

Response to the European Commission Stakeholder Consultation on the EU environment policy priorities for 2020: “Towards a 7th EU Environment Action Programme”

Introduction

This paper presents the coordinated Scottish response to the European Commission’s consultation on the EU Environment policy priorities for 2020: “Towards a 7th EU Environment Action Programme”. It reflects the discussions of the public bodies and organisations¹ that participated in the conference on Future EU Environment Policy held in Edinburgh on 9 May 2012. This note is an outcome of this multi agency and partner conference organised by the Scottish Environment Protection Agency (SEPA), Scottish Government and Scotland Europa. The organisations that participated are listed in **Annex 1**.

The purpose of this event was to create a forum for discussion amongst a cross-section of key partners, to explore future EU policy and legislation and the potential opportunities for Scotland; identifying contributions to be made to the development of a 7th EAP.

We regarded this as a significant environmental conference for Scotland, bringing key players together in sharing views on the emerging European framework. The effective working relationships of Scottish partners has resulted in the production of this co-ordinated Scottish response that we hope the Commission will find useful in its consideration of a new EAP.

The state of our environment is important to everyone who works, lives or visits Scotland, and other parts of the EU. The environment is one of Scotland’s greatest assets. Our natural resource endowment is central to wellbeing and wealth creation in Scotland – with a quarter of the EU’s offshore wind and tidal potential; with abundance of water; and with seas, soils and forests rich in biodiversity. Scotland’s landscape is rightly world-famous and central to our vibrant tourism industry and high quality of life. Environment policy is also a success story that has been deeply influential in Scotland and the UK. We estimate that close to 90% of the environmental regulation we implement is European in origin and, consequently, adopting a new EAP is potentially important to Scotland’s, and Europe’s, environmental future. It is through the better implementation and strengthening of environment policy we can put ourselves on course to achieving an ambitious 2050 vision for a green Europe and a green European economy.

We support the priorities promoted for a 7th EAP of:

- improving the implementation track record in order to deliver better environmental outcomes;
- further integrating climate and environment into other policies and instruments and strengthening policy coherence to deliver multiple benefits;
- aligning existing policy and practice to latest scientific knowledge;
- filling significant policy gaps in the field of environment where justified by the latest scientific information and in line with the precautionary approach.

These resonate with Scotland’s aspirations and priorities for sustainable economic growth, a low carbon economy, human health and wellbeing, and ecosystems health and well being; all supported by sound evidence based on good science. Strong scientific evidence is essential to inform good policy development. In many areas, particularly the impacts of climate change and land degradation, the evidence base is currently not sufficient and greater research investment is needed. Key challenges include threats to

¹ These organisations may still submit additional individual responses, be it through the consultation form or written pieces.

soils, biodiversity and contaminants in the environment. Achieving greater policy coherence and integration presents the biggest challenge but the greatest opportunity. For example, the integration of air quality into other policy areas is a big concern; there is a mismatch between policies concerning energy, agriculture, and transport. Road traffic is a principal source of air pollution in urban centres and, in Scotland, is also the second most significant source of greenhouse gases (GHG) emissions. Where integrated thinking does not take place there may be unintended consequences. For example building a by-pass road and diverting vehicles from a town centre might improve local air quality but the additional distance travelled will increase GHG emissions.

Our conference on 9 May provided a forum for discussing the suggested objectives in the 7th EAP consultation document. Emerging from the conference, plenary and workshops, was a single well defined picture of the perceived final goal: a healthy and economically prosperous society in a healthy environment; along with a collective agreement on what is paramount to consider and tackle, in order to achieve this common goal. It is under the following themes we present our views below, not in any order of priority:

- Human health and well-being;
- Sustainable cities;
- Sustainable land use;
- The sea;
- Low carbon economy;
- Better regulation;
- Ecosystem services;
- Improving the scientific evidence base for environment policy.

An important role for the 7th EAP is to provide coherence to the multitude of environmental legislation within and between different aspects of the environment including marine, freshwater and terrestrial systems. Also to bring out the importance of addressing environmental issues through other sectors such as energy, transport, farming and fisheries.

In addition, the collective response to some of the questions from the Commission's on-line consultation document can be found in **Annex 2**. Over 40% of the conference delegates responded to the questionnaire and their contributions and comments showed a strong agreement on what is expected by the 7th EAP and on which the major challenges are. *Note that not all delegates replied to all questions.*

Human health and wellbeing

The 6th EAP had a focus on environment and health through the Environment & Health Action Plan, as well as legislation in the areas of air, chemicals, pesticides and water. Progress has been made, however still more needs to be done in a 7th EAP.

The Commission consultation highlights two areas in relation to health and wellbeing. Moving towards a toxic-free environment, for example by addressing combination effects of chemicals, safety concerns related to endocrine disruptors, nanomaterials and chemicals in products, and promoting full recovery of chemical resources at end of life. And the more "traditional" environment and health considerations of clean air and ensuring water quality.

