

To: Commission President Ursula von der Leyen, Vice President Frans Timmermans, Vice President Maroš Šefčovič, Vice-President Margrethe Vestager, Commissioners Thierry Breton and Virginijus Sinkevičius

14th October 2022

Dear President, Dear Executive Vice Presidents, Dear Commissioners,

Civil society vision on how the EU can deliver the European Green Deal and address the multiple crises we face

Europe is at a turning point in history and the EU's response to the current geopolitical and fuel price crises, and to the linked climate, biodiversity, and pollution crises, will define what the EU is and what future we are choosing for current and future generations.

When you launched the European Green Deal (EGD), you classified it as a “man on the moon” moment in 2019 that promised to deliver a set of deeply transformative policies able “to reconcile the way we produce, the way we consume, with our planet and to make it work for our people”. Civil Society's [mid-term assessment of the EGD](#) highlighted several achievements but also missed opportunities that we believe need to be addressed by the European Commission in 2023 if the EGD ambitious agenda was to succeed.

We are highly concerned that the Commission's [Letter of Intent](#) listing priority initiatives for 2023 failed to mention a number of the priority legislative files we have been expecting for the European Commission to publish in 2023 based on earlier plans by the European Commission.

We are writing to you to ask you to:

- A. Adopt an ambitious Work Programme in 2023 and resist pressures to delay important files; and
- B. Drive initiatives to help Europe overcome the current energy crisis.

Together this can create the “man on the moon moment” for Europe, while making a major contribution to addressing the current energy price, climate, environment, and social crises.

A. Adopt an ambitious Work programme 2023 and resist pressures to delay important files

It has become increasingly evident that many arguments are being tabled to delay key files that had been promised for 2023 and essential for the success of the EGD.

Critics of the EGD are defending business-as-usual and demanding that there be no new regulatory obligations. This would mean missing the opportunity to make these sectors climate resilient and environmentally responsible. Listening to these unjustified arguments risks locking-in wrong and overly short-term solutions and should be resisted.

Good short-term solutions should and can enable long-term viability and sustainability. In fact, faster implementation of the EGD will help support fuel independence, reduce fuel prices faced by industry and consumers, as well as boosting green innovation.

If the proposals that had been promised for 2023 by the Commission are delayed, then there is a strong risk of missed opportunity as a new Parliament and Commission may not continue the inter-institutional negotiations in late 2024, undermining the legacy of the EGD. Legislative initiatives that need to be prominent in CWP2023 include:

- The **REACH regulation, originally foreseen for 2022**. The REACH reform proposal should not happen beyond March 2023. Note that REACH will not create obligations on companies in the short term. The objective of a toxic-free future ahead of us will trigger new solutions and investments. If the Commission sticks to its EGD promises on REACH, then the EU will be in a good place to avoid future chemicals pollution, negative health impacts, and worsening the climate and biodiversity crises.
- The **Review of the EU Mercury regulation**, initially planned for Q4 2022, and now promised for Spring 2023, should not be delayed further. A few months delay in the CWP can lead to years of actual delay.
- The **new Sustainable Food Systems (SFS) law**. This is a fundamentally important piece of legislation and essential in our bid to ensure food system sustainability, long-term resilience and food security.
- The **Soil Health Law** and **Forest Monitoring Law** were all also earlier promised for 2023. You should keep this promise. These are essential laws to invest in the regenerative economy promised in the 8EAP.
- The **Raw Materials Act** is particularly needed to contain the demand for critical materials, secure recycling investments through systematic and ambitious recycling targets, and only allow mining on condition of strict environmental and social criteria.
- While progress has been made on carbon emissions from new cars, trucks, if left untouched, will eat up all the car CO2 savings by 2030. The Commission should propose **truck CO2 standards** no later than January 2023, including a 100% CO2 reduction from new freight trucks not later than 2035."

B. Drive initiatives to help Europe overcome the current energy crisis.

The way forward needs to be a positive agenda that gives companies and citizens hope and leaves no one behind. The following priorities should be embraced to demonstrate EU action and concern and drive a positive way out from the fuel crisis. We ask you to:

1. **Push for the fastest possible roll out of energy efficiency, energy savings and building renovation measures.** This will decrease the burden on the private and public sectors. Particular attention should be paid to the most vulnerable and most affected by energy poverty;
2. **Speed up renewables deployment** without undermining EU law or consultation processes that underpin our democratic model and reputation for the rule of law. We are very concerned about the weakening of assessment processes and consultations and the implications not only for nature but also for citizen support;
3. **Promote taxes on windfall profits** to raise needed funds and to give a signal of fairness to the population. Make direct use of the taxes to fund renovation, energy savings, renewable technologies to support households in need;
4. **Ensure that the Social Climate Fund is well-resourced** and revenues from it are a reliable source. This can be a real game changer if it helps countries provide social assistance and an alternative to the fossil fuel subsidies that many countries cannot afford;
5. **Encourage national action and policy reform.** Make use of the Semester, the National Recovery and Resilience Plans (NRRPs), as well as the National Energy and Climate Plans (NECPs) to push for policies to drive renewable and energy savings;
6. **Promote green hydrogen in a targeted way** to enable fuel switching from fossil gas and support some hard-to-abate industrial activities, but do not promote hydrogen for domestic heating, as this is not a cost-effective use. Green hydrogen production should only be based on additional renewable electricity;
7. Push forward a substantial reform of the **Stability and Growth Pact.** This can provide the fiscal space to fill the green funding gap and make Europe energy independent from fossil fuels;
8. Promote actions to reduce national **material and consumption footprint** to scale up of resource savings;
9. Invest in **safe and sustainable by design chemicals** to support EU chemicals industry transition towards decarbonisation and detoxification as well as to reduce energy dependence;
10. **Implement and enforce the EU laws:** the EU already has important laws in place, however, their implementation and enforcement have not been given a top priority by the European Commission, thus missing opportunities to protect nature, achieve sustainable water management, achieve energy savings, improve the energy performance of buildings, products and processes, support resource efficiency, and help reduce sensitivity towards fuel and material prices among others.

The Commission and many Member States have already moved on a number of these areas. Of course, had the EU moved faster on energy efficiency, renewables, less fossil-dependent chemicals, and circular economy before, our societies wouldn't be in as difficult a situation as they are now. A further positive push in these areas will create an agenda of hope, increase our resilience and be a clear demonstration of solidarity.

You are at a turning point.

You can either accelerate the move towards energy and materials independence or you can take a step back into the past by subsidising fossil fuels and deregulating. The former creates a solution for the future and is a peace project. The latter is a major missed opportunity and reneges on your responsibilities for our youth and future generations.

The EGD has the potential to be the transformative agenda we need, that citizens demand, that science argues for, and make industry future proof. It can be the "moon moment" that you promised, at this critical moment in our history.

We look forward to an ambitious work programme for your Commission in 2023.

Yours sincerely,

A handwritten signature in black ink that reads "Genon Jensen". The signature is written in a cursive, flowing style with a large loop at the end.

Genon Jensen, Executive Director of Health and Environment Alliance (HEAL) on behalf of the Green 10