

EUROPEAN ENVIRONMENTAL POLICY AND THE STRATEGY 'EUROPE 2020'

Olga GIOTI PAPADAKI

Associate Professor

Department of Economic and Regional Development

Panteion University

opapadak@panteion.gr

Abstract

The evolution of European environmental policy is examined in this paper in conjunction with the objectives of developmental strategy 'Europe 2020'. The possibility of being mutually supportive with the objectives of environmental policy is a key issue in this paper. It might be argued that the current economic crisis has negative impacts upon the overall achievements of the European Union. In this light, the success of the implemented strategy can be said to be a necessity. The approach in this paper is based on the contention that adopting environmental protection objectives, apart from moral and sustainable reasons, is amongst the most important apparatus for overcoming economic downturn, given that the European Union is able to reduce its dependence on imported energy resources and take advantage of its leadership on environmental technology.

Environmental Policy

As early as 1986, protection of the environment has become a common policy objective, mentioned in the European convention texts and the Single European Act.¹ In the Maastricht Treaty in 1992, the concept of environmental protection was upgraded and "to promote harmonious and balanced development that should be stable, lasting, non-inflationary, and respectful of the environment", became a fundamental objective of the EU.² Subsequent revisions expanded further the content of the respective title³ which now constitutes the legal basis for environmental protection. The Treaty of Lisbon elevated environment protection to the status of an EU objective,⁴ stipulating that the EU member states must finance and implement environmental policy.⁵

Environmental policy in the EU has a long history, beginning with the adoption of waste management policy. During the 1970s and 1980s a series of problems and scandals involving waste treatment gave the necessary impetus for the creation of environmental policy. Adopting stricter environmental regulation requirements in the industrialized countries caused a very rapid increase of the disposal cost of hazardous waste. In seeking cheaper ways to get rid of waste, certain "toxic materials businesses" began to transport hazardous waste mainly to developing countries and Eastern Europe. Exposing such activities, an international outcry prompted a new agreement in 1989, the Basel Convention; namely an international environmental agreement regulating the transboundary movement of hazardous waste. As a result, the European Community established a system for monitoring and checking every shipment of transported waste.

Its first directives, however, did not specify the acceptable environmental emission parameters for waste management, namely sanitary burial of waste, incineration and recycling. This omission inadvertently allowed waste disposal methods that were, in effect, harmful to the environment.

Most of the omissions were tackled later in a directive on spaces for sanitary burial of waste, endorsed in 2001, and by a 2000 directive concerning the incineration of waste. These directives established standards for atmospheric and groundwater pollution and the legislative texts formed the foundation of the regulatory structure for waste management.

Environmental policy in the EU is formulated in the EU Environmental Action Programmes, setting the appropriate policy framework in accordance with the priorities adopted during their effective period. This has led to the establishment of legislative acts that cover particular aspects of

¹ Single European Act, Article 25

² TEU Article 2

³ Treaty of Amsterdam, Article 130S

⁴ TEU (as amended by the Treaty of Lisbon) Article 3

⁵ Treaty on the Functioning of the EU, Article 192

environmental protection. The Sixth Action Program,⁶ which will be in effect until year 2012, emphasizes four priorities:

- Climate change, with the short run aim of achieving the Kyoto protocol goals
- Biodiversity, with primary emphasis is on the prevention and management of major disasters involving hazardous substances⁷, and on expanding the Natura 2000 Network⁸
- The connection between the environment and health, aiming to environmental quality such as that human health is neither threatened nor negatively influenced;⁹ and finally,
- Sustainable management of resources and waste materials. Regarding the latter, the EU endeavors to define the objectives and describe the instruments by which it can move towards a better waste management, clarifying also the current legal frame of reference. Waste management is considered a priority field in the general endeavor of simplifying European law.¹⁰

