



**Friends of
the Earth
Europe**

President José Manuel Barroso
European Commission
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B-1049 Brussels

Friends of the Earth Europe
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1050 Brussels

31 March 2014

**Re: The need to have effective indicators and targets
to progress the resource efficiency agenda**

Dear President Barroso,

Cc Commissioner Janez Potočnik

I am writing to express my concern about the lack of development of the resource efficiency agenda. With this letter, Friends of the Earth Europe would like to encourage the Commission to complete its mandate by meeting the objectives stated in the *Roadmap to a Resource Efficient Europe*, in particularly around selecting indicators and setting targets.

Although we recognise that the *Roadmap* has triggered a much-needed debate on our resource consumption, the lack of action from the Commission is slowing the process down and is in danger of giving the impression that this policy area is not worth continuing by the next Commission.

As one of the biggest consumers of natural resources per capita, with the majority imported from other continents, the EU is extremely dependent on access to cheap resources. This reliance on cheap and abundant imports is harmful, not only for the global environment but also for the European economy. The Commission cannot continue perpetuating a situation that makes citizens, government and companies vulnerable to supply disruption, price instability and probable price increases in the future, hence contributing to material insecurity.

With this letter I would like explain why: 1) Indicators for land, water, materials and greenhouse gasses are needed; 2) The Commission's proposed productivity indicator is unsuitable to monitor whether the objectives of the *Roadmap* are met; and 3) Why targets are needed.

1) The need for four indicators

The Commission's plan to focus almost exclusively on one, material-based, resource indicator (Raw Material Consumption) is narrow minded and will provide undesirable results, as was warned about in the *Roadmap*¹.

The *Roadmap* stated the need to have indicators for the four areas of land, water, carbon and materials², and it is clear that only a consumption-based approach can clearly establish Europe's dependence on global resources. Therefore the Commission should commit to adopting Carbon Footprint, Land Footprint and Water Footprint in addition to Raw Material Consumption. Measuring

¹ Page 20 *Roadmap to a resource-efficient Europe*, "This, however, only captures the material resources aspects and does not deal with other resources or the potential shift of burden across countries"

² Page 21 *Roadmap to a resource-efficient Europe*, "Because this provisional lead indicator only gives a partial picture, it should be complemented by a 'dashboard' of indicators on water, land, materials and carbon".

only materials, excluding these footprint indicators, would provide an incomplete picture of the total quantity of resources used. For example, it might indicate that a move to a bio-based economy will increase productivity, but in reality this move will result in much more land and water being used. A brief introduction to these four footprints indicators is available here: <http://www.foeeurope.org/sites/default/files/four-footprints-455691.pdf>

2) An indicator that promotes business as usual

The Commission is planning to use GDP/RMC as its headline indicator, yet this indicator does not show if resource use is actually reducing or increasing, and effectively encourages the EU to maintain the current system of high natural resource consumption.

To start with, adopting a productivity approach rewards business as usual (simultaneous economic growth and resource consumption growth). For example, between 1980 and 2005, the world economy increased its resource productivity, due to the fact that it increased the amount of economic value created per unit of material consumption by 30%. Despite this progress, global material extraction has increased by almost 80% since 1980 and is currently around 70 billion tonnes³.

Since the indicator is linked to GDP, the results will show that richer countries are more sustainable, despite their higher levels of resource use. It will also show that a country where, for example, the financial sector is strong will be more resource-efficient than other countries.

3) Lack of progress on targets

The *Roadmap* sets 2013 as the year when the Commission will “set the targets needed to meet the challenge (by 2013)⁴”. The urgency of action on resource efficiency has not reduced – the 2013 target was missed, but the 2014 circular economy package provides an opportunity to propose initial targets for land, water, material and carbon (Greenhouse gas) footprints.

The UN International Resource Panel is already asking for developed nations, such as those in the EU, to reduce their consumption of resources such as land to 0.2 ha per person by 2030⁵, highlighting, therefore, that there is enough evidence to start setting initial resource reduction targets. It's also clear that material and water footprint targets would encourage EU nations, companies and organisations to focus on the massive efficiency opportunities available. Finally, a Carbon Footprint target – at least in line with production-based climate targets – would make it clear that the EU is not planning to meet its climate obligations by moving production overseas.

Not setting targets on this area means that resource efficiency is the only one of the 7 flagships with no target, which is not a good signal to the next Commission on this policy area.

Friends of the Earth Europe believes that the EU needs to lead in resource use by taking the issue of resource efficiency seriously and measure our land, water, materials and GHG footprints, setting EU-wide reduction targets for each of these and implementing policies that will reduce our consumption over the four categories.

I look forward to hearing from you,
Yours sincerely,



Magda Stoczkiewicz

³ SERI (2013) *Green economies around the world?* http://seri.at/wp-content/uploads/2012/06/green_economies_around_the_world.pdf

⁴ Page 21 *Roadmap to a resource-efficient Europe*

⁵ International Resources Panel (2014) *Assessing Global Land Use* <http://www.unep.org/davos/index.asp>