2020 the EU shows its interest in addressing more effectively global environment and climate-related challenges. Underlining the importance of considering the objective 9 as part of a global approach in which the cooperation with other countries is crucial, the EU intends to implement the commitments made at Rio+20, improve implementation of international environmental law and give the United Nations a more environmentally sound structure for sustainable development. The Union supports the Sustainable Development Goals both in the international fora and during negotiations for the conclusion of international agreements. The Programme highlights not only the importance of policy coherence, but also on the impact assessment.

Comments from the interview:

The personal opinion of a representative of an international organisation is that it is very fundamental and that there is a need to have the international dimension in the 7th EAP. Currently, the EU could probably be one of the few champions on environment on global scale. The debate on the post-2020 international biodiversity targets is now starting, and the EU could play a prominent role in it towards ambitious new targets.

Gaps in scoping Objective 9

This question seeks to reveal the potential gaps in Objective 9 in order to ensure its relevance.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	33	2	19	1	6	2	2	1

Approximately one third replied ‘mainly no’ or ‘no’ to this question, around one third replied ‘yes’ or ‘mainly yes’, and a little under one third ‘did not know’.

Two nature interest groups and six national authorities replied ‘yes’, one international organisation, one citizen interest group, two nature interest groups and three national authorities replied ‘mainly yes’, while two research organisations, one industry network organisation and five national authorities replied ‘mainly’, one nature interest group and one national authority replied ‘no’, and the rest replied ‘do not know’ (total respondents 33).

Comments from the survey:

European Environmental Bureau, a nature interest support organisation, said that an overall updating and adjustment in light of the adoption of the sustainable development goals’ and the 2030 Agenda, and streamlining reporting would be desirable.

BirdLife Europe, a nature interest support organisation, noted that the SDGs are not properly addressed through EU’s policy or through the governance structure of the EU.

CCPIE-CCIM (Belgian Coordination Committee for the International Environment Policy), a national authority commented that the next EAP should notably focus on the implementation of the 2030 Agenda. The implementation of the 2030 Agenda should notably build synergies with the Paris Agreement on Climate Change.

Another national authority commented that there should be an explicit sub-objective concerning the international responsibility of corporate and business sector, especially trans-national corporations to incorporate environmental (as well as social) responsibility throughout their value and product chains. They believe that to achieve a global sustainable economy it is necessary not only to demand strict regional (EU) demands on environmental protection and green growth but also to take into account international consequences and dimension and these may lead then to double environmental standards in different parts of the world in the same value product chain.

WWF European Policy Office, a nature interest support organisation, remarked that the Convention on International Trade in Endangered Species (CITES), Illegal Wildlife trade and developing and implementing measures beyond GDP are missing. The EU, as a transit, consumer and source region, has an important role to play in combatting and halting illegal wildlife trade. In this context, the EU must continue to strengthen the implementation of the CITES Convention and the EU and MS should take

forward all actions agreed in the 2016 EU Wildlife Trafficking Action plan, including putting sufficient resources into implementation. Moreover, now that the 2030 Agenda for Sustainable Development is adopted, attention must shift to the translation of the goals and targets into ambitious regional and national implementation strategies. In Europe, Member States and the European Parliament are calling for an EU overarching and high-profile strategy for implementation of the 2030 Agenda. They note that it should complement the efforts of Member States and demonstrate the added value of joint action at the EU level.

Greenpeace EU, a nature interest support organisation, commented that a sub-objective should be to close off the EU market to products that drive deforestation and forest degradation and to use the context of bilateral trade arrangement to advance the achievement of the sustainable development goals, both within the EU and partner countries.

UNECE (Environment Division), an international organisation, commented as follows: ‘the Objective contains specific references to some of the immediate neighbourhood of the EU, still the stronger focus on regional (pan-European) level could be considered. More active and more strategic engagement of the EU in the existing regional platforms and multilateral environmental agreements’.

Another international organisation commented as follows: ‘Strengthen industrial cooperation with partner countries to strengthen capacities for green industry and facilitate the transition to a circular economy, e.g. resource efficiency and cleaner production. Country’s ownership: it is important to let the developing countries identify their priorities in accordance to their specific national conditions and needs. Knowledge-sharing: The EU should provide environmental data and the tools for environmental monitoring, building knowledge and skills and supporting the mainstreaming and policy coherence process of national environmental governance.’

Comments from the interview:

A nature interest support group stated that the problematic use of biofuels/ biomass should be added to the sub-objectives under Objective 9.

The personal opinion of a representative of the international organisation IUCN added that marine litter in the future EAP could be better reflected, as it is a crucial issue and also has important communication potential.

Comments from the focus group:

The focus group commented that targets should be set and followed-up, without creating extra legal targets. It is a question of political will, and not so much that we can do better. The SDGs are a good example. The SDGs have a much higher level of awareness amongst the general public and local authorities. The SDGs are much broader goals, and more ambitious, however they bring all issues together, and have communicated the goals well. It’s all about reconnecting citizens to Europe, and setting it as a priority on the political agenda, and the 7th EAP could benefit from such an approach. Politicians at the top agree the priorities. EU needs to be much clearer on how it wants to live up to EU commitments. Ambiguous approach to SDGs – could be much clearer on translating these into EU objectives. At present they don’t do this and instead focus on other issues – employment, migration etc. The 8th EAP should be looked at as the way of implementing the environmental part of the SDG.

3.6.2 Knowledge base

Knowledge gap – understudied areas

A set of questions in the survey focused on Objective 8 of the 7th EAP promoting scientific knowledge and an evidence base for policy-making in the context of International environmental and climate-related challenges and role of the EU. These questions relate to enabling Objective 5 of the 7th EAP on improving scientific knowledge and evidence for EU environmental policy-making.

Respondents were asked to identify areas within Objective 9 which have been understudied and where evidence is missing.

Comments from the survey:

One national authority wrote that the development of common indicator sets would be needed.

A research organisation commented that a better understanding of the interlinkages between various global targets and pathways of goods and finances across nations and regions would be required in order to effectively address targets under Objective 9.

What knowledge is underutilised?

This question is similar to the one above, however this is more directed towards gaps in policy-making and asks if there are any areas within Objective 9 where knowledge exists but it is not utilised for evidence based policy-making.

Comments from the survey:

One international organisation mentioned policy coherence and impacts of consumption patterns as two areas where knowledge exists but is not utilised in an optimal way. It wrote that ‘further efforts are needed in truly embedding policy coherence for sustainable development in EU policy-making. Literature shows that establishing a strategic sustainable development policy framework helps to ensure that individual policies are consistent with sustainable development goals and priorities, commitment by political leadership is a necessary precondition to coherence, as well as mechanisms to anticipate, detect and resolve policy conflicts early in the process to identify inconsistencies, and finally, monitoring mechanisms must be designed to ensure that policies can be adjusted in the light of progress and new information. Secondly, the impacts of our consumption patterns beyond Union’s borders are well studied, but Europe keeps building its economy in the unsustainable use of all our resources. Structural changes in our production and consumption patterns are not taking place at the pace required. As an example, we know that EU consumption of crop and livestock products led to the loss of 9 million hectares of forest over the period 1990-2008, an area the size of Portugal. However, instead of taking the necessary steps toward a more sustainable agricultural system e.g. through the reform that our Common Agricultural Policy needs, the EU is still supporting business as usual’.

One research organisation mentioned foresight modelling for both climate and energy systems, use of big data, use of new technologies and their assessment from sustainability perspective, as areas that could be utilised under Objective 9.

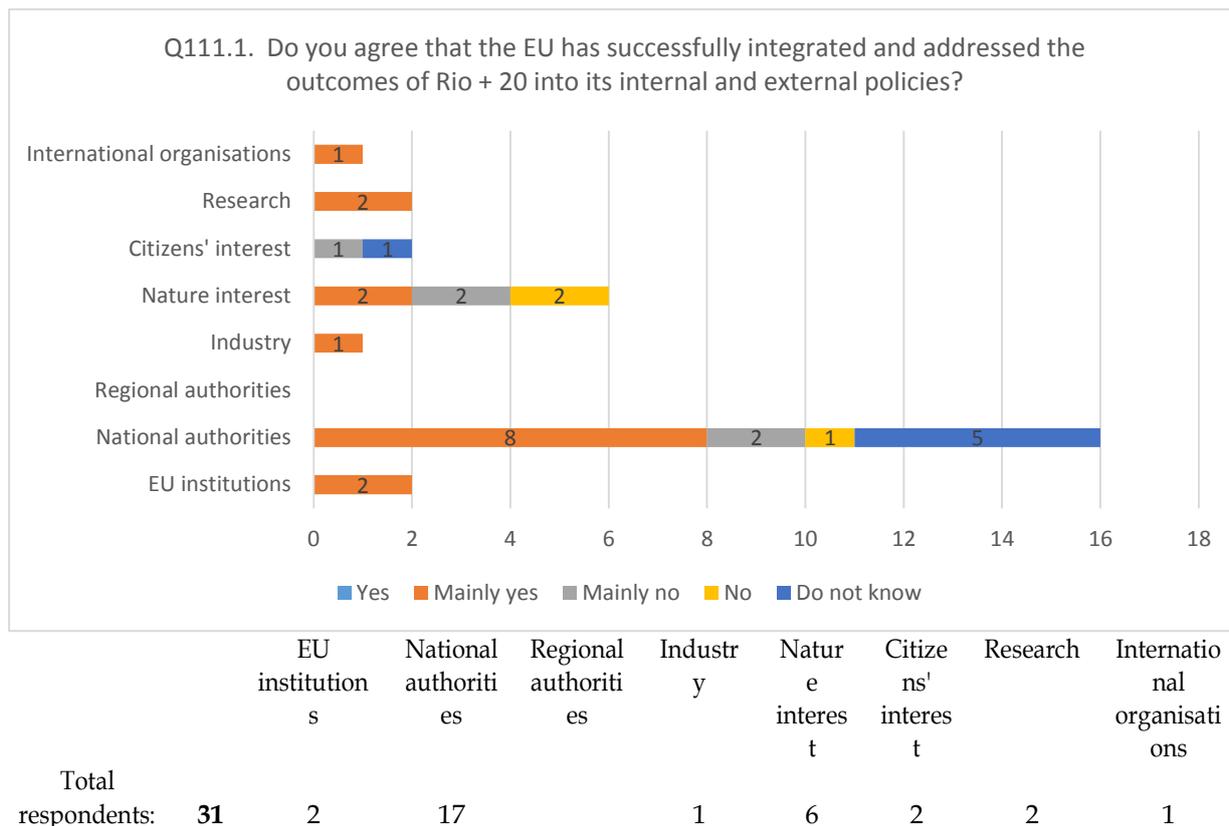
Comments from the interview:

A personal opinion of a representative of the international organisation IUCN is that considering the known benefits and cost of inaction for environmental protection (e.g. of the Birds and Habitats Directive, also of the invasive alien species Regulation), we can say that the EU could probably do more to avoid it. On other issues, the knowledge could certainly be advanced to improve decision making, e.g. on agriculture/CAP, where the EU is very soon taking decisions on how future CAP will look like.

3.6.3 Coherence

Coherence between EU policies and the Rio+20

The purpose of this question was to assess the coherence of the EU internal and external policies with the international sustainability goals defined under the Rio+ 20.



