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COVER NOTE

from: Secretary-General of the European Commission,
signed by Mr Jordi AYET PUIGARNAU, Director

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to: Mr Uwe CORSEPIUS, Secretary-General of the Council of the European
Union

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Subject: Commission staff working document
Impact Assessment *accompanying the document* Proposal for a Decision of the
European Parliament and of the Council on a General Union Environment
Action Programme to 2020
"Living well, within the limits of our planet"
- Details of the responses to the public consultation

Delegations will find attached Commission document SWD(2012) 398 final.

Encl.: SWD(2012) 398 final Annex 1

DETAILS OF THE RESPONSES TO THE PUBLIC CONSULTATION

The Commission has recently consulted stakeholders on several thematic issues such as biodiversity, water, resource efficiency or sustainable consumption and production. This *ad hoc* public consultation with a background document and an online questionnaire was broader and more strategic in nature. It aimed at collecting the views of all stakeholders, at EU and national level, and the public at large, on the environmental policy priorities up to 2020, the priority areas to be addressed and the most effective tools in addressing them.

The consultation was launched on 12 March and closed on 1 June 2012.

The final number of web respondents to the public consultation was 300: 136 (45%) responses came from individuals and 164 (55%) came from organisations. A further 39 written contributions were received by the same date from industry, NGOs, national authorities and other organisations/individuals.

Out of the total 164 responses on behalf of organisations, the majority came from companies/business associations (57), followed by NGOs (47), regional/local public authorities (21), national authorities (10), "others" (10), international organisations (7), academic organisations (3), law firms/consultancies (3), think-tanks (3), trade unions (2) and one response from a representative of religions (see Figure 1).

40% of the respondents answered on behalf of an EU-wide organisation, while the other organisations mainly originate from Germany (16), United Kingdom (10), Spain (9), France (8), Poland, Finland and Austria (7 each).

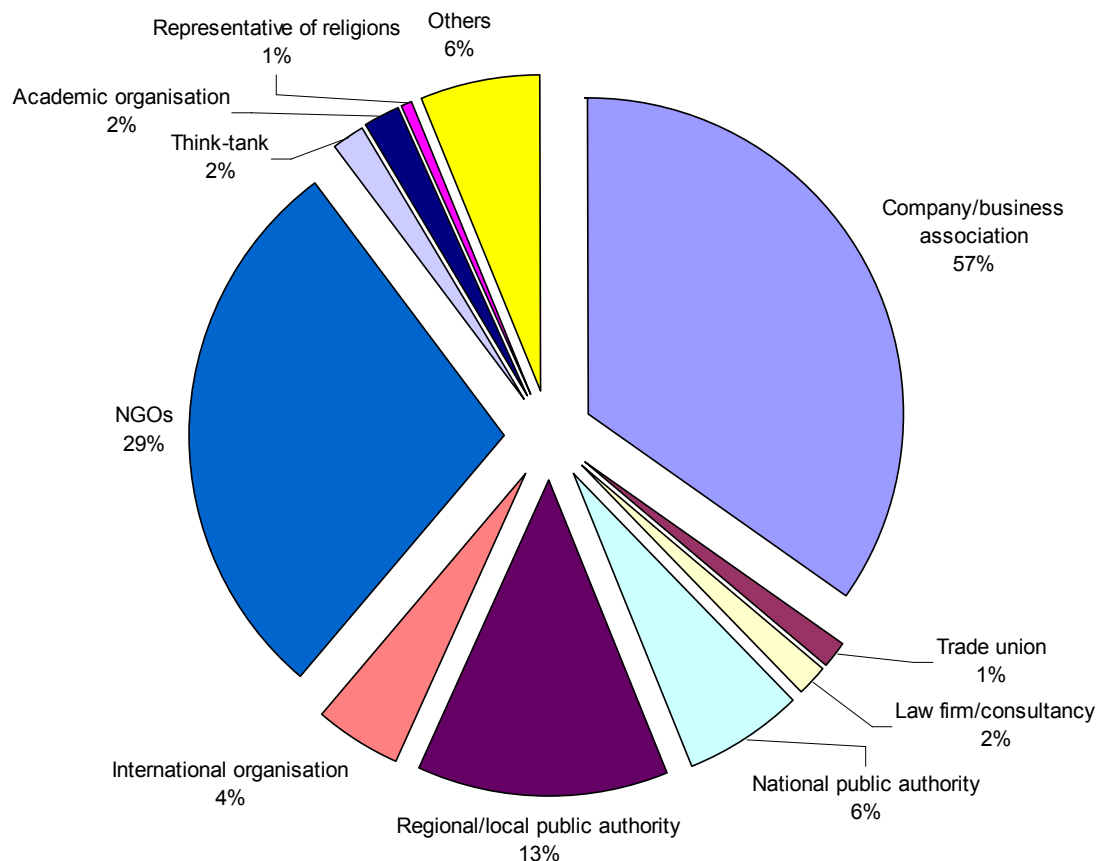


Figure 1: Breakdown of respondents according to their type of organisation

1. ADDED VALUE OF A NEW EAP AND MAJOR CHALLENGES

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

232 of the 300 respondents agree on the added value of a new EAP (63% of whom strongly agree) whereas only 1.3 % of the respondents think a new EAP would have no added value. A larger number of organisation compared to individuals 'strongly agree' on the added value of a 7th EAP (67% versus 58%).