The drive for a toxic-free environment is admirable but it needs to be weighed against other bigger issues such as climate change as a threat to society and human health (including migration pressures), and policy in these areas need to be complimentary to encourage this.

Human health is also about more than the traditional absence of pollution, although we agree that solutions adopted to solve the problem of poor air quality, for example, would have multiple benefits for health and quality of life. However, this area also needs to be linked with “Smart Cities” work and other areas like green infrastructure to address places that can improve wellbeing by being designed to encourage physical activity and mental restoration; also see “Sustainable cities” below.

The biggest health challenges of the developed world are obesity, depression and an ageing population. Scotland’s [Good Places, Better Health](#) work package launched in 2008 as the [Scottish Government’s strategy on health and the environment](#), with a focus on children’s health issues of obesity, unintentional injury, asthma and wellbeing. We consider this an important document that we would draw to the Commission’s attention as good practice.

In Scotland, £10billion² is lost annually due to ill-health and worklessness. Worklessness tends to generate feelings of hopelessness and that in turn increases risk of death – mainly concentrated in our city areas of Glasgow/Greater Glasgow area and Dundee. We recognise that the elements of health, sustainability, equity and prosperity are essential for our valuable cities to flourish. A high quality environment which is protected and improved (which people can access) is critical to sustain a healthy population. The health benefits of ecosystem restoration or green infrastructure should not be underestimated. These messages need to be embedded within a 7th EAP. Policy coherence needs to be strengthened to address this.

Good Places, Better Health promotes the recognition supported by Scotland’s Chief Medical Officer, Dr Harry Burns, that the environment within which people live is a key determinant of whether or not they can live a healthy life. It also seeks to create environments which will encourage healthy lifestyles. This can be helped by increasing public involvement and understanding of the environment, leading to new societal values which actively support protection of the environment and also help to franchise government and authorities to make some of the increasingly difficult decisions, for example relating to green taxes or road pricing.

It is also recognised that environmental volunteerism and engagement can lead to improved local cohesion and networking, greater community self-confidence, reduced long-term stress and improved health outcomes, and also enhanced entrepreneurship and economic and social gains. This delivers multiple benefits, with an aspiration for greater public participation in delivering environmental policies central to this. We have expanded on this concept of “Citizen Science” in the section below on “Improving the scientific evidence base for environment policy”.

Health and well-being should be the overall driver for the 7th EAP as it is close to the public’s interest and frequently a higher priority than the environment. There is a need for a joined-up approach to achieve this, with wellbeing being the key focus. Real stakeholder empowerment and involvement is needed, as opposed to a top-down view of policy-making. Here governance is more important than regulation; wellbeing in particular is quite a young science which to date has not really been considered within policy so it is difficult to see how this translates to regulation. It is in this context that the funding avenue should be explored further as a policy-shaping instrument.

² Figure quoted by NHS Scotland

Sustainable cities

The Commission's [Smart Cities](#) initiative is supporting cities and regions in taking measures to improve energy efficiency and reduce greenhouse gases through integration of energy, transport and communication technology. We also see cities taking the lead on environmental quality and citizens' health. Scottish partners are working together to make Scotland's cities smart and will use the Scottish Government's [Agenda for Cities](#) as a focus for this activity.

When asked what is important in determining whether cities are sustainable, attractive and clean places to live, there is broad agreement that green urban areas incorporating sustainable land use is the most important criteria. Good quality green urban areas can have multiple benefits, not only do they have a clear influence on health and wellbeing as they encourage physical activity, but they can also help in raising awareness of environmental issues. For many, green urban areas are their only encounters with nature, thus an important link in building public awareness and a way to engage and empower people to have control over their local area. This would help with implementation of environmental legislation as poor public understanding makes implementation more difficult. We need a common purpose to build our narrative on with actions that target not just environmental, but also social and behavioural issues.

Scottish Natural Heritage has undertaken a lot of work on Green networks, promoting the concepts of green infrastructure, greenspace and greening the built environment. Further information is available from this [link](#). From here links are also available to a number of associated initiatives that we consider good practice: the ['Glasgow and Clyde Valley Green Network Partnership'](#) and the ['Central Scotland Green Network'](#).

Sustainable land use

We support the Commission's consultation theme that sustainable land use is a major environmental challenge. There are multiple pressures on land that need to be reconciled so as to maintain the assets for wealth creation and wellbeing in the long term. These challenges are addressed in Scotland's [Land Use Strategy](#) which has the objectives of:

- land based businesses working with nature to contribute more to Scotland's prosperity;
- responsible stewardship of Scotland's natural resources delivering more benefits to Scotland's people;
- urban and rural communities better connected to the land, with more people enjoying the land and positively influencing land use.