Over half of the respondents are positive about the coherence of EU policies with the global framework, while a quarter of respondents have negative perception and another quarter has no view in this. One citizen interest group, two nature interest groups and two national authorities replied ‘mainly no’ to this question, one citizen interest group and five national authorities replied ‘do not know’. The regional authorities did not cast their vote on this question. The rest were positive towards the statement (total respondents 31).

Comments from the survey:

The EU continues to see SDG implementation as mostly something for its external policies failing to critically review its internal policies as well, but also in its trade policies, insufficient process has been made in assessing compatibility with the SDGs as remarked by a BirdLife Europe and European Environmental Bureau. EEB adds further that the EU continues to see SDG implementation as mostly something for its external policies failing to critically review its internal policies as well.

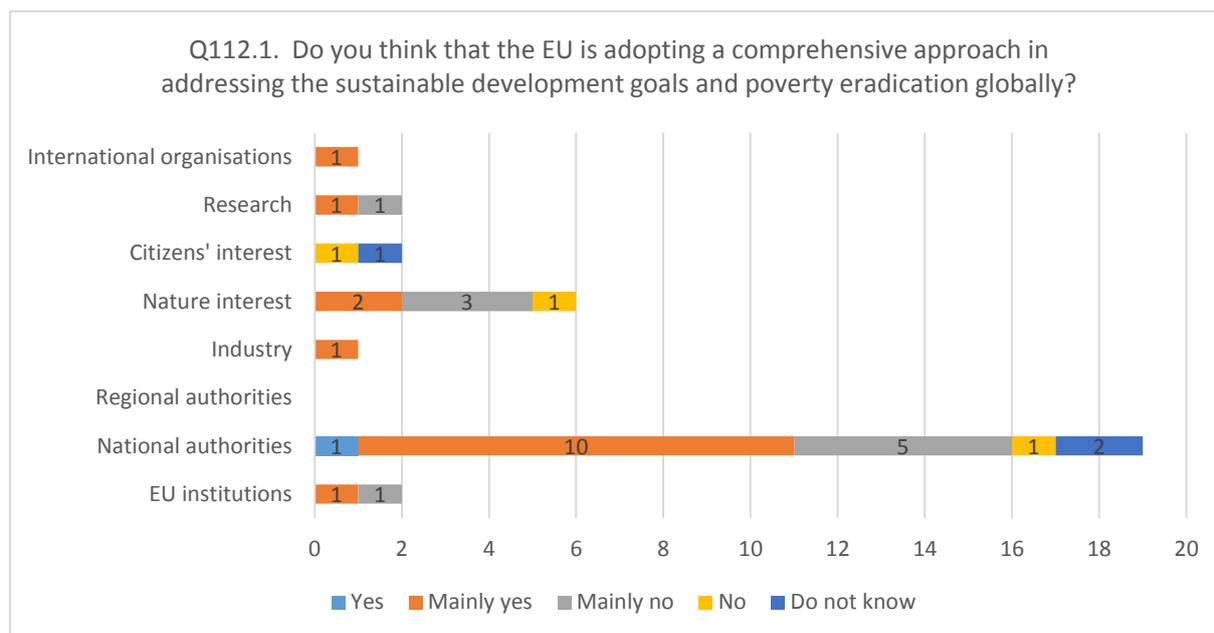
WWF European Policy Office commented that the 2030 Agenda for Sustainable Development provides a strong rationale for reinforcing the implementation of the 7th EAP. However, this does not replace the need for an overarching strategy for EU implementation of the SDGs. They go on to say that a concrete action plan is urgently needed for putting sustainable development at the heart of all EU policies and to live up to the ambition agreed in the 2030 Agenda.

Greenpeace EU notes that much remains to be done such as to promote the uptake of a different farming model based on agro-ecology, which is resilient to climatic and other environmental shocks, productive but at the same time respects planetary boundaries and suited to boost livelihoods in rural areas, instead of accelerating towards a further intensification of agriculture, which benefits few.

A national authority said that the EU has not taken an active approach in reviewing its policies and measures against the 2030 Agenda and its SDGs and that there is a need for identifying existing gaps in all relevant policy areas to assess what more needs to be done until 2030 in terms of EU policy, legislation, governance etc.

EU approach to global sustainability and poverty eradication

This question relates to the coherence of the approach of the EU in addressing global sustainable development goals and poverty eradication.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	33	2	19	1	6	2	2	1

The majority responded positively to this question, the rest were mainly or in fully disagreement with the statement. One research stakeholder, three nature interest groups, five national authorities and one EU institution answered 'mainly no', one citizen interest group and one nature interest group as well as one national authority answered 'no', while three respondents answered 'do not know'. The rest were positive towards the statement (total respondents 33).

Comments from the survey:

A national authority commented that there are plenty and comprehensive public initiatives in different areas, nevertheless, for truly comprehensive approach more corporate responsibility and accountability should be addressed. They go on to say that these demand ambitious international agenda in areas such as tax evasion, income redistribution and switch in burden sharing of negative social and environmental externalities of global trade and production so that the beneficiaries (consumers/business/states) are the ones that pay the price of such externalities via causal link of the production value chain instead of regional communities/states that now carry the costs because of lack of enforceable global corporate regulation/standards.

Another national authority notes that the New Consensus for Development is an important framework and political achievement.

A third national authority remarked that the EU has been passive in taking leadership in the implementation of the 2030 Agenda, whereas many MSs are proceeding much faster. Placing the coordination of sustainable development into the Office of the Secretariat General of the Commission is positive, but it is crucial now that all the key Directorates General are involved in the implementation process in a meaningful way.

WWF European Policy Office commented that "the 2030 Agenda for Sustainable Development is a universal agenda, and all goals should be addressed across the full range of EU policies. Incorporating the SDGs in EU external action must be part of a broader overarching EU strategy for the implementation of the 2030 Agenda". They explain that the strategy should set out the role of the EU in relation to implementation of the SDGs by Member States and align both external and domestic policies with the 2030 Agenda. The EU must also ensure that no EU policies undermine the delivery of sustainable development domestically and externally. Policy coherence for sustainable development means ensuring that policies across sectors (trade, agriculture, etc.) are not undermining but rather strengthen the delivery of sustainable development globally. They state that the Agenda 2030 does not imply a whole

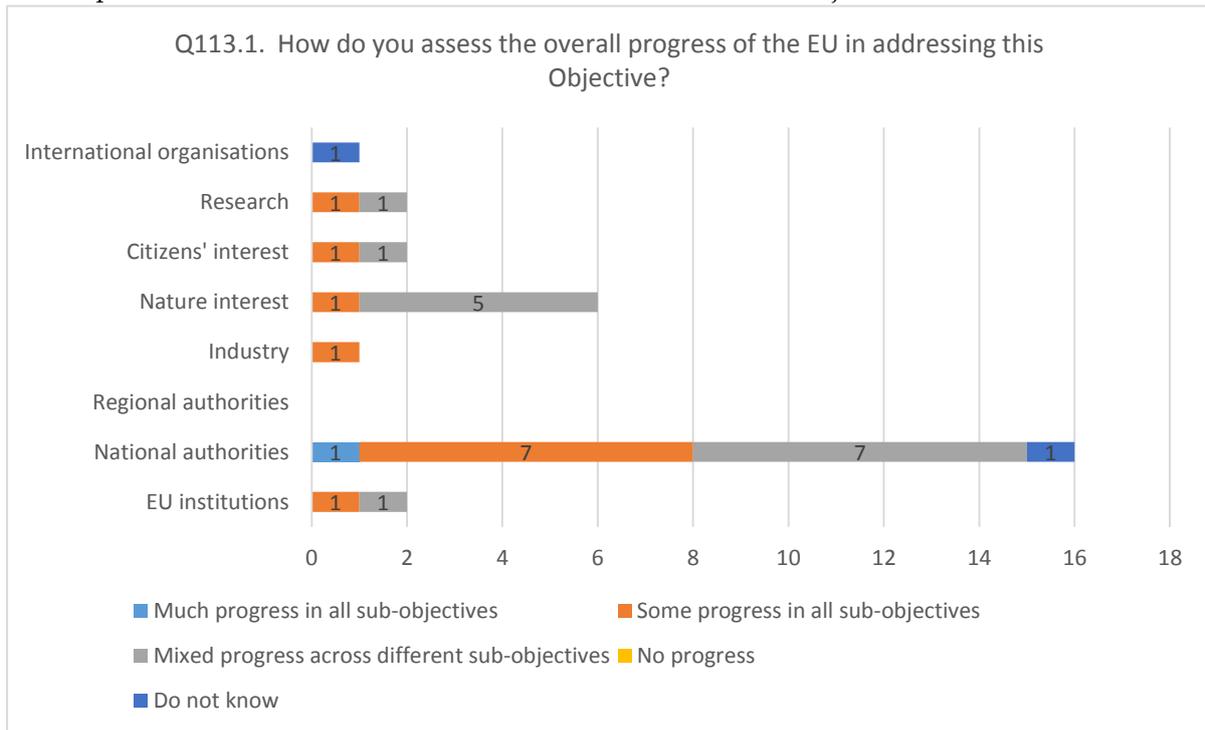
new suite of policies and legislation, rather, sustainable development is an approach: it is doing things in a more coherent and effective way that brings about long-term human development without degrading the planet on which that development depends.

An international organisation commented as follows: 'As stated in the General Union Environment Action Programme to 2020, the objective 9, in order to be achieved, must be part of a global approach and in cooperation with other countries. This means that the environmental policies must be coherent with those of the other countries within a global structure for environmental protection. In addition, the EU has highlighted the necessity of optimizing the use of funding and allocate it to address the sustainable development goals and poverty eradication globally. Before the development of the General Union Environment Action Programme to 2020 the EU focused mainly on neighbouring countries, accession candidates and strategic partners. The EU could also aim its advocacy activity at big powers and emerging economies, for instance Brazil, China, India and USA in order to promote a joint movement on tackling environmental problems at the global level. However, EU support to countries with degraded and vulnerable ecosystems and high exposure to the impacts of climate change and climate variability, such as Least Developed Countries (LDCs) and small island states, was critical.'

3.6.4 Effectiveness

Overall progress in achieving Objective 9

This question seeks to uncover the effectiveness of Objective 9 in the 7th EAP.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	30	2	16	1	6	2	2	1

A slight majority responded that the EU has made some progress in all sub-objectives. One national authority responded that much progress in all sub-objectives had been made, and many responded that mixed progress has

been made across different sub-objectives. The national authorities mainly followed this distribution of answers (total respondents 30).

Comments from the survey:

WWF European Policy Office replied that while the EU has taken some steps towards implementing the 2030 agenda for Sustainable Development (sub-objective 2) and has identified all relevant EU policies to the SDGs in its November 2016 communication, the European Commission has still not identified areas where further action or implementation is needed and where sustainable development principles need to be further integrated in the EU policy framework. They mention that an EU overarching strategy for the implementation of the SDGs by the EU is still missing. They give this example “the EU is failing to address the impacts of EU consumption of agricultural commodities beyond its borders. As a consequence, the EU is failing to address sustainable sourcing (sub-objective 3). The EU should address the impacts of EU consumption by looking at challenges both at the demand level for the products in the EU and at the supply level in producer countries”.

Greenpeace EU notes that the EU’s production and consumption footprint must urgently be addressed. One international organisation noted that economic instruments can make a difference in consumer behaviour and that structural changes in the EU can make an impact, through budgeting you can promote some activities, that support environmental priorities.

