



EUROCITIES response to the Commission consultation on the development of a 7th EAP

Cities are central to EU environmental policy. It is in urban areas that environmental challenges are more acute and affect the most citizens. 75% of the EU population already lives in cities, and with increasing urbanisation this figure is set to rise. What's more, 80% of Europe's energy is consumed in cities and more than two thirds of EU CO₂ emissions originate there. At the same time, cities, and in particular big cities, offer a wealth of environmental opportunities. Well-managed urban concentration reduces transport distances, increases energy efficiency and enables the concentration of environmental management. As EUROCITIES, the network of over 130 major European cities, we see a real potential for the 7th EAP to support and strengthen action at all levels of government on a range of environmental and climate issues. However, based on our experience of the 6th EAP, we have identified a number of areas for improvement.

Involving cities more

Almost all environmental challenges are also city challenges, ranging from air quality, climate change mitigation and adaptation to noise, water, waste, biodiversity, soil pollution and others. The long and detailed 'wish-list' of these issues and proposed solutions in the 6th Environment Action Programme (EAP) turned out to be difficult to implement, particularly in light of developments that took place after the adoption of the 6th EAP. The next EAP should instead concentrate on governance, instruments, policy coordination, mainstreaming and filling gaps in other relevant EU strategies like the roadmap for a resource efficient Europe.

Cities should be involved more closely in EU environmental policy making. We have valuable experience on the ground, so we can help ensure that policies are designed in a way that allows for thorough and efficient implementation. We should not only be involved in implementation but also at the beginning of the policy cycle when legislation is formulated, to identify and avoid problems in implementation as early as possible. The EU should also encourage member states to cooperate more closely with local authorities on policy making and implementation.

EU environmental legislation should be clear but also leave our cities enough space to act. We should be able to adapt action to the specific situation of every city, including through stricter environmental standards than foreseen at the national or EU level if necessary.

Better policy coordination

The EAP should continue to fulfil and improve its role coordinating environmental policy and improving the mainstreaming of environment and climate policy into other EU policies. Mainstreaming not only helps coordinate policies at the EU level, it also facilitates an integrated approach to policy implementation at the local level.

The next programme should also consider the interplay between different policies and measures more thoroughly. An example of this at city level would be policies around densification. Densification can significantly reduce emissions, increase energy efficiency and facilitate

transport. However, depending on how it is managed, it can also have positive or negative effects on other areas such as air quality, noise, biodiversity and quality of green areas.

The 7th EAP should also propose new, enhanced instruments for environmental policy, for example, to better share environmental information and improve implementation.

Effective source policies and coordination

EU environmental policy must focus on measures that tackle the causes of environmental problems. For instance, ambient air pollution and noise should be addressed first by effective legislation to limit pollutant emissions and noise from vehicles, industry and other relevant sources. Manufacturers should introduce less toxic substances in their products, including building materials. Not only is this approach the best way of preventing environmental damage in the first place, but for the most part source measures are also more cost-effective.

Targets for member states, regions or cities only make sense when they are well-coordinated with ambitious and effective source policies. This applies to almost all relevant environmental policy areas, including in particular air quality, noise, water, waste and climate change. The EU and its member states should continuously monitor how effective and relevant testing and enforcement methods for source policies are on the ground, and swiftly improve ineffective procedures.

Efficient funding instruments for implementation and innovation

We are aware that the 7th EAP will be adopted relatively late to be considered in the development of the next Multiannual Financial Framework (MFF). However, the EAP should at least provide some guidance for the implementation of the next MFF, for example for annual or biennial work programmes. It should also further develop innovative concepts of financing and ways to incentivise private investment in sustainability, despite often long and sometimes low or negative financial returns on investment.

Behaviour and lifestyles remain core challenges for the European environment. Our cities are very well placed to influence citizens' and businesses' behaviour. We need financial support for 'soft measures' like awareness-raising and cooperation with local businesses to ensure that practices become more sustainable and enable businesses to offer more sustainable solutions to consumers.

Research on urban environmental issues should be needs-driven, result-oriented and connected to demonstration projects that make it possible to apply new solutions at a larger scale.

The EU should continue and strengthen the exchange of best practices between local authorities to support EU policy implementation and further-reaching initiatives. We would welcome additional tools for exchanging information, such as EU databases on local, regional and national strategies and actions. The CLIMATE-ADAPT website¹, which provides a platform to share climate adaptation strategies, should be used as a test case for the effectiveness and design of such tools.

Focus on health

The ultimate goals of environmental policy include not only to preserving the environment but also protecting citizens' health. The 7th EAP should have a strong focus on health, all the more since the roadmap to a resource efficient economy does not address this. We believe that more

¹ <http://climate-adapt.eea.europa.eu/>

research and demonstration is needed to better understand the health impacts of different environmental problems and what measures are effective to tackle them. For our cities, this includes:

- pollutants in ambient and indoor air, water and soil
- noise
- hazardous chemicals in consumer goods, especially those that children are exposed to
- health impacts of exposure to multiple pollutants

Conclusions

The 7th EAP should recognise the urban environment as key to EU environmental policy and make proposals for more efficient multilevel environmental governance that directly involves cities. Our cities also need more effective source policies and environmental policy coordination, including environmental mainstreaming in other policy areas, as well as effective funding instruments for local environmental management. In addition, the 7th EAP should include a focus on better governance and the health impacts of environmental issues and policies.