Alongside climate change, changes in land use and land management practices are the most important pressures affecting Scottish soils. The [Scottish Soil Framework](#) describes the relevant policies to combat those threats, and identifies the future focus for soil protection, key soil outcomes, and actions across a range of sectors.

Following this Framework, [The State of Scotland's Soil report](#) was produced in 2011, available on SEPA's website [here](#) with more information about soil. This provides evidence of the need for more soil protection in Scotland and also how this links with water quality and climate change mitigation/adaptation needs. The State of Scotland's Soil Report describes the drivers and pressures that affect the state of soil, how these pressures result in a number of threats to soil functions, and the consequences of soil degradation for the wider environment, the economy and society. Soil degradation therefore directly impacts on water quality and flood risk, as well as biodiversity and climate change mitigation and adaptation. This is a good example of the interconnection of issues where solving one problem can, again, deliver multiple benefits.

Climate change can have a range of impacts on soil processes, mainly as a result of changes in soil wetness, soil temperature and also rainfall patterns, which result in soil degradation, including loss of organic matter, erosion and compaction. Changes in land use (e.g. conversion of agricultural to urban land and of grassland to cropland) and land management practices can also result in a range of soil degradation processes, including loss of organic matter, erosion and contamination, as well as a direct loss of soil through sealing and development. The evaluation carried out suggests that the principal threats to soil functions are:

- loss of soil organic matter;
- changes in soil biodiversity;
- erosion and landslides.
- Soil sealing.

This reflects the importance of soil organic matter, and the associated role soil biodiversity plays, in storing carbon, as well as underpinning the majority of soil functions and wider ecosystem services. Addressing these issues through improved soil legislation at EC level will improve soil protection and soil quality across member states. Sustainable soil management should be recognised as part of the solution to a number of the key issues that the world faces.

Integration of environment into agricultural policy is also necessary, and we recognise the major implications for the CAP and CFP reform proposals, and of course the multi-annual financial framework for environment policy, whilst acknowledging the timing of these against a new 7th EAP.

The Sea

Scotland's seas and coasts provide rich natural harvests and varied ecosystem services including climate control, energy supply, coastal protection, nutrient recycling, health benefits and leisure opportunities, as well as supporting diverse biodiversity that adds value to local tourist economies. A pressing new focus is needed on the sustainable management of our seas to ensure that these multiple benefits can be maintained and enhanced, and this is being addressed by the Scottish Marine Nature Conservation Strategy. Management of the coastal zone will be increasingly challenged by the impacts of climate change.

A key role for the 7th EAP is to bring coherence to the range of Directives covering Europe's seas.

Low carbon economy

The 7th EAP will unfold during a key phase in international climate negotiations and can therefore contribute to enhancing the EU's international credibility through domestic environmental policy.

Scotland is at the forefront of global efforts to combat climate change, deploy renewable energy, and develop the low carbon economy of the future. The Climate Change (Scotland) Act 2009 introduces ambitious, world-leading legislation to reduce emissions by at least 80% by 2050, with an interim target to reduce GHG emissions by 42% by 2020, compared to 1990 levels. Due to the size of the traded sector in Scotland success in meeting our targets is strongly dependent on the EU increasing its ambition for emission reductions from 20% to 30% by 2020. Our ambitious targets are already driving new thinking, new solutions and new technologies, putting Scotland at the forefront of building a sustainable low carbon economy and preparing for a changing climate; Scotland's first [Low Carbon Economic Strategy](#) was published in November 2010 and is aligned with the Europe 2020 Strategy. Scottish Government, the Enterprise Agencies (Scottish Enterprise and Highlands & Islands Enterprise), SEPA and other key public

sector organisations have been working in partnership on this strategy to encourage new and existing businesses and industries to develop and innovate for a low carbon future, realising benefits to Scotland's long term sustainable economic growth. In Scotland, Environmental Regulation is not viewed as a barrier to achieving new low carbon and environmental opportunities and solutions, but as a framework that can:

- support the transition to a low carbon economy through the setting of standards, and emission limits;
- drive innovation/behaviour changes to encourage the uptake of new environmental and low carbon technology solutions and practices;
- help businesses manage risk through the avoidance of future costs relating to non-compliance or failure to achieve future environmental standards / emissions limits.

Our vision is for global climate justice – we must contribute to the global drive to reduce greenhouse gases in line with the scientific evidence, and help the world's poorest countries to achieve the economic growth they need to end poverty. We believe that a healthy environment is essential to support a sustainable future for all.

Scotland's leadership and aspiration is also shown by our renewable energy strategy; Scotland's actions were highlighted last year by the European grid co-ordinator Georg Adamowitsch as 'a fine example' of how to utilise different offshore technologies. We want to see 100% of our electricity consumption from renewables by 2020; and 30% of our overall energy demand (transport, heat, electricity) met by renewables in 2020.

