



ESPP input:
**EU public consultation on the proposal for
“Environmental Implementation Review”.**

https://ec.europa.eu/info/law/better-regulation/initiative/1969/publication/319625/attachment/090166e5bec82559_en

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NOTE: the consultation concerns the proposed outline and objectives of the evaluation. The consultation does not address farm policy itself.

ESPP INPUT TEXT

We welcome the continuing emphasis placed on environmental implementation by the Commission. European Commission monitoring, incitement and enforcement actions have, in particular, played a key role in moving towards better protection and improved quality of Europe's surface and ground waters. European action has been essential to addressing from eutrophication, especially through implementation of the Urban Waste Water Treatment Directive and the Nitrates Directive – although in both cases, further action is needed. European implementation actions will also be critical in achieving the Water Framework Directive objectives.

We support the statements in the proposed review Roadmap that weak environmental implementation generates high societal costs and creates an uneven playing field for sustainable business.

We welcome the proposed approach of the Environmental Implementation Review (EIR): country reports and local examples, identification of important implementation gaps, assessment of causes of these failures, sharing of best practices, dialogue on possible solutions.

The importance of interactions between EU environmental policies and other policies and sectors is recognised in the proposed Roadmap. This is very important, and the review should aim to identify aspects of other EU policies which directly or indirectly counter environmental implementation.

In particular the review should assess the impacts of the Common Agricultural Policy (CAP): agriculture is mentioned in the proposed Roadmap and in the 2017 EIR communication COM(2017)63, but not the CAP. Whereas, the CAP has a major impact on the EU's environment, and on environmental policy implementation and compliance: e.g. achievement



of water policy objectives, as cited above; air quality objectives: National Emission Ceilings Directive.

We welcome that EU tax/fiscal policies, which also significantly impact environmental implementation, were discussed in the EIR communication COM(2017)63. They are not mentioned in the proposed Roadmap but should be added as a key factor to address.

We welcome the widening of scope proposed to cover climate change, industrial emissions and chemicals. We suggest that:

- chemicals should include pharmaceuticals and microplastics, both of which are of significant concern as regards water policy and circular economy (contaminants posing obstacles to organics and nutrient recycling)
- waste should be widened to consider the Circular Economy package, resources and Critical Raw Materials.

The European Sustainable Phosphorus Platform (ESPP) promotes the implementation of sustainable phosphorus management in Europe, in particular phosphorus recycling. ESPP is a non-profit organisation, funded by its members. The Platform has over 40 members from a range of different industries (water and waste companies, mineral and organic fertilisers, chemicals, recycling technologies), knowledge institutes and public establishments.

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