



8th Environmental Action Programme

WWF RECOMMENDATIONS IN REACTION TO THE
COMMISSION PROPOSAL • DECEMBER 2020

In 2019, the European Commission came forward with its European Green Deal, acknowledging the need to address the most pressing environmental problems that the EU and world are faced with. The proposal by the Commission for an 8th Environment Action Programme¹ (8th EAP) aims to build on the European Green Deal. It tries to set out the direction for EU environmental and climate policy action until 2030. However, **as it stands the 8th EAP proposal lacks the overall ambition and forward-looking actions to tackle environmental degradation and achieve the EU's long-term aim of 'living well, within the means of our planet'.**

Worryingly, **the 8th EAP proposal by the European Commission tries to put forward the non established concept of 'regenerative growth'** as a new economic model for the EU. This concept seems to rely heavily on conventional models of economic growth and continues to be far removed from balancing social, environmental and economic sustainability. **Instead, the 8th EAP should help trigger a shift towards an EU 'sustainable wellbeing economy'**, combining prosperity with the possibility of social progress within planetary boundaries as defined by the 2030 Agenda for Sustainable Development.

With the 8th EAP, the opportunity must be seized to put forward a strategy all the way up to 2030 that supports the EU in meeting its domestic and international environmental commitments, whilst ensuring prosperity and wellbeing for all. For this, **it must go beyond simply repeating the existing commitments and actions under the European Green Deal** which are limited only to the mandate of the von der Leyen Commission (end 2024). **It should provide specific and measurable targets, put in place the necessary mechanisms to track progress and adjust actions when needed, and create the enabling conditions for successful implementation.**

WWF calls on the European Parliament and Member States to:

1. Ensure that the 8th EAP triggers a shift at EU level towards a sustainable wellbeing economy within planetary boundaries. The 8th EAP must call for the development of a dashboard of wellbeing indicators which integrates the 8th EAP as well as other social and economy monitoring frameworks for more coherent and streamlined EU level policy making and monitoring of progress.
2. Ensure that the 8th EAP and its thematic priority objectives are specific, measurable, aligned but not limited by the commitments of the European Green Deal, and provide a pathway for progressively stepping up EU environmental actions and measures where necessary.
3. Put in place the right and efficient enabling conditions in the 8th EAP in order for the EU to be able to achieve all the thematic priority objectives, by calling for the integration a 'think sustainability first approach across Better Regulation rules, stepping up efforts on implementation and enforcement, and setting clear deadlines and actions for eliminating environmentally harmful subsidies at EU and national level.

¹ [Proposal for a Decision of the European Parliament and of the Council on a General Union Environment Action Programme to 2030, COM\(2020\) 652 final, 2020/0300 \(COD\)](#)



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4. Carry out a mid-term review of the 8th EAP at the end of this Commission's mandate in 2024 and require the incoming European Commission in 2024 to publish within its first 100 days a roadmap and the actions as to how it will guarantee the achievement of the thematic priority objectives of 8th EAP by 2030.

Shifting to a sustainable Wellbeing Economy by redefining our idea of growth

The 8th EAP refers to the European Green Deal as the EU's growth strategy and puts forward a new, undefined concept: 'regenerative growth.' This framing is flawed for two reasons:

1. It implies that the EU continues to maintain conventional GDP growth as the headline measure of progress and the main indicator for political decision-making, to the detriment of social wellbeing and the respect of planetary boundaries.
2. It also risks implying that nature and our environment can easily be regenerated, whereas once extinct species do not return, once emitted emissions are not captured easily, once exploited resources are not easily replenished and once destroyed biodiversity does not recover quickly.

Instead, a true paradigm shift is needed. The EU should decisively move away from focusing solely on the pursuit of economic growth. This was acknowledged by the European Commission in its 2020 Strategic Foresight Report which remarked that the Covid-19 pandemic "*reignited the debate on what kind of economic growth is desirable, what actually matters for human wellbeing in a world of finite resources and on the need for new metrics to measure progress beyond GDP growth*"².

Already in the evaluation of the 7th EAP, the European Commission concluded that there should be more consideration of social issues by building on the links between environment and social policy.

The 8th EAP is an opportunity to embed the idea that the EU needs to shift to a sustainable wellbeing economy³. This starts from the idea that public interests should determine economics, and not the other way around. A sustainable wellbeing economy monitors and values what truly matters: our health, nature, education, and communities. In its role as a guiding framework for European environmental policy making until 2030, the 8th EAP can be a determining strategy to embed this approach.

Currently, there are several monitoring tools and frameworks to track economic, social and environmental performance within the EU, such as the EAP itself, the 2030 Agenda for Sustainable Development, the European Pillar of Social Rights or the European Semester. Unfortunately, these **existing monitoring frameworks are not succeeding in providing a clear and coherent overview of the EU's progress. Besides the European Semester which continues to be led by conventional economic growth indicators, very few of them actually have any weight in EU and national policy-making processes.** Very few of these tools allow the public to easily track progress and hold their governments accountable.

