



Brussels, 6 October 2011

To : EU Environment Ministers

RE: Environment Council, 10 October 2011 - Agenda item: Rio+20

Dear Minister,

We, the undersigned NGOs, are writing to bring to your attention our concerns regarding the EU position on the Rio+20 Summit. In the true spirit of collaboration, we are willing to support actions and commitments taken by the EU to promote and ensure sustainable development worldwide.

We welcome the overall concept of the green economy in the context of sustainable development and poverty eradication, as an important theme of the Rio+20 Conference. However, we note with regret a gradual deterioration of the concept of "sustainable development" over the two decades since Rio. Whilst we recognize that the greening of our economies can make a significant contribution to sustainable development, we feel that it cannot serve as the main strategy to reach sustainable development. The concept of green economy as it has been presented by the EU so far does not resonate with social equity and with the fair sharing of resources.

The current EU 2020 Strategy promotes "sustainable growth", which is significantly different from sustainable development. The strong focus on growth is at odds with sustainable development and cannot be compensated by the Resource Efficiency Flagship Initiative. It would be better to upgrade and renew the EU Sustainable Development Strategy as the overall framework for development in the EU.

In order for the EU to maintain its leading role on the world stage, it has to be willing to take leadership by example not for Europe only, but also with respect to third countries. We strongly reject any use of the current global financial and debt crisis, which affects Europe as well, as an argument to delay tackling the associated environmental and social challenges; we see it rather as providing an opportunity to create the momentum for a change to a sustainable Europe.

The suggestions below, given by the signatory NGOs, are submitted for kind consideration by the Council in its upcoming deliberations.

Green economy in the context of sustainable development and poverty eradication

Green economy is an important tool for achieving sustainable development, but much more is needed to solve problems of inequity and respect human rights worldwide. The need to transform patterns of consumption and production has been recognized since 1992. But most of the strategies are focusing on technological innovation (eco-efficiency), without taking into account the so-called “rebound effect” which minimizes efficiency gains. We need ultimately to set a baseline and eventually reduce in absolute amounts our use of natural resources. This should happen alongside a long-term reallocation of natural resources to tackle poverty and inequity. It is necessary that the EU also acknowledges this challenge and tries to develop a roadmap for a green and fair economy, based on the equitable sharing of natural resources. The Resource Efficiency Flagship Initiative needs therefore stronger commitments and targets and timetables to reach that goal, recognizing that even with the most eco-efficient technologies, Europe will struggle to live within its environmental limits and therefore will need more social innovation to achieve sustainable lifestyles.

Governance for sustainable development

Concerned at the inadequacies of existing governance structures to help meet our sustainability goals, we call for strengthened institutional frameworks for sustainable development.¹ This could take the form of a reform of UNEP to a specialized agency and a decision to strengthen the Commission for Sustainable Development to the status of Council. The latter should also include the role of an Ombudsperson or High Commissioner for sustainable development that would be independent of overarching bodies and able to make fair unbiased assessments of the implementation of sustainable development goals. A similar institution at the national level would ensure not only that we integrate sustainability into the heart of policy making but also that we include the interests and concerns of the public and civil society alike. We call upon the EU to facilitate active involvement of civil society, including all of the major groups to ensure they are fully embedded in future governance frameworks. This should be done by establishing and/or strengthening adequately resourced National Advisory Councils on Sustainable Development.

We also call for the EU’s valuable experience with the Aarhus Convention to be made available to the Rio+20 Conference, both by lending support to calls for a global convention on Principle 10 of the Rio Declaration and by proposing that the Conference should result in the preparation of guidelines

¹ As defined by the Brundtland Report, 1987

providing minimum standards of civil society participation in international fora dealing with the matters related to sustainable development.

We call for strong commitments on those three themes:

(Legally) binding instruments: as soft law does not give us the needed results, we believe that (inter)national legal frameworks, product norms and regulations have to be part of the toolkit for achieving a Green and Fair Economy. We furthermore demand governments to support certification systems and public procurement practices at all levels with sustainable products and services.

Sustainable Development Goals: such goals, as proposed by Colombia and endorsed by civil society organisations during the last UNDPI conference², would complement and build on the Millennium Development Goals.

Innovative finance mechanisms: New and innovative financial mechanisms should trigger structural and systemic changes which will lead to sustainable development. Reform of taxation, removal of harmful subsidies and other measures are needed to discourage harmful activity in the real economy and financial sector, reflecting true costs to environment and society while contributing to greater equity. The EU's financing commitments for international agreements on tackling climate change, deforestation and biodiversity loss as well as the Millennium Development Goals are adding up, while European government budgets are facing ever greater pressures. With the European Commission's proposal for a Financial Transactions Tax within Europe, the EU has an historic chance to offer global leadership in this domain, by securing a substantial portion of the resulting revenues for the global challenges of poverty and climate change.

Conclusion

As Brussels based NGOs, we are actively involved in the preparations for the Rio+20 summit and we are keen to continue communication with you and your administrations on those topics, where we can offer you tools and policy proposals. Rio+20 will be a historic moment of environmental multilateralism, where the global south looks to the developed countries to see what we can put on the table – and not only in financial terms. We are in the same boat altogether – and we should unite our efforts to pull in the same direction, even if our paddles are different.

Kind regards,

Andras Krolopp (Ceeweb), Leida Rijnhout (ANPED), Jeremy Wates (EEB), Bernd Nilles (CIDSE), Catherine Pearce (WFC)

² <http://www.un.org/wcm/content/site/ngoconference/resources/final>