The best added value to EU environment policy by the 7th EAP is seen in:

- 1) developing a strategic agenda for the environment,
- 2) ensuring full implementation of agreed policies and legislation, and
- 3) providing a coherent framework and furthering the integration of environmental considerations into other policies. 55% of the respondents very much agree on these options.

A more moderate agreement was expressed for the following:

- Ensuring a joint commitment from EU institutions and Member States to a common agenda;

- Stimulating public debate on environmental priorities and active participation of citizens, local authorities and businesses;
- Providing the long term certainty and a conducive framework for the private sector to invest in resource efficiency, low carbon technology and eco-innovation;
- Defining a detailed list of actions to be implemented by 2020;
- Establishing environmental priority objectives for inclusion in the monitoring process of the EU semester.

The results however show a divergence when looking at the choices of the different types of organisations: businesses rank as best added value the provision of a long-term certainty and a conducive framework for the private sector to invest in resource efficiency, low-carbon technology and eco-innovation; whereas governmental organisations (regional, national & international) and NGOs rank as best added value the provision of a coherent framework and a further integration of environmental considerations into other policies.

- ✓ ***The final assessment of the 6th EAP has shown that a long term vision for Europe's environment would help in guiding the definition of priority objectives to be achieved by 2020. Bearing in mind the long term visions already set out in the Resource Efficiency Roadmap¹, the 2050 Low-Carbon Roadmap² and the EU Biodiversity Strategy to 2020³, are there any elements you feel are missing?***

Free responses by organizations

Some 35% of them indicate that there is no significant missing element in terms of areas to be tackled, but there should be higher focus on implementation and more realistic and achievable milestones. Others, mainly NGOs, indicated the need to add policies for addressing chemical pollution and new risks.

Among the elements that appear more often are the inclusion in the 7th EAP of a health & environment priority to protect human health and wildlife from endocrine disruptors (EDCs), chemical mixtures, nanomaterials and SVHC, with the policy goal to have all "known and suspected" SVHC substituted by 2020. For 40% of organisations, diseases (environmental non-transmissible diseases) should also be analyzed. Some also point to

¹ By 2050 the EU's economy has grown in a way that respects resource constraints and planetary boundaries, thus contributing to global economic transformation. Our economy is competitive, inclusive and provides a high standard of living with much lower environmental impacts. All resources are sustainably managed, from raw materials to energy, water, air, land and soil. Climate change milestones have been reached, while biodiversity and the ecosystem services it underpins have been protected, valued and substantially restored.

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

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

the need to promote a bio-based economy and the use of renewable materials where possible for all products.

A significant number of organizations (35%) mention as an important element the increase of policy coherence and integration of environment into other policies, e.g. transport. Among the options indicated to address policy coherence: more consistency in the implementation of the various policy papers and the need to clearly link the 2050 vision to medium-term targets for 2020 and 2030; harmonization of all EU policy objectives and the inclusion of binding targets e.g. setting a target for resource efficiency (such as a 80% absolute reduction in resource use) and an early agreement on a firm 2030 climate target with the ETS as its central policy instrument; elimination of multiple and overlapping targets and assessment of the interactions between targets; integrated approaches for food production (e.g. sustainable spatial planning for land use); an integrated climate change adaptation strategy that also aims to reduce natural disasters; long-term vision for the urban environment.

Another common issue was the international aspects of policies: the EU should consider the impacts of its policies on third countries, but also impacts on EU competitiveness by importing products with lower environmental standards.

Some other elements often mentioned: the necessity to take on board new technologies and innovation, to support knowledge base and research and to promote citizens involvement, governance and transparency. The use of economic instruments is another recurrent element, by strengthening price signals, including a stronger CO2 cost integration. Support for the creation of inclusive business models that account for business needs, including a differentiated approach for SMEs, and better information to customers to help them make choices.

Free responses by individuals

Almost one third of the individuals consider that no element is missing from the three visions mentioned in the question. Among the elements that appear more often in the free responses was the need for enforcement strategies and tools that will push the Member States to respond to and respect agreed environmental targets, implement legislation and other binding agreements, and promote compliance. Some respondents indicate the need to apply sanctions, while others say that more effort is needed for making rules compulsory for business.