Implementation of actions listed in Objective 9

Actions set to achieve the Priority objective 3 in 7th EAP¹¹³:

- (i) working as part of a coherent and comprehensive post-2015 approach to the universal challenges of poverty eradication and sustainable development, and through an inclusive, collaborative process, towards the adoption of sustainable development goals
- (ii) working towards a more effective UN structure for sustainable development, in particular its environmental dimension b
- (iii) strengthening the impact of various sources of funding, including taxation and domestic resource mobilisation, private investment, new partnerships and innovative financing sources, and creating options for using development aid to leverage those other sources of financing as part of a sustainable development financing strategy, as well as in the Union’s own policies, including international commitments on climate and biodiversity finance;
- (iv) engaging with partner countries in a more strategic way, for example by focusing cooperation with:
 - a. strategic partners on the promotion of best practice in domestic environment policy and legislation and convergence in multilateral environmental negotiations;
 - b. countries covered by the European Neighbourhood Policy on gradual approximation with key Union environment and climate policy and legislation and on strengthening cooperation to address regional environmental and climate-related challenges;
 - c. developing countries to support their efforts to protect the environment, fight climate change and reduce natural disasters, and implement international environmental commitments as a contribution to poverty reduction and sustainable development;
- (v) engaging in existing and new multilateral environmental and other relevant processes, in a more consistent, proactive and effective way, including through the timely outreach to third countries and other stakeholders, with a view to ensuring that commitments for 2020 are met at Union level and promoted globally, and to agree on international action to be taken beyond 2020, and ratifying and boosting efforts to implement all key multilateral environmental agreements well before 2020. Implementing the 10-year Framework of Programmes on Sustainable Consumption and Production;

¹¹³ Full version of the text can be seen in Annex A

- (vi) assessing the environmental impact, in a global context, of Union consumption of food and non-food commodities and, if appropriate, developing policy proposals to address the findings of such assessments, and considering the development of a Union action plan on deforestation and forest degradation;
- (vii) promoting the further development and implementation of emissions trading schemes around the world and facilitating the linking of such systems;
- (viii) ensuring that economic and social progress is achieved within the carrying capacity of the Earth, by increasing understanding of planetary boundaries, inter alia, in the development of the post-2015 framework in order to secure human well-being and prosperity in the long-term.

With regard to the actions listed under the Objective 9 of the 7th EAP, respondents were asked to assess if they had been sufficiently implemented. This question seeks to answer the effectiveness of the actions under Objective 9.

Q116. With regard to the following actions under the Objective 9 of the 7th EAP, what is your assessment of their implementation?		EU institutions	National authorities	Regional authorities (n/a)	Industry	Nature interest	Citizens' interest	Research	International organisations	TOTAL
		Total	2	16	0	1	6	2	2	1
Working as part of a post-2015 approach to the universal challenges of poverty eradication and sustainable development, towards adoption of enhanced sustainable development goals	Strong		5			1				6
	Moderate		7			4		2		13
	Weak	2								2
	None									0
	Do not know		5			1	2			8
Working towards a more effective UN structure for sustainable development	Strong		5			1	1			7
	Moderate		6			1		1		8
	Weak	1				3	1	1		6
	None									0
	Do not know	1	4			1				6
Strengthening the impact of various (non-traditional) sources of funding in development aid for sustainable development, commitments on climate and biodiversity finance	Strong		3							3
	Moderate		4			2				6
	Weak		2			3		2		7
	None									0
	Do not know	2	7			1	2			12
	Strong		3			2				5

Q116. With regard to the following actions under the Objective 9 of the 7th EAP, what is your assessment of their implementation?		EU institutions	National authorities	Regional authorities (n/a)	Industry	Nature interest	Citizens' interest	Research	International organisations	TOTAL
More strategic cooperation in promoting best policy practices with neighbour and developing countries	Moderate	1	6		1	1	1	2	1	13
	Weak		1			2				3
	None									0
	Do not know	1	6			1	1			9
Consistent, proactive and effective implementation of all key multilateral environmental agreements well before 2020	Strong		2			1	1	1		5
	Moderate	1	7		1	2				11
	Weak		1			3	1	1		6
	None	1								1
	Do not know		6							6
Assessing the environmental impact, in a global context, of Union consumption of food and non-food commodities development of a Union action plan on deforestation and forest degradation	Strong		2			1				3
	Moderate							1		1
	Weak		4			4				8
	None	1				1				2
	Do not know	1	9				2	1		13
Promoting the emissions trading schemes around the world	Strong		5			1	1	1		8
	Moderate	2	4			1				7
	Weak		1			2				3
	None							1		1
	Do not know		5			1	1			7
Ensuring that economic progress is achieved within the carrying capacity of the Earth	Strong		2							2
	Moderate		4			1		1		6
	Weak	2	4			1	1			8
	None					3		1		4
	Do not know		6				1			7

The following answers have been reported for each action point:

Working as part of a post-2015 approach to the universal challenges of poverty eradication and sustainable development, towards adoption of enhanced sustainable development goals (total respondents 29):

A slight majority replied that the implementation has been 'moderate'. This opinion was shared by seven national authorities, four nature interest groups and two research stakeholders. Five national authorities and one nature interest group believed it to be 'strong', two EU institutions thought it to be 'weak', and eight respondents answered 'do not know'.

Comments from the survey:

The WWF European Policy Office estimates the implementation of this policy action to be moderate. It commented that the EU made a positive and constructive contribution when the 2030 Agenda for Sustainable Development was being drafted. The EU's approach to sustainable development was coherent and consistent with existing goals on biodiversity or climate change which are universally applicable. Moreover, the recently adopted European Consensus on Development includes important content on aligning EU development policy with the 2030 Agenda, ensuring policy coherence for development, and integrating sustainability and climate change in development programmes, as well as improves integration of the three dimensions of sustainable development in future development policy. Yet, the EU is still lacking a concrete action plan identifying areas where further action or implementation is needed and where sustainable development principles need to be further integrated.

More strategic cooperation in promoting best policy practices with neighbour and developing countries (total respondents 30):

A slight majority responded 'moderate' to this statement, some did not know and a few thought the implementation to be 'strong'. Three national authorities and two nature interest groups answered 'strong', one national authority and two nature interest groups replied 'weak', while nine respondents replied 'do not know'. The rest answered 'moderate'.

Comments from the survey:

The WWF European Policy Office estimates that the level of ambition here is sufficient, as the EU development cooperation with partner countries goes well beyond aid. One national authority who believes that implementation of this action is weak mentioned that Russian collaboration is not effective enough for a strong cooperation.

Working towards a more effective UN structure for sustainable development (total respondents 27):

The responses were more or less evenly divided between these four options: 'strong', 'moderate', 'weak' and 'do not know' on the implementation. Five national authorities, one nature interest groups and one citizen interest group replied 'strong', six national authorities, one nature interest group and one research stakeholder group replied 'moderate', one EU institution, three nature interest groups and one citizen interest group as well as one research stakeholder group replied 'weak'. Six respondents replied 'do not know'.

Comments from the survey:

For the WWF European Policy Office, the implementation of this action is moderate but the level of ambition is still insufficient. It commented that even though the EU has made efforts in this direction, it is a slow process. It recognised that in terms of environmental governance, the EU has been successful in strengthening UN Environment with a stronger voice and has played an active role in UN Environmental assemblies.

Promoting the emissions trading schemes around the world (total respondents 27):

The overall response from respondents is positive towards the statement on implementation. Five national authorities, one nature interest group, one citizen interest group and one research stakeholder group replied 'strong'. Two EU institutions, four national authorities, and one nature interest group replied 'moderate'. One national authority, and two nature interest groups replied 'weak'. Seven respondents answered 'do not know' to this statement.

Comments from the survey:

CCPIE-CCIM replied 'strong' and commented that the EU ETS is the first full-scale emission trading scheme in the world and helped develop similar schemes elsewhere, notably in China, and some states and provinces in North America. Greenpeace European Unit did not answer the question but commented that promoting emission trading schemes around the world is not a desirable objective.

Consistent, proactive and effective implementation of all key multilateral environmental agreements well before 2020 (total respondents 29):

A majority of the respondents believed the statement to have been implemented in a moderate way. Two national authorities, one nature interest group, one citizen interest group and one research stakeholder group answered 'strong', one EU institution, seven national authorities, one industry network organisation, and two nature interest groups replied 'moderate', one national authority three nature interest groups, one citizen interest group and one research stakeholder group replied 'weak'. One EU institution said 'none' and six national authorities replied 'do not know'.

Comments from the survey:

One citizen interest support organisation that responded 'weak' justified its answer by pointing out that the implementation of the Aarhus Convention is weak both in certain EU Member States (Austria, Germany) as well as regards to EU institutions.

The WWF European Policy Office believes the level of implementation of this action is moderate and estimates that the level of ambition is not sufficient. It wrote that the EU played a key role in pushing for a strong 2030 Agenda for Sustainable Development and Paris Agreement to tackle climate change. On the first agreement, however, the EU still needs to develop a concrete action plan that puts sustainable development at the heart of all EU policies. On the Paris Agreement, current proposals to reduce greenhouse gas emissions are inconsistent with the global commitment of holding the increase in temperature well below 2°C. WWF believes that EU emissions must be cut by 55% by 2030, through targets of 40% renewable energy and 40% energy savings. Only this level of ambition will ensure that the EU lives up to its international commitments to prevent dangerous climate change.

Strengthening the impact of various (non-traditional) sources of funding in development aid for sustainable development, commitments on climate and biodiversity (total respondents 28):

The majority of respondents opted for the option ‘do not know’ in order to answer this statement on implementation. Three national authorities replied ‘strong’, four national authorities, and two nature interest groups replied ‘moderate’, two national authorities, three nature interest groups and two research stakeholder groups replied ‘weak’, while 12 respondents answered ‘do not know’.

Comments from the survey:

The WWF European Policy Office rated the implementation as weak and the level of ambition of this objective as insufficient. It wrote that for an effective implementation of the European Consensus on (international) development, the EU and its Member States should urgently deliver on the joint EU commitment to the 0.7% GNI for official development assistance (ODA) target; the commitment to development effectiveness principles; the agreed goal of 100 billion USD per year from public and private sources for climate change mitigation and adaptation in developing countries; and commitments on financial resources for international biodiversity. With regards to the growing use of Public-Private Partnerships or other blended instruments in development cooperation, these should be more clearly and consistently defined. Such projects should be transparent, promote local ownership, deliver additional value and development effectiveness and social and environmental standards should apply to these initiatives. Finally, while aid is important, other financial flows and investments are increasingly instrumental for supporting SMEs, sustainable infrastructure and services. European development and investment banks should lead the way in driving support and shifting investments towards sustainable development and climate resilience which aim to limit global temperature increase to 1.5°C.

Ensuring that economic progress is achieved within the carrying capacity of the Earth (total respondents 27):

Six national authorities and one nature interest group responded that the level of implementation of the statement was not known to them. Two national authorities replied ‘strong’, four national authorities, one nature interest group and one citizen interest group answered ‘moderate’, two EU institutions, four national authorities, one citizen interest group and one nature interest group replied ‘weak’, while three nature interest groups and one research stakeholder group replied ‘none’.

