

## **The Stockholm University Baltic Sea Centre's comments to the Environmental Action Programme to 2030 (COM(2020) 652 final)**

1. An action programme covering such a broad area needs clear, coherent and mutually supporting policies. Although it contains a lot of positive elements, it is doubtful if the proposal meets these criteria.
2. While it is positive that the proposal takes a step in the direction of better implementation by the roles, and resources, envisioned for the EEA and ECHA, a much stronger emphasis on implementation is needed. A comparison with e.g. points 22, 31 and 32 in the Presidency's conclusions from the EU Summit in Göteborg 2001 shows that the EU have not made significant progress in the nearly 20 years since then. Reformulating worthy goals is not enough.
3. It is positive that the proposal includes regular reporting on progress. To be useful, such reporting must be much more open, transparent and honest than much of the reporting on already existing commitments.
4. We welcome the initiative under the Chemicals Strategy to work to increase accessibility to data by streamlining methodologies and interoperability between legislations and structures. Pooling data together in a systemic way will be crucial to reach goals in EAP, Green Deal etc, which also strengthen transparency principles.
5. The proposal rightly acknowledges the important role of environmental monitoring. We stress the importance of long-time data series. Such series have proven useful in discovering slow changes in the environment and tracking drivers, and being essential for evaluating actions both regarding costs and effects.
6. An analysis of the lack of progress towards reaching the goal of Good Environmental Status for marine areas by 2020 under the MSFD shows that in addition to data, lack of analysis has been a bottleneck, e.g. in determining target threshold values. One lesson from this is the need for adequate data and analyses. Another is the need for rules of thumb for measures to be taken while waiting for necessary data and analyses. If we know in what direction we need to move and that we are already short of time, it is hardly cost effective to delay measures while waiting for data and analyses to determine how far we have to move. The longer we continue with business as usual, the more costly the efforts to rectify the problems.
7. We question the value of attempting to focus on a small number of overarching indicators for assessing the general condition of the environment.
8. While we applaud the aim of living a good life within the planetary boundaries, this needs to be made more operational in order to impact on actual policies.
9. The ambitions for seabed mining in the Blue Growth strategy highlight the need for developing assessments of planetary boundaries for the marine environment and for extraction and use of non-renewable resources.
10. We note that water and seas are mentioned but would like to underline the importance of water and the marine environment for both ecosystems and for the provision of their essential services.
11. Environmental considerations must be systematically integrated in other policy areas. Too little progress has been made since this was proposed in point 32 in the

Presidency conclusions from 2001. The EAP is therefore a concern for policy areas such as agriculture, energy, transportation, growth, trade, and fisheries.

12. The role of trade agreements in the ambition from the Göteborg summit to “Getting prices right” (point 22) should be included in the ongoing revision of the EU trade policy.
13. Welcoming the extra resources for ECHA and the EEA, we point to the need for more resources for the disbursement and management of funds. Management of new funds in the Recovery and Resilience Facility need extra resources. Conditionality needs to be more robust than it has been in e.g. the EMFF. The Commission should to give more emphasis to its role as Guardian of the Treaty instead of Maker of Deals.