Brief Response from Friends of the Earth Europe to the Commission Working Document:

Consultation On The Future "EU 2020" Strategy

January 2010

Introduction

Friends of the Earth Europe welcomes this opportunity to feed in our comments to the Commission's consultation on the future "EU 2020" strategy.

However, we must express our disappointment at the short time available to respond to this important consultation. The consultation period is less than two months, with the Christmas and New Year holidays further reducing available time. In addition, Friends of the Earth Europe – like many other organisations – has been devoting a lot of effort to the Copenhagen Climate Conference during this period.

For this reason, this consultation response focuses on one specific – though wide ranging – aspect of a future EU 2020 strategy:

The importance of the EU measuring its real consumption of the world's natural resources, and the role of this measurement in the framing of policies that will reduce the EU's use of the world's resources

Measuring Europe's real resource use as a tool to help make a "lower and more efficient" consumption of resources a reality

It is clear that the Commission has already recognised the importance of addressing Europe's use of the world's resources, as can be shown by these quotes from the Working Document:

"our prosperity will come from innovation and from using resources better, and where the key input will be knowledge"

"The EU should compete more effectively and increase its productivity by a lower and more efficient consumption of non-renewable energy and resources in a world of high energy and resources prices, and greater competition for energy and resources."

"In developing a new vision and direction for EU policy, we need to recognise that conserving energy, natural resources and raw materials, using them more efficiently and increasing productivity will be the key drivers of the future competitiveness of our industry and our economies."

*"This means using the material inputs in the economy more efficiently, becoming more **productive** by reducing pressure on resources."*

Friends of the Earth's key argument is that Europe must start measuring its resource use in order to be able to devise effective polices that will reduce this resource use - as the management dictum goes, "***if it's not measured, it's not managed***". Through measuring resource use it will be possible to incorporate resource efficiency into the impact assessment process.

The EU does not know how much of the world's resources we currently use – whether land, materials or water – or enough about how much of the world's climate emissions we are responsible for.

In some cases we know our resource use within Europe, and we know our within-Europe climate emissions, but the EU does not collate data on how much of the rest of the world's resources we use. This has the perverse outcome that the current EU approach would push for all manufacturing to leave the EU, as then the resources used by this manufacturing would not count in the EU's environmental impacts!

The solution – measuring Europe's overall resource use

Friends of the Earth Europe has been working with Sustainable Europe Research Institute (SERI) in Vienna to investigate how to measure Europe's resource use, and published a study in July 2009.[1]

[1] See http://www.foeeurope.org/publications/2009/seri_foee_measuring_eu_resource_use_final.pdf

This study concluded that the best way to ensure that Europe's use of resources was properly measured, in a way that was both achievable and reasonably comprehensive, was to focus on four elements:

- **The land use by the EU (in hectares)**, including land used outside the EU (e.g. to grow crops for us to eat or use as energy sources).
- **The material used by the EU (in tonnes)**, including materials that are used to make products that are imported into Europe (the material 'rucksack' of products); the data sources allow this figure to be broken down into different forms of materials quite easily (e.g. looking at wood alone).
- **The water use of the EU (in litres)**, including water used outside the EU to produce imported products (e.g. cotton).
- **The greenhouse gas emissions created by EU's consumption (in $CO_{2equivalent}$)**, which includes both Europe's Kyoto emissions, and the 'Carbon Footprint' associated with imported products.

This approach is incorporated in the Spring Alliance manifesto[2], supported by the Unions and a large number of Environment, Development and Social NGOs, includes a demand for Europe to measure its overall resource use:

- *"Measure the EU's overall resource use, including the use of material, water and land, as well as greenhouse gas emissions, whether occurring inside or outside the EU"*

How would these indicators be used?

This measurement approach would provide a key tool to use in increasing integration and policy coherence, showing the real extent of EU's consumption of natural resources.

Adding these indicators into impact assessment would enable resource impacts to be highlighted at an early stage, and help in identifying areas were further investigation is required (which is a key role of impact assessment).

- For example, if these indicators had been part of the impact assessment of the biofuels targets in the Renewables Directive, it would have been clear that to achieve such targets the EU would need a considerable increase in its land footprint. This would then have triggered further questions as to where this land might come from, and what – or who – was using it at the moment.

These indicators would also allow the EU to develop targets to reduce its resource use, and help in the development of policy to achieve these targets.

- For example, our research has shown that the EU is disposing of more than €5 billion a year of valuable resources[3] (by landfilling or incinerating them) – and this is a conservative analysis, which also excludes the scarce metals found in electrical goods, for example. Yet the impact assessment of the Thematic Strategy on Waste Prevention and Recycling in 2006 did not assess the resource efficiency benefits of different policy measures.

Conclusion

"To stay ahead, the EU needs to be quick in seizing opportunities and in anticipating and adapting to future trends."

As global population continues to increase, and standards of living rise in many countries, it is clear that the pressure on the world's resources – whether it be land, materials, water, or, of course, climate – becomes ever greater. This pressure will have impacts on people, environment, governments and businesses around the world.

It is therefore clear that the EU needs to adapt to these future trends by seizing the opportunity to truly assess and reduce our resource use. Friends of the Earth Europe strongly believes that the indicators we have developed with SERI provide a workable and effective way of helping the EU deal with this vital issue.

- *Further enquiries relating to this response should be directed to Dr Michael Warhurst, who leads Friends of the Earth Europe's work on Resources & Consumption – michael.warhurst@foe.co.uk*

[2] See http://www.springalliance.eu/
[3] See http://www.foeeurope.org/press/2009/Oct07_Europe_wastes_its_resources.html