Comments from the survey:

The WWF European Policy Office responded ‘none’ and highlighted that millions of hectares of forest, savannah and grasslands around the world have been lost in recent decades, mainly due to agriculture expansion. This has destroyed biodiversity-rich habitats, depleted ecosystems services and emitted vast amounts of greenhouse gases. Europe’s excessive demand is significantly contributing to this. The EU is heavily dependent on the natural capital and resources of other countries, effectively outsourcing large parts of its footprint. The Ecological Footprint of the EU is huge: on average, we need 2.6 planets to maintain our current lifestyles. The EU should do much more in adopting complementary measures of progress to GDP covering the environmental and social dimensions of sustainable development.

A national authority that estimates the implementation of this goal to be weak wrote that production & consumption market standards are not in place yet to make the attainment of this objective possible.

Assessing the environmental impact, in a global context, of Union consumption of food and non-food commodities; development of a Union action plan on deforestation (total respondents 28):

The majority of respondents replied ‘do not know’. Two national authorities and one nature interest group responded ‘strong’. Four national authorities and four nature interest groups responded ‘weak’, while one research stakeholder group answered ‘moderate’. One EU institution and one nature interest group responded ‘none’. 13 respondents answered ‘do not know’.

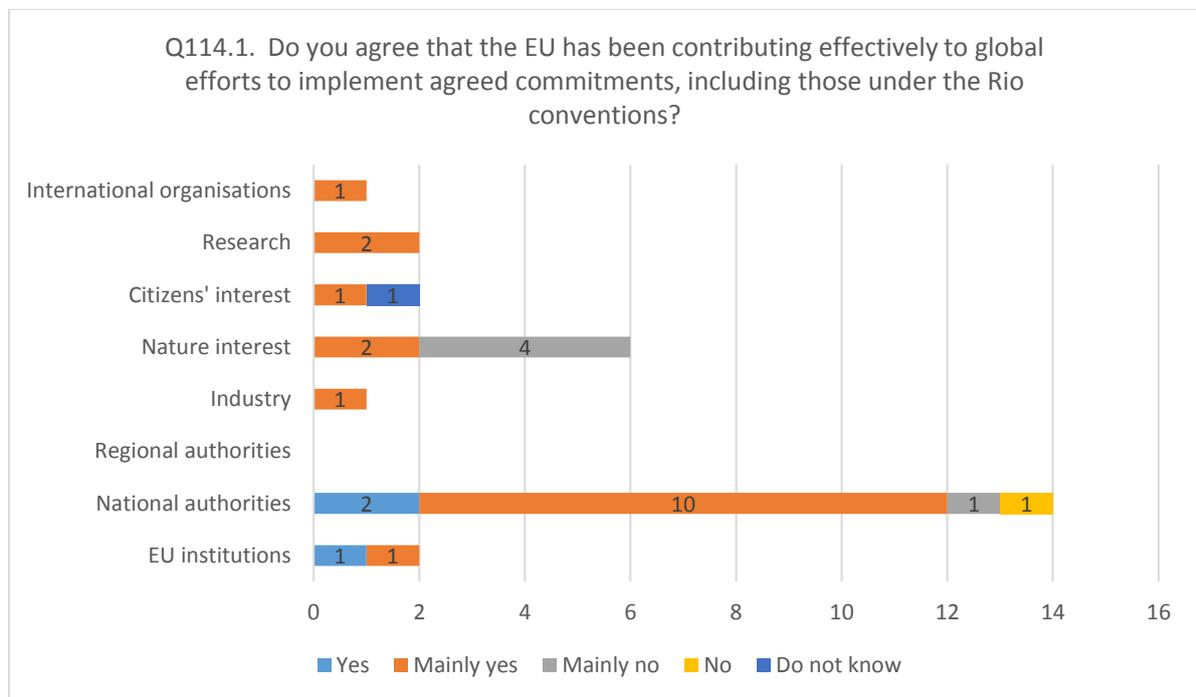
Comments from the survey:

The WWF European Policy Office responded ‘none’ and made the following comment: ‘While the implementation of the 2003 FLEGT Action plan to curb illegal logging has provided a clear framework

to address the detrimental impact of illegal logging, deforestation and forest conversion still remains a persistent problem across the world. By importing products such as palm oil, beef, leather, soy, rubber, cocoa and timber, the EU is part of this problem. In fact, the EU has been the world's largest importer of embedded deforestation between 1990 and 2008. The commitments and measures contained in the FLEGT Action Plan remain highly relevant today, but tackling illegal logging alone is not enough. A number of far-reaching measures should be taken to minimise the impact of EU consumption on global forests and communities' livelihoods. While the Commission indicated in the EU Forest Strategy that it is committed to assessing the environmental impact of Union consumption of food and non-food commodities and developing policy proposals, including the development of a Union action plan on deforestation and forest degradation, it has however not developed such measures. Greenpeace European Unit shared the same view as it commented that the EU has failed to develop a Union action plan on deforestation and forest degradation.

EU contribution to the global efforts to agreed commitments

This question also seeks to explore the effectiveness of Objective 9 under the 7th EAP.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	28	2	14	1	6	2	2	1

A large majority of the respondents were mainly in agreement with this statement. Less than a quarter responded 'mainly no'. Four nature interest groups and one national authority answered 'mainly no', while one national authority answered 'no' and one citizen interest group answered 'do not know'. The rest were positive towards the statement, however note that the regional authorities did not give any response (total respondents 28).

Comments from the survey:

The European Environment Bureau said that Sustainable Development Goals' implementation has been half-hearted and slow so far.

One national authority said that there has been almost no common EU approach in implementation issues. However, many MS's have been active and contributed a lot.

The WWF European Policy Office, which responded ‘mainly no’ wrote that the EU has a long history of expertise on promoting sustainable development in international negotiations. The European Union and its Member States are the largest donors of official development assistance and have long been determined to play a leading role in promoting sustainable development and eradicating poverty worldwide. The implementation of the Agenda 2030 for sustainable development mainly looks at existing policies and there seems to be a tendency to think that many of the objectives and goals are already compatible with the current legislative and policy framework. This is however a shortcoming as many of the objectives would need further reaching action to protect the environment, address poverty and ensure sustainable production and consumption. More focus on new and innovative methods should be set by the EU in that respect. The demand in the EU for agricultural goods, natural resources and seafood products has environmental impacts in third countries, such as deforestation, overfishing and loss of biodiversity, as well as social impacts such as poor working conditions and loss of livelihoods. For example, the consumption of fish from illegal, unreported and unregulated fishing depletes fish stocks, damages marine ecosystems and jeopardises the livelihoods of coastal communities. In order to contribute to global efforts to implement the sustainable development agenda, WWF calls on European Institutions to ensure that sustainable development is an objective that is mainstreamed across all policies areas.

Comments from the interview:

European Chemical Industry Council (Cefic), an industry organisation, had a specific comment regarding the implementation of international conventions, for example the discussion on POPs, where Cefic recommends aligning any action with the core chemical legislation REACH and CLP.

Reducing the global impact of consumption in the EU

This question tries to measure the effectiveness of the EU’s efforts to reduce the impact of its consumption patterns on the environment outside the EU.

Q115. Do you see progress in reducing the impact of consumption in the EU on the environment beyond the Union’s borders?		EU institutions	National authorities	Regional authorities (n/a)	Industry (n/a)	Nature interest	Citizens’ interest	Research	International organisations	TOTAL
	Total	2	17	0	0	6	2	2	1	30
Consumption of food commodities	Yes									0
	Mainly yes		5			1		1		7
	Mainly no	1	5			3		1		10
	No	1				1				2
	Do not know		7			1	2		1	11
Consumption of non-food commodities	Yes									0
	Mainly yes		4			1		1		6
	Mainly no	1	6			3		1		11
	No	1				1				2
	Do not know		7			1	2		1	11

Consumption of food commodities (total respondents 30):

Approximately one third of respondents replied ‘do not know’, one third ‘mainly no’, and about one quarter ‘mainly yes’. Five national authorities, one nature interest group and one research stakeholder group replied ‘mainly yes’, one EU institution five national authorities, three nature interest groups and one research stakeholder group replied ‘mainly no’. One EU institution and one nature interest group replied ‘no’. Seven national authorities, one nature interest group and two citizen interest groups as well as one international organisation replied ‘do not know’.

Comments from the survey:

The WWF European Policy Office replied ‘mainly no’ and pointed out that while the 7th EAP mentions the need to introduce structural changes in European food production and consumption patterns, measures taken so far overlook the huge potential in promoting sustainable food consumption. The European Parliament adopted their own initiative report on palm oil and deforestation in April 2017 where an overwhelming majority of 640 MEPs voted for the Commission to develop an Action Plan to tackle deforestation and forest degradation. EU Member States have also shown their support for action: in December 2015, the EU Council for Environment welcomed the ECs engagement on deforestation; in May 2016, the EU Council on Foreign Affairs supported the promotion of action on responsible supply chains in the agriculture sector, including on deforestation; in June 2016, the EU Council for Agriculture expressed its concern about deforestation and forest degradation still being a substantial problem and encourages the Commission to examine options tackling deforestation and forest degradation globally; etc. The European Commission is about to publish a study in the autumn of 2017, assessing possible measures for an EU action plan on deforestation and forest degradation. Work has however been slow, considering this issue has been included in the 7th EAP since late 2013.

Greenpeace European Unit answered ‘no’ and emphasised EU production and consumption patterns’ environmental impact on other regions of the world. It wrote ‘the EU is still pushing production (e.g. animal feed and palm oil) and technology (e.g. industrialised farming) into other regions, escalating impacts beyond the Union’.

Consumption of non-food commodities (total respondents 30):

On this issue, the distribution of responses is more or less similar to the question on food commodities. Four national authorities, one nature interest group and one research stakeholder group answered ‘mainly yes’, one EU institution, six national authorities, three nature interest groups and one research stakeholder group replied ‘mainly no’, one EU institution and one nature interest group replied ‘no’. Seven national authorities, one nature interest group and two citizen interest groups replied ‘do not know’.

Comments from the survey:

The WWF European Policy replied ‘mainly no’ and stated that a resource efficiency target is a necessity to ensure that the EU sends a clear political signal to industry and investors. Such a target should aim for a reduction of EU consumption in absolute terms and improve sustainable sourcing of resources consumed in the EU.

Greenpeace European Unit was also very critical about the progress of this target and said that the EU is still pushing production (e.g. bioenergy) and technology (e.g. coal power) into other regions, escalating impacts beyond the Union.

Impact of Objective 9 activities on citizens, nature and economic actors

This question aims to measure the impact of Objective 9 activities on citizens, nature and economic actors

Q117. What do you think is the impact of global environment and climate-related policies on:		EU institutions	National authorities	Regional authorities (n/a)	Industry	Nature interest	Citizens' interest	Research	International organisations (n/a)	TOTAL
	Total	2	17	0	1	6	2	2	0	30
Citizens	Very negative									0
	Negative									0
	Neutral		3							3
	Positive	2	13		1	2	1	2		21
	Very positive		1			4	1			6
Nature/flora & fauna	Very negative									0
	Negative									0

Q117. What do you think is the impact of global environment and climate-related policies on:		EU institutions	National authorities	Regional authorities (n/a)	Industry	Nature interest	Citizens' interest	Research	International organisations (n/a)	TOTAL
	Neutral	1	2							3
	Positive		12		1	2	2	1		18
	Very positive		3			4		1		8
Economic actors (businesses, farmers, etc)	Very negative									0
	Negative		1		1					2
	Neutral		2			1				3
	Positive	1	11			2	2	1		17
	Very positive		1			3		1		5

Overall, stakeholders believe that the impact of climate-related policies is positive as a large majority of them responded 'positive' or 'very positive' for all three categories.