Again though, a balance needs to be struck. [Research funded by SEPA](#) highlighted that many of the technologies required to meet Scotland's renewable energy targets contain materials which are on the [EU Critical list](#) and which may face supply risks in the short to medium term. For example wind turbines require rare-earth elements, solar panels require indium, gallium and tellurium, and electric vehicle batteries require lithium. Supply risks include: trade quotas, physical shortages, concentration of supply, political instability etc., all leading to significant price fluctuation. We recommend further evaluation of the impact of such risks on the achievement (and the cost) of renewable energy targets. Opportunities for businesses to develop substitutes, increase efficiency, and recover such materials should also be explored. In the longer term, end-of-life renewable technologies could provide valuable sources of critical materials – however design for dismantling and recovery needs to be built into the manufacture and commissioning of projects in the short term.

In Scotland we are clear in our ambition to lead the world in the development of the low carbon economy. We see Scotland as a test bed for the low carbon technologies, behaviours and policy framework that can deliver global benefit in the coming decades. We are committed to ensuring that low carbon economic growth delivers benefit for all of the people of Scotland, and to sharing our knowledge, and the prosperity it brings for the benefit of the whole world. To enable this we need credible long term certainty to develop the market with greater public private co-operation and champions in the business community.

There is the potential of a 7th EAP to act as a framework to support the transition to a low carbon economy through the setting of standards, and emission limits; and drive innovation/behaviour changes to encourage the uptake of new environmental and low carbon technology solutions and practices. It could also consider what is not working (carbon markets, financial innovation?).

A 7th EAP could also bring some clarity to the language being used when discussing a "low carbon", or "Green" economy; it is a wide topic that is open to interpretation

nationally and internationally, therefore we would find a single definition helpful aligned with Roadmap to a Resource Efficient Europe.

A recurring theme is also the need for more equality with sectoral policies such as transport and housing. Current infrastructure across the EU has largely been designed for a high-carbon economy and locks people into associated lifestyles and behaviours. Climate change policies should be coherent with future environmental policies and be visibly recognised in a new EAP as the most important challenge to address.

Wealth creation and wellbeing both rely on well maintained natural assets. These are the source of our resources for primary and secondary industries, biodiversity and ecosystem services, landscapes and sense of place. Measures of progress based solely on economic measures such as GDP can result in growth through 'sweating' or 'stripping' natural assets – eroding the base for future wealth creation and wellbeing. It is important that national accounts and wider measures of wellbeing include natural assets and the [Natural Capital Index](#) is a step towards this. We expand on this theme below in the section on *Ecosystem services*.

Better regulation

Scottish Government and SEPA have recently launched a joint consultation on legislative proposals to support the implementation of Better Environmental Regulation. This new consultation marks an important milestone for Scotland setting out proposals that should ensure more effective and efficient protection of the environment and reduce the regulatory burden on the regulated. Key propositions are:

- A single, proportionate and risk-based permissioning structure;
- A single consistent regulatory procedure;
- A flexible approach to permissioning;
- A flexible and proportionate approach to enforcement.

The consultation runs until 4 August 2012. A link to the consultation document is included [here](#).

The intention is to focus effort most effectively on higher risk activities and less compliant operators. This approach depends on sound science and analysis to identify the most significant potential harms. It also depends on working in partnership on problem-solving projects to tackle the most serious issues. The consultation contains a strong statement on the importance of environmental regulation in Scotland and SEPA's role as a regulator. Our efforts on this are also very much in line with the EU's drive to improve implementation and we would like to be seen as an exemplar in this work.

Ecosystem services

In parallel with the shift to Better Environmental Regulation, we are keen to see in the 7th EAP the development of ecosystem services as a major business driver for the future. The UK National Assessment for Scotland clearly shows a mixed picture with some indicators stable or improving and others declining. About 44% of Ecosystem Service Indicators are declining in Scotland, and only 14% are improving. Broadly, regulating services, for example soil quality, clean air, and climate regulation, are declining, whilst provisioning services such as food production are stable or increasing. We consider biodiversity loss and degradation of ecosystem services as one of the major challenges we face of great importance to address in the 7th EAP.

We need a set of indicators for ecosystem health so that we can monitor and measure change and respond to or manage it as appropriate. Ecosystems, by their nature, are extremely complex. It is unlikely that a single measure of 'ecosystem health' can be usefully derived – we need around 6-12 broad indicators that use existing time-series

data that are routinely collected and can be assessed at the catchment scale. These indicators should reflect the main ecosystem services such as soil quality, water quality, habitat quality, extent of semi-natural land, an index of connectivity, some measure of species diversity and, perhaps, a measure of penetration by invasive non-native species.

