

# TOWARDS MORE INTEGRATED IMPLEMENTATION OF ENVIRONMENTAL LEGISLATION IN URBAN AREAS

*Working Group on Integrated Implementation of Environmental Legislation – WG/IIEL*

**FINAL REPORT, March 2002**

## **PREFACE**

The mandate given to the Working Group by the Expert Group on the Urban Environment has been really challenging. “Integration” represents the main engagement for many EU local administrations, involved by the responsibility of managing every days complex and interrelated problems as Mobility, Quality of the Air, Noise, Land use, etc. Local authorities and Members States remain the main actor in finding policy solutions to this issue, but it is absolutely clear that a promoting action at EU level could influence the effectiveness of their efforts. The anticipatory task defined by the Expert Group is now part of a wider EU policy process that has moved in this direction.

In the Working Group view the recommendations made for the Expert Group to put forward to the Commission will help the Commission in helping national, regional and local authorities to secure the more integrated implementation (and so, the more effective) of environmental legislation at local and urban level. We ask for a joint effort, with a wide dissemination of this Report towards national and local authorities and for the concrete implementation of the included Recommendations by the Commission.

**Giuseppe Gamba** (Co-Chairman of the Working Group)

## **ACKNOWLEDGEMENTS**

This paper has been prepared by the Expert Group’s Working Group on *Integrated Implementation of Environmental Legislation*, which was established in January 2001 under the chairmanship of Francesco La Camera of the Italian Ministry of the Environment and of Giuseppe Gamba Provincia di Torino, Italy.

The members of the group that have actively participated in the - drawn from different levels of government and other bodies active in the field and from a range of countries – were:

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Inès Urriaga (Ministry of Transport and Housing, France) and Abdullah Osman (Leicester City Council), has participated only in the initial WG phase.

A Shadow group of just over twenty, mainly representatives of local authorities from across Europe has been established, asking them to follow the working group’s activities (see in Annex list of S.G. members and list of active participants during the 2 consultation on the Interim Report during spring and summer 2001).

The Expert Group has been asked for comments on the pre-final and on the final version (Axel Thrige Laursen (Denmark) , Ole A. Hagen (Norway) and Marlies Veenstra (Netherlands) have provided comments and suggestion useful to refine the final version.

The role and participation of the European Commission – DG Environment has been managed by Claude ROUAM and Susann PAULI (and Marjo KASANKO for the Joint Research Centre - Space Application Institute, Ispra)

All these individuals contributed their time and expertise to the work, and for this we are very grateful.

We would like to record our thanks to Maria Berrini and Giulio Conte, our Project Consultants, who prepared discussion papers for the meetings, the interim report and this policy paper on behalf of the group (maria.berrini@ambienteitalia.it)

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<b>1 INTRODUCTION (SCOPE, APPROACHES, STATUS)</b> .....	<b>4</b>
1.1 THE WORKING GROUP: SCOPE AND OBJECTIVES .....	4
1.2 WHAT IS AN INTEGRATED APPROACH AT URBAN LEVEL ? CHALLENGES AND WG-DEFINITIONS .	4
1.3 THE FRAMEWORK: THE “ON GOING” EUROPEAN POLICY PROCESS.....	5
1.4 THE WG OVERALL WORK.....	7
<b>2 RECOMMENDATIONS</b> .....	<b>8</b>
2.1 WG AIMS, PRODUCING THESE RECOMMENDATION .....	8
2.2 THE EUROPEAN COMMISSION AND ALL EUROPEAN INSTITUTIONS AS MAIN ACTORS FOR IMPLEMENTATION OF THE RECOMMENDATIONS .....	8
2.3 NATIONAL AND LOCAL GOVERNMENTS AS MAIN PARTNERS IN THE IMPLEMENTATION .....	9
2.4 OBSTACLES TO OVERCOME.....	9
2.5 GENERAL APPROACHES AND PRINCIPLES .....	10
2.6 RECOMMENDATIONS .....	11
2.7 “WHAT”: THE 4 PRIMARY FIELDS RECOMMENDED FOR SUPPORTING ACTION AT EUROPEAN LEVEL .....	12
2.7.1 <i>Promote the use of Urban Integrated Environmental Plans based on Local Agenda 21     approaches and methods</i> .....	12
2.7.2 <i>Promote the voluntary implementation of EMAS in local-urban public policies</i> .....	14
2.7.3 <i>Promote the voluntary implementation of SEA in local-urban public policies</i> .....	14
2.7.4 <i>Promote the use of innovative tools specifically oriented to increasing public awareness     and changing market and consumption patterns</i> .....	15
2.8 “HOW”: THE 7 “SUPPORTING MEASURES” RECOMMENDED FOR THE EUROPEAN PROMOTING ACTION .....	16
2.8.1 <i>Enforcement and further development of the EU policy framework dedicated to the urban     environment</i> .....	17
2.8.2 <i>Action programmes, targeted to Member states national government level</i> .....	17
2.8.3 <i>Environmental Contracts and Agreements in urban areas</i> .....	18
2.8.4 <i>Facilitation, networking, and dissemination of good practices</i> .....	19
2.8.5 <i>Training and communication programmes in the field of integrated and concerted     approaches to improve governance and empowerment</i> .....	20
2.8.6 <i>Supporting funding policies</i> .....	20
2.8.7 <i>Governance models and legislation</i> .....	21
<b>3 ANNEXES LIST</b> .....	<b>24</b>
3.1 ANNEX 1: WORKING GROUP TERMS OF REFERENCE .....	24
3.2 ANNEX 2: THE WG.....	24
3.3 ANNEX 3: WG OVERALL WORK.....	24
3.4 ANNEX 4: WG PRELIMINARY DEBATE – CONTENTS .....	24
3.5 ANNEX 5: OVERVIEW OF EU POLICY FRAMEWORK .....	24

# 1 INTRODUCTION (Scope, approaches, status)

## 1.1 The Working Group: Scope and Objectives

The Expert Group on the Urban Environment has identified, during its 1999 work, the “integrated implementation of environmental legislation” as a priority theme.

The Working Group on integrated implementation of environmental legislation (WG – IIEL) has been set up by the Expert Group and by the European Commission, with the specific task to *define and propose the further steps which the Commission could take to encourage more integrated approaches to the implementation of environmental legislation in urban areas.*

*(See Terms of reference and WG composition and resources in the Annex).*

## 1.2 What is an integrated approach at urban level ? Challenges and WG-definitions

**The challenge:** Most of the urban areas in Europe suffer from similar aggravating environmental problems such as air pollution and noise caused by traffic or industry, improper land use, areas with contaminated soil, spoiled drinking or bathing water resources, lack of open space, parks and recreation areas and so on. As these are specific urban problems people expect them to be tackled by the local urban authorities. To meet the expectations of their citizens (and to show quick and effective political action and effective implementation of legal obligations) many local authorities have tried in the past, to tackle these problems on their own. But the problems are often many-layered and in many cases local authorities don't have the power to handle all aspects. Adequate solutions can only be worked out if all aspects are carefully taken in consideration, and if all legal and administrative authorities concerned and all relevant stakeholders (including the public and the NGO's) are playing together and are involved in the solution finding processes.