Respondents mention also the need to transform not only the European economy, but also the society; to reduce consumption by changing people's consumption attitudes; to reduce the environmental footprint of production and consumption by promoting recycling; to value the resources we use; to set targets to be achieved and to measure progress in achieving these targets with other indicators than GDP.

Another very common element in most of the responses was the need to enhance the role that the environment is playing for human health and the wellbeing of society. Some respondents asked for an environmental social agenda and even a roadmap, others asked for assuring the resilience of the environment, or highlight the need to address new challenges in the fields of chemicals and nanomaterials, pointing to the need for testing new technologies before applying them.

The management of natural resources scored also high in the elements that the vision should contain. Respondents felt that the vision set out in the biodiversity strategy should

be complemented by action to promote the sustainable management of scarce natural resources, while others made explicit references to the need for action on soil, on reducing urban sprawl, on a comprehensive climate change adaptation that looks beyond climate change objectives, and the need to preserve the European culture, landscape and traditional land use practices. Other issues mentioned, but to a lesser frequency, were noise, air quality and the quality of urban environment and buildings. Only few respondents mentioned also the link of this vision with the global level asking for the footprint of Europe and its imports to be sustainable.

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

The environmental challenges considered the most important (more than 50% of the respondents consider them very important) to be addressed at EU level are: biodiversity loss and degradation of ecosystem services; energy production and use; water pollution; climate change mitigation/greenhouse gas reductions; unsustainable consumption & production patterns; pollution from hazardous chemicals; outdoor air pollution; marine resource exploitation; environmental challenges linked to food and to energy production and use. Challenges that are comparatively given the least importance are indoor air pollution, major industrial accidents and noise (with respectively 31%, 30% and 23% of respondents considering them very important).

Businesses give less importance to the environmental challenges compared to other respondents, many of them (between 35 and 50%) considering them only important instead of very important. Overall, the environmental challenges given the most importance by businesses are unsustainable consumption patterns (65% consider it important and very important - more than production patterns), climate change mitigation and energy production & use. The same issues are topping NGOs' list but their answers are more concentrated. For instance 30% of businesses consider climate change mitigation very important and 40% important; when 72% of NGOs consider it very important. For NGOs, unsustainable production patterns are ranked more important than consumption patterns: they are considered very important by 77% of NGOs. Biodiversity loss & degradation of ecosystem services is ranked the most important by governmental organisations (74% of them consider it very important).

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

Concerning the priority approaches to address the identified challenges, there is a strong call for EU action to address the identified environmental challenges: in only three cases the option "no need for further action" is chosen by more than 5% of respondents. Those cases were: indoor air pollution, noise and major industrial accidents, where respectively 10%, 6% and 9% of respondents consider that no further action is needed.

Concerning the type of action needed:

- The use of **market based instruments (MBIs)** is identified as a priority for unsustainable consumption and production patterns, and considered more relevant for consumption than production. MBIs are considered a priority also when dealing with resource overconsumption, potential scarcity and price volatility, which is also linked to consumption and production issues.
- **Improving existing legislation** is considered as a priority mainly for dealing with pollution issues: pollution from hazardous chemicals, water pollution, outdoor

and indoor air pollution, marine pollution, but also insufficient water quality, generation or proliferation of waste, and noise. It is also considered the preferred instrument to address biodiversity loss and degradation of ecosystem services; deforestation; major industrial accidents; and, although in a minor way, environmental challenges linked to the urban environment.

- **Filling the gaps through new legislation** seems a priority for most of the respondents in the case of adaptation to climate change; competitive uses of land and soil degradation and pollution. It is also rated as a priority by most of the respondents for marine resource exploitation; environmental challenges linked to food, housing, mobility, energy production and use.
- **Strengthening the mainstreaming of environmental considerations** in other policies appears as a quite important measure, even though not considered a priority by the majority of respondents.

It is worth noting that responses show a division on the best tools to address climate change issues: 27% are in favour of improving existing legislation, 26% of filling policy gaps and 21% of using MBIs to address mitigation/GHG reduction; while to address adaptation to the impacts of climate change 28% are in favour of filling policy gaps, 22% of strengthening the mainstreaming of environmental considerations and 18% of improving legislation.

More than 50% of businesses express no opinion on several issues such as marine resource exploitation, marine pollution or food. Very polarized answers by NGOs were registered on land use, with 28% showing no opinion and the others split among strengthening mainstreaming, more use of MBIs and legislative measures. Governmental organisations' answers show more dispersion on the measures to implement when addressing key sectors (food, housing, mobility).