The Sixth Action Plan is followed by the integration of environmental protection issues¹¹ in the fundamental development strategy ‘Europe 2020’. The EU environmental policy is permeated by the principle “*The Polluter Should Pay*”, which is incorporated in EU treaties following the adoption of the Treaty of Maastricht.¹² Another important principle is the Extended Producer Responsibility Principle, with positive consequences on the recycling processes. According to this principle, the producers and importers of goods share responsibility for the environmental impact of their products for the entire duration of the products’ life, from the acquisition of raw materials, through the manufacturing process, the distribution and use of the products (Davis et al, 1997). This, rather broad, interpretation of the principle “The Polluter Should Pay”, acknowledges the fact that the producer shares the responsibility towards limiting pollution. The argument runs as follows. The cost of recycling solid waste should be borne primarily by the producers—who will thus be compelled to design their products in such a way as to assure the longest possible useful life and optimum reclaiming in the waste phase, facilitating recycling. This principle is originated in two Directives of year 2002.¹³ The two principles described here have been combined in the Framework Directive of the European Parliament and the Council concerning waste management.¹⁴

Public Health

The Treaty of Maastricht was the first EU treaty which has included a title on Public Health¹⁵, stating that “The Community contributes to assure a high level of protection for human health, by encouraging cooperation among the member states and, where required, supporting their action.” Stated in an alternative way, initially, the action of the European Community regarding matters of Public Health was limited, consisting solely in the coordination of respective national policies. A subsequent amendment of the Treaty included a moderate expansion of the content under this title by

⁶ Decision No 1600/2002/EU, 6th Action Program for the Environment was decided by the European Parliament and by the Council (decision issued on 22 July 2002) and it sets forth the strategic framework for environmental policy making in the European Union during 2002-2012.

⁷ Council Directive 96/82/EU of 9 December 1996 on the control of major accident hazards involving dangerous substances.

⁸ Council Directive 92/43/EC of 21 May 1992 on the conservation of natural habitats and wild fauna and flora.

⁹ Announcement dated 24 January 2001 by the European Commission to the Council, the European Parliament, the Economic and Social Committee and the Committee for the Regions, concerning the Sixth Community Action Program for the Environment “Environment 2010 – Our Future, our Choice” [COM(2001) 31 final

¹⁰ COM (2005) 535 Communication of the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of Regions Implementing the Community Lisbon program: A strategy for the simplification of the regulatory environment

¹¹ It should be noted, nevertheless, that several items were already included in the Lisbon Strategy.

¹² TEU Article 130R 2; Treaty on the Functioning of the EU, Article 191 Paragraph 2 “It shall be based on the precautionary principle and on the principles that preventive action should be taken, that environmental damage should as a priority be rectified at source and that the polluter should pay”.

¹³ Directive 2002/95/EU of the European Parliament and of the Council, dated 27 January 2003 regarding the restriction of use of certain hazardous substances in electrical and electronic equipment; and Directive 2002/96/EU of the European Parliament and the Council, dated 27 January 2003 on waste electrical and electronic equipment (WEEE)

¹⁴ Directive 2008/98/EU of the European Parliament and of the Council, dated 19 November 2008 on waste and repealing certain directives.

¹⁵ TEU Title X (Consolidated version of the Treaty on the Functioning of the EU: Title X Article 152 (former Article 129)

anticipating (among other things) that the Council may institute “measures to encourage the protection and improvement of human health [...]”¹⁶. The respective Article forms the legal base upon which the articulation of European Public Health Policy is based.

The Directorate General for Public Health has also presented five special action programs for Health (cancer, drug addiction, and so forth) and two programs in total, one for period 2003-08 and one for period 2008-13.¹⁷ In addition to the independent action programs, the two General Directorates, one for the Environment and one for Public Health, presented their first joint program, covering period 2004-10.¹⁸ The proposal for joint action emerged due to the realization of the fact an increasing growing number of Europeans citizens are concerned about the environmental effects on health. Its principal objectives are:

- Contributing to scientific knowledge on the effects of certain environmental parameters upon the health of human populations,
- Improving cooperation among all agencies involved, and finally
- Helping review and revise the answers that policies offer to resolve problems as they arise.

The level of the European strategy concerning health can be considered as quite satisfactory, even though member states bear primary responsibility for health issues. Even more satisfactory is the overall level of European environmental law, which is probably the most contemporary and potent legal system in the world for environmental protection. There is a variety of Regulations and Directives adopted by the EU under this policy, serving to regulate the entire breadth of individual issues connected with the protection of Public Health and the Environment. In addition to the general provisions, defining the principles, several action programs and instruments employed under this system. In particular, strategies for sustainable development, climate change, air pollution, the protection and management of water resources, the protection of Nature, biodiversity, protecting the soil, chemical products, protection against environmental accidents and disasters, waste management, and noise pollution, are also included in European Union regulations.