It is a common experience of all urban authorities that the setting up of integrated plans and solutions like this needs much time and often is a hard and rather frustrating work to do. Nevertheless it has to be done. Otherwise the results are unsatisfactory, sometimes generating problems in other fields, only curing symptoms, rather than addressing the roots and the whole width of the problems.

The WG was established to give some recommendations on how the integration of the implementation of environmental laws could be made easier, better and more common. In doing this the WG bore in mind that every urban area in Europe has its specific problems with the necessary integration, depending on the existing environmental problem and the different legal and administrative tasks and competences of the local, regional and state authorities in the different EU member-states. Specific solutions taking into consideration local differences for every urban area and every special plan, closely adapted to the different legal and administrative situations in the different countries / regions / states are therefore unavoidable.

The working group nevertheless tried, to identify some common obstacles and to propose some general rules and recommendations for a better integrative approach, especially at the EU-level, which should be paid attention to by all authorities involved.

The definition of “integrative approach”, in this particular context (related to the implementation of environmental laws), was discussed by the Working Group, which concluded that an *Integrated approach:*

- In order to specifically enable environmental legislation to be implemented through combined strategies/action plans/tools, avoiding the use of separate, uncoordinated and duplicative ones for each sector/piece of legislation:
  - should be based on finding and implementing coherent and comprehensive solutions able to tackle different, interrelated (sometimes apparently separated) problems/sectors in the urban environment, connected to environmental quality and land use plans (e.g. housing, infrastructure, water management, economic activities);
  - should promote measures which are “tailored” precisely (adapted) to different area - specific problems
  - should promote, wherever possible, “win win solutions” addressing different points of view/interests and positively involving different interests;
  - should promote vertical and horizontal cooperation among different sectorial administrative bodies and among various actors (public servants, political elected representatives, private social operators), among different institutional levels and across different geographical borders of administrative relevance;

Integration – implementation: the WG considers the issues of "integration" and "implementation" to be strongly linked.

Urban environment is the “target” of this Report. An “integrated approach” should obviously consider functional linkages between urban and rural areas (“*rurban* areas”), and between the urban and regional scale, too.

What can an integrated approach at urban level contribute to a sustainable environment? Integrated approaches to rural and urban environment management are recognised as necessary to improve legislative compliance; indeed, such approaches are increasingly explicitly required by the legislation itself, for example in the fields of air quality, waste management and environmental noise (COM/468/2000). Furthermore, environmental legislation places obligations for certain actions to be taken in urban zones and agglomerations with large populations or where certain environmental conditions exist.

The WG sees the IIEL approach as an important building block to bring further in urban areas the Sustainable Development Strategy of the European Union, as adopted by the Göteborg European Council, march 2001.

The WG feels that besides the IIEL approach, the urban environment in the long run can only become sustainable and provide a high standard of living quality, by means of a proactive, source oriented environment protection policy at EU level.

This means for example that the necessary urban transport must be maintained with a significantly lower level of noise, air pollution and energy consumption at the source, by making significantly better use of technical innovation on motor engines and transport systems within the next decade. There lies a connection also with the proposed 6th Multi-annual Framework programme for Research and Technological Development.

### **1.3 The framework: the “on going” European policy process**

The main focus of the WG mandate is the need for integration WITHIN environmental legislation and policies and BETWEEN environmental legislation and other sectoral policies, relevant to implementation. In this second direction, positive signals and steps have been taken at European level in view of the Amsterdam Treaty’s objectives of sustainable development along with the aim to integrate environmental policy into other Community policies (from the Cardiff European Council) placing responsibility

on individual Council formations (of each sector such as energy, transport, agricultural, internal market, etc.) to develop their own strategies and monitoring indicators.

More recent European policy initiatives (*See details in the Annex "Overview of EU policy framework"*) are promoting an Integrated approach and enlarging the "policy tools box".

Some EU policy papers contain specific statements and points that could be more effectively developed using, as "building blocks", the Recommendations defined in this Report. In particular:

- The 1996 Commission Communication on Implementing Community Environmental Law COM(96)500 defines commitments that could be directly related to the issue "local integrated policies" and that fit perfectly with the recommendations developed by the WG IIEL. In addition to this, the Council, in its Resolution on the Implementation issue, has invited the Commission:
  - *to study the overall coherence of the whole system of Community environmental legislation and suggest to the Council **possible improvements** without lowering the level of environmental protection, taking account of the linkage between environmental media.*
  - *to improve the coherence of EC legislation by the use, inter alia, of **framework directives** and of codification or consolidation of legislation, taking also into consideration the legislation in other Community sectors and ensuring coherence with international environmental instruments.*
- The EU Strategy for Sustainable Development addressed to the Gothenburg European Council in June 2001. In Section III ("Setting long term objectives and targets) the Strategy defines "Measures at EU level". Among the measures related to "Improving the transport and land use management" one finds: "**Encourage local initiatives to tackle the problems faced by urban areas; Produce recommendations for integrated development strategies for urban and environmentally-sensitive areas.**"
- The Common Position adopted by the European Council on the Sixth Community Environment Action Programme 2002-2011 (7 June 2001), states that "*the Programme shall ensure that the Community's environmental policy-making is undertaken in an integrated way and to all available options and instruments, taking into account regional and local differences*". Art. 7, pg. 40, "*Objective and priority areas for action*", defines the Commission engagement for the development of a "**Thematic strategy on urban environment promoting an integrated approach across Community policies, taking account of progress made in implementing the existing cooperation framework, reviewing it where necessary and addressing:**
  1. *the promotion of Local Agenda 21;*
  2. *the reduction of the link between economic growth and passenger transport demand;*
  3. *the need for an increased share in public transport, rail, inland waterways, walking and cycling modes;*
  4. *the need to promote the use of low emission vehicles in public transports;*
  5. *the consideration of urban environment indicators*".
- The White Paper on European Governance (the consultative process will run until the end of march 2002) proposes to open up the policy - making process, suggesting accountability and responsibility for all those involved. The paper proposes a less top-down approach and to complement policy tools more effectively with non-legislative instruments. Among the Proposals one finds the following objective, to, "**Bring greater flexibility into how Community legislation can be implemented in a**

*way which takes account of regional and local conditions; Promote greater use of different policy tools (regulations, “framework directives”, co-regulatory mechanisms)”.*

More integrated approaches are also growing in some other policy papers (e.g. the White Paper on Transport) and in some EU legislation (e.g. the Water Framework Directive, the IPPC Directive, the SEA Directive, the revision of the Public Procurement Directive, etc.).