Developments on an Ecosystem Services approach in Scotland are included within the Scottish Biodiversity Strategy and Scottish Land Use Strategy, already mentioned and joint Agency initiatives, for example through [CAMERAS](#), Scotland's Coordinated Agenda for Marine, Environment and Rural Affairs Science. CAMERAS partners realise that a successful ecosystem services approach to environmental management requires top-down (e.g. policy led, strategic national and regulatory approaches) and bottom-up (local partnerships of land managers, business sectors and community representatives) methods. It is important that future European policy and legislation supports these by recognising the need to link national and international strategies/ambitions with local priorities.

In turn, this needs shared information on the state of the environment and ecosystem services, and we are working in Scotland to provide this through [Scotland's Environment Web](#) (SEWeb), as described below.

The 7th EAP will need to reflect the ecosystem approach that is central to the Aichi biodiversity targets and the EU Biodiversity Strategy for 2020.

Improving the scientific evidence base for environment policy

Science provides the evidence-base underpinning the development and implementation of climate and environment policy. Strong scientific evidence is essential to inform good policy development. A lot of the challenges we deal with are interlinked, but policies are not yet interlinked. The more significant social and environmental problems are consequences of complex open systems (e.g. population health, climate change, loss of biodiversity) that require systemic interventions. This raises significant challenges for the standard of evidence required to support action (e.g. if it is difficult or impossible to prove a direct cause-effect relationship especially over large areas and longer timescales). Clearer guidance on applying the precautionary principle could help to manage this challenge and to stimulate action. It also raises significant governance challenges to bring together the range of relevant evidence (e.g. scientific, social, economic, political, historical) and to apply that in policy that reaches across sector boundaries (including different aspects of the environment).

An increasingly critical issue is the link between information and access to it. There is a considerable amount of environmental data currently available, for example through SEWeb and ecosystem accounting, but an integration of all forms of relevant evidence needs to be used to understand opportunities and threats. There is also the potential for additional measures to strengthen the knowledge base for environment policy including giving citizens a greater role in monitoring environmental data ("Citizen Science"). It is this we would like to see reflected in the 7th EAP, together with the development of evidence strategies which are focussed on core questions.

There is increasing interest and concern amongst Scotland's public for all aspects of our environment, particularly as greater recognition is given to potential impacts on human health as indicated above in the section on "Human Health and wellbeing". More must be done however to influence a change in values and to inform the public of the importance of their environment and to increase their involvement in defending, assessing and improving it. If everyone in Scotland were able to participate in environmental monitoring and feed back their observations this would represent a huge resource of data which could help us all in our understanding of the environment as a whole. Through SEWeb

we are encouraging the public to provide data and observations on their local environment. This will not just help us improve the understanding of Scotland's environment as a whole and take action to improve it, but promote the need to take personal responsibility for the environment, changing public values. Many of the aspirations we are seeking, e.g. on resource efficiency won't get achieved without getting the public involved.

[SEWeb](#) is part of the Scottish Government's 'Natural Scotland' campaign, which raises awareness of the positive impact that small changes we make in our lives can have on Scotland's environment. A wide range of organisations are involved in monitoring Scotland's environment and SEWeb is therefore steered by a [partnership](#) chaired by the Scottish Government.

SEWeb was launched in November 2011 and brings together information on Scotland's environment in one place. The site provides information at a range of levels:

- straightforward descriptions of the condition of Scotland's environment, its value, the threats it faces, and what is being done about these;
- more detailed information for those with a technical interest;
- the ability to look at information and data on maps;
- search facilities that allow users to find data and reports on Scotland's environment.

SEPA applied successfully to the European Commission on behalf of the SEWeb partnership for funding to support this initiative from the EU Life+ Financial Instrument for the Environment. A project with a total value of 4.9 million Euros started in September 2011, providing funding to support the development of SEWeb until March 2015. The Life+ funding covers four key areas of work:

- a partnership programme bringing together the key data providers and data users;
- promoting the expansion of a European SEIS (Shared Environmental Information System) that makes available data on Europe's environment. Scotland will implement SEWeb as a regional SEIS, as an example of European best practice in reporting;
- measuring the effectiveness of policy development and the targeting of environmental measures by providing a better understanding of the wider impacts of environmental change, with a means of prioritising environmental problems based on environmental, economic and social information;
- engaging the public in the protection of the environment and thereby improving their understanding of the environmental issues at a Scottish and European level.

The site will develop over time and will do much more than just provide information. It will involve users in developing our understanding of the environment and improving the way we protect it.

We are also keen to explore new tools to share information, for example the use of mobile applications (apps) to assist in enforcement of environmental crime or identifying problems of diffuse pollution and would like to learn from European partners' experiences of this.

Conclusion

This consultation has given us the opportunity to look to the future and reflect on what the environmental policy priorities up to 2020 and beyond should be.

There is no doubt that a new EAP will add value to environment policy and will be most successful if it is scripted in such a way that aims to achieve as much integration across

priorities as possible. As stated earlier, strong scientific evidence is essential to inform good policy development.