Several countries have started to use a wellbeing economy approach, including New Zealand, Iceland, Scotland and Wales. Scotland has adopted a National Performance Framework (NPF) as its

² [2020 Strategic Foresight Report – Charting the course towards a more resilient Europe](#), p13

³ [Towards an EU Wellbeing Economy - A fairer, more sustainable Europe post Covid-19](#)



way of achieving the SDGs and a Wellbeing Economy. The NPF is built around national outcomes aligned to the SDGs and an indicators framework to measure progress against the national outcomes. The NPF is built around the recognition that success is about more than just GDP, and is used by the Scottish government to guide policies and spending.

A framework already being used by decision-makers at the local level, including the cities of Amsterdam and Brussels, is Doughnut economics, developed by Economist Kate Raworth. Doughnut economics is a visual framework for achieving sustainable development shaped like a doughnut, consisting of an environmental ceiling of nine planetary boundaries, beyond which lie unacceptable environmental degradation and potential tipping points in Earth systems, and a social foundation made up of twelve dimensions derived from the Sustainable Development Goals. The doughnut shows that sustainable development happens in the balance between using resources to meet our human needs, and protecting the planet's life-support systems. The overall target for humanity should be to remain within the boundaries of the doughnut.

The 8th EAP could take inspiration from these initiatives and call on the European Commission to **ensure a single coherent and overarching EU progress framework is in place. To this end, the Commission should produce a report by 2022 in which it identifies the interlinkages between the various social, economic and environmental progress and monitoring frameworks that are in use at the EU level**, as well as any alternative models. This report must trigger an informed EU level debate around which headline indicators to use to guide EU policy making, and communicate progress towards citizens.

Setting specific and measurable thematic priority objectives

The 8th EAP proposal by the Commission remains broadly true to the long-term vision for 2050 set in the 7th EAP, in which citizens live well within the planetary boundaries. The vision highlights that there will be nothing wasted, no net emissions of greenhouse gases produced and economic growth is decoupled from resource use and environmental degradation. A healthy environment will underpins the well-being of citizens, biodiversity thrives and natural capital is protected, restored and valued in ways that enhance resilience to climate change and other environmental risks. This 2050 vision closely matches with the principles of a sustainable wellbeing economy.

Yet the Commission's proposal does not provide for a concrete pathway as to how the 2050 vision will be achieved, and what the concrete contributions of the 8th EAP will be towards that vision. **The current thematic priority objectives are based on the right themes, but are not specific and measurable enough to allow the 8th EAP to support the 2050 vision.**

The thematic priority objectives of the 8th EAP should be improved to allow for it to set a direction for EU policy making, as well as greater accountability during the monitoring and evaluation. **The 8th EAP its thematic priority objectives should build on - but not be limited to - the already agreed 2030 commitments of the European Green Deal.**

To ensure coherence, specific targets from for example the Farm to Fork and Biodiversity Strategy should be embedded within the thematic priority objectives. These include, inter alia⁴:

- Establishing legal protection for at least 30% of the land and 30% of the sea in the EU;

⁴ The thematic priorities listed here are not intended to be exhaustive, but reflect the areas of environmental policy WWF European Policy Office currently has expertise on.



- Establishing strict protection for at least 10% of the land and 10% of the sea in the EU, including all remaining EU primary and old-growth forests;
- Restoring at least 25,000 km of free-flowing rivers through barrier removal and floodplain and wetland restoration;
- Reducing the overall use and risk of chemical pesticides by 50% and the use of more hazardous pesticides by 50% by 2030;
- Reducing nutrient losses by at least 50%, while ensuring no deterioration on soil fertility, and reducing the use of fertilisers by at least 20% by 2030;
- Reaching the objective of 25 % of the EU's agricultural land under organic farming by 2030.

In addition, recognition should be given to areas where existing legal targets already exist, and are at risk of not being achieved or haven't been met so far. In these areas in particular, the 8th EAP must call for actions by the EU and Member States to be stepped up. These include, inter alia:

- Achieving good status for all Union waters, including freshwater (rivers and lakes, groundwater), transitional waters (estuaries/deltas) and coastal waters within one nautical mile of the coast by 2027 at the latest, as set out in the Water Framework Directive;
- Ensuring that EU seas are in good environment status, as set out in the Marine Strategy Framework Directive;
- Limiting fisheries to sustainable levels by maintaining a Maximum Sustainable Yield exploitation rate for all fish stocks, as set out in the Common Fisheries Policy.