The Structural Funds Regulation 2000-2006 have given new attention to sustainability in urban development, as have some other Funding Programmes (e.g., in different ways, LIFE, Interreg III, Urban II; Research Framework Programme; the recent “Community Framework for co-operation to promote sustainable urban development”).

In the background, it is also important to consider other European initiatives (such as The European Spatial Development Perspective - ESDP; The Member States Urban Exchange initiative – UEI).

**All these EU policies and actions can be considered as convergent efforts that could be reinforced and developed by the “building blocks” presented in the Recommendations put forward in this Report.**

#### **1.4 The WG overall work**

The WG has met 5 times (9 February 2001, 26 March 2001 and 18-19 June 2001 in Rome; 15 October in Milan, 10 December 2001 in Rome).

The Interim reports (draft and final) have been sent for consultation (during spring and summer 2001) to the “Shadow Group” which was established to follow the working group’s activities and is composed of representatives of local authorities from across Europe, (*see Annex “The WG” for SG composition and members selection procedure*). The Interim Report (final) has been sent to the Expert Group on the Urban environment and, as requested by one WG member, to the CEMR board (summer 2001). The 2 consultation rounds have produced some comments, suggestions, support by some participants.

A Final Report has been prepared and discussed during November and December for presentation to the Expert Group in January 2002. The Expert Group members have been asked for comments. This version is the result of this process..

*(See for some more details the Preface and the Annex “WG-SG members”, “Overall work carried out by the WG”)*

The main tasks and deliverables developed by the WG have been:

- Definition of the state of the art, considering the EU policy framework and good practices at national/local level (*See Annex “Overview of EU policy framework”*)
- Identification of the main obstacles to IIEL (*See Annex “Content of the WG debate”*)
- Definition of a set of recommendations for the European Commission which is also able to positively influence the main policy building process at European level (*See this Report, next chapter*).

## 2 RECOMMENDATIONS

### 2.1 WG aims, producing these recommendation

Even though there are some positive trends in on going European policies, it is however clear that there are some concerns that should be considered. **The WG considers** that, looking at national and local level, as confirmed by the local experience, **some obstacles remain** and the current IIEL approach is not an absolute “winner”. (See Annex, “Content of the WG debate” and in the following paragraph “Obstacles to overcome, possible solutions”). **Integrated and “Source oriented” policies**, aimed to protect and improve urban environment, emerge as a clear need.

**The WG IIEL, offering this Report and the Recommendations , intends:**

- **to suggest ways to overcome remaining obstacles.**
- **to support the positive trends of the European policy process**
- **to influence and propose early consideration of future initiatives and proposals (e.g. Structural Funds for the period from 2007).**

The WG think that the main European targets, goals and strategies related to “integrated implementation” and “urban areas” (as the main European policies mentioned above) should be defined and developed in more detail, considering the following Recommendations. The “European policy framework” should aim at addressing and supporting national and local efforts to adapt the IIEL approach to their context and to implement it effectively.

The WG considers the ICZM strategy (European strategy on Integrated Coastal Zone Management) an interesting model to follow for the further development of IIEL. Of particular interest is the “policy – process” adopted by the ICZM strategy, developed during the past few years by means of:

- demonstrative projects,
- the setting up of shared principles,
- the adoption of Recommendations and strategies by the Commission and by the Council and the Parliament,
- guidelines and requests to Member States for review and integration of their own regulative and policy framework.

The IIEL/urban areas policy process could be similar to the ICZM one: promote IIEL good practices, directly with and in Member States and local authorities, through European supporting measures such as demonstrative projects, guidelines, funds, voluntary agreements and a helpdesk on IIEL at the national level (such as the INFOMIL in the Netherlands that gives extensive advice to cities and regions and also SME’s).

### 2.2 The European Commission and all European Institutions as main actors for implementation of the Recommendations

As a general criteria, it is important to underline that the “interlocutor” of this Report, as requested by the Expert Group Terms of Reference, is mainly the European Commission and the other European institutions (first of all the Council and the Parliament, then the involved European agencies and institutional bodies). Therefore, in order to be effective, the Recommendations have been developed considering:



- the specific role that the EC can play, (possible limitations due to the subsidiarity principle and budget constraints).
  - the framework of existing instruments and programmes, where coherent with the IIEL perspective, considering them as “steps in the right direction” and policy or funding resources available for IIEL.

### **2.3 National and local governments as main partners in the implementation**

Whilst it is true, that the following principles and Recommendations have been developed with the aim to integrate and support the European Commission’s future strategies, it is also clear that active support and co-operation is needed from:

- Member States, regional governments, local authorities (and their European and national Networks).
- **The Expert Group have the responsibility to evaluate and proceed on the “recommendations follow up” matters. In particular the Expert Group should further complete/develop:**
- **The list of “Field of actions” and “Measures” as defined in the Recommendations** (in particular exploring the need/opportunities to introduce, at local level, additional powers and “compulsory” tools/policies),
- **The “Who and When” implementation matters,**
- **The Recommendation priorities “ranking”.**

The report of this Working Group should be seen as an advice to the Commission. It doesn’t formally represent any “common position” adopted by national and local authorities. But the process (that has involved city Networks, the Shadow Group, the Expert Group on Urban Environment, see details in Annex Overall Work – The process) that produced this report, is a positive pre-cursor to the success of the following recommendations.

### **2.4 Obstacles to overcome**

The WG has identified during its preliminary work, the main Obstacles to be overcome to achieve better and faster integrated implementation at local level of environmental legislation (*See for details Annex “WG preliminary debate – contents”*).

Summarising the main contents of the debate, the WG underlines, as main obstacles, the following:

#### **1. The sectoral organisation of administrative bodies and policies at all institutional levels.**

Local environmental plans (energy management plans, waste management plans, air protection plans, water plans,...) land use plans and socio-economic plans, in some countries reflect this fragmented organisation (in some countries this is mainly due to sectoral approach at regional/national level), often being sectoral and unco-ordinated (e.g. there is a typical lack of co-ordination, if the priority goal is “citizen health and climate protection” between the Land use, Mobility and Air quality sectors. Another example, is lack of integration among the Environment, Public works, Urban planning and Agricultural sectors in achieving the goal of “nature, water and land use protection”). The local level in particular lacks strategic plans and support from the regional/national level in co-ordinating the goals.

## **2. Lack of awareness/information/knowledge of administrative bodies and other subjects**

Data and research enabling interpretation and representation of cities as integrated systems are not always available or are not accessible for end-users (elected people, civil servants, NGOs, citizens).

Local ability to produce strategic, integrated, negotiated, action oriented plans and programmes is weak (the “Not In My Term of Office” approach is dominant). Very often, training of the public administration is carried out on a sectoral basis, and public officers are not used to integrated, interdisciplinary approaches and new tools.

