

Opinion of the European Economic and Social Committee on the 'Mid-term evaluation of the LIFE Programme'

(exploratory opinion)

(2017/C 173/02)

Rapporteur: **Lutz RIBBE**

Consultation	25.8.2016
Legal basis	Article 304 of the Treaty on the Functioning of the European Union
Bureau decision	15.3.2016
Section responsible	Agriculture, Rural Development and the Environment
Adopted in section	6.2.2017
Adopted at plenary	23.2.2017
Plenary session No	523
Outcome of vote (for/against/abstentions)	169/25/18

1. Conclusions and recommendations

1.1. The EESC reiterates ⁽¹⁾ its strong statement in favour of retaining and further developing a standalone EU funding programme for the environment, biodiversity protection and enhancement, resource efficiency, sustainable development, communication and information, and funding for environmental non-governmental organisations.

1.2. Over the last 25 years, the LIFE programme has been instrumental in European environmental policy, and increasingly in sustainability policy as well. It is fair to say that it has become part and parcel of the EU's environmental policy, which it has strengthened considerably.

1.3. This has happened in two ways. LIFE projects have:

- (a) directly contributed to achieving direct and tangible successes: for example, certain endangered species that are protected under EU law have been protected from outright extinction thanks to projects funded by LIFE;
- (b) given local people an illustration of the positive concepts underlying the EU's environment policy, and the benefits of this policy for people, nature and the environment. LIFE has thus become a kind of 'bridge' between EU policy and the 'Europe of citizens and regions', which is particularly important at a time when the added value of Europe is increasingly being called into question.

1.4. The LIFE programme, which is particularly appreciated for its constant adaptation to new challenges, has also demonstrated that there is within civil society great deal of potential and a real willingness to get involved in implementing and developing the EU's environmental and sustainable development policies. The implementation of EU law is far more than just a legislative act that the Member States have to put into effect. Environmental and sustainable development policy stands and falls on public acceptance; it must be publicised and made transparent, which is another area where LIFE can make an extremely valuable contribution.

⁽¹⁾ EESC opinion OJ C 191, 29.6.2012, p. 111.

1.5. However, in many cases LIFE projects also reveal — whether directly or indirectly — the inconsistencies in policy decisions, including at EU level. While this might be awkward for some decision-makers, it should be seen as another valuable contribution that could ultimately result in environmental protection being more deeply integrated into other policy areas.

1.6. The implementation of the UN's 2030 Agenda (the SDGs) in European policy is one of the major challenges facing the EU over the next few years. LIFE will need to support this process. It is not just a question of engaging in close dialogue with the social partners and civil society groups to find the most effective means of implementation; rather, there also needs to be a change of mindset in many Commission departments and — at Member State level — many ministries, authorities and offices for which sustainability has so far been something of a side issue, in order to turn the much-discussed integration of environmental and nature protection in other policy areas into a reality.

1.7. The EESC recommends a number of changes:

- The LIFE programme should be made the main instrument for funding the Natura 2000 network. The approach taken in the past, of funding the Natura 2000 network primarily via the EU's regional development funds and the second pillar of the Common Agricultural Policy, must be regarded as unsatisfactory. The Committee would draw attention to its opinion⁽²⁾ in this connection, and calls for the LIFE programme to be supplemented with appropriately earmarked funds. It is important in this connection to ensure coherence between all support measures, i.e. to avoid any conflict between or duplication of support from other EU funds.
- It would be advisable to examine how to further improve the extent to which projects supported by LIFE can be turned into genuine 'model projects', i.e. replicated elsewhere in Europe (ideally without additional subsidies).
- Conventional research projects should not receive LIFE funding, in order to distinguish it even more clearly from Horizon 2020.

1.8. The climate action strand should be further developed, primarily with regard to possible adaptation measures that could be taken by the individuals, farmers, cities/municipalities and regions particularly affected.

2. Background

2.1. LIFE was established in 1992; it is the main funding programme of the European Union specifically dedicated to the environment. It addresses biodiversity and habitat protection, in particular through the Natura 2000 Network, resource efficiency, climate change and communication and information. LIFE's budget for 2014-2020 amounts to approx. EUR 3 456 million, compared to approx. EUR 2 000 million over the previous seven-year period.