✓ ***In your view, which of the following policies hold the greatest potential for improving the quality of the environment?***

Concerning the potential of other policies to improve the quality of environment, more than 40% of respondents considered that those with the greatest potential are, in order: energy (53% of respondents consider it holds the greatest potential), transport (47%), agriculture (46%) and the cross-sectorial climate change policy (41%). Also economic and social policies are considered having a significant potential: research & innovation, economic & financial policy (e.g. taxation), education & culture, regional policy. EU development cooperation and enterprise & SMEs policies are considered comparatively with a more limited potential for environmental improvements, with less than 15% of respondents considering them holding the greatest potential.

More than 50% of businesses see in research & innovation the greatest potential for improving the quality of environment, while a majority of NGOs and governmental organisations see in economic & financial policy high potential against a 12% of businesses. Interestingly, 55% of NGOs consider that public procurement has a significant environmental potential, against 24% of governmental organisations (who would have to apply them) who consider it with high environmental potential.

Free responses by organizations

Only 20% of the organisations chose to suggest an additional policy. Within other policies that can play a role in improving the quality of the environment the most quoted

have been research & innovation, as well as science development and ITC. Other policies that also scored high were health, chemicals and waste & recycling policies. Some respondents identified the need for more policies that will try to change behaviours, in particular consumer behaviour. Some also indicated the need for economic tools (reinforcement of taxation, shift of taxation from labour to resources, water pricing/taxes, tax for pesticides and chemicals, reform of EHS), and for addressing property rights and patents. Others mentioned biodiversity & nature protection, resource & product policies and regional policy. Finally, some respondents mentioned the SDS and the need for a holistic approach, as most of the European policies are interrelated.

Free responses by individuals

Around 30% of the individuals choose the option "other" in this question, with a majority of them pointing to the need to develop social and behavioral policies aiming to change people's attitudes, consumption patterns and responses. Some pointed to the need to address security issues and resilience of ecosystems and society, as well as policies for raw materials and minerals. Others suggested policies that will make the transformation to a more sustainable economy happen, that will examine how financial systems can promote sustainability and will promote more use of MBIs. Some respondents mentioned the need to develop new policies to address nanomaterials and ecotoxicity, as well as GMOs, while others asked for integrated spatial policies to address tourism, urban development, and sustainable agriculture.

✓ *In your view, which of the following policies hold the greatest potential for contributing to meeting our climate objectives?*

Concerning the policies with the greatest potential to contribute to meeting the climate objectives, energy, transport and agriculture are the sectors in which measures would carry the greatest potential. More than 80% of governmental organisations see the greatest potential in energy and transport policies. Economic & financial policy, environment policy, research & innovation are also mentioned among those with a significant potential.

Free responses by organizations

Only 20% of the organisations chose to suggest an additional policy area to support the climate agenda. Most of the replies indicate the need to address areas not covered by the ETS and to strengthen the emission trading scheme. A majority of replies also identified that more can be done by an integrated building and construction/housing policy embedding energy efficiency and by more efforts on waste policy and packaging. The reform of the CAP, as well as promoting the footprint concept, are considered also to be able to help achieving climate targets. Finally economic tools like taxation and reform of EHS are mentioned. Other issues: the need for more awareness raising, for better knowledge base and for improving the resilience of both the environment and the society. Some respondents pointed to the need for strong leadership in international discussions and for strengthening relations with third countries.

Free responses by individuals

Only 10% of the individuals choose to suggest an additional option, highlighting the importance of leading the international climate agenda, by supporting actions to address deforestation, provide for co-operation projects and build awareness raising. Some point to the need to promote more the use of renewable sources of energy, while others address

security issues, the resilience of ecosystems and society and their role in adaptation to climate change, as well as the role of soil as carbon sink. Some suggest further efforts on the implementation of agreed policies while others on climate change measures in urban areas, by reducing energy use and being more efficient.

2. NEW INTEGRATED APPROACHES TO IMPROVE COMPETITIVENESS AND ENHANCE ECOLOGICAL AND SOCIETAL RESILIENCE

- ✓ ***In your view, what are the 3 most important initiatives that should be taken at EU level to reduce the environmental impacts of food production and consumption?***

Free responses by organizations

According to the majority of the responses from organizations, food policy should fully contribute to the EU objectives on climate change, air pollution and water protection. A lot of respondents stress the need to promote sustainable and resource efficient agriculture, adopt resource efficiency practices to reduce water use and reform the CAP to better contribute to climate change and environmental objectives. Issues related to land use and efficient spatial planning are also mentioned, as well as the link between food production and the state of Europe's ecosystems.