Distribution of Competences between the EU and the Member States

The European Union functions abide by the Principle of Conferral, maintain that EU competences remain within the limits conferred to the EU by its member states,¹⁹ while all the competences that have not been expressly conferred to the EU remain in the domain of the member states.²⁰ Certain competences have been granted to the EU in full (e.g. monetary policy) while others are shared between national and supranational institutions. The latter category includes the policies for the environment and for Public Health protection. These are policies where the competences conferred by the member states to the EU are not exclusive, and the member states retain the option of adopting more stringent intervention measures if they choose. The funding and implementation of those measures are also in the hands of the member state, and the EU may intervene only if and to the extent that the objectives of the proposed action cannot be achieved to a sufficient degree through the actions alone of the lower level of administration, according to the principle of Subsidiarity. The competences, determined as exclusive, are clearly distinguished in law from concurrent (or parallel) competences, in the sense that EU regulations may be more succinct and clear for its citizens.²¹ If competences are concurrent, the European Union operates in accordance with the principles of Subsidiarity and Proportionality.

¹⁶ Ibid., Article 152 Paragraph 4c

¹⁷ COM 2007/630 final

¹⁸ [COM\(2003\) 338](#) final

¹⁹ TEU (as amended by the Lisbon Treaty) Article 5

²⁰ TEU (as amended by the Lisbon Treaty) Article 4

²¹ Treaty on the Functioning of the EU Articles 3 and 4

EU Laws and their Application

Nowadays EU environmental policy covers practically every environmental issue. Member states are charged with transcribing EU level provisions into national law, as to implement in each country. The obligations of the member states vary in accordance with the type of the legal provisions. European level provisions are distinguished into Regulations, Decisions, and Directives. Regulations impose immediate and undeviating provisions on all member states. Decisions apply only to specific member states or sectors. Directives define one or more objectives that must be fulfilled by the member states within a determined time, without imposing limits on the choice of instruments or procedures for implementation. Their implementation is often inadequate, due to the fact that even though the member states incorporate EU – level law into national legislation, they fail to accompany the new laws with corresponding actions producing immediate environmental effects. To ensure sufficient implementation of European law, the EU - level institutions, further cooperation with national institutions is required. This is, usually, accomplished through bilateral consultations with the member state, aiming to organize efficient resolution of any implementation issues. Moreover, cases with great delay in resolving the relevant problems may be adjudicated in the European Court of Justice.

The European Commission is in charge of reviewing the compatibility of national laws with the provisions of EU - level regulations. In cases of deviations, the European Commission follows the judicial route established in the Treaties. Every EU citizen is entitled to submit to the Commission a complaint concerning an infringement of the EU law.

European Development Strategy and the Environment

The Lisbon Strategy

In the first decade of the 20th century, the Lisbon Strategy established a strategic goal for the European Union. That is to say, to transform the European Union into a more robust and competitive knowledge-based economy, capable of both sustainable development and social cohesion. The environmental dimension, with particular emphasis on environmental protection and sustainability, was added on the Lisbon development strategy in 2001, during the EU summit in Gothenburg - Goeteborg. The strategy for sustainable development initiated after Goeteborg, and the Lisbon Strategy, were regarded as being mutually compatible and complementary.

The policies intended to advance the implementation of the Lisbon strategy objectives are almost exclusively within the competence of the member states. The method applied for the implementation of the policies—an open coordination method—was not particularly helpful (Papadaki 2007). The intermediate review of that strategy did not show any encouraging results. The growth rate of new-jobs creation declined while investments in research and innovation remained inadequate. The revision of that policy²² focused mainly on four priority areas: investments in knowledge and innovation; utilizing the potential of business (especially of SMEs); investing in human resources and modernizing the labor market, and finally an economy with low CO₂ emissions and fuel efficient. Examining the effectiveness of the Lisbon Strategy — until the beginning of the current crisis — range from absolutely negative (Treidler, 2011)²³ to positive — at least as far as some of its objectives (European Commission, February 2010). Irrespective of the degree to which it has been accomplished, the Lisbon Strategy is widely appreciated for its policy goals, one of which is to create an economy with low CO₂ emissions. The approach chosen to the commitment to sustainable development is based on the principle that sustainable development ought to be incorporated and integrated at every level of policy formulation. In turn, this calls for a greater need for cooperation at all levels of policymaking. A more effective approach would be to incorporate the goal of sustainable development in the majority of EU policies. This view emerged, initially during the Cardiff European Council in June 1998. From a strictly short-run-profit perspective, environmental protection is, rather often, considered to restrict economic development. In a similar vein, the concept of open markets seems to exclude any concerns