The thematic priority objectives should also cover areas where EU measures are currently under consideration or should still be established in order to achieve the 2050 vision. The 8th EAP should for example set out the commitment to **eliminate EU-driven global deforestation and ecosystem conversion through products placed on the EU market, by introducing an EU legal framework together with complementary measures to address underlying drivers**⁵.

Creating the conditions and governance to achieve the 8th EAP

Currently, the 8th EAP proposal does not sufficiently develop the enabling conditions and governance that will ensure the 8th EAP's thematic priority objectives are met. **The 8th EAP should ensure that the commitment made in the European Green Deal for all EU initiatives live up to a green oath to 'do no harm' is integrated into the EU's way of working.** Policy integration and coherence is key to the success of the Green Deal. Ensuring a better contribution from the Better Regulation agenda to achieving the Green Deal can be done by implementing a 'Think Sustainability First' approach, covering the whole policy life cycle from proposal to evaluation that would ensure sustainability and wellbeing are the central compass of all EU legislation.

In particular, the three following aspects of the 8th EAP should be strengthened:

- **Impact assessments carried out by the European Commission need to be better balanced, with systemic evaluation of environmental impacts of all policies.** The 8th

⁵ The European Commission is currently considering the development of an EU legal framework to halt and reverse EU-driven global deforestation. The European Parliament adopted a [legislative own-initiative report](#) on the subject in October 2020, calling on the Commission to come forward with a legislative proposal which shall ensure that the Union market and consumption patterns do not detrimentally affect natural resources, such as natural forests, biodiversity and natural ecosystems.



EAP should build on its call for the best evidence to be the basis for policy-making by pressing for the development in the Better Regulation toolbox of more tools to assess environmental impacts. Currently only one tool exists to assess environmental impacts, compared to nine tools for economic concerns. Moreover, the tool for environmental impacts focuses only on climate change, therefore leaving biodiversity and resource use unaddressed in the EU's impact assessments process.

- **Tools to ensure better implementation of the EU's body of environmental laws need to be developed.** The environmental protection afforded by EU law is only as strong as its implementation on the ground. Given the current numbers of infringements and other indications for non-compliance with environmental laws (as seen in the current Annual Implementation Report published by the European Commission), it is due time to put stronger focus on this issue. The 8th EAP should call for the Commission to reinforce its actions on implementation with a proper agenda and improved staffing. This agenda should:
 - Ensure additional financial and staff resources are allocated within the European Commission to translate into practice the commitment made in the 2030 Biodiversity Strategy to prioritise implementation and enforcement.
 - Allocate these resources as a priority to ensuring that infringement proceedings are systematically followed up on to ensure that the harmful activity is fully stopped.
 - Put in place a public database monitoring the steps taken by Member States to implement environmental infringement and preliminary reference judgments. This database should include all follow-up inquiries by the Commission and resulting activities⁶.
- The 8th EAP should **reinforce the commitment from the 7th Environment Action Programme that aimed at phasing out environmentally harmful subsidies.** In order for the EU to be on track toward climate neutrality by 2050 at the latest, the EU and all Member States should, as early as possible and by 2025 at the latest, have phased out all direct and indirect fossil subsidies. The EU should also commit to harmful subsidies reporting across all Member States to help identify where the harmful subsidies are still in place at the EU and at the national level. To that end, the European Commission should initiate a first report by 2022 capturing the current situation and identifying pathways for a full and swift phase out.

Establishing political accountability and stepping up actions

The 8th EAP should help the EU to regularly assess progress made towards achieving environmental goals, and build an evidence base to improve the implementation of current policies and set increased ambition and new policies, legally binding targets and environmental standards where necessary. To fully use its potential, it is important to monitor the implementation of the 8th EAP and evaluate its approach regularly, before its end in 2029. Unfortunately, with the current Commission proposal, chances are high for the 8th EAP to gather dust on a shelf once adopted.

⁶ Further recommendations on responses to infringements can be found in the EEB and Birdlife Europe report '[Implementation of rulings for nature conservation: Court of Justice of the European Union case studies](#)'



Considering the impact of the changes in EU political leadership, as witnessed by the introduction of the European Green Deal, the European elections and the appointment of a new European Commission should in future be used as a moment of reflection for the EU to highlight what fresh actions and measures should be taken towards the achievement of the EAP.

Therefore, by the end of current European Commission's mandate in 2024, the von der Leyen Commission should, on the basis of scientific data provided by the EEA, carry out a mid-term evaluation of the 8th EAP and assess the performance of the EU against the thematic priority objectives set in the 8th EAP. This should be accompanied by a broadly communicated public consultation and communication campaign highlighting the progress made.

In response, the incoming Commission should be obliged to produce a report within the first 100 days of its mandate to set out its environment and climate priority actions for the next five years and roadmap as to how it will achieve the 8th EAP ambitions by 2030.

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