Food production issues of major concern were the use of pesticides and other harmful substances, the use of antibiotics and endocrine disruptors. Except these risks, the issue of food quality is mentioned by 30% of respondents who suggest that food should be produced locally using traditional practices and favoring organic cultivation. Some mention that urban agriculture could be promoted. Others mention that efforts should be made to take account of the ecological footprint of food produced in third countries and consumed in Europe. The need to address the conflict of land use for farming and for energy production is also mentioned, suggesting the use of guidelines and auditing.

Food waste is also an issue raised by a large part of the respondents, calling for an EU strategy with clear targets, with an increased role for the supply chains and with biowaste treated separately from waste. According to them food packaging should be tackled and the concept of LCA promoted. Education of consumers is needed to introduce good practices in consumption, identify healthy diets and promote less consumption of meat. Economic instruments and market approaches to reduce food waste (such as taxes on imports, higher prices of transport of non-local foods, increase of prices or tax on pesticides, tax on junk/unhealthy food, support for eco-labelling of sustainable food, EHS reduction) have been mentioned by many respondents together with other practical solutions.

Free responses by individuals

Responses to the question on food by individuals often mention the need to produce food locally (thus minimizing transport), using as less pesticides and artificial fertilizers as possible and using old traditional techniques that support sustainable agriculture and the landscape, and also supporting small producers instead of intensive agriculture. Organic farming is preferable to industrial agriculture and organic products should be made more affordable, and GMOs banned. Education of consumers on the dietary value of different foods and efforts to try to switch diets to less meat proteins is felt as an important action by 55% of the respondents. Sustainable use of soil is also quoted. Some of the

respondents (35%) mention that we need to take account of the ecological footprint of food produced in third countries and consumed in Europe, and some indicate that the concept of life cycle assessment needs to be applied also to food and that packaging needs to be reduced and recycled. Others mentioned also a variety of economic instruments and market approaches to reduce food waste, like more taxes on imports, higher prices of transport of non-local foods, increase of prices or a tax on pesticides, support for eco-labelling of sustainable food, etc. Some respondents also refer to actions in the food supply chain, pointing to the role of supermarkets and food-banks, as well as to stricter rules on labelling covering different indicators. Research and innovation are also mentioned by some respondents.

✓ ***In your view, what are the 3 most important initiatives that should be taken at EU level to reduce the environmental impacts of housing?***

Free responses by organizations

Respondents to this question are mostly governmental organizations and NGOs, as most business have not commented. The great majority feels that actions in this field should be focused on energy efficiency (70%) and on less consumption of materials and land for housing (50%), while at the same time promoting the use of environmentally friendly materials like wood (30%) and water efficiency (30%). Respondents indicate that buildings' renovation plays an important role and that targeted actions to improve buildings' performance in energy and water should be subsidized. Governmental organizations point to the need for better spatial planning and for targeted interventions supported by Structural funds, stressing the need for efficient recycling in towns and more efficiency in the provision of community services (mobility, waste collection, green spaces, etc). NGOs support in addition to the above a wider range of ideas from LCA approaches to new environmental and energy taxes. Some also ask for increasing efforts on awareness-raising on energy efficiency in third countries and mention deforestation issues linked to an overuse of forest resources for energy. All the few business that responded mention energy efficiency, new business models, and the role of novel materials and products aiming to reduce energy consumption.

Free responses by individuals

Individuals feel that actions to address the impacts of housing should be focused on energy and water efficiencies (70%), as well as less consumption of materials and land for housing (50%), while promoting the use of environmental friendly materials like wood (30%). Action in the field of energy should support insulation, solar panels, biomass, etc. Some consider that imports from countries with not so high environmental standards should be kept to a minimum or even banned, while others suggest limiting the ownership of a house to only one per family. A significant proportion of respondents (35%) call for improvements in the current houses and buildings, advocating for support for renovation and retrofitting of buildings, even setting binding targets for it. Some ask for more regulation and a clear reporting from home owners about the sustainability of their houses.

✓ ***In your view, what are the 3 most important initiatives that should be taken at EU level to reduce the environmental impacts of mobility?***

Free responses by organizations

Mostly NGOs and governmental organizations replied to this question. The majority suggest supporting a wider use of public transport by enhancing the network and services, promoting the use of bicycles and tele-working, subsidizing more efficient vehicles and using ITC in managing transport networks. Governmental organizations mention the promotion of environmentally friendly transport modes (electrification or renewable energy use in transport), while recognizing the need to promote the reduction of the average distance in daily commuting and to take action towards public information to stimulate behavioral changes. They indicate the need for integrated transport networks, for investment in clean energy and use of economic instruments like taxes or positive tax incentives. Respondents from academia and research mention developing zero emission transport modes; businesses ask for establishing an EU level playing field, for the use of new materials in transport and efforts to develop new engines to reduce emissions from vehicles, for the deregulation of the railway system and for free "cabotage" in order to improve efficiencies.