²²COM(2005) 24 final

²³ See Oliver Treidler ' The immediate aim of this paper was to provide a consistent and convincing answer to the question “was the Lisbon Strategy successful?” Answer: **No, it was distinctly negative**'.

for environmental protection. In response to that, seemingly, contradiction, the European Commission endeavored to create synergies between the single market and environmental policy by adopting economic instruments such as environmental taxes in order to promote and implement the principle ‘The Polluter Should Pay’²⁴. Furthermore, “the incorporation of environmental concerns in other policy sectors” was endorsed during the Cardiff process in 2004.²⁵ Indeed the environmental dimension was incorporated in several policy sectors such as (i) industrial policy;²⁶ (ii) energy policy²⁷ — as a result of energy policy adjustments, and the commitments made under the Kyoto Protocol signed in 1997, the EU adopted the European Program for Climate Change;²⁸ (iii) environmentally safe sustainable agriculture — as a result of agriculture policy adjustments, subsidies were disconnected entirely from the quantities produced, and supplemented with direct payments of revenue support to farmers. The amounts of support depend on compliance with the environmental terms and conditions. In addition, the environmental dimension was incorporated in (iv) the Common Fisheries Policy;²⁹ (v) in sustainable urban development,³⁰ (vi) in economic policy,³¹ (vii) in transport,³² and finally (viii) in aid to developing countries.³³

Europe 2020 Strategy

On the 3rd of March 2010 the European Commission inaugurated the Europe 2020 Strategy³⁴, aiming to prepare the EU economy for the forthcoming decade. The Europe 2020 Strategy has succeeded the Lisbon Strategy for Growth and Jobs.

The priorities of the Europe 2020 Strategy are mutually supportive and can be summarized as follows:

- Intelligent development aiming to improve access to education; more spending on research and innovation and on utilizing information and communication technologies by advancing the digital society.
- Viable development by building a more competitive economy with low carbon emissions; limiting the loss of biodiversity; making pioneering advances in creating new green technologies; employing efficient electric power grids; providing aid to enterprises, especially SMEs; assisting consumers to make appropriate choices.
- Development without exclusion; increasing total employment; reducing the number of people who live under the poverty level or are threatened with poverty or social exclusion.

The quantified objectives for viable development, the so-called 20–20–20, include the following specific goals:

- Reducing greenhouse gas emissions by 20% against the 1990 baseline before the year 2020. The EU intends to increase greenhouse gas reduction by an additional 30%, provided that other developed countries also contribute proportionally to their capabilities, and commit themselves in international agreements.
- Raising the share of renewable energy sources to 20%, measured in terms of actual final consumption.
- Increasing energy efficiency by 20%.

At the heart of the development plans of this new strategy are the new technologies of low carbon emission. Similarly, it proposes stricter reviews and controls of the national reform programs ensuring that they have been aligning themselves with the strategy. Such controls were entirely absent in the Lisbon strategy, which can be considered as a principal weakness. The overall objectives of the strategy are distributed quantitatively among the EU member states;³⁵ while the EU president Herman

²⁴ COM (1999) 263

²⁵ COM(2004) 394

²⁶ COM(2002) 714 final and COM(2006) 136

²⁷ Directive 2006/32/EC and European Program for Climate Change.

²⁸ COM(2000) 88 and COM(2001) 580

²⁹ COM(2002) 186, Regulation (EC) No. 2371/2002, COM(2004) 438

³⁰ COM(2005) 718

³¹ COM(2000) 576

³² Council Report of 6 October 1999 to the Helsinki Council, COM(2005) 446, COM(2005) 459

³³ Regulation (EC) No. 2493/2000, COM(2004) 629

³⁴ COM(2010) 2020

³⁵ See http://ec.europa.eu/commission_2010-2014/president/news/speeches-statements/pdf/20110623_2_en.pdf

Van Rompuy suggested that member states which have reached their targets should be rewarded with additional allocations.³⁶ The overall effect of those European Union initiatives and actions is that the EU has adopted a decisive role in steering international response to core issues such as climate change, sustainable transport, preserving natural resources (European Commission, 2009).