## **3. Lack of an integrated approach in the process of decision making**

IIEL requires that every actor in the urban scene plays its role, but sometimes some of the actors are weak (e.g. Local Authority, environmental NGOs) and so the possibility to implement policies is sharply reduced. Similarly, lack of consultation and transparency and inadequate involvement of stakeholders may induce the “Not-In-My-Back-Yard” reaction.

## **4. Sectoralised legislation and inappropriate use of funds**

Finally, not all EU legislation and funding policies are based on a fully integrated approach. In particular, some directives of the “older generation” (e.g. on urban waste water and on waste) have a sectoral approach that hardly allows an integrated implementation. In some cases they are the “sum” of different pieces of legislation, in some others tight tasks or standards to fulfil have been set leaving little room for the tools of integrated approaches (incentives, multipurpose and “win-win” solutions, voluntary agreements, etc.). On the other hand, it is evident that weakly integrated implementation of the European legislation is sometimes the result of weaknesses at national level (delay in transposition, transfer in the national laws not coherent with the EU approach, lack of measures of support, etc.).

The intention of the following approaches and recommendations (see 2.7 and 2.8) is to present possible solutions to overcome the above Obstacles. These obstacles are in fact directly related to the Recommendations (problem-solution), although it is not possible to highlight a clear 1 to 1 relation, due to the integrated nature of the below recommendations

## **2.5 General approaches and principles**

There is no unique and simple solution able to overcome obstacles and promote IIEL, due to the complexity of the issue and the different starting points characterising the various European States. Whilst the legislation plays an important role, solutions at the urban level should also comprise other positively combined policy tools. Environmental legislation is usually complemented by a range of other measures and integrated implementation needs to be promoted mainly through positively combining different typologies of policy tools, such as funding or incentives, infringement procedures, cooperative actions, exchange of information/networks, training actions, demonstrative projects, etc.. In many cases these instruments aid legislative compliance.

Nevertheless it is clear that the legislation itself could play a positive role, evolving towards more integrated approaches and directly supporting this policy development effort.

Positive examples of integrated approaches at local level are the results of the use of integrated Plans or procedures (such as Strategic or Environmental Assessment, Strategic or Environmental Plans, Local Agenda 21, EMAS) based on shared goals and actions.

In the mean time, a “new generation” of tools, such as reporting, awards, benchmarking and ecolabel, greening consumerism, public purchase and public procurement, eco-incentives, internalisation of environmental costs within the market and public fare system, local power to use fiscal revenue for local purpose, etc. also make a positive contribution. They are all innovative and specifically oriented to increase public awareness and to change market and consumption patterns and are at present also being promoted in many EU policy documents.

Agenda 21 and similar integrated planning procedures could themselves represent a learning process for the subjects involved. In many cities Agenda 21 has succeeded quite well in spreading environmental information to the public and fostering openness and co-operation in special areas, even though sometimes such newly integrated processes are confined to only a part of the administration and its activities and fail to penetrate the administration sectors and activities as a whole.

Summarising, the general principles and approaches that the WG recommends to adopt, at EC and national/local levels, mainly consist of:

1. Enforcing **strategic (integration and with a long term perspective) visions**, planning ability, capacity to use a wider and more innovative range of tools
2. Promoting management skills to start up and join **participatory and proactive processes**, involving all relevant actors/bodies and to drive, adapt and implement local strategic planning, influencing and promoting the adoption of self - regulated behaviour from all the partners
3. Considering and reflecting **upon national/local specificity and differences**, being aware of new urban dynamics and of recent and relevant trends (such as increasing liberalisation of the environmental markets, globalisation of pressures, the need for urban renewal,...).

When and Where ? Integration should in general be sought “as soon as possible” in the decision and implementation processes regarding environmental laws, starting from the highest level possible. Environmental issues and considerations should be integrated in a planning process from the start.

## **2.6 Recommendations**

The Recommendations defined by the Working Group have been divided in 2 “types” : “Fields for action (WHAT)” and “Supporting Measures (HOW)” and are described in detail in the next 2 sections (2.7 and 2.8).

“Fields for action” represents “What” should be promoted, by EU Institutions and at national and local level, as good practice in relation to integrated implementation of environmental legislation. All 4 refer, in one way or another, to different kind of “tools”, potentially available for the local level, but currently not effectively promoted and supported.

“Supporting Measures” represents “How” EU Institutions should promote the above tools and stimulate the national and local level to explore them and built on these fields as they develop their own good practice.

These Fields and Measures could be imagined as vertical and horizontal lines in a Recommendation Matrix, where ALL the measures relate to ALL the Fields, with the aim to contribute to their promotion at national and local level.

<b>WHAT: FIELDS for action</b>	<i>1. Urban integrated Environmental Plans – AG21</i>	<i>2. EMAS</i>	<i>3. SEA</i>	<i>4. Innovative tools</i>
<b>HOW: Supporting MEASURES</b>				
<i>1. EU policy framework dedicated to the urban environment</i>				
<i>2. Action programmes, targeted to national government level</i>				
<i>3. Environmental Contracts and Agreements applied to urban areas</i>				
<i>4. Facilitate, network and disseminate good practices</i>				
<i>5. Training and communication programmes for the local public administration</i>				
<i>6. Funding policies for environmental integrated implementation in urban areas</i>				
<i>7. Governance models and legislation role</i>				

## **2.7 “What”: the 4 primary fields recommended for supporting action at European level**

**The WG recommends, as primary fields for Commission action, the following:**

- 1. Promote the use of Urban Integrated Environmental Plans based on Local Agenda 21 approaches and methods.**
- 2. Promote the voluntary implementation of EMAS in local-urban public policies**
- 3. Promote the voluntary implementation of SEA in local-urban public policies**
- 4. Promote the use of innovative tools specifically oriented to increasing public awareness and changing market and consumption patterns.**

### **2.7.1 Promote the use of Urban Integrated Environmental Plans based on Local Agenda 21 approaches and methods**

Background: Many environmental directives already require “action plans” (or a kit of coherent actions) to be implemented. The Expert Group on the Urban Environment also identified better integration of the requirements of EU environmental legislation into land use plans and other strategies prepared at local level (as Mobility plans) as a priority. Some Member States have developed national policies in this field, but not all member states and local institutions have a relevant policy framework or guidelines.

On the other hand many local authorities are already involved in local Agenda 21 processes (more than 1.300 cities have signed the Aalborg Charter, joined the European Sustainable Cities and Towns Campaign and launched the process locally). Many other have launched similar participatory planning processes, if not explicitly labelled as Agenda 21. Due to the voluntary character of the practice and to the lack of a “legislative framework” each local community is developing the AG21 practice in its own way. In some countries the Agenda 21 experience has been an opportunity to actively involve NGOs, to open a public debate on sustainability principles and to define a possible shared vision of the future for the local community, but has failed to exert a strong influence on environmental and sectoral policies in the medium term. In others, “*Local Agenda 21 has become the main environmental management tool at municipal level*” (Footnote: *Experiences with the LAG21 as a Policy Tool – City of Helsinki/2001*), but elsewhere it has failed in implementing effective participatory approaches.

