

# UNICE

THE VOICE OF BUSINESS IN EUROPE

Mr David O'Sullivan  
Secretary General of the European Commission  
Brey 12/62  
Rue de la Loi 200  
B-1049 Brussels

8 January 2001

Dear Secretary General,

The Commission's preparations for the 6<sup>th</sup> Environment Action Programme, a draft of which we understand is now in interservice consultation, have been marked until recent weeks by excellent consultation with a full range of stakeholders. UNICE was pleased to play an active role in these consultations on the Global Assessment of the 5<sup>th</sup> programme, which identified deficiencies of approach needing to be addressed.

UNICE is pleased to note that parts of the preparation of the 6<sup>th</sup> programme have taken into account such input by the stakeholders. We have concerns, however, about apparent inconsistencies of content in the draft programme that undermine its ability to identify a balanced approach to sustainable development.

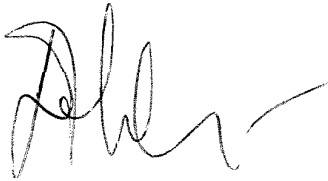
These concerns become even more relevant, since DG Environment seems to intend to change the character of the 6<sup>th</sup> programme from a short strategic document, to set out the Community environmental priorities, into a detailed programme, now expressed as a detailed legal instrument of a draft decision of the European Parliament and the Council.

UNICE will comment on the content of the 6<sup>th</sup> programme at the appropriate time. Here we wish to draw your attention to our concerns about both intent and process:

- The draft programme is in danger of **pre-empting** a coherent Community Sustainable Development Strategy by pre-defining its "environment pillar" in isolation from any constraints of social considerations and economic aspects.
- We find that approaches agreed for several existing policy areas seem to be **discounted**. A clear example is the section on **chemicals** policy, in which the balanced approach already identified by the Commission is disregarded. A further example is the approach to **waste** management, which is inconsistent with current EU Waste Management strategy in prioritising material recycling ahead of recovery of energy.

- Similarly, proposed approaches seem **inconsistent** with existing Community policy in some areas. Thus, the approach to health and the environment does not reflect the science-based risk assessment philosophy endorsed at the Nice summit, and the Commission Communication on the **Precautionary Principle**.
- The approach to **climate change** seems to be too narrowly focused on the first budget period of the Kyoto protocol, when a more **strategic vision** is needed. The reference back to the 1992 proposal for an EU carbon/energy tax seems to **discount** all subsequent discussions of this issue by the Community Institutions.

UNICE believes the 6<sup>th</sup> programme should offer the Community a strategic vision for how to set and tackle environmental priorities in the context of a balanced approach to Sustainable Development, that is consistent and integrated with other Community policies. We rely on interservice and cabinet consultations to deliver this coherence.



Daniela Israelachwili  
Acting Secretary General

Cc: Mr James Currie (Director-General DG ENV)  
Mr Fabio Colasanti (Director-General DG ENTR)