There is a strong need for a coherent framework that has very clear priorities and objectives, bringing together under one banner agendas on climate and energy efficiency, resource efficiency, biodiversity, water (The Blueprint), air quality, waste, soil and new issues such as nanotechnology. This framework should build on existing policies where possible and take the opportunity to bring together and simplify environmental standards into a single compendium with common definitions and streamline monitoring and reporting requirements, e.g. Water Framework Directive, UWWTD, and Nitrates directive, including rationalising and harmonising reporting cycles.

In order to achieve this, national and international stakeholders need to work together, share information and learn from each other. Public education, awareness and empowerment are vital means to achieve the EAP objectives. Positive examples of environmental governance, when a unified approach has been adopted, are represented in Scotland by work on implementing the Water Framework Directive, Floods Directive, Scottish Biodiversity Strategy, and more recently on Land Use Strategy. These were very demanding processes but future programmes such as these will benefit from the additional engagement, knowledge and data provided by our SEWeb and Citizen Science initiatives.

“Future proofing” policies and joining them up is a major challenge. Fitness for purpose and coherence are essential. I hope you agree from this response that Scotland is leading on several fronts, in particular: evidence, reputation and proportionate regulatory interventions.



James Curran
Chief Executive
SEPA

On behalf of the participants of the EU Environment Policy conference held on 9 May 2012 in Edinburgh

1 June 2012

As a public body committed to openness and transparency, SEPA feels it is appropriate that this response be placed on the public record.

Annex 1

74 delegates from the following organisations attended the event on EU Environment Policy in Edinburgh on 9 May, thereby contributing to this consultation response:

Organisers:

- Scottish Environment Protection Agency
- Scottish Government
- Scotland Europa

Scotland Europa Members:

Scotland Europa is a membership-based organisation, registered in the EU Transparency Register with ID number 01312486176-25. SEPA is a Member, and the following also attended the event:

- James Hutton Institute
- Scottish Enterprise
- Scottish Natural Heritage
- Scottish Parliament (Scottish Parliament Information Centre)
- Scottish Wildlife Trust
- University of Aberdeen

Other attendees:

- European Parliament Information Office in Scotland
- Health Protection Scotland
- NHS Health Scotland
- RSPB Scotland
- Scottish Environment Link (forum for Scotland's voluntary environment organisations)
- SNIFFER (Scotland and Northern Ireland Forum for Environmental Research)
- UK Government Department for Environment, Food and Rural Affairs (Defra)
- One independent contractor

In addition, guest speakers participated from:

- Institute for European Environmental Policy (IEEP)
- Network of heads of European Environment Protection Agencies (EPA Network) (represented by Environment Agency for England & Wales)
- European Environment Agency (EEA)
- European Commission

Annex 2: The collated consultation questionnaire responses from delegates attending the conference in Edinburgh on 9 May

2. Added value of a new EAP and major challenges

2.1 The final assessment of the 6th EAP has pointed to strengths and weaknesses of such a programme. How could a new EAP best add value to EU environment policy?

Please score each the following statements from **1-6** (1 “I don’t agree at all” and 6 “I agree very much”; leave blank if no opinion)

Statement	Score (1-6)
By developing a strategic agenda for the environment, with clear priorities and objectives	6
By ensuring full implementation of agreed policies and legislation	5
By providing a coherent framework and furthering the integration of environmental considerations into other policies	6
By ensuring a joint commitment from EU institutions and Member States to a common agenda	5
By stimulating public debate on environmental priorities and active participation of citizens, local authorities and businesses	5
By providing the long term certainty and a conducive framework for the private sector to invest in resource efficiency, low carbon technology and eco-innovation	5
By defining a detailed list of actions to be implemented by 2020	4
By establishing environmental priority objectives for inclusion in the monitoring process of the EU semester	4
A new EAP has no added value	1

2.2 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 Roadmap, the 2050 Low-Carbon Roadmap and the EU Biodiversity Strategy to 2020, are there any elements you feel are missing? (max. 500 characters)

- The concept “*contribution to human wellbeing and economic prosperity*” must be the headline message; otherwise we will never achieve integration or success.
- The aspiration of policy integration.
- Link to economic policy and economic development and prosperity. Clear methodology to calculating costs and benefits, including the use of ecosystem accounting for environment protection, biodiversity.
- Reference to built/urban environment.

2.3 & 2.4 Environmental challenges and priority actions *(the answers are combined together)*

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

- a. *very important*
- b. *Important*
- c. *Somewhat important*
- d. *Not at all important*
- e. *No opinion*

And, which of the following **actions** best describes what needs to be done **as a priority** to address each of the challenges?