Citizens (total respondents 30):

Citizens were seen as the group that benefits the most from these policies. The impact of climate policies on citizens was indeed never assessed as 'negative' or 'very negative'. Three national authorities chose to stay 'neutral' towards this question. Two EU institutions 13 national authorities, one industry network organisation, two nature interest groups, one citizen interest group and two research stakeholder groups were 'positive' towards this statement. One national authority, four nature interest group, and one citizen interest group were 'very positive' towards this statement.

Nature/flora & fauna (total respondents 29):

One EU institution and two national authorities chose to stay 'neutral' towards this statement. 12 national authorities, one industry network organisation, two nature interest support organisations, two citizen interest support organisations and one research stakeholder group responded 'positive'. Three national authorities, four nature interest support organisations and one research stakeholder group replied 'very positive'.

Economic actors (total respondents 27):

On the other hand, economic actors were perceived as the most likely category to be impacted in a negative way by these policies. It was the only group of actors for which the impact was judged 'negative' by a minority of respondents. One national authority and one industry network organisation responded 'negative'. Two national authorities and one nature interest group replied 'neutral'. One EU institution, 11 national authorities, two nature interest groups, two citizen interest support organisations and one research stakeholder group replied 'positive'. One national authority, three nature interest support organisations and one research stakeholder group replied 'very positive'.

Nature interest organisations, citizens' organisations and research organisations were overall very positive about the effects that such policies have on the three categories.

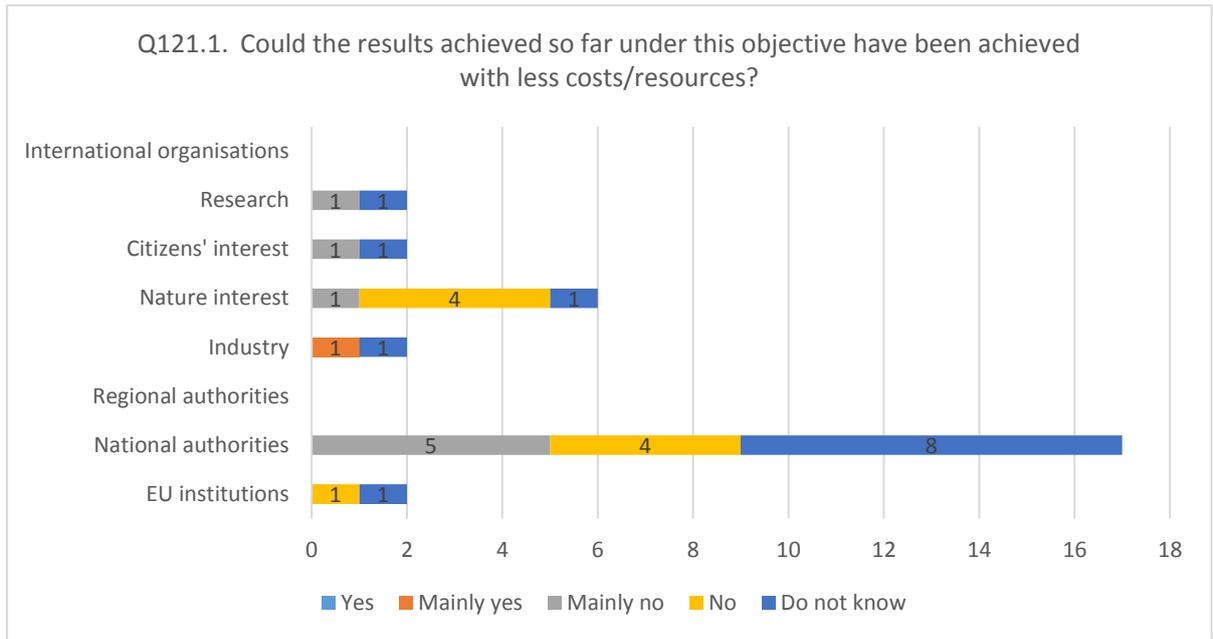
Comments from the survey:

One international organisation specified in a comment that "if ambition was increased and legislation properly implemented, the overall impact would be extremely positive".

3.6.5 Efficiency

Could results be achieved with less cost?

This question relates to the efficiency of the measures taken under Objective 9.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	31	2	17	2	6	2	2	

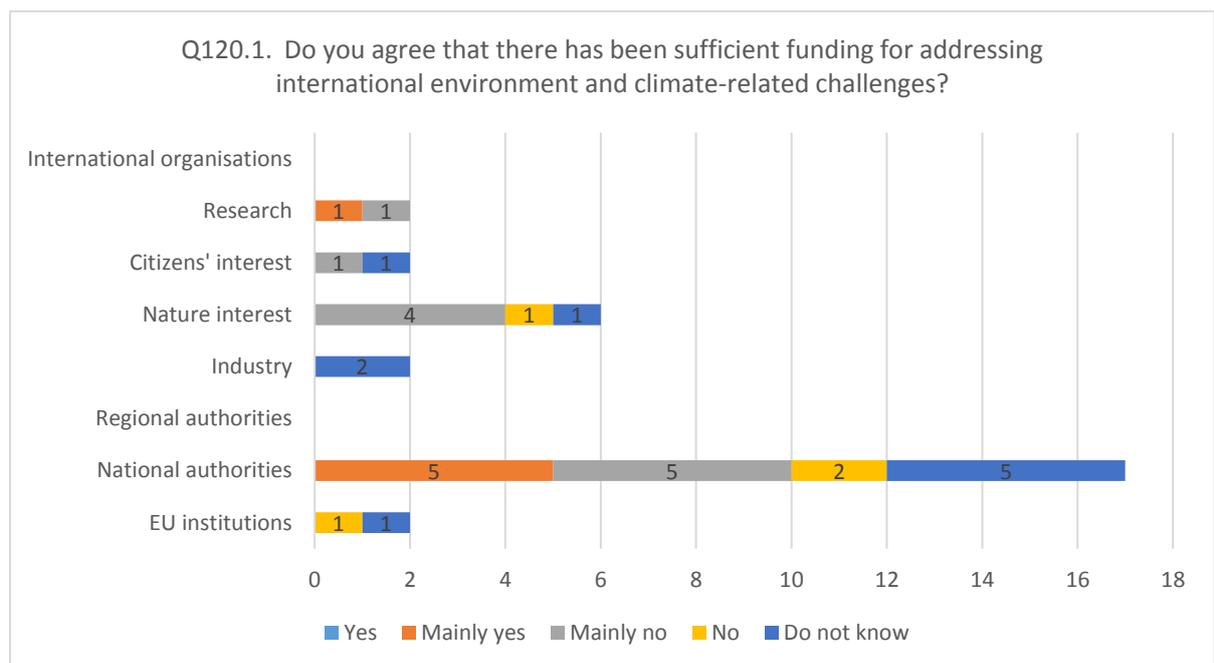
A slight majority of respondents said that the existing results could not have been achieved with less costs or resources, as they replied ‘no’ or ‘mainly no’. It should also be noted that almost half of respondents answered ‘do not know’.

One research, one citizen and one nature interest support organisation as well as five national authorities replied ‘mainly no’. Four nature interest support organisations, four national authorities and one EU institution replied ‘no’. While, only one industry network organisation replied ‘mainly yes’. The rest responded ‘do not know’ (total respondents 31).

No comments were added by respondents.

Securing funding for addressing global environmental challenges

This question seeks to evaluate the effectiveness of EU measures addressing international environment and climate-related challenges, in terms of funding provided. Further, it refers to one of the horizontal objectives under the 7th EAP, which is Objective 6.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	31	2	17	2	6	2	2	

About half of respondents thought that funding was insufficient as they responded 'no' or 'mainly no'. Around one-third of the respondents could not answer the question and selected the option 'do not know'. One research stakeholder group and five national authorities responded 'mainly yes'. One research, one citizen interest support organisation, four nature interest support organisations and five national authorities replied 'mainly no'. One nature interest support organisation, two national authorities and one EU institution answered 'no'. The rest responded 'do not know' (total respondents 31).

Comments from the survey:

The WWF European Policy Office, who replied 'no' said the EU and its Member States should urgently deliver on the joint EU commitment to the 0.7% GNI for ODA target; the commitment to development effectiveness principles; the agreed goal of 100 billion USD per year for climate change mitigation and adaptation in developing countries; and commitments on financial resources for international biodiversity. Yet, these commitments are not enough to address the major challenges we face. Moreover, it's necessary to put in place sufficient funding to address the EU's footprint on the environment through our demand for agriculture products within and outside the EU, as currently, the CAP is not sufficiently addressing this problem and there are no real complementary measures.

CCPIE-CCIM responded 'mainly yes' and commented that funding of climate-related challenges is to be seen as part of the EU's NDC under the Paris Agreement (PA). It will be reviewed in the framework of the ambition cycle of the PA.

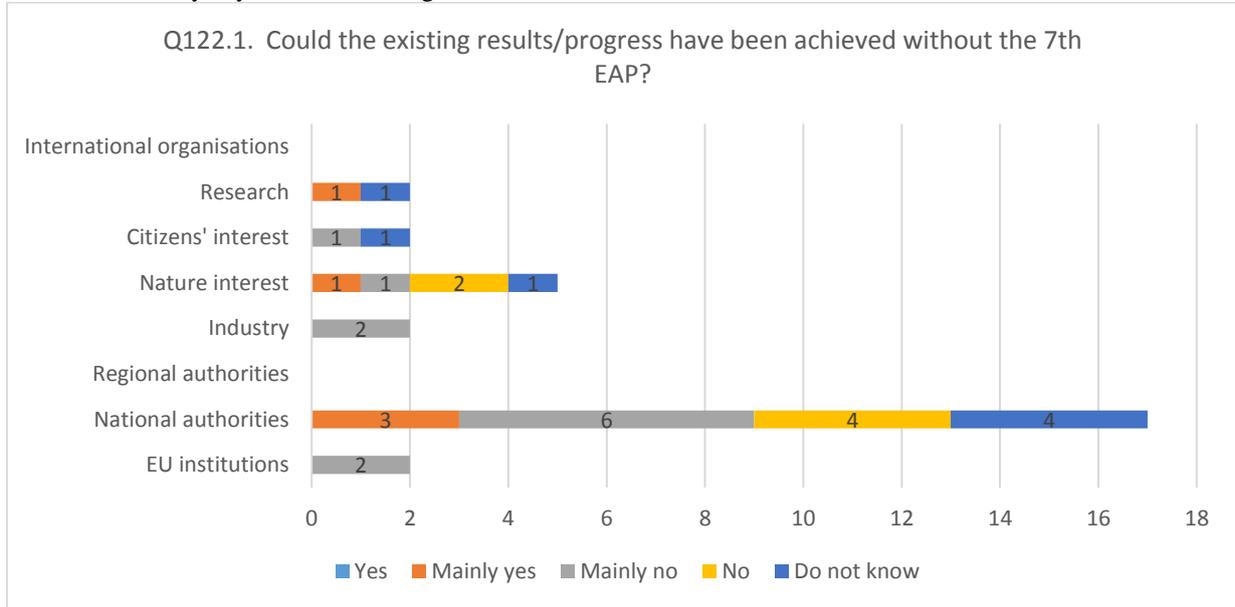
A national authority answered that the EU is still the major funder for international environmental and climate-related issues which is a status to be maintained.

