

eseia contribution for the Committee of the Regions Opinion on the Environmental Implementation Review

eseia Vice-President T. Ponce de Leão
eseia Coordinator of the Working Group Bioresources M. Narodslawsky
eseia Economic Advisor Y. Krozer

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1. Introduction

eseia, the European Sustainable Energy Innovation Alliance, is an association of European cross-sector organisations leading the field of sustainable energy systems, from energy provision to energy consumption in research, teaching and innovation. Our members are dedicated to advancing implementation of renewables and sustainable technologies in Europe. eseia is proud to provide her opinion to the stakeholder consultation on the Environmental Implementation Review (EIR) organized by the European Committee of the Regions on March 23rd.

2. Scope of the EIR

eseia considers the scope of the EIR sufficient to gauge progress on current policy efforts focussing on environmental symptoms. The range of topics analysed in the EIR is appropriate for this problem oriented approach: waste management, nature and biodiversity, air quality and noise, and water quality and management are all crucial subjects for the sustainable development of the planet and the well-being of current and future generations. However, the EIR itself indicates that the reasons behind these problems are systemic, such as the EIR examples of the air-mobility, the water-nature-food and the nature–land use–urbanisation nexuses.

Some subjects that are not discussed in the report, such as land use and soil protection, industrial emission and climate change are also fundamental for reducing human ecological footprint, but eseia considers them out of the scope of the review. Specifically, eseia attributes the regulation and the control of land use and soil protection and industrial emissions to the national and European legislation bodies, and consider “climate change” as an overarching challenge to be addressed by several combined initiatives, with EIR being one of these. In our view, the European Union should maintain the subsidiarity principle in the environmental policy and monitor the countries progress in implementation in these fields, too.

For these reasons, eseia agrees with the scope of the current EIR but recommends broadening the scope of future EIRs to provide a clearer picture on progress of policies relating to environmental sustainable development in the European Union.

3. Strategies for methodological consistency and meaningful comparison

eseia indicates two complementary strategies to ensure consistency in the methodologies used by member states and to afford meaningful comparison across countries.

On the one side, the European Union needs to provide specific methodologies and measurement tools on environmental issues in particular as a basis for EU-wide policies. The European Union should reach agreements about the minimum environmental standards across the member states, monitor the countries implementation and introduce supra-national instruments for compliance with them. On the other side, a process of diversification considering the local needs of each Country-Region is necessary. The latter requires supra-national tools and technologies for sustainable innovations and in particular a continuous exchange between regional stakeholders about their assessment methodologies in order to ensure transparency of their approaches and foster learning, for instance within framework of Regional and Structure funds.

These two strategies follow the “*Think global, act local*” vision, where the EU adopts a leading and coordinating role on monitoring actions, but at the same time allow transparent diversified standards for each member states according to their economic development and environmental capacity.

4. Links between EIR and other actions of the EC

There is consensus among eseia members on the need to bridge, strengthen and expand interactions between EIR and other EC actions: a more holistic approach is necessary to enforce the implementation of environmental objectives, especially in the light of the *common root causes* identified in the EIR. The vertical involvement of all societal stakeholders (citizens, private sector and local, national and European government bodies) and the consideration of horizontal impact across every societal area are necessary to provide solutions to the systemic challenges of sustainable environmental development in the Union.

The effectiveness of this approach has been demonstrated in many cases from the past, such as the Mission of Innovation initiative, where success is achieved through involvement of all ministries and high transparency. It is a particular responsibility of the European Union to provide consistent and systemic framework policy action that allows stakeholders to drive economic and social development in a sustainable and holistic way within the ecological limitation of functioning eco-systems.

5. Involvement of regional authorities and stakeholders in national dialogues

eseia believes that local and regional authorities and stakeholders are at the forefront of actions ensuring sustainable ecological development in the Union. They must be granted a prominent role in the upcoming national dialogues. Furthermore, environmental sustainable development must be ensured by cyclically reviewed top-down systemic instruments and bottom-up initiatives and holistic approaches of complementary nature. EU directives shall provide a solid framework of systemic objectives and goals for sustainable environmental development that is conveyed to local actors via a top-down approach by responsible ministry and by creation of appropriate national legislation. This has to be accompanied by national regular, participatory consultation processes to adapt to the needs of the specific context of regional stakeholders.

The national dialogues must focus on the systemic drivers of environmental impacts as identified in the *common roots* part of the EIR. Within the framework of national dialogues, regional innovative capabilities must be strengthened. This enables to transfers regional tacit knowledge about environmental resources and environmental technologies into sustainable innovations. The European Union Smart Specialisation policy provides sound framework for fostering regional capabilities on sustainable innovations.

6. Implementation gaps, root causes and follow-up actions

eseia agrees with the main implementation gaps and root causes identified in the European Commission Communication. To address these challenges, eseia suggests issuing a systemic framework of environmental objectives and goals as a basis for a strategy promoting EU programmes along the logic of the horizontally integrated “nexus policy” as put forth in the EIR. This strategy will include dedicated support actions for targeted countries and actions equally applied to all countries in case of non-compliance. Specific part of this shall be the promotion of the “circular economy” concept at national, regional and local level through financial and legal tools.

7. Role of cor in the eir governance

eseia understands the critical advisory role of the CoR to the European institutions. In this context, eseia consider this role as an excellent opportunity for the CoR to facilitate coordination with member states and foster a “Think global, act local” vision.

The EIR also suggests particular roles that the CoR can perform to improve the implementation of environmental legislation. This includes the provision of a platform for exchange on assessment methods used at regional level to foster transparency and a systematic effort to create local and regional initiatives to meet the systemic environmental challenges visible across the Union. Finally, the CoR can provide monitoring and guidance for regions during their participatory process on the national level.

8. Summary

The recommendations that eseia, with its pool of more than 400 experts in renewable energies, can provide to the CoR for the formulation of an opinion on the EIR are:

- to maintain the current EIR scope and to include mandatory more decisive implementation actions at local and global scale;
- to follow a “Think global, act local” approach, with the EU and national, regional governments providing specific framework legislation but also performing a process of conversion considering the local needs of each Country-Region;
- generate regional tacit knowledge about environmental resources and technologies to accelerate sustainable innovations;
- to bridge, strengthen and expand interactions between EIR and other EC actions through vertical involvement of all societal stakeholders and horizontal impact analysis across every societal area;
- to foster involvement of local and regional authorities and stakeholders in the upcoming national dialogues by complementary, cyclically-reviewed top-down instruments and bottom-up initiatives; and
- to issue a more comprehensive strategy promoting EU programmes.

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10. Contact

Stefano N. Granata, Ph.D

Programme Manager

eseia Graz Office, Mandellstrasse 11/II, A-8010 Graz, Austria

Tel.: +43 316 873 5281

email: Stefano.granata@eseia.eu office: office@eseia.eu