

HEAL's additional comments to the public consultation on the 7th Environment Action Programme



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FROM THE 7TH TO THE 8TH ENVIRONMENT ACTION PROGRAMME: PROVIDING FOR A DESIRABLE HORIZON FOR PEOPLE & PLANETARY HEALTH AND FOR THE TOOLS TO REACH IT

The Health and Environment Alliance (HEAL) welcomes the opportunity to comment on the European Commission's evaluation of the 7th Environment Action Programme (7thEAP) and is calling for the swift elaboration of an 8thEAP for beyond 2020.

THE 7THEAP IS A MILESTONE FOR HEALTH PROTECTION IN THE EU AND BEYOND

The World Health Organization (WHO) says 25% of all death and disease in the European region is due to environmental factors.

With the 7thEAP, the General Environment Action Programme sets for the first time a priority objective of protecting health from environmental threats, explicitly links to health and acknowledges the priority and urgency to act.

The 7thEAP is therefore an essential tool for EU policies to address the environmental health challenges. The goals and strategies defined are essential for initiating action,

improving the knowledge and evidence base and ultimately building planetary health.

Examples of action taken so far include improved bathing water quality and encouraging trends on emissions reduction of some of the main air pollutants in Europe.

But the list of health challenges is still huge, as clearly expressed in the EEA table at the bottom of this document. Immense political will, enthusiasm and action remain to be mobilised for implementing the EU's legal goals on improving air quality and preventing chemical pollution, as well as reducing noise impacts and harm from climate change.

HEAL contributed to the development of the 7thEAP, is currently contributing to its implementation and is calling for the swift elaboration of an 8thEAP for beyond 2020.

PROVIDING FOR A DESIRABLE HORIZON FOR PEOPLE AND THE PLANET

1. Those who build the future of Europe need a long-term vision: the 7thEAP is a vision

The 7thEAP provides a coherent and comprehensive long-term vision until 2050 on climate, health and environmental actions to policy makers at all levels. It enables the healthy assessment of the European Commission and its performance in steering the delivery of EU commitments in the fields of sustainability.

The 7thEAP is strengthened by EU budget allocation, namely through the LIFE financial programme that runs in parallel and that refers to the EAP. The 7thEAP runs until 2020, with

a number of activities still expected, such as a strategy for a non-toxic environment by 2018. In some areas, action has successfully taken place, such as the delivery of a circular economy strategy.

2. Policy-makers need guidance: how implementation can be improved from the 7th to the 8thEAP

As outlined in the Environmental indicator report 2017 (image 1, page 4), law implementation is a major recurrent challenge for the EU, and hampered by [lack of political will at all levels](#). This comes in addition to the challenges posed by the status of the ecosystems themselves and the subsequent consequences for human health and wellbeing.

Being de facto an iteration that is highly dependent on will

of individuals, successful implementation of the EU environmental laws needs an EAP to steer the challenging processes on a daily basis and beyond contingencies relating to moving political contexts.

In order to improve implementation, the 8thEAP should include the following lessons learnt:

- The level of success of an action programme needs regular monitoring and assessment, in order to safeguard room for adjustments. Regular evaluation of the actions listed nor a dedicated steering committee for identifying obstacles to implementation and providing for remedy for possible delays was included in the 7thEAP.
- The European Commission did not include 7thEAP actions in the scope of the European Semester, despite the knowledge and experience the European Commission has in steering the achievement of economic goals at the EU level. The 8thEAP therefore should be clearly referenced in the European Semester after 2020, building on but drastically increasing the level of concrete action from the EU environmental implementation review.
- The level of success of an action programme also depends on the level of awareness of the very programme by policy-makers and the public. Therefore, the 8thEAP should include a communication plan for each target audience with dedicated awareness raising campaigns, which can evolve over the lifespan of the programme.

... AND FOR THE TOOLS TO REACH IT

The obvious tool that is needed for any implementation of a plan is a corresponding budget, as it is the case with the linkage of the 7thEAP with the EU LIFE programme. The future 8thEAP should be the guidance document of the overall EU budget 2021 – 2027 and should be clearly linked with MFF programmes.

1. Those who implement the law need a mirror to know whether they are on the right track

In the 8thEAP, it is necessary to set up a dedicated committee representing Member States, the European Commission, the European Parliament, civil society and other stakeholders that will focus on identifying what obstacles are on the way of implementing EU environmental law, in a pragmatic and objective way, in order to ensure the efficiency and efficacy of environmental health planned action of the EU.