One international organisation commented as follows: 'The EU could help developing countries to identify, access, blend and sequence various financial sources to develop synergies between climate change, biodiversity, disaster reduction and development, and notably capacity building to operate in the complex climate change financing market. The EU can in addition exert a leading role by bringing a coherent approach to environment, climate change and development financing, and utilizing development aid for catalytic capacity building purposes to lay the groundwork for an increased flow of significant non-ODA funds.'

3.6.6 EU added value

Extra contribution of the 7th EAP to addressing global environmental challenges

This question seeks to evaluate the added value of the 7th EAP by asking whether the current results could have been achieved anyway without the Programme.



	EU institutions	National authorities	Regional authorities	Industry	Nature interest	Citizens' interest	Research	International organisations
Total respondents:	30	2	17	2	5	2	2	

Most respondents do not think it is the case as they replied in majority ‘no’ or ‘mainly no’. One research stakeholder group, one nature interest support organisation and three national authorities replied ‘mainly yes’. One research stakeholder group, one citizen and one nature interest support group as well as four national authorities responded ‘do not know’. While the rest either indicated ‘no’ or ‘mainly as their response (total respondents 31).

Comments from the survey:

One national authority that answered, ‘mainly yes’ justified its answer by saying that the aims under Objective 9 were mainly driven by UN processes.

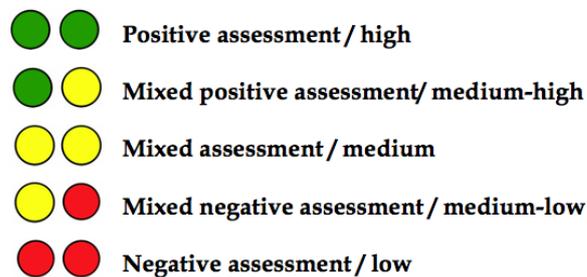
Another national authority that responded ‘no’ stressed the importance and added value of the 7th EAP as it wrote that ‘an overall framework with vision and long-term direction is fundamental’.

An international organisation recognised the value added of the 7th EAP and wrote: ‘the 7th EAP offers the possibility to engage on broad policy discussions, such as how to significantly reduce the environmental impacts of EU consumption patterns. It for example recognises the need for an action plan against deforestation and forest degradation. Considering that all three EU decision-making institutions approved such a plan, it gives a good basis for those civil society organisations that claim for further action to be taken. On the other hand, the 7th EAP has not really contributed to the adoption of the Agenda 2030 for Sustainable Development, but the situation is rather the other way around: the 2030 Agenda provides a strong rationale for reinforcing implementation of the 7th Environmental Action Programme’.

One nature interest group remarked that the 7th EAP is seen to be important, but as there sometimes are only few results, it is hard to judge how much the 7th EAP contributed, and also where we would stand without having it.

3.6.7 Overall assessment of Objective 9

In overall assessment of the progress in the objectives a colour coding based scoreboard system (as presented on the right-hand side) has been applied to summarise assessment on *relevance, coherence, effectiveness, efficiency* and *EU added value* criteria. It distinguishes five assessment colour codes indicating spectrum between positive and negative assessment:



- Positive assessment or high relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value
- Mixed positive assessment or medium-high relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value
- Mixed assessment or medium relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value
- Mixed negative assessment or medium-low relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value
- Negative assessment or low relevance/ knowledge base/ coherence/ effectiveness/ efficiency/ EU added value

Relevance – **High-Medium**

According to the respondents, in regard to the scope of the Objective 9 and whether or not it remains relevant to global environment and climate-related challenges, the response was clearly positive, however more action is needed to assess, promote and engage at EU level. In relation to if any sub-objectives should be added in order to cover needs not currently addressed, half did not think this to be the case whereas the other half were mostly **mainly** positive towards adding new sub-objectives. However, adjustments to the present sub-objectives might be all that was needed to make the overall objective more relevant. Therefore, the score of relevance under Objective 9 is high-medium.

Knowledge base - **Medium-Low**

Respondents felt that knowledge could be more advanced. A general feeling is also that knowledge is under-utilised, and could be better integrated into policy-making or modelling, especially in an area such as policy coherence and impacts of consumption patterns. The knowledge base under Objective 9 is therefore scored as medium-low.

Coherence – **Medium**

In regard to the coherence between Rio+ 20 and EU's internal and external policies, respondents were mainly in agreement that this has been successfully integrated. The EU continues to see sustainable development goals (SDG) implementation as an external not internal policy task, which therefore provides the rationale for reinforcing the implementation of the 7th EAP.

When respondents were asked in more detail if they think the EU is adopting a comprehensive approach in addressing the SDGs and poverty eradication globally, half were '**mainly**' in agreement (i.e. certain doubts remain), implying that more can be done in this area to support the 2030 Agenda for Sustainable Development both as a universal goal, but also at EU level. Therefore, the coherence under Objective 9 is scored as medium.

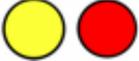
Effectiveness – **Medium-Low**

Overall, the assessment of Objective 9 has showed a mixed view on effectiveness from stakeholders. Respondents assessed that some or mixed progress was happening in the EU towards addressing Objective 9 under the 7th EAP.

Some steps have been taken by the EU to implement the 2030 Agenda for Sustainable Development, however more should be done to address EU's production and consumption footprint. As to the EU's contribution to efforts towards global issues, respondents replied that they were 'mainly' in agreement with the fact that EU has supported these along with agreed commitments including under the Rio conventions, but there is still more that can be done.

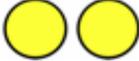
In relation to the consumption of food commodities in the EU beyond its borders respondents replied in general that there is mainly no progress or that they didn't know. The same was true for non-food commodities, which could indicate that this is an area where the EU is lacking in its efforts.

As to how the impact of global environment and climate-related policies affects citizens, nature and economic actors the respondents were in general in agreement that the effect was mainly positive towards the three groups. If ambition was increased and legislation properly implemented the overall impact would be extremely positive according to one stakeholder. This could be facilitated by for example common indicator sets and better understanding of linkages between various global targets and pathways of financial support. Therefore, the score of effectiveness under Objective 9 is medium-low.

Efficiency - Medium-Low 

A slight majority of respondents said that the existing results could not have been achieved with less costs or resources. It should also be noted that almost half of respondents answered 'do not know'. The score therefore lands on medium-low.

Respondents mainly did not believe that there has been sufficient funding for addressing international environment and climate-related challenges, and many also responded that they didn't know, which indicates that this area is lacking in funding opportunities.

EU added value - Medium 

Respondents were mainly in agreement that the existing results and progress could not have been achieved without the 7th EAP, as the Programme offers the possibility to engage on broad policy discussions. However, comments from stakeholders were mixed on the added value of the 7th EAP, as some remark that the actions are mainly driven by other initiatives such as the Sustainable Development Goals. The EU added value under Objective 9 is scored as medium.

Overall scoreboard for Objective 9

Relevance	Knowledge Base	Coherence	Effectiveness	Efficiency	EU added value
 	 	 	 	 	 

3.6.8 Recommendations

Respondents were offered to comment on issues which could not be raised answering the above questions, and also express any other recommendations for improvements of the implementation of international development activities under the 7th EAP.

- Stakeholders want to see EU to play leading role by bringing a coherent approach to environment, climate change and development financing, and utilizing development aid for catalytic capacity building purposes to lay the groundwork for an increased flow of significant non-ODA funds. EU should reinforce industrial cooperation with partner countries to strengthen capacities for green industry and facilitate the transition to a circular economy, e.g. resource efficiency and cleaner production, while letting the developing countries identify their priorities in accordance to their specific national conditions and needs. Stakeholders also want to more active and more strategic engagement of the EU in the existing regional platforms and multilateral environmental agreements
- It was suggested that the EU should emphasize in its external policies a number of topics including: green industrialization, circular economy, gender equality, vulnerable population, employment, disaster risk reduction, natural resources management, food security, migration and technology transfer.

- Several respondents suggest better integration of the UN SDGs and the 2030 Agenda in the EU's policy and the governance structure. They recommend streamlining reporting for EU and SDG progress and drawing the focus the next EAP on the implementation of the 2030 Agenda in synergies with the Paris Agreement on Climate Change. It was also suggested that the attention must shift to the translation of the Agenda 2030 goals and targets into ambitious regional and national implementation strategies.
- There is a call to address international responsibility of corporate and business sector, especially trans-national corporations to incorporate environmental (as well as social) responsibility throughout their value and product chains. To achieve a global sustainable economy it is necessary not only to demand strict regional (EU) regulation on environmental protection and green growth but also to take into account international consequences and dimension and these may lead then to double environmental standards in different parts of the world in the same value product chain.
- With regard to sustainable investment actions, there is a need in increasing public funding to invest in developing countries, while stopping the private sector's unethical investments. The financial sector funds countless projects and owns companies at global level. Their financial services and trading activities impact negatively societies and the environment. Besides, consumers receive often too little transparent and credible information about how their money is used. Despite the fact that many financial institutions state that they are committed to sustainability and social responsibility 'reality often looks a lot darker.' European Commission progress on setting up in autumn 2016 a High Level Group on Sustainable Finance is welcomed,
- EU should provide more financial and technical assistance to producer countries to protect, maintain and restore forest ecosystems.
- There is a call for developing and implementing measures beyond GDP. EU should also take into account a different kind of growth – qualitative, not only quantitative – and design new tools to assess it.
- There is a need in integrating in the EAP additional sub-objectives related to the Convention on International Trade in Endangered Species (CITES), Illegal Wildlife trade. EU must continue to strengthen the implementation of CITES including putting sufficient resources into implementation.
- It was recommended that EU introduces forest-specific provision in EU trade and investment agreements and establishes a regulatory framework to ensure that all supply chains that feed the EU market are sustainable, free from deforestation and forest degradation. It was urged to close off the EU market to products that drive deforestation and forest degradation and to use the context of bilateral trade arrangement to advance the achievement of the sustainable development On a wider perspective, it was recommended that EU has to:
- EU should share the EU experience in setting up Nature 2000, the largest nature protection zone in the world. For example, Canada wants to check and get inspired by Natura 2000 to set up their own network.
- Finally, EU should take actions to minimise food waste and overconsumption of goods.

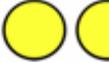
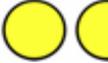
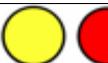
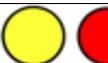
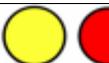
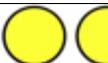
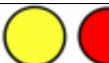
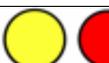
4 Final assessment of and conclusions on implementation of the 7th EAP

4.1 Assessment

Based on the assessment of each objective an overall scoreboard has been compiled to give a cumulative picture of the progress of the 7th EAP. The scoreboard paints a mixed picture of progress across various Objectives and evaluation criteria.