- a. *Fill policy gaps (e.g. through new policy/legislation)*
- b. *Improve implementation of existing policy and legislation*
- c. *More use of Market-based Instruments (cap and trade, taxation, subsidies, incentives)*
- d. *Strengthen mainstreaming of environmental considerations in other policies*
- e. *No need for further action*
- f. *No opinion*

Challenge	Score (a-e) (importance) Q2.3	Score (a-f) (action) Q2.4
Unsustainable consumption patterns	a	c
Unsustainable production patterns	a	c
Resource over-consumption, potential scarcity and price volatility	a	c
Pollution from hazardous chemicals	b	b
Insufficient water quantity	a	b
Water pollution	b	b
Outdoor air pollution	a	b
Indoor air pollution	c	a/b
Biodiversity loss and degradation of ecosystem services	a	d
Deforestation	b	b/d
Climate change mitigation/greenhouse gas reductions	a	a/c/d
Adaptation to the impacts of climate change	a	d
Marine pollution	b	b
Marine resource exploitation	a	a/b/c/d
Competing uses of land leading to environmental degradation	a	b
Soil degradation and pollution	a	a/b
Generation and proliferation of waste	a	b/c/d
Environmental challenges linked to food	a	d

Challenge	Score (a-e) (importance) Q2.3	Score (a-f) (action) Q2.4
Environmental challenges linked to housing	b	b/d
Environmental challenges linked to mobility	b	d
Environmental challenges linked to the urban environment	a	d
Environmental challenges linked to energy production and use	a	a/b/c/d
Noise	b	b
Major industrial accidents	c	b

2.5 & 2.7 (the answers have been combined into a single table)

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

And, which of the following policies hold the greatest potential for **contributing to meeting our climate objectives**?

Score 1-5 (1 least potential – 5 greatest potential) Leave blank if no opinion.

Policy	Score (1-5) (cont. to environment) (Q. 2.5)	Score (1-5) (cont. to climate objectives) (Q. 2.7)
Agriculture and rural development policy	4	4
Climate change policy	4	n/a
Competition policy (state aid)	3	3
Consumers and health policy	3	3
Development cooperation policy	3	3
Economic and financial policy (including taxation)	4	4
Education and culture policy	3	3
Employment policy	3	3
Energy policy	4	5
Enterprise and SMEs policy	3	4
Environmental policy	n/a	4
External relations policy	2	3
Maritime and fisheries policy	4	3
Products/services standards	3	4

Policy	Score (1-5) (cont. to environment) (Q. 2.5)	Score (1-5) (cont. to climate objectives) (Q. 2.7)
Public procurement policy	3	4
Regional policy	3	3
Research and innovation policy	3	4
Trade policy	3	4
Transport policy	4	5
Other (please specify) - <i>Biodiversity recovery</i>	5	4

3. New integrated approaches to improve competitiveness and enhance ecological and societal resilience

3.4 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**?

- a. *very important*
- b. *Important*
- c. *Somewhat important*
- d. *Not at all important*
- e. *No opinion*

Challenge	Score (a-e) (importance)
Desertification	b
Deforestation	b
Conversion of agricultural land to urban land	a
Conversion of grassland to cropland	a
Conversion of land for energy crop cultivation	b
Other land use changes	a
Land fragmentation	b

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

- a. *very important*
- b. *Important*
- c. *Somewhat important*
- d. *Not at all important*
- e. *No opinion*

Challenge	Score (a-e) (importance)
Reinforce existing legislation to improve the application of the 'polluter pays' principle to address soil degradation	a
Establish a soil monitoring scheme to measure and/or evaluate progress towards less soil degradation	a
Set binding targets to reduce soil degradation	a
Provide platforms for exchanging best practice	a
Promote greater public awareness of the role played by soil as a resource in the environment and the economy	a

3.6 Scientific evidence points to a certain number of environment-related impacts on human health. In your view, how well does EU policy currently address the following environment & health related challenges?

- a. *Very well*
- b. *Well*
- c. *Somewhat well*
- d. *Not at all well*
- e. *No opinion*

Challenges	Score
Endocrine disruptors	b
Nanomaterials	c
Combined effects of chemicals	c
Harmful chemicals in products	b
Outdoor air pollution	c
Indoor air pollution	c
Water pollution	a
Noise	b
Climate change	b
Nuclear radiation	b
3.7 Other: <i>Stress emanating from environmental pressures leading to low levels of life expectancy</i>	d

3.8 In determining whether cities are sustainable, attractive and clean places to live, what is important for you? The list reflects the 12 criteria identified for the European Green Capital Award

- a. *Very important*
- b. *Important*
- c. *Somewhat important*
- d. *Not at all important*
- e. *No opinion*

Criteria	Score
Local contribution to global climate change	b
Local transport	a
Green urban areas incorporating sustainable land use	a
Nature and biodiversity	a
Quality of local ambient air	a
Noise pollution	c
Waste production and management	c
Water consumption	c
Waste water treatment	c
Eco innovation and sustainable employment	c
Environmental management of the local authority	c
Energy performance	c

4. Making change happen

- 4.2 On a scale of 1-5 (1=least, 5=most), 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?