The Economic Crisis and the Europe 2020 Strategy

The new Strategy coincided with unfavourable economic conditions wiping out achievements that took decades to build up. GNP in the EU declined by 4% in 2009; industrial production reduced to the level of the 1990s and unemployment increased to 10% (European Commission report, March 2010). The Europe 2020 Strategy aims to reverse these negative effects and to advance a new paradigm for growth. It goes without saying that the current crisis, and the need to overcome it, involves policies and objectives of a broader scope than environmental policy per se. Yet the adoption of a cohesive and effective environmental policy can be used, along with other policies, as a mean to overcome the crisis and an instrument for viable development. It follows, therefore, that environmental policy has been elevated to a major strategic option of the European Union. The EU must be able to deal with negative developments within its own member states so that they do not become consolidated, remaining adaptable to the continuously changing international context, with the intensity of globalization, the pressure for raw materials and the demographic ageing of its own population. If European citizens continue to enjoy the same living standard and affluence, there is no choice other than to underpin the European economy; a necessity if the EU wishes to continue interacting and influencing the international community as presently, employing indirect and peaceful means.

All the EU major policies need to be adapted to the mutually supportive objectives of the Europe 2010 Strategy. Those policies must enable the EU to confront with the challenge of facilitating economic growth, and simultaneously ensuring the condition that the environment will not be aggravated. As in the basic priorities of the Europe 2020 Strategy described above as mutually supportive and complementary, there is not necessarily any contradiction between the goal of inducing growth and, at the same time, protecting the environment, even at a first sight they seem contradictory. Nevertheless, a change of paradigm will be necessary, and Europeans need to modify their attitude on issues such as, waste management, for example. Waste must not be seen as a necessary evil to be managed in a rudimentary, albeit short-sighted manner, involving minimum cost, but rather as a potentially valuable resource. The transition of the EU to an age of sustainable economics with low noxious emissions shall depend on a combination of actions which cannot remain in the domain of policymaking alone, but rather emerge from every segment of society; that is to say, individual citizens, businesses, research centres and administration at every level.

Europe is a world leader in cost-effective environmental technologies that can provide solutions to a series of environmentally sensitive issues, including limiting the inflow of raw materials, curbing energy consumption and the resulting pollution, processing waste to reclaim useful by-products, and downscaling the overall volume of waste. European companies are in a strong position as far as renewable energy production, waste management and recycling, fields where they hold 40% and 50% of the global market share respectively.³⁷ By taking advantage of its leadership in environmental technology, the EU is in position to create significant opportunities for economic growth, provided, of course, that the issues connected with the requirements of environmentally friendly economic development are acknowledged and more widely accepted.

Acceptance of environmental issues by the citizens is a major factor toward accomplishing the goals of environmental policy. But it is the citizens that will transform environmental goals into inducing-growth actions. Of critical importance is the particular combination of policy instruments. The EU's long involvement, including policymaking in environmental issues, has endowed the Union with a "toolbox" of suitable instruments, including legal requirements, technology transfer, market-based instruments, relevant research, and environmental responsibility regulations. Among these instruments, the EU has developed great expertise in the field of market-based instruments such as the

³⁶ 'Seven steps to deliver on the European Strategy for growth and jobs' Brussels 8 February 2010
<http://www.euractiv.com/sites/all/euractiv/files/HRV%20EU%202020%20strategy.pdf>

³⁷ European Environment agency 'Environmental technology' <http://www.eea.europa.eu/themes/technology/intro>