The committee, that should meet on a regular basis and at least twice a year, should also be in charge of coming up with solutions to the obstacles identified. Those solutions should take the form of specific recommendations for each relevant target audiences, on the model of the European Semester. To that end, behavioral science and theories of change can be of precious help. As much as an evaluation of the obstacles is key for findings adequate solutions, the exchange of best practices should be encouraged and eased through adequate structures and fora.

2. Those who are in charge of implementing the 8thEAP should know there is an 8thEAP

The existence of a plan does not in itself provide for awareness about the existence of that plan. This is why the 8thEAP should be accompanied with a concrete communication plan for each action and for each target audience so that it is maintained high on the European agenda all along the programme. This would counterbalance the risks linked to turn over in the institutions and organizations that are targeted by the plan and would ultimately make it easier to use.

Summary

Table S.1 Indicator scoreboard by 7th EAP thematic priority objectives

Indicator	EU indicator past trend (*)	Outlook for meeting the selected objective by 2020								
Priority objective 1: 'To protect, conserve and enhance the Union's natural capital'										
(!) Exposure of terrestrial ecosystems to eutrophication due to air pollution (*)	▲	●								
Gross nutrient balance in agricultural land: nitrogen	▲	●								
(!) Land take (*)	▲	●								
(!) Forest: growing stock, increment and fellings	▲	●								
Status of marine fish stocks	▲	●								
Abundance and distribution of selected species (common birds (!) and grassland butterflies)	▲	●								
(!) Species of European interest	▲	●								
(!) Habitats of European interest	▲	●								
(!) Status of surface waters	N.A.	●								
Priority objective 2: 'To turn the Union into a resource-efficient, green, and competitive low-carbon economy'										
Resource productivity	▲	●								
Waste generation in Europe (excluding major mineral wastes) — absolute and per capita	▲	●								
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	▲	●								
Greenhouse gas emissions from transport	▲	●								
Animal product consumption (animal protein)	▲	●								
Share of environmental and labour taxes in total tax revenues	▲	●								
Employment and value added in the environmental goods and services sector	▲	●								
Environmental protection expenditure in Europe	▲	●								
Priority objective 3: 'To safeguard the Union's citizens from environment-related pressures and risks to health and well-being'										
Exceedance of air quality standards 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 , PM _{2.5} ▲ O ₃	●								
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}) (*)	▲ SO ₂ , NO _x , NMVOCs, PM _{2.5} ▲ NH ₃	● SO ₂ , NO _x , NMVOCs, PM _{2.5} ● NH ₃								
Bathing water quality	▲	●								
Number of countries that have adopted a climate change adaptation strategy and/or plan	N.A.	●								
Population exposure to environmental noise	▲	●								
Consumption of chemicals, by hazard class	▲	●								
Total sales of pesticides	▲	●								
<table border="1"> <thead> <tr> <th>EU indicator past trend</th> <th>Outlook for meeting the selected objective by 2020</th> </tr> </thead> <tbody> <tr> <td>▲ Improving trend</td> <td>● It is likely that the objective will be met by 2020</td> </tr> <tr> <td>▲ Stable or unclear trend</td> <td>● It is uncertain whether or not the objective will be met by 2020</td> </tr> <tr> <td>▲ Deteriorating trend</td> <td>● It is unlikely that the objective will be met by 2020</td> </tr> </tbody> </table>			EU indicator past trend	Outlook for 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
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Notes: (*) The examined past trend period is unique to each indicator and is specified in Annex 2.
 (*) The indicator past trend is also available at EEA member country aggregate level and not just at EU aggregate level. The colour assessment remains the same for the EU and the EEA member country (including the EU) indicator past trend.
 (!) The indicator has not been updated with more recent data in this year's report.
 N.A. Non applicable.

6 Environmental indicator report 2017

Source: Environmental indicator report 2017 - In support to the monitoring of the Seventh Environment Action Programme. European Environment Agency <https://www.eea.europa.eu/publications/environmental-indicator-report-2017>

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About the Health and Environment Alliance (HEAL):

The Health and Environment Alliance (HEAL) is the leading not-for-profit organisation addressing how the environment affects human health in the European Union (EU) and beyond. HEAL works to shape laws and policies that promote planetary and human health and protect those most affected by pollution, and raise awareness on the benefits of environmental action for health.

HEAL's over 70 member organisations include international, European, national and local groups of health professionals, not-for-profit health insurers, patients, citizens, women, youth, and environmental experts representing over 200 million people across the 53 countries of the WHO European Region.

As an alliance, HEAL brings independent and expert evidence from the health community to EU and global decision-making processes to inspire disease prevention and to promote a toxic-free, low-carbon, fair and healthy future.

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Promoting environmental policy that contributes to good health