Score = 4 (if co-ordinated and in context)

- 4.3 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?

- a. *Very significant*
- b. *Significant*
- c. *Somewhat significant*
- d. *Not significant*
- e. *No opinion*

Measures	Score (a-e)
More extensive criteria on how Member States should undertake inspections and surveillance	c
Complementing national inspections and surveillance with enhanced capacity at EU level to ensure consistency and effectiveness of implementation	b
Criteria on complaint-handling systems in each Member State or similar alternative dispute resolution mechanisms	c
Legislation to ensure better access to national courts	c
Support for experts' networks, e.g. inspectors, prosecutors and judges to share best practice and develop projects of common interest	b

Measures	Score (a-e)
Implementation plans that target resources at solving environmental problems	a

- 4.4 On a scale of 1-5 (1= insufficient, 5=excellent), how would you rate the environmental data **currently available** to you?

It depends on the aspect of the environment in question. In general the more difficult it is to survey (e.g. soils, freshwater, marine) the less good the data overall (although it can be very good for specific survey areas or species etc). There is a question is 'how much or how good is good enough?' (paralysis by analysis etc). See comment on pp7-8 on the nature of environmental problems and the evidence required to support action.

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

- a. Very high potential
- b. High potential
- c. Some potential
- d. Low potential
- e. No opinion

Measures	Score
Give to citizens a greater role in monitoring environmental data (e.g. through new media tools such as 'eye on earth')	a
Improve data collection on and analysis of compliance and enforcement within each Member State	c
Improve the science-policy interface and ensure that scientific environmental data are accessible and user-friendly	a
Fill existing research gaps (e.g. ecological thresholds, environmental tipping points, impacts of new technologies, etc.)	b
Improve knowledge on consumers' perceptions, values and their actual behaviour	c
Improve EUs international research cooperation on global environmental issues (i.e. biodiversity, climate change)	c
<i>Other: The relationship between evidence and policy is complex. Even if we had perfect knowledge we'd probably still have imperfect policy – especially if we fail to put environmental problems in their wider social, political, economic and historical context.</i>	

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

- a. Very Effective
- b. Effective
- c. Somewhat effective
- d. Not effective at all
- e. No opinion

Initiatives	Score
Provide more detailed information to consumers through more detailed labels	c

Increase consumers' education and awareness through general awareness-raising campaigns	d
Increase consumers' education and awareness through targeted actions and on-the-spot information	c
Provide examples of positive/successful behaviours to consumers	c
Reward environmentally-friendly behaviours	c
Discourage environmentally-damaging behaviours	a
Apply different approaches for each specific context via "behavioural experiments"	a

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

- a. Very significant
- b. Significant
- c. Somewhat significant
- d. Not significant
- e. No opinion

Actions	Score (a-e)
Strengthening International Environmental Governance	b
Strengthening the EU leadership in Multilateral Environmental Agreements	b
Leading by example - EU leadership through setting unilateral targets and commitments	b
Ensuring that the EU consistently speaks with one voice in international fora	a
Enhancing the integration of environment in the EU's external policies	a
Promoting EU environmental standards abroad	b
Engaging bilaterally with key partners to address global environmental challenges	a
Building alliances with other countries in line with our environmental objectives	b
Enhancing the effectiveness of environment and climate-related EU development cooperation assistance	b
4.9 Other: Forging alliances with multinational companies willing to champion resource efficiency and green growth	a
<i>Addressing problems caused by non-native species within Europe and Internationally.</i>	a

4.10 If you have further comments on this consultation or suggestions, please write them here (max. 1000 characters)

- Consider more flexible, outcomes based, approach to a new EAP with focus on a few key actions
- Consider use of smarter economic instruments, including market mechanisms for sustainable consumption and to offset biodiversity loss
- Incorporate more holistic approach to place and people

- Improve cross-sector development of policy/strategy
- Improve overall integration of policy, particularly of climate policies with other areas
- Move to a 30% CO₂ reduction target, would help to drive change
- Better links to demonstrate cost benefits
- A more joined-up approach, balancing Directive compliance with decision to invest in other things that bring great benefits e.g. resource efficiency. Where do companies put their limited investment budget?
- Change focus to address both regulation issues and social perception issues linked with wellbeing
- Seek to change/influence consumption culture, e.g.: limit certain forms of advertising.
- Simplification and legislation to deal with environmental harms
- Develop ideas about “environmental limits” to land use
- The encouragement of education and awareness raising should be promoted rather than relying on enforcement.

Q 4.7 – behaviour change is complex and requires approaches at three levels – individual, social and material (infrastructure, institutions etc). Simply exhorting or even coercing people to change behaviour when that is working against the grain of social norms and material context is largely pointless. Even if you get the desired change on the specific intervention, there are likely to be rebound effects. Behaviour change requires integrated policy interventions and coherence. Scotland’s experience on recycling domestic waste is a good example.

END