Many Guidelines have been developed on Agenda 21 methods (e.g. the ones by ICLEI or others developed at national level by different agencies), but all of them underline the fact that the final output of the participatory process should be a “Policy tool”: an Action Plan, based on an integrated approach, with medium- to long – term perspectives, defining targets, actions, deadlines, partnerships and responsibilities; a tool, in other words, capable of redirecting sectoral policies towards sustainability. (See Annex “*Report on some examples of national good practices*”).

### **Recommendation:**

**The WG underlines the importance of introducing integrated approaches within and through Development plans and programmes at urban level,** starting with those required by Environmental Directives.

**Urban Integrated Environmental Plans** (developed with the aim to implement, in an integrated way, environmental legislation requirements of EU and national/regional policies) **should favour and foster integration within the “traditional environmental fields”** (water, soil, air, noise, landscape, nature, energy,...) **and in the other sectors**, where relevant (the priority being the city and land use development and mobility management).

The purpose of such local Plans, should be to **influence local “development strategies” in broad terms**, and they should **be strongly “action oriented”** (a clear programme of action, with deadlines, responsibilities, targets, monitoring systems, etc.). The establishment of **local “targets”** by means of the planning process should be basic requirement.

To enforce their contents and effectiveness, Plans should be developed by means of **participatory processes and be based on concerted long - term visions of sustainability**, as proposed by Local Agenda 21 approaches and practices.

Drawing up and approving an Urban Integrated Environmental plan, through a Local Agenda 21 participatory process, could become, if not “compulsory”, at least a “pre-requisite” **or a positive condition for securing EU funding** for local development.

To promote the use of these Integrated plans by means of local Agenda 21 as a policy tool” approach there is need for **strong supporting measures** on the part of the Commission (see in the next paragraph “How”), enforcing the direction already taken in the past with the establishment of the Expert Group, the launch of the Sustainable Cities Campaign and the implementation of the “Community Framework for

cooperation to promote sustainable urban development”. Further on the Commission should **promote the key role of active national policies**, as political and financial supporting measures for the local Agenda 21 approaches and methods (the key role of national policies has been widely demonstrated by the recent assessment of the main European Agenda 21 experiences, see e.g. by the LASALA Project).

### **2.7.2 Promote the voluntary implementation of EMAS in local-urban public policies**

#### Background

**EMAS**: for several years some Member States (e.g. UK) have developed pilot application of the European Eco - Management and Audit Scheme (EMAS) **to local public authorities**. Recently a revision of the - **EMAS** Regulation has extended the voluntary scheme so that it now covers now all private and public sectors including public authorities.

#### **Recommendation:**

**The WG underlines** the importance of **introducing integrated approaches through EMAS implementation in the public sector**. Public authorities that decide to implement EMAS have to assess all their significant environmental impacts, and develop an environmental policy and programme for continuous improvement. In addition, EMAS requires the publication of an environmental report and external verification of the system installed by accredited verifiers. Therefore **EMAS represents a suitable tool to support local integrated planning, and to guarantee monitoring of results in the future**.

At the same time is important to recognise the fact that public authorities, developing their own EMAS implementation also tend to **positively influence the private sector** (e.g. making use of EMAS in public procurement policies)."

To promote the use of EMAS in this specific sector (local public authorities) there is need for **strong supporting measures** on the part of the Commission (see in the next paragraph “How”).

### **2.7.3 Promote the voluntary implementation of SEA in local-urban public policies**

#### Background

Strategic Environmental Assessment - SEA (Directive 2001/42/CE, approved in May 01) is a procedure, to be applied to plans and programmes at all levels, that **could positively contribute towards IIEL**, since it should involve different sectors, consider different environmental aspects and analyse different alternative strategies to reach a certain goal through citizens’ participation. The objectives of environmental legislation should in particular contribute to defining the set of assessment criteria for SEA.

#### **Recommendation:**

**The WG underlines the importance of introducing integrated approaches through SEA, with particular focus on it as a tool for Urban Integrated Environmental Plans implementation.**

The Environmental Plans (as described in point 2.7.1), should define the “environmental target scenario” for the strategic environmental impact assessment – SEA of any sectoral plan affecting local environment. **Guidelines or SEA Dir. interpretative documents**, such as the ones under construction by Commission initiative and expected by the end of 2002, are welcomed and should underline this aspect, detailing procedure and methodologies (an effort in this direction has been produced by ENCORE - The Environment Conference of the Regions of Europe).

Moreover, it is important to consider that in many Member States, at all levels, the only (or the more relevant) plan is represented by the financial/budget programme (annual or biannual). This kind of plan (“*budgets and other plans and programmes of a financial nature*”), are excluded from the scope of the SEA Directive,. But these kind of plans/programmes in many cases govern local strategies very strictly, defining priorities (in terms of % of total public expenditure amount) and the list of actions to be financed without any other plans/programmes as background reference..

To succeed in strategic assessment policies, these kind of **financial plans** (when lacking any other plans as reference) **should also be considered as “ plans” and assessed**, together with the environmental aspects involved, in an integrated way.

Due to the present content of the SEA Directive (that does not consider financial plans), **the WG recommends involvement of Member States in a debate/reconsideration of this specific aspect for further Directive development, and promotes the application of SEA to this specific field, on a voluntary basis, involving Member States and regional and local authorities in pilot actions, by means of strong supporting measures** on the part of the Commission (see in the next paragraph “How”).

#### **2.7.4 Promote the use of innovative tools specifically oriented to increasing public awareness and changing market and consumption patterns**

##### Background:

Some experiences have shown the positive and great potential of some “Innovative” tools, capable of increasing public awareness and harnessing the behaviour of the business sector, citizens and local authorities towards more IIEL-oriented approaches, such as:

1. Indicators and reporting systems
2. Benchmarking, scoreboards, ranking systems, awards, name-fame-shame strategies
3. Green public procurement
4. Eco-Taxes/fares; Eco-Incentives/subsidies

##### Recommendation:

**The WG underlines the importance of introducing integrated approaches through promotion of the kind of Innovative tools mentioned above.**

**In particular the WG recommends:**

1. giving a strong role to the use of **Indicators and reporting systems at local level**, supporting Initiatives as the one called “European Common Indicators”, enforcing synergies with some other ongoing EU programmes, launching new actions in the field of local environmental accountability...

