



Issue for Commission Designate Hearings: Weakening of DG Environment

Brussels, 22nd December 2009

Dear Member of the Environment Committee of the European Parliament,

As representatives of the ten largest European environmental organizations, having a long experience with working on environmental issues at the EU level, we express our serious concerns about reorganizations inside the Commission that President Barroso announced as they would significantly weaken DG Environment. We call upon you to raise this issue in your hearings with the Commissioners-designate for Climate Action, for Environment and for Health and Consumer Policy, as well as in your debate with President Barroso before your final vote on the new Commission.

We would like to underline that we welcome the appointment of Mrs Hedegaard as special Commissioner for Climate Action. We believe that with Mr Potocnik she can form a great team in tackling climate change in the EU and globally in an environmentally sound manner. However, for this to happen, both Climate Action and Environment should become closely interlinked horizontal portfolios, ensuring the integration of environmental, including climate, and sustainability objectives in all EU policies.

This is also required by Article 11 of the new Treaty of the Functioning of the Union (part of Lisbon Treaty): *“Environmental protection requirements must be integrated into the definition and implementation of the Union policies and activities, in particular with a view to promoting sustainable development.”*



We are concerned, however, about the consequences of a weakened DG Environment for the effectiveness of the environmental policies of the EU in the coming decade. Climate is a crucial factor for the ecosystems on which we humans and our economy depends, but by far not the only one. Any impression must be avoided that action on biodiversity, soil, water, etc. might be reduced – on the contrary more efforts are needed there, especially in the light of climate change. In addition, we are concerned that a potential new “DG for Climate Action” could, without need, separate issues that belong closely together, like climate change adaptation and the strengthening of resilient ecosystems. We therefore see a risk that a separate Climate Action DG would not take duly into account the environmental dimension of climate change, both in terms of its impact on the environment and on the ability of ecosystems to mitigate and adapt to climate change.

We call upon you to plead in particular for:

1. Objecting to weakening of the existing DG Environment through the transfer of certain key environmental competences to a new DG Climate Action as this would imply slow down the integration of environmental policy into sectoral policies. Climate Change is an environmental problem and it needs to be treated like that, which includes a strong integration link with sectoral policies such as energy, transport, agriculture, marine and fisheries, development, research, etc. In the coming years we need to see holistic responses that are effective in fighting climate change, and consistent with other environmental concerns, such as the degradation of biodiversity, air pollution, water scarcity, resource efficiency in relation to waste management, etc. That is why it is important that the Commission climate change staff remains embedded in DG Environment. DG Environment then could serve two Commissioners, just as DG TREN has done so in the last five years. The Climate Action Commissioner could be more effectively served by a DG that naturally integrates climate policy with other elements of environment policy, both in mitigation and adaptation, to prevent counterproductive solutions. Given that adaptation will become more and more important, and that the resilience of our ecosystems will play a crucial role here, it would be especially important to leave this issue within DG Environment.
2. If a DG Climate Action is created, ensuring that it closely coordinates with DG Environment (more than through the usual inter-service consultation) to ensure that both DGs together drive the integration of environmental policy into the other sectors, rather than competing with each other.



3. Calling for keeping in any case the Units dealing with Industry Emissions and or other air pollutants within DG Environment, as this includes waste and water dimensions and air pollution different from greenhouse gases.
4. Calling for keeping the Unit on Biotechnology, Pesticides and Health within DG Environment. In the current proposal, this Unit would move to DG SANCO. We find this very difficult to understand because the main concerns regarding the use of GMOs and pesticides have always been around the impact they have or may have on the environment (water and soil pollution, impacts on species, on ecosystems). So these issues need to be tackled in the first place by DG Environment . This is also relevant for the issue of imported products containing GMOs. In this case the main issue is whether the EU as importer should sponsor the use of such GMOs elsewhere when they are disputed here. This does not exclude involvement of DG SANCO in relevant dossiers, but the coordination should stay with DG Environment.
5. Calling for further strengthening of DG Environment by giving it full responsibility also for the decarbonization of transport and electricity production, rather than leaving this to DG Transport or Energy.

We hope that our suggestions are seen as a constructive contribution to make the new European Commission and environmental and climate policy as effective as needed in these crucial years.

Yours sincerely,

John Hontelez
Secretary General European Environmental Bureau

On behalf of G10 Directors

- Angelo Caserta, BirdLife International
- Matthias Duwe, Climate Action Network Europe (CAN)
- Anelia Stefanova, CEE Bankwatch
- Genon K. Jensen, Health & Environment Alliance
- Christian Baumgartner, Friends of Nature International
- Magda Stoczkiewicz, Friends of the Earth Europe
- Jorgo Riss, Greenpeace European unit
- Jos Dings, European Federation for Transport & Environment (T&E)
- Tony Long, Director, WWF European Policy Office.