One can conclude that the Programme is perceived as still relevant, with some reservations in some areas where there is a desire to see more ambitious objectives. Despite the growing knowledge base, there are many gaps, and the existing knowledge is largely underutilised in policy-making. While the coherence between EU and MS policies is considered to be satisfactory, there is poor alignment between environmental policy objectives and the objectives of other EU policies (such as some sectoral policies). Stakeholders see many challenges related to effectiveness, although they see positive impacts in many areas. While some progress has been achieved in implementing legislation, many stakeholders feel that more action is needed. Many are convinced that achieving existing results with less resources would not have been feasible. Funding is not always perceived to be adequate for fulfilling all objectives. Many acknowledge a moderate to high value added in the EU efforts to promote actions under the 7th EAP.

Figure 3 Scoreboard - Stakeholders' assessment of implementation of the 7th EAP

Criterion/Objective	Objective 1	Objective 2	Objective 3	Objective 8	Objective 9
Relevance					
Knowledge Base					
Coherence					
Effectiveness					
Efficiency					
EU added value					

-  **Positive assessment / high**
-  **Mixed positive assessment/ medium-high**
-  **Mixed assessment / medium**
-  **Mixed negative assessment / medium-low**
-  **Negative assessment / low**

Objective 1

Relevance – stakeholder opinion evaluates this as **medium-high** based on the following:

- Respondents all agreed that existing sub-objectives under Objective 1 remain relevant. One third of respondents would like to see additional sub-objectives, in areas such as addressing integration of nature protection with climate and natural resource policies.

Knowledge base - stakeholder opinion evaluates this as **medium-low** based on the following:

- With regard to improving scientific knowledge and the evidence base for nature protection and conservation policies, there is a perception of clear progress in better understanding of climate change impact and natural disasters and in understanding implications for species loss for ecosystem services
- Respondents felt that there are gaps in the knowledge base, namely in better understanding environmental thresholds and ecological tipping points, as well as in better methodologies.
- Existing knowledge and methodological tools that have been developed are regarded as under-utilised in policy-making.

Coherence – stakeholder opinion evaluates this as **medium-low** based on the following:

- There is a high coherence in policies and actions promoted by the EU and the Member States, however, these actions are often said to be insufficient
- The CAP was the EU policy that was most mentioned as lacking coherence with the 7th EAP. The TEN-P received a similar response, although it was also perceived that respondents lacked knowledge of the policy. The opinion on Cohesion policy indicates a perception that it has recently included a number of environmental considerations, unlike previous reforms. Fisheries policy received a mixed response. The majority of respondents believe the policy to be mainly coherent with the 7th EAP, however, there was also a number of respondents who did not know. The budget, fiscal, transport and bioenergy policies were also mentioned as being somewhat incoherent with the nature protection and conservation objectives.

Effectiveness – stakeholder opinion evaluates this as **medium-low**, based on the following:

- The overall assessment of the effectiveness of Objective 1 was mixed. The majority of respondents felt that the rate of progress in achieving Objective 1 was mixed across all sub-objectives. The mixed rate of progress is often explained by respondents as resulting from ineffective policy implementation and integration at national level. There are some areas of dissatisfaction in the nature protection area, but stakeholders generally indicate that the

implementation has been satisfactory, however some feel that the rate of progress is too slow when the rapid rate of loss of biodiversity is considered.

- Effectiveness under Objective 1 is therefore scored as medium-low.

Efficiency – stakeholder opinion evaluates this as **medium**, based on the following:

- It seems that monitoring conservation efforts on species and habitat and the restoration, structure and function of habitats are very costly for national authorities, especially initiatives such as Natura 2000. However, a statement was also made that costs are sometimes perceived as higher than they are.
- For the question if results could have been achieved with less cost and resources, respondents mostly replied that it could not.
- The funding at EU and MS level is mainly viewed as inadequate for real needs, and the overall assessment of public and private funding was that it is mainly inadequate, or that respondents are unaware of the extent of this type of funding.
- This resulted in the overall assessment for efficiency under Objective 1 being ranked as medium.

EU added value – stakeholder opinion evaluates this as **medium-low**, based on the following:

- At EU level the balance of opinion suggests that the 7th EAP has a moderate effect on nature protection and conservation policy areas. The influence at MS level seems to be less than at EU level.
- The positive comments related to the added value of the 7th EAP are that it recognises that environmental challenges are cross-border issues and as such need a concerted approach at EU level. Otherwise, actions taken by a Member State risk being undone by inaction or adverse action by another Member State.
- Overall, the assessment of EU added value of Objective 1 is estimated as medium-low.

Objective 2

Relevance – stakeholder opinion evaluates this as **medium-high**, based on the following:

- Most respondents argue that the green economy objective of the 7th EAP is highly relevant, with some arguing that an update is necessary in light of the Paris agreements and the UN sustainable development goals (SDGs).
- However, some gaps are said to exist in product policies. The Circular Economy and, specifically within that paradigm, consumption patterns are not effectively targeted. Many suggest that sustainable procurement is an effective way to motivate industry

Knowledge base - stakeholder opinion evaluates this as **medium**, based on the following:

- Most respondents feel that scientific knowledge related to the green economy and the impact of production and consumption has increased. However, it seems that this knowledge is underutilised and fails to influence the relevant policy and decision makers.
- At the same time respondents indicate that there are several areas with a major knowledge gap that is most present in relation to the Circular Economy paradigm, understanding of environmental pressure of consumption, but also comes up when policy-makers set targets for future CO₂ emissions.

Coherence – stakeholder opinion evaluates this as **medium-low**, based on the following:

- Sectoral and green economy policies at EU and Member State level are insufficiently coherent. Funding and emissions targets are not aligned with the ambitions of the EAP. Among sectoral policies, the Common Agricultural, Common Fisheries and trans-European networks policies are seen to be most inconsistent with the green economy objectives. At a higher level, a more holistic approach is felt to be required to align policy-making on several levels,

Effectiveness – stakeholder opinion evaluates this as **medium-low**, based on the following:

- Most respondents suggest that resource-efficient, green, and competitive low-carbon economy policies have improved the competitiveness of European industry and SMEs, partly because such policies spur innovation. The EAP was said to cause significant improvements in legislation.
- However, there are many areas for improvement, such as gaps in implementation of policies, failures to enforce legislation, lack of ambition in climate targets along with insufficient support for low-carbon energy production. Circular Economy policy is too focused on end-of-life (waste) options and recycling rather than changing consumption and production patterns. Lack of trust among citizens seem to stem from a perception that the EAP has been most effective in furthering the interests of industry, rather than flora/fauna and citizens.

Efficiency – stakeholder opinion evaluates this as **medium** based on the following:

- Though effectiveness is lacking in some cases, it is recognised that the effects could not have been achieved at lower costs. Some stakeholders (mainly from national authorities) suggest that there is a large enforcement burden in waste management and recycling, especially in rural areas. Enforcement of renewable energy and emission control related regulations was also said to be excessively costly.
- While the funding to support greening the economy has increased both at EU level and in most of the Member States, this funding is still not adequate to meet all needs, according to the majority of respondents.

EU added value – stakeholder opinion evaluates this as **medium**, based on the following:

- The EU is the logical policy-making level for environmental issues, as they defy borders and EU policy helps to move towards a unified market. The influence of the EAP on European policy making is assessed as moderate, with some mentions that the EAP may have had an influence on the Circular Economy package. However, the actual influence remains hard to assess as most action points in the plan have no clear pathway for realisation or associated indicators.

-

Objective 3

Relevance – stakeholder opinion evaluates this as **medium**, based on the following:

- Respondents all agreed that the existing sub-objectives under Objective 3 are relevant. However, some respondents believed that new objectives need to be added in order to cover other issues, such as pharmaceutical effects on human health.

Knowledge base - stakeholder opinion evaluates this as **medium-low** based on the following:

- Overall, respondents see some improvements to the knowledge base, namely in the understanding of health and environmental implications of certain chemicals in products and of endocrine disruptors. However, the knowledge about the impact of certain nanomaterials and of the combined effects of chemicals needs to be improved.

- Existing knowledge is under-utilised and policymakers are urged to make better use of the existing knowledge.

Coherence – stakeholder opinion evaluates this as **medium-low**, based on the following:

- Overall, respondents thought that general policy-making at Member State level and the goals under Objective 3 were coherent.
- However, the respondents believed that European and national sectoral policies were at odds with environmental pollution control and health risk reduction targets under Objective 3. This mainly concerns the Common Agricultural Policy and the Common Fisheries Policy.

Effectiveness – stakeholder opinion evaluates this as **medium-low** based on the following:

- Overall, the respondents seem to recognise some progress in general implementation of Objective 3 activities, but this is not uniform across the different fields. The policies were generally envisaged as very positive for citizens, a bit less but still positive for nature interest organisation and even a bit less for economic actors.
- With regard to the level of implementation of activities/instruments/actions under Objective 3, the general trend that emerges is that EU and Member State implementation is insufficient.

Efficiency – stakeholder opinion evaluates this as **medium** based on the following:

- Respondents agreed that the results achieved so far in the field of environmental pollution control and health reduction could not have been reached with less costs or resources.
- Some of the open questions on enforcement and compliance costs of certain policy/legislation under Objective 3 for national authorities and industry did not receive many answers.
- The majority of stakeholders think that EU and national level funding, is inadequate for Objective 3 needs, particularly at Member State level. There is discontent regarding the lack of available funds for environmental pollution control and health risk reduction policies.

EU added value – stakeholder opinion evaluates this as **medium** based on the following:

Many responses made the point that the EU added-value stems from the capacity of the EU to design harmonised and binding policies across all Member States. Some responded that in the field of air pollution in particular, EU action is necessary because it is a transboundary problem that cannot be solved by national policies alone. The capacity to create binding legislation and to regulate enforcement was also outlined as an EU-specific characteristic.

- A majority of respondents felt that the influence of the 7th EAP on pollution and health risk reduction policies was moderate or strong. However, it should be noted that the influence of the 7th EAP on Member State policy-making was judged weaker than on EU policy-making. However, there is still a criticism on inadequately delivered work at EU level on combination effects of chemicals, endocrine disruptors, chemicals risk and nanomaterials.

Objective 8

Relevance – stakeholder opinion evaluates this as **medium** based on the following:

- Respondents felt that objectives are still relevant but some issues are missing. The actions to be incorporated in a future EAP need to be more concrete. Better links should be made to the SDGs and other international commitments.

- There is a need for special attention to the problems of those EU cities which are not frontrunners.

Knowledge base - stakeholder opinion evaluates this as **medium-low** based on the following:

- There are still a number of areas where the knowledge base is insufficient, such as social aspects of sustainability, nature-based solutions for urban development, criteria for sustainable urban development and the role of cities in implementing environmental legislation.
- On the other hand, some of the existing knowledge is underutilised such as sustainable urban planning and design; air and noise pollution; urban and food waste; soil sealing and loss of fertile land; smart cities, etc.

Coherence – stakeholder opinion evaluates this as **medium-high** based on the following:

- No respondent singled out Objective 8 issues that clash with EU city policies. However, there are issues such as sustainable urban transport, fighting air pollution, brownfield development and green infrastructure which, while being vital for cities, are not within the focus of Objective 8.
- Additionally, coherence is also seen to depend on the financial capacities of the cities. It was also pointed out that some cities are much more ambitious than the 7th EAP.
- The impact of the 7th EAP on policy-making is larger at EU and national level than at city level.