2. **comparing and making visible differences in performance and results**, adopting name-fame-shame strategies, organising awards events, ecolabelling local authorities (e.g. as the EU Blue Flag), launching a “Green local authority week”,..
3. continuing to promote innovations in the public purchasing field in line with the **Green public procurement** directives and existing supporting programmes
4. promoting the local use of **“economic” tools** such as: the internalisation of environmental costs within the market and the public fare system; the increase/decrease of a tax/fare with the aim to discourage uses/promote different behaviours; the local use of public money for grants to encourage voluntary actions that would not be taken otherwise (e.g. the EC funds for sustainable agriculture and forestry - Reg 2078/92, 2080/92).

All these instruments are potentially available, but they seem to be insufficiently disseminated at local level. **The WG recommends to strengthen the dissemination process, developing and planning supporting measures** (see also the next paragraph “How”), **taking into account the nature of the main obstacles:**

- cultural background, not always open to innovation,
- present statutory and fiscal system in many Member States, where local governments have very limited power to use this kind of tools,
- differences and constraints in private/public power sharing, where private companies are involved in environmental services management
- ongoing discussions on “conflicting interpretations” of the real possibility to use aids and incentives for environmental purpose (in some Member States State aids for urban regeneration and cleaning contaminated soil, or Energy eco-taxes were sometimes found to be in conflict with the “competition rules” set by the Commission).

**The WG considers that a stronger supporting effort**, developed at EU level, towards the dissemination of such innovative tools, could succeed in bridging the existing gaps. These are all areas where the EU can have a significant impact with relatively modest expenditure and low legislative cost.

## **2.8 “How”: the 7 “supporting measures” recommended for the European promoting action**

**The WG recommends as primary measures for Commission action**, with the aim to support and implement the 4 action fields described above, the following :

1. Enforce and further develop the **EU policy framework dedicated to the urban environment**, integrating and developing WG recommendations into the main EU policy process.
2. Launch specific **action programmes, targeted to Member states national government level**, with the aim to stimulate direct initiatives on their part.
3. Develop (as supported also by the EU Governance White Paper) the use of environmental **Contracts and Agreements** applied to urban areas.



4. Facilitate the dissemination of **good practice**, national/local approaches and methods, demonstrative projects, also by means of indicators, benchmarking, awards, name-fame-shame campaign.
5. Support **training and communication** programmes in the field of integrated and concerted approaches for the local public administration, with the aim to promote **innovation in the public organisation and to improve governance and empowerment**
6. Define and strengthen **funding policies** for integrated implementation of environment policy in urban areas.
7. Innovate and enforce **governance** models and the role of **legislation**.

Some more details on these 7 measures are described in the next paragraphs.

### **2.8.1 Enforcement and further development of the EU policy framework dedicated to the urban environment**

**The WG recommends that the Commission** develops the Council position related to the “*Thematic Strategy on urban environment*” in the Sixth Community Environment Action programme 2002-2011 (see here, par. 1.3), **in the direction expressed in this Report.**

In particular the Thematic Strategy line (“*promotion of Local Agenda 21*”) should follow the arguments, contents and criteria defined in para. 2.7.1 of this Report, where Local Agenda 21 processes are defined as participatory processes, involving NGOs, citizens and local institutions, with the aim to produce local integrated environmental plans (action oriented) able to drive and influence sectoral policies.

The Thematic Strategy line (“*the consideration of urban environment indicators*”) should be developed taking into consideration aspects and suggestions underlined in para. 2.7.4 of this Report, where Indicators are defined as a tool for addressing and monitoring local environmental integrated plans and where the main on going experiences (as the European common Indicators Initiative) are mentioned.

All the Measures listed and described in para.2.8 of the Report should be considered as useful **building blocks for the Urban Environment Thematic Strategy.**

### **2.8.2 Action programmes, targeted to Member states national government level**

Some of the 4 fields for action suggested in this Report (see para. 2.7) should not only be tackled by the Commission. In most cases the direct power to intervene and promote is in the hands of Member States national legal framework.

This is particularly the case with SEA application (at least on a voluntary basis) of local financial programmes and budget (see par 2.7.3), and the case of innovation in the local fiscal system (see par. 2.7.4), where only Member States could play a direct role in implementing the suggested actions. More generally, transposition of the European environmental legislation is clearly a national responsibility. In many cases (e.g. the promotion of Local Agenda 21) the efficacy of the Commission action could increase exponentially if developed directly by action at Member State level.

The Commission should launch specific Action programmes, targeted at Member states national government level, with the aim to **promote possible models of “national policies for local - urban sustainability” and specific parts of these Recommendations** (in particular the ones mentioned above). The **action**, could be based on Workshops, Handbooks, Bi-partite agreements, Pilot projects funding, etc.

As already underlined elsewhere in this Report the dissemination of good practice (helpdesks, knowledge centres, etc.) represents the key strategy for this action programme. As second level of action should be considered the promotion of positive “competition” among national and local governments (awards, name – shame – fame strategy, ranking, ...).

All the above actions, obviously, could be developed if previously implemented Recommendations n. 6 (supporting funding policies).

### **2.8.3 Environmental Contracts and Agreements in urban areas**

**The WG underlines the importance** of developing a system of “**voluntary contracts or agreements**” (or “covenants”, “treaty”), between the Commission and individual local authorities (and their national governments) with the aim to implement European environmental legislation more flexibly, overcoming specific local obstacles in complying with EU environmental requirements, whilst finding and allowing local adaptive solutions to achieve the EU best environmental standards.

**Some good practices at national level** demonstrate the potential of these kind of tools (as for e.g. the quality contracts that are so popular in the urban public transport). Preparing the content of a covenant is an awareness-raising process in itself.

#### Basic requirements

Taking into consideration the fact that a clear reference to these contracts has been recently made by the Commission in the European Governance White Paper (and a first “model” contract is under more detailed definition by DG Environment), **the WG recommends that** covenants and agreements should be set up, respecting the **following requirements/criteria**:

- **Clear definition of objectives, targets and success monitoring indicators for the whole area involved**
- **Definition of area-specific policies** (tailor-made solutions to problems, by means of Integrated Environmental Plans as described in par 2.7.1. The Netherlands City and Environment project represents an example in such direction) aimed to achieve environmental targets/standards for the area as a whole, in a comprehensive and integrated way (e.g. by means of “environmental compensations” mechanisms between sectors/problems) and using a wide range of tools
- **Involvement of all the actors** (including all the relevant institutional levels and NGOs, by means of local Agenda 21 approaches and methods) **in the process**, in order to achieve the best possible solution for everyone (win-win solutions) and wider control on the implementation.

#### Field of application

The “contract” (and/or the Pilot – demonstrative projects to be developed in its framework) could be **framed in order to achieve particular objectives defined in**

**environmental legislation**, through action at the urban level, also directed towards meeting local priorities/opportunities for environmental and urban regeneration.