Free responses by individuals

To reduce the environmental impacts of mobility, the majority of individuals suggest the wider use of public transport and the interdiction for big private cars to enter large cities at certain hours. Half of the respondents mention different MBI that can be used, like taxes in fuels, subsidies for buying electric cars (reduced taxation, reduced electricity price), etc. Some call for better urban planning that will enable to reduce distances between living and working.

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

To address sustainable land use at EU level more than 40% of the respondents consider deforestation, conversion of agricultural land to urban land and conversion of land for energy crop cultivation as very important. The most important area for NGOs is the conversion for energy crop cultivation, with 70% of them considering it very important. 34% of governmental organisations give strong importance also to land fragmentation and more than 40% of individuals to desertification. Between 35 and 60% of businesses show no opinion on the different areas.

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

The reinforcement of existing legislation to improve the application of the "polluter pays" principle (55%) and the setting of binding targets (47%) are considered the most important measures to reduce soil degradation.

When looking into the breakdown of answers, more than 40% of businesses give some importance to the provision of platforms to exchange best practices and to the increase of public awareness on the role played by soil as a resource in the environment & the economy, while 40% consider not important at all setting of binding targets, and 30% show no opinion on the matter. Promoting public awareness is the most important

measure for governmental organisations, 66% of them considering it very important, while 47% of NGOs consider it only somewhat important. A majority of individuals see establishing a soil monitoring scheme to measure progress towards less soil degradation as a very important measure.

✓ ***In your view, how well does EU policy currently address the following environment & health related challenges?***

On many environment & health related challenges, the answers show that a significant number of respondents either express no opinion or find that EU policy is currently addressing them not well at all. More than 30% think that nanomaterials and the combined effects of chemicals as well as other challenges are not well addressed at all. At the same time, more than 30% show no opinion on endocrine disruptors, nanomaterials and nuclear radiation. EU current policy is addressing well or somewhat well outdoor air pollution, water pollution and climate change for around 30% of respondents. Concerning the specific type of organizations, around 60% of NGOs think the EU is addressing climate change somewhat well and that nanomaterials and the combined effects of chemicals are not well addressed at all.

Free responses by organizations

Only a limited number of respondents (20%) provided some further ideas in addition to the challenges indicated in the questionnaire, the vast majority coming from NGOs and governmental organizations. Most answers stress the need to address unknown environmental risks to health, mainly from chemicals, nanomaterials, endocrine disruptors, persistent organic pollutants and biocides. They also see the need to improve air quality and better monitor air quality related health problems, like asthma and allergies, and to address the combined effects of different environmental stressors. Governmental organizations mention the need for bio-monitoring and improving the quality of air for citizens, as well as addressing electromagnetic radiation for communications, transport, electricity like WIFI spots, etc. Businesses hardly commented on this question, the few calling for level playing field on possible health effects of electromagnetic fields.

Free responses by individuals

Some 40% of individuals provided some further ideas in addition to the challenges indicated in the questionnaire. Some mention the links of health with soil loss, landscape quality, and increase in antibiotics use, while other mention that scarcity of essential resources may have impacts on human health. The emerging risks from electromagnetic fields was central to the answer of 40% of the replies, mentioning electromagnetic radiations like WIFI spots, cellular phones in public transport and increasing exposure of children to them. Others say that the combination of impacts from chemicals, noise and electromagnetic pollution should be addressed. Few mentioned that bio-monitoring should be used as a toll to measure impacts. Few pointed also to the risks related to the use of GMOs without studying them further, and the loss of biodiversity and its impact on the pharmaceutical industry.

✓ ***In determining whether cities are sustainable, attractive and clean places to live, what is important for you?***

In determining whether cities are sustainable, attractive and clean places to live, the following issues are considered very important to more than 50% of respondents: local

transport; green urban areas incorporating sustainable land use; quality of local ambient air; waste production and management; waste water treatment; energy performance. When looking at the responses from NGOs the percentage goes up to 72% for energy performance, 79% for the quality of ambient air, and 87% for local transport. Governmental organisations consider very important local transport (82%), green urban areas (79%), energy performance (76%) and waste water treatment (71%). For more than 60% of individuals, nature and biodiversity is also very important. Around 40% of businesses show no opinion on the matter, with the exception of energy performance that is considered very important by 37% of them.