European Emissions Trading System (EU ETS), targeted subsidies, and environmental taxes.³⁸ The purpose of those instruments is to transfer to the market the cost that those economic activities impose upon the environment and health, and to define accordingly prices for the utilization of natural resources such as the air, fresh water, and the sea. A good example is the Emissions Trading System (EU ETS). The reasoning for the adoption of this instrument is to endeavour to correct market distortions, and cases where an economic activity generates social costs upon assets that are public by nature, as for example environmental assets. Although some of these instruments, e.g. the environmental taxes, have been labeled as obstacles to economic development, it is quite possible to incur positive effects. In other words, they could provide a valuable contribution to innovation, since they tend to discourage “traditional” detrimental activities and to foster the creation and dissemination of new technologies (EEA 2011). The view held by the European Commission is that, along with regulations and other institutional measures, certain other instruments and methods should also be employed; especially in the form of market-oriented instruments such as commerce, taxation and subsidies. These instruments can yield positive economic results in the pursuit of environmental and other objectives, both at the national and the European level.³⁹ The EU is advancing its basic choices in relation to the environment and to the Europe 2020 Strategy by incorporating environmental impact into the design of other European policies and by employing appropriate policy measures. In this context, it is important to note that the principal policy employed toward the achievement of EU goals is the Cohesion Policy — a major European policy currently entrusted with over one-third of the total European budget (33% allocation in 2014-2020). Cohesion Policy alignment with the Europe 2020 Strategy may contribute to its success. The primary choice governing the design of the Cohesion Policy over the next program period (2014-2020) is to concentrate resources in a small number of priorities. These may include investments related to climate change and the transition to a low-carbon-emission economy, and viable urban development. Among the regions receiving aid, the more developed ones will be required to allocate 80% of the ERDF funding in energy efficiency, renewable energy sources, innovation, and to support SMEs and the remaining 20% to be allocated in energy efficiency and renewable energy sources.⁴⁰

A principle priority, under the Europe 2020 Strategy, is to reduce dependence on imported energy resources, making ultimately the EU self-sufficient in terms of energy. This is a very ambitious goal and can be pursued by means of technological improvements, major changes in manufacturing-processing and agricultural production, in energy generation, and in the transport systems. Although the overall goals set forth in the environmental policy are very ambitious, some progress is visible: recycling has become an everyday practice in the EU for many businesses and for millions of citizens, gas emissions have been reined in by 10% since 1990, and dependence on raw mineral resources tends to decline along with the development of alternative energy sources.⁴¹ Whether or not the goals of economic growth and simultaneous protection of the environment can be fulfilled will depend on the insistency that these goals are supported; on the creation of an effective framework for long-term review, formulation and implementation of related policies; and on the incorporation of environmental impact research and considerations into all EU policies.

³⁸ European Commission, Green Paper on market-based instruments for environment and related policy purposes COM(2007) 140 final

³⁹ Commission Of The European Communities, Commission Staff Working Document 'Analyzing the replies to the Green Paper on market-based instruments for environment and related policy purposes' SEC(2009)53 final

⁴⁰ Regulation2014_ leaflet_el.pdf

⁴¹ EUROPEAN COMMISSION Brussels, 26.1.2011 COM(2011) 21 Communication from the Commission to the European Parliament, the Council, the European Economic And Social Committee and the Committee of the Regions 'A resource-efficient Europe – Flagship initiative under the Europe 2020 Strategy'

References

1. G.Davis C. Wilt, P. Dillon 1997 'EXTENDED PRODUCT RESPONSIBILITY: A NEW PRINCIPLE FOR PRODUCT-ORIENTED POLLUTION PREVENTION' Prepared under Cooperative Agreement with the United States Environmental Protection Agency Office of Solid Waste
2. Oliver Treidler 'Evaluating the Lisbon Strategy' Bayerische Julius-Maximilians-Universität Würzburg Lehrstuhl für Volkswirtschaftslehre, insbes. Wirtschaftsordnung und Sozialpolitik Sanderring2
3. EUROPEAN COMMISSION, COMMISSION STAFF WORKING DOCUMENT 'Lisbon Strategy evaluation document' Brussels, 2.2.2010 SEC (2010) 114 final
4. Olga Gioti Papadaki 'Les adaptations des politiques structurales grecques dans le cadre de la stratégie de Lisbonne' 44th Congres Association de Science Régionale de Langue Française. Paris 2007
5. EUROPEAN COMMISSION (COM (2010) 2020) Brussels, 3.3.2010 COMMUNICATION FROM THE COMMISSION EUROPE 2020 'A strategy for smart, sustainable and inclusive growth'
6. European Commission COM(2000) 347 'Directive Proposal of the European Parliament and the Council concerning waste consisting of electric and electronic equipment'.
7. European Commission COM(2009) 400 final 'Commission Announcement to the European Parliament, the Council, the Economic and Social Committee and the Committee of the Regions'
8. European Environment Agency 'Environmental tax reform in Europe: opportunities for eco-innovation' EEA Technical report No 17/2011