**The WG suggests as a positive field** for implementation the issue of **contaminated sites and urban regeneration**: dealing with the remediation of contaminated areas in practice, requires “multi-objective” integrated strategies (in the field of soil, waste, water, land use, health,...), co-operative models among local stakeholders and horizontal and vertical co-ordination. The E.C. White paper on Environmental liability and the Commission draft paper on soil protection, may lead to EU legislation concerning future damages, but the old damages are still to be managed by means of “case by case” and “on the ground” solutions. In this regard, it seems feasible to suggest that, by a “contract”, the Commission manages agreements with local authorities to handle remediation of old contaminated sites, prioritising the most harmful situations and investigating the possibility to share the costs with the responsible or the gain winning partners.

**The WG underlines also the opportunity to maintain a “comprehensive” approach, not focusing on one single issue** (such as waste, water, biodiversity...) but **focusing, in an integrated way, on all the environmental problems and opportunities** of an individual area involved by a contract.

#### Involved parties/roles

The Contracts should be mainly **directed to “local authorities”** (not only Municipalities or Regions), chosen following consideration of the specific character and institutional asset of the area/problem to be tackled.

The Contract should be **“multipartite” involving Member States** (e.g. as funding contributors, and playing a key role in setting up such contracts and remaining responsible for their implementation) and the other main local parties with roles and responsibility in the area involved. Some kind of control / **involvement of the civil society** (NGOS,...) should be guaranteed (e.g. by means of Steering committee).

**The Commission should mainly play a role** in drawing up the contract contents (based on Integrated Environmental Plans, as mentioned above), in the permanent monitoring of action (contracts should not override national standards and laws) and in promoting faster and better implementation of the European policies and legislation.

#### **2.8.4 Facilitation, networking, and dissemination of good practices**

At European level interesting examples of good practice are available including a number of innovative national/local approaches and methods that could represent different and possible models to be followed.

**The WG recommends to maintain and strengthen** the European support for local authority **Networking** (by means of initiatives similar to the ones already on going such as the Sustainable Cities Campaign, the “Co-operation Framework...”, the Urban Exchange Initiative).

Arrangements must be made to facilitate to a greater extent the **exchange of experiences** among regions and cities (and local environmental agencies) in existing Member States and those in accession countries. Specific suggestions include organising ‘IIEL laboratories’ and developing toolkits for environmental implementation at a regional level. Further development of web-sites (e.g by the Sustainable Cities Campaign) is an important part of this Dissemination Strategy.

The Commission (as defined also by the European Governance White Paper) should **propose twinning arrangements** between national/regional/local administrations to share best practice in implementing measures within the area of “integrated implementation of environmental policies at local level”.

The Commission should take the initiative to make an inventory report with a description of the best practices in member states with the integration of requirements of EU environmental legislation in urban land-use planning processes and the enforcement procedures.

Is also important to raise the level from Good practices “project-based” to “policy-making based”, collecting and disseminating the good practises on the policy making (e.g. changing institutional set-ups, tax-system,...).

An other effective way to facilitate good practice dissemination is promotion by means of awards, ecolabeling for local authorities, benchmarking, ranking, scoreboards and name-fame-shame campaigns, directly managed by the Commission or its own Institutions and involving other key partners (NGOs, the existing European networks, etc.).

**The WG strongly supports the strategy proposed** in Art 3 of the Council position for the Sixth Community Environment Action Programme 2002-2011, which endorses:

- *promoting best practice with respect to sustainable land use planning, which takes account of specific regional circumstances ....;*
- *promoting best practices and supporting networks fostering the exchange of experience on sustainable development including urban areas...*

### **2.8.5 Training and communication programmes in the field of integrated and concerted approaches to improve governance and empowerment**

**The WG recommends giving and maintaining a high priority to awareness raising** actions so as to ensure successful delivery of any **training strategy** aimed at improving the integration of environmental legislation in local policy making by politicians and civil servants. **Education**, delivered locally, at all levels and to all stakeholders is a critical component of this.

The requirement to **promote local empowerment and dialogue** with and among urban stakeholders is to be strongly supported. **Support** of local authorities/NGOs governance **skills**, in the field of integrated and concerted approaches (horizontal and vertical co-ordination, multi-purpose and win win solutions, Agenda 21 approaches and practices) has to promoted.

### **2.8.6 Supporting funding policies**

Some opportunities to fund actions for the urban environment have been offered in recent years under some **EC funding Programmes** (e.g. as developed in the past or more recently by ALTENER/SAVE, LIFE; Urban initiative and SF art 10 – Pilot Projects, Interreg, DGEnvironment funds for communication/education, Research programmes;) and by the recent implementation of the “Community Framework for cooperation to promote sustainable urban development”.

**The WG recommends to maintain these programmes and steer their use more and more in the direction of** environmental integration at urban level in coherence with the strategies defined in this Report. The 4 fields of action (par. 2.7) and some of the 7 Measures (par 2.8), should represent priorities for these funding programmes.

**Their budget should be augmented**, considering the increasing interest in the issue. **National networks** of local authorities (or partnership among them) should **also be eligible for these funds**.

The EU funding regulations (1260/99) or **Structural Funds 2000-2006** are becoming more and more strict with regards to “compliance with environmental legislation” as a prerequisite for financing. Monitoring procedures to assess the environmental impact of the projects funded and participatory processes to define them have been set up. But despite these requirements, the need **to strengthen the use of SF in the direction of environmental integrated approaches at urban level**, still remains a field for further actions. 2003 should represent an important interim milestone for monitoring and “greening” the ongoing SF round.

**The WG recommends to maintain and strengthen the monitoring procedures** on environmental legislation compliance (the on going EU actions implementing localised urban indicators represent a key monitoring strategy. The Urban Audit II indicators, under development at the moment, could be steered into a direction which takes more into account the fact if and how the EU environmental legislation has been implemented by the local authorities.

**IIEL approaches** (in the form of a local Agenda 21 process, or Local Integrated Environmental Plans) **should be considered as a positive pre-requisite** to obtain funds and **a subject for the SF quota dedicated to Commission initiatives and “innovative projects”**. This SF quota should be also be clearly **addressed to supporting the “Environmental Contracts” measure** (see par. 2.8.3).

**The WG also recommend to verify and realise synergies** with all the existing opportunities for orienting other European funds towards environment purposes and integrated approaches, , such as those managed by other DGs, responsible for Energy, Transport, Agriculture, Industries, Tourism, Information Society, etc.

**The WG recommends to define and support all the funding measures able to support the effective implementation of the “Environmental Contracts” measure** (2.8.3) also by means of demonstrative Pilot projects , co-funded by the Commission and Member States.

**The WG recommends also to support empowerment**, promoting stronger engagement of Member States in enforcing the role of local authorities, citizens and NGOs **in the direct control of European/national funds** and in controlling decisions and supporting EC Directives implementation (e.g. through European/local steering committees for fund control/management); to promote (with good practice dissemination, training, etc.) **local capacity building** in achieving and using funds in the IIEL perspective.