Effectiveness – stakeholder opinion evaluates this as **medium** based on the following:

- The progress is mixed across the actions under this thematic objective.. While answers indicate that the sub-objectives on sharing best practices, integration of sustainability issues in urban planning, and on information on funding sources have had a moderate level of implementation this is less the case with the sub-objective on agreeing a set of evaluation criteria.
- In terms of progress of EU cities in implementing policies in different sustainability fields some progress is seen in energy efficiency, sustainable public transport and mobility and sustainable urban planning and design, while somewhat less progress is seen in sustainable buildings and the conservation of urban biodiversity.
- Respondents perceive the impact of EU urban sustainability policies on different stakeholders as overall positive. The impact is perceived as being the highest on citizens and slightly less on nature. The impact on economic actors is considered to be more moderate.

Efficiency - stakeholder opinion evaluates this as **medium**, based on the following:

- Most of the respondents who provided an opinion think that the results achieved under Objective 8 could not have been achieved with less costs and resources. More than half of the respondents do not have an opinion on the issue. A note of caution was raised on the need to better streamline the objectives in order to achieve higher efficiency.
- It is generally considered that funding is insufficient. The difficulty of securing constant funding for sustainable urban projects as opposed to one-off funding was raised. A lack of capacity for proposal writing (for funding applications) was also raised.

EU added value – stakeholder opinion evaluates this as **medium-high** based on the following:

- The overwhelming majority of respondents think that the 7th EAP has played a fairly important role in achieving urban sustainability results. Other EU agendas, such as cohesion policy were also an important driver. The importance of having an overall strategy for development at EU and national levels was also acknowledged.

- However, in some countries and cities, objectives are achieved at lower levels of governance, despite the EU.

Objective 9

Relevance – stakeholder opinion evaluates this as **medium-high** based on the following:

- According to the respondents, with regard to the scope of the objective and whether or not it remains relevant to global environment and climate-related challenges, the response was positive. However more action is needed to assess, promote and engage at EU level. In relation to the need to add any sub-objectives in order to cover needs not currently addressed, there was a slight positive response to add more sub-objectives.

Knowledge base - stakeholder opinion evaluates this as **medium-low**, based on the following:

- According to respondents, the knowledge base could be improved and existing knowledge could be better integrated into policy-making and modelling, especially in areas such as policy coherence and the impacts of consumption patterns.
- The knowledge base was perceived as having seen a slight improvement and better awareness has been generated.

Coherence – stakeholder opinion evaluates this as **medium**, based on the following:

- Regarding the coherence between Rio+ 20 and EU's internal and external policies, respondents were mainly in agreement that this has been successfully integrated.
- Many respondents thought more could be done to address and adopt a more comprehensive approach in addressing the SDGs and global poverty eradication.

Effectiveness – stakeholder opinion evaluates this as **medium-low** based on the following:

- Respondents assessed that some or mixed progress was happening in the EU towards addressing Objective 9 of the 7th EAP. With regard to the EU's contribution to efforts towards global issues, respondents were 'mainly' in agreement with the fact that the EU has supported these along with agreed commitments including those under the Rio conventions.
- In relation to the impact of the consumption of food commodities in the EU beyond its borders respondents replied that in general there is mainly no progress or that they didn't know. The same was true for non-food commodities.
- As to how global environment and climate-related policies affect citizens, nature and economic actors the respondents were generally in agreement that the effect was mainly positive towards the three groups.

Efficiency – stakeholder opinion evaluates this as **medium-low**, based on the following:

- A slight majority of respondents said that the existing results could not have been achieved with less costs or resources.
- Most respondents did not believe that there has been sufficient funding for addressing international environment and climate-related challenges.

EU added value – stakeholder opinion evaluates this as **medium**, based on the following:

- Respondents were mainly in agreement that the existing results and progress could not have been achieved without the 7th EAP.

- However mixed comments were received from stakeholders, as some remarked that the actions are mainly driven by other initiatives such as the Sustainable Development Goals.

4.2 Conclusions

This study solely focused on consulting and collecting the views of relevant stakeholders on the progress of the 7th EAP using a targeted stakeholder survey, interviews and a focus group. Based on the information collected the report identifies the main trends and the challenges faced in fulfilling the Programme objectives by 2020.

The 7th EAP is generally seen as an important and very relevant part of the agenda in addressing the environmental challenges and needs that exist in the EU and its Members States.

The overall assessment is that progress in implementing each of the Programme objectives and sub-objectives is mixed. Some **progress** has been seen in implementing the European climate and energy package, climate change adaptation strategy, all of the key pieces of water legislation, sustainable innovation and research and development.

However, a very low percentage of stakeholders envisage that the EU and the Members States will be able to meet the objectives of the Programme by 2020, especially when considering that there are only two years till this deadline.

Due to **insufficient progress**, possible failures in reaching the targets are foreseen in the areas of natural capital and biodiversity, healthy fish stocks, air and soil quality, nitrogen and phosphorus pollution, sustainable forestry, sustainable design, production and consumption, risks from chemicals and biocides, as well as in bringing the EU policy frameworks in line with the Paris Climate Agreement and the UN's Sustainable Development Goals (SDGs).

Stakeholder's perception is that despite being praised for its ambitious nature, the 7th EAP should increase its focus on how to implement its objectives by providing more detail on them, which would make it easier to measure if the goals have been reached and understand how they should be reached. Many stakeholders also feel that there is a need for even **stronger, or new targets and objectives** on a number of issues, as listed below:

- Under Objective one the objectives that some stakeholders think are missing relate to wildlife trafficking, biodiversity and agriculture, green infrastructure, emerging soil contaminants, integration of biodiversity protection, climate change and natural resource policies, bioenergy and integrating natural capital into national financial reporting;
- Under Objective two the objectives that some stakeholders think are missing relate to circular economy, going beyond waste targets towards eco-design, sustainable consumption targets, clear and better (e.g. circular economy related) objectives for green public procurement, low carbon transport modes, aligning renewable energy with the energy union and considering the impacts of digitalisation on society;
- Under Objective three the objectives that some stakeholders think are missing relate to widening green infrastructure to support physical and mental health, a more transversal and holistic approach in hazard assessments to tackle co-exposure, chemicals in products and packaging, pharmaceutical pollutants, vulnerable group orientated policies (children, unborn babies and elderly), and noise pollution;
- Under Objective eight the objectives that some stakeholders think are missing relate to climate adaptation and green infrastructure in cities, sustainable urban mobility and specific topical sub-objectives that are a challenge for cities (e.g. waste, noise, air quality, energy, climate and circular economy);

- Under Objective nine the objectives that some stakeholders think are missing relate to an overall updating and adjustment in light of the adoption of SDGs and the 2030 Agenda, wildlife trafficking, endangered species, EU impact on global deforestation, and implementing measures beyond GDP.

Stakeholders feel that the Programme should continue to have strong horizontal penetration in all sectors. Special attention needs to be paid to aligning with, and the promotion of, environmental objectives into the Common Agricultural Policy. The Europe 2020, Trade, Fisheries and Investment Policies are also seen as lacking coherence with the environmental objectives and this requires prompt action in order to put Europe onto a sustainable and resilient development path.

The stakeholders consulted also feel that there is a need for increased awareness among, and pressure on, national authorities to take the Programme seriously and to improve enforcement at EU level. There is also a need for an improvement in the political will and the provision of more funding opportunities in order for progress to be made towards the Programme's goals.

There is a perception that **knowledge gaps** still exist in topics such as the economic value of ecosystems and natural capital and their interaction with anthropogenic activities, the impact of alien species, understanding the environmental pressure of consumption (with the focus having been on production), endocrine disruptors, nanomaterials, the combined effects of chemicals, the impact of pharmaceuticals on the environment, persistent, bioaccumulative and toxic (PBT) substances, micro-plastics impacts and flows, hazards assessment methods, registration of nanomaterials, the social aspect of sustainability, nature based solutions for urban development, interrelations between cities and their hinterland, impact of greening cities and the interlinkages between various global targets.

The existing scientific knowledge is perceived to not always trickle down into policies or to take too long to be taken on board. Some policies are perceived to be out of line with the scientific evidence, e.g. in the bioenergy field, sustainability criteria are perceived as not being consistent with the scientific literature on the subject, including the Commission's research papers. These failures to use scientific knowledge have been linked to political issues.

The key stakeholder groups are expected to play the following prominent **roles** in improving the implementation of the 7th EAP, especially as regards its core thematic objectives (1, 2 and 3):

The role of the **EU institutions** is seen to be holding Member States accountable, better dissemination of targets, enabling and monitoring policy-makers, improving stakeholder participation, ensuring the free flow and sharing of the data needed for better decision making and actions, being political leaders and coordinators along with MSs in better implementing planned activities, and ensuring financial support mechanisms.

The role of **Member States** is seen to be promoting the 7th EAP by pushing for the political will required to reach goals, setting up stronger environmental policies and implement them, better enforcing EU legislation, integrating environmental considerations into national sectorial policies and improving funding support.

Regional governments' role is seen to be more supervision and inspections, setting up stronger and clearer policies that are better aligned with the 7th EAP objectives, raising awareness among local authorities and supporting them in their decisions on the environment, and improving access to funding.

The role of **business and industry** is seen as doing less lobbying for the lowest common denominator, gaining more awareness of and giving more consideration to environmental impacts and action plans (e.g. training staff on these issues), improving the integration of environmental considerations into new business models, promoting good practices, innovations and solutions that are economically and environmentally beneficial, providing transparency of knowledge and data, and ensuring compliance with legislation.

The role of **Academic and research** actors and organisations' is seen as being to improve knowledge and research in order to enable better understanding of environmental problems and to develop effective solutions, promoting knowledge sharing and transparency, embedding the 7th EAP and other policy areas into the curriculum, providing information on best practices, and acting as watch-dogs.

Civil society organisations' role is seen as promoting the 7th EAP via better communication with the general public, cooperation with other stakeholders, and the EU institutions, and translation of the EU

objectives into concrete measures and solutions on the ground. They should also continue to put pressure on Member States and the European Commission regarding progress towards the objectives. The 7th EAP will come to an end in three years. Stakeholders were asked if there is a need for a **successor programme**. There was a clear consensus (despite a small number of opposing views) amongst all the stakeholder groups that there is a future need for a strategic umbrella programme, and that an 8th EAP would be a good framework for policy-making in the field of environment and climate change at EU and MS level. However, the endorsement of a new programme by the wider stakeholder community will depend on its content and format. It has been suggested that the next EAP should have a simplified framework and should be better communicated at the national level. All stakeholder groups should be more involved with the drafting. It should also reflect the new political landscape and the progress of the new programme should be very closely monitored.

The 7th Environment Action Programme (7th EAP) is the long term overarching strategy of the EU and its Member States in the field of environment and climate change. It covers a seven-year time frame (between 2014 and 2020) and is the first to set a long-term vision for policy-making in the field, until 2050.

This European Implementation Assessment found that while the EAP scope remains relevant to current needs and adds value to EU and national policy-making efforts, its objectives are unlikely to be fully met by 2020, despite sporadic progress in some areas.

Another key finding in this document is that environmental and climate-related concerns are not sufficiently integrated into a number of EU policies.

These findings were made on the basis of publicly available sources of information (specifically aimed at informing the evaluation of the 7th EAP) and views shared in the course of the targeted stakeholder consultation in support of this document.

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