3. MAKING CHANGE HAPPEN

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

Free responses by organizations

One third of the respondents either did not answer or indicated “no opinion/do not know”. Another third consider that both Regulations and Directives should be employed. Governmental organizations mention that Directives are preferable when the problem to be addressed requires regional differentiation and flexibility at local level, while Regulations can be more effective and quicker to implement. Businesses say that Regulations should be preferred, as they offer more harmonised standards, equal application and create a level playing field, but also agreed that certain issues are better tackled with Directives when there are different business practices in the EU. In both cases they stress the need not to hamper competitiveness and overburden industry with regulations. The remaining third (mostly NGOs and businesses) is in favour of Regulations because they come into force more quickly, they do not allow for divergences in implementation between Member States, they raise more easily awareness and make the rules clearer. Half of the respondents advocating for regulations mention the need for ambitious but also coherent legislation, calling for other areas linked to environment to be tackled and for new legislation to be developed addressing environment & economy. The need for coherence in policy making is mentioned (mainly by NGOs), the need to reinforce implementation through penalties and sanctions (NGOs and businesses), ideally at EU level instead of at national level. Some respondents, mostly businesses, consider that voluntary initiatives, or the development of and adherence to standards, should also be considered, as they can offer an alternative to legislative approaches and can deliver good results on the ground in implementing policy objectives.

Free responses by individuals

A third of the individuals has “no opinion/do not know”, while two thirds are mostly in favour of Regulations as the best legal instruments to achieve environmental objectives. The reasons mentioned for this are: comes into force more quickly, does not allow for divergences between Member States and makes rules clearer. Some mention the need to review adopted regulations, which should change if the policies are not working, through adaptive management practices.

- ✓ ***How would you rate the usefulness of increasing the information being actively disseminated on-line by Member States and the Commission on how EU environment legislation is being implemented?***

56% of respondents consider useful (or even very useful for 30%) increasing the information being disseminated on-line by Member States and the European Commission on how EU environment legislation is being implemented. 12% consider of little or no use this increase of information. These percentages are quite similar when looking at governmental organisations' answers, while on the opposite, 33% of businesses and 75% of NGOs consider this useful.

- ✓ ***What contribution do you think the following could make at EU level to strengthen the correct implementation of EU environment law by Member States and ensure a level playing field?***

70% of the respondents see as a very significant contribution to strengthening MSs' correct implementation of EU environment legislation: 1) complementing national inspections and surveillance with enhanced capacity at EU level to ensure consistency and effectiveness of implementation; 2) support for experts' networks to share best practice and develop projects of common interest; 3) implementation plans that target resources at solving environmental problems. Complementing national inspections and surveillance is considered significant by 90% of NGOs and almost 50% of them consider very significant also to develop or implement alternative dispute resolution mechanisms. Businesses globally give lower scores to the options described to the exception of a support for expert's networks, considered by 58% of them a significant contribution.

- ✓ ***Science provides the evidence-base underpinning the development and implementation of climate and environment policy. How would you rate the environmental data currently available to you?***

Some 35% of respondents consider sufficient or even excellent (5.7%) the environmental data currently available to them. Only 3% consider it insufficient. When looking at the breakdown by type of respondents, it shows that only 19% of governmental organisations find the available data sufficient against 23% of businesses and 25% of NGOs.

- ✓ ***How would you consider the potential of the following measures to strengthen the knowledge base for environment policy?***

To strengthen the knowledge base for environment policy, the following measures are considered with high potential (more than 40%): improve the science-policy interface and ensure that scientific environmental data are accessible and user-friendly; fill existing research gaps; improve knowledge on consumer's perceptions, values and their actual behaviour. 17% of the respondents consider, instead, that giving to citizens a greater role in monitoring environmental data carries low or no potential. A majority of governmental organisations (55%) find the highest potential in improving knowledge on consumer's perceptions, values and their actual behaviour.

Free responses by organizations

Only 30% of the organisations choose the "other" option, all groups pointing to the need for better environmental information and for improving its accessibility. Governmental organizations ask mainly for the improvement of knowledge base and for capacity building of expert networks; for knowledge dissemination as well as for linking

implementation with basic research. They also ask for efficient monitoring of policies and development of methods to address their efficiency, with the help of indicators; and for more use of bio-monitoring. Businesses ask more for monitoring and disclosure of information at Member State, regional/provincial and municipal level, while mentioning the need to improve statistics (for the waste sector in particular). They also mention CO₂ labelling and the development of resource flow/e-accounting, as well as strategic planning linking key waste and material streams. They ask for efforts to shorten the periods to transfer results from innovation and research to SMEs. Academics and researchers ask in particular to improve access and share of environmental data and to improve research cooperation with other existing, global or regional, science initiatives. NGOs highlight the need to apply the precautionary principle, to make progress with SEIS and INSPIRE and other information tools, and to explore further the use and application of Market Based Instruments (MBIs).