### **2.8.7 Governance models and legislation**

**The WG underlines the need to strengthen an integrative approach in existing and future EU environmental Directives and to open up the whole process of preparing and implementing European legislation and policy.**

This concept is explicitly adopted in the 1996 Communication on Implementing Environmental law” and has, more recently, been developed in the 2001 “European Governance White Paper”. As already stated in the White Paper “*Better involvement and more openness*” and *Better policies, regulation and delivery*” now represent priority issues in the Europe agenda.

**The WG strongly supports (and requests the implementation of) the European Governance White Paper (EGWP) approach and Commission engagement with regard, in particular, to the following statements (EGWP quotations are in *Italics*):**

- *provide up-to-date, on-line information on preparation of policy through all stages of decision-making; (the WG recommends also to intensify the approach aimed at inserting legislation from the point of view of genuine implementation also by means of “pre and post P.R. work” (with the Member States direct co-operation), disseminating better information on the advantages of fast and comprehensive implementation of EU-directives for local authorities and every citizen in the different member states)*
- *establish a more systematic dialogue with representatives of regional and local governments through national and European associations at an early stage in shaping policy; (the WG recommends also to Introduce a sort of “enquiry” to identify and eliminate specific barriers on the way to an integrated implementation of Directives at national level)*
- *bring greater flexibility into how Community legislation can be implemented in a way which takes account of regional and local conditions (“Improving the quality of EU policy involves using a combination of different policy tools, speeding up the legislative process, and finding the right mix between imposing a uniform approach and allowing greater flexibility in the way that rules are implemented on the ground”); (the WG recommends also the production of “framework and target oriented” Directives (as defined by the Governance paper and by the WG debate, see Annex – Contents of the debate/Obstacle 1, the reference to the new Framework Directive on water as a positive example). The aim is to promote, also by means of the legislation, the use of a wider range of tools in an integrated and adaptive way, taking into consideration different regional and local situations, having as a main objective the achievement of environmental targets and standards as defined by policies and laws, in ways other than strictly adhering to legal procedures. Urban mobility/Air/Noise could represent a priority for such a legislative effort, considering the fact that they represent a “cluster” of issues, strongly interrelated, where environmental targets (respect of air and noise levels) can be reached in different ways, if considering the 3 issues as a whole.*
- *establish and publish minimum standards for consultation on EU policy (what to consult on, when, whom and how to consult); (the WG recommends use of hearings and working groups, enlarging existing consultation procedures with the aim to involve also medium-sized cities; to use existing Webs, Newsletters, and augmenting the DGENV funds for Communicative actions at national level).*
- *establish partnership arrangements going beyond the minimum standards in selected areas committing the Commission to additional consultation in return for more guarantees of the openness and representativeness of the organisations consulted;*
- *develop a more systematic and pro-active approach to working with European and national associations of regional and local government, to enable them to contribute to decision shaping and policy execution; (The WG specifies that “associations” should include at least the following - the 5 city networks participating at the*

European Sustainable Cities campaign, the largest number of those eligible for the “Community Framework for co-operation to promote sustainable urban development” and the regional/national networks focused on sustainability issues, representing a relevant number of cities/inhabitants; **the WG also recommends** that specific funding/training actions should be defined aimed at creating Networks of “**professional legal skill**”).

- *promote greater use of different policy tools (regulations, “**framework directives**”, co-regulatory mechanisms)*
- *simplify further existing EU law and encourage Member States to simplify the national rules which give effect to EU provisions; (the WG also recommends that **technical language used in Directives is made clearer** in order to enable citizens to understand the texts more correctly, in the light of their bottom up role in the implementation control and that terminology among different Directives should be harmonised).*
- *develop a stronger culture of **evaluation and feedback** in order to learn from the successes and mistakes of the past (the WG also recommends strengthening of monitoring with wide use of **the name- fame-shame strategy**);*
- *reinforce attempts to ensure policy **coherence and identify long-term objectives**, while the EU institutions and Member States must work together to set out an overall policy strategy.*

**Furthermore the WG recommends strengthening of horizontal co-ordination across EU Directorates General (DGs) and all Units in DG-Environment**, in order to realise positive synergies and links among different Directives (e.g. highlight links between separate plans related to traffic-air-noise with the aim to promote, by means of Directive implementation, Local Integrated plans; links between different Reporting requirements with the aim to promote integrated State of the Environment, etc...). Detailed proposals on DGs internal co-operation have already been defined by the WG Sustainable Land use Report, Recommendation n. 12 , Nov. 2000.

**The WG, in coherence with the above recommendations, strongly supports (and requests implementation of) the strategy proposed** in Art 10 of the Council position for the Sixth Community Environment Action Programme 2002-2011, which defines the following as priority actions:

- (a) development of improved mechanisms and of general rules and principles of good governance within which stakeholders are widely and extensively consulted ...*
- (b) strengthening participation in the dialogue process by environmental NGOs*
- (c) improvement of the process of policy making through ex-ante and ex-post evaluation ...*
- (d) ensuring that environment and notably the priority areas identified in this Programme are a major priority for Community research programmes...*
- (e) ensuring regular information (through indicators) ...*
- (f) Reviewing and regularly monitoring information and reporting systems ...*

**The WG underlines also that the European Union Network for the Implementation and enforcement of Environmental Law (IMPEL), could and should play an important role** in the described direction. IMPEL Projects such as the one on “Interrelationship between IPPC, EIA, Seveso Directives and EMAS Regulation” (adopted 1998), and the one on “Integrated permitting procedure” (2000) shows the **IMPEL capability** to realise analysis on European legislation with the aim to identify

potentially unwanted discrepancies or overlapping and to highlight the possibilities of using the synergies between different legislative instruments. .

**A similar effort could be developed (by or with IMPEL)**, with reference to issues and environmental legislation that have particular relevance in the urban context (e.g. waste, air). Issues such as noise and traffic (IMPEL currently has no competence) could be considered as further fields, where IMPEL action could be extended in future.

**The primary aim should be to highlight synergies, establish links and identify ways to avoid duplication**, and propose feasible and integrated solutions (by means of Recommendations or Guidelines, see Measure n. 2) to Member States and Local authorities with reference to:

- production of information, documentation or Plans
- development of participatory processes
- management of required decisions
- monitoring actions

as required by a single piece of EU legislation.

**Finally, the WG strongly recommends defining the “legal basis” (and financial support) for Tripartite contracts and Voluntary agreements (see Measure 3).**

### **3 ANNEXES LIST**

**3.1 Annex 1: Working Group terms of reference**

**3.2 Annex 2: the WG**

**3.3 Annex 3: WG overall work**

**3.4 Annex 4: WG preliminary debate – contents**

**3.5 Annex 5: Overview of EU policy framework**