Free responses by individuals

25% of the individuals chose the "other" option, pointing to the need for better environmental information, to make it accessible to all citizens and scientists. They also emphasise the role of research in facilitating knowledge base for policy making and put a lot of emphasis on the communication aspects and on the need for awareness raising campaigns to empower citizens.

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

To encourage environmentally-friendly behaviour, the use of incentives to reward environmentally-friendly behaviours and to discourage environmentally-damaging ones is considered effective by more than 75% (very effective by more than 40%) of the respondents. Conversely, applying different approaches for each specific context via "behavioural experiments" is considered the least effective, since only 18% of respondents find it very effective and 20% express no opinion on this specific option.

To NGOs, the least effective measure is the provision of more detailed information to consumers through more detailed labels (15% find it very effective). 70% of governmental organisations find effective (26% very effective) to increase consumer's education and awareness through targeted actions and on-the-spot information.

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

To strengthen the external dimension of the EU, the action considered the most significant (seen as very significant by almost 50% of the respondents) is the enhancement of the integration of environment in the EU's external policies. More than 40% of the respondents also consider very significant strengthening international environmental governance, strengthening the EU leadership in Multilateral Environmental Agreements, EU leadership through setting unilateral targets and commitments, ensuring that EU is consistent in its interventions in international fora, promoting EU environmental standards abroad and building alliances with other countries in line with EU environmental objectives.

Almost 40% of businesses find not significant at all an EU leadership through setting unilateral targets when 83% of NGOs find it very significant.

Free responses by organizations

Global agreements are seen as the solution for dealing with global problems. There is the need to ensure coherence between environmental objectives, EU companies' practices abroad and the objectives set at EU level. There is also a need for EU leadership in incorporating anti-corruption and accountability commitments in climate financing. The external dimension of the EU environmental policy is considered essential. Development Aid and co-operation assistance to third countries should be linked to sustainability criteria and there is need to link trade and customs policies to the full reciprocity in legislation on imported products. NGOs ask in particular that the EU introduce and propagate an international energy and land quota scheme.

Free responses by individuals

10% of the respondents who chose to indicate an additional option wish to increase efforts on international trade policy (in particular for their impact on climate change) and labelling to avoid that products with chemicals banned in EU enter the EU market, and also efforts to promote globally more the European approach ("lead by example").

4. GENERAL FINAL COMMENTS

Free responses by organizations

Concerning the *final comments/suggestions*, these were mentioned:

From Businesses:

- Take into account best practices and initiatives from businesses.
- More integration of environment into other policies.
- No need for a 7th EAP, as Europe 2020 and the flagship initiatives fulfil this need.
- Support more targeted actions for resource efficiency (with focus on the food supply chain).
- Policy for indoor air quality, setting targets and a more ambitious NEC proposal.
- Support and implement ISO standards on packaging. Work with recyclers and manufacturers.
- More efforts in greening transport policy, address emissions of the transport sector.
- Focus on the prevention of exposures to hazardous chemicals through national and EU measures, particularly with regard to EDCs, and the review of the EU Environmental Noise Directive.
- Promote international agreements on climate change, since environmental considerations remain insufficiently tackled in the EU external relations.

From governmental organizations:

- Need to take on board the regional and social specificities in policy making.
- Consider the territorial dimension and the impacts of a future programme to promote better coordination of local stakeholders.

From NGOs:

- Promote the effectiveness of legislation, focus more on implementation.

- Green the EU Treaties, look for a coherent approach to sustainable development, integrate environmental performance assessments in the Annual Growth Survey and in the European Semester, use more evaluation and assessment of progress.
- Seek solutions to problems with management and new technologies.
- Promote a coherent approach to resource efficiency with clear targets, progress on setting indicators
- Introduce a 2050 energy efficiency target.
- Promote efficient land use, implement the EU Biodiversity target, support soil legislation, promote sustainable agriculture, organic farming and reform the CAP
- Address environment and health issues
- Improve sustainable production and consumption, work with consumers.
- Reduce Europe's global footprint, promote the collection of global ecological footprint data.
- Engage with society and stakeholders to promote awareness raising, education and governance.

Free responses by individuals

Concerning the *final comments/suggestions*, these were mentioned:

- There is no ownership in Member States of the Europe 2020 Strategy.
- In some areas, please do not reinvent the wheel: use the existing expertise/networks. Be pragmatic in the proposed actions. Do more integration for a better leverage of the programme.
- Implementing a vision change can be done best with the base of the society.
- Health should be recognized as a key output in developing environmental policies.
- Produce a scoreboard, and make it public, on the main gaps of each Member State in environmental policy. A barometer of national strengths and weaknesses in divers fields of environmental policy would probably not praise always the same member countries and criticize always the same others, but may encourage discussion and educate pressure groups.