2.2. The programme's main objectives are:

- contributing to the transition towards a resource-efficient, low-carbon, climate-resilient economy as well as to protecting the environment and biodiversity,
- better environmental policy-making, improved implementation and control of the EU environmental *acquis* as well as stronger mainstreaming of environmental and climate objectives in other policies and in public and private organisations' practices,
- improved multilevel environmental and climate governance, in particular by involving civil society, NGOs and local stakeholders,
- supporting the implementation of the 7th Environment Action Plan and, in future, the implementation of the UN's 2030 Agenda in European policy.

⁽²⁾ See EESC opinion 'The Biodiversity policy of the EU' (OJ C 487, 28.12.2016, p. 14).

2.3. Compared to the 2007-2013 programming period, the LIFE programme now includes a number of new features:

- the introduction of the 'Climate' sub-programme,
- the introduction of a new category of projects known as 'integrated' projects alongside the 'traditional' projects, capacity-building projects and preparatory projects,
- the introduction of financial instruments, namely the Natural Capital Financing Facility (NCF) focusing on ecosystem services and natural capital protection and the Private Finance for Energy Efficiency (PF4EE),
- the progressive phasing-out of national allocations of projects: from 2018, project selection will be based exclusively on merit, regardless of the geographic distribution (for traditional projects),
- the Commission now relies on the Executive Agency for Small and Medium-sized Enterprises (EASME) for the management of the programme.

2.4. Over the 2014-2020 period, LIFE is composed of:

- an 'Environment' sub-programme, which is divided into 'Environment & Resource-Efficiency', 'Nature & Biodiversity' and 'Governance & Information' and accounts for roughly 75 % of the budget (EUR 2 592 million),
- a 'Climate' sub-programme, which is divided into 'Climate Change Mitigation', 'Climate Change Adaptation' and 'Governance & Information' and accounts for roughly 25 % of the budget (EUR 864 million).

2.5. The European Commission will undertake a mid-term evaluation of the LIFE programme by 30 June 2017, and has asked the EESC and the Committee of the Regions to give their views on the new shape of LIFE considering the new features introduced in 2014 ahead of the publication of the mid-term evaluation.

3. General comments

3.1. The EESC feels that it is too early for a thorough 'mid-term evaluation' of the current phase of the programme given that the first projects in the new phase were only awarded in 2015 and the vast majority of them have not yet been completed, and certainly cannot yet be evaluated. Nonetheless, it would like to make an initial contribution to shaping LIFE in the 2021-2028 programming period, in light of an evaluation of the previous phases.

LIFE's track record to date, added value and limitations

3.2. Over the last 25 years, the LIFE programme has been instrumental in European environmental policy, and increasingly in sustainability policy as well. It has made an invaluable contribution to protecting biodiversity. It is fair to say that it has become part and parcel of the EU's environmental policy, which it has strengthened considerably.

3.3. This has happened in two ways. LIFE projects have

- (a) directly contributed to achieving direct and tangible successes. For example, certain endangered species that are protected under EU law have been protected from outright extinction thanks to projects funded by LIFE — examples include the projects to protect the northern bald ibis and the great bustard. LIFE was, and still is, often the only available funding option, as in many cases the Member States have not set up relevant conservation programmes, and/or have no interest in doing so;
- (b) given local people an illustration of the positive concepts underlying the EU's environment policy, and the benefits of this policy for people, nature and the environment. LIFE has thus become a kind of 'bridge' between EU policy and the 'Europe of citizens and regions', which is particularly important at a time when the added value of Europe is increasingly being called into question.

3.4. Many of the projects supported by LIFE to date have demonstrated that there is within civil society a great deal of potential and a real willingness to get involved in implementing and developing the EU's environmental and sustainable development policies. The implementation of EU law is far more than just a legislative act that the Member States have to put into effect. Environmental and sustainable development policy stands and falls on public acceptance; it must be publicised and made transparent, which is another area where the LIFE programme can make an extremely valuable and indispensable contribution.

3.5. However, in many cases LIFE projects also reveal — whether directly or indirectly — the inconsistencies in policy decisions, including at EU level. While this might be awkward for some decision-makers, it should be seen as another valuable contribution that could ultimately result in environmental protection being more deeply integrated into other policy areas.

3.6. This brings us to the limitations of the LIFE programme: it cannot and should not claim to remedy shortcomings caused by inadequate enforcement of existing environmental legislation or by a failure to take account of environmental concerns in other policy areas. This can be demonstrated by the following three examples:

3.6.1. LIFE can help to make it clear to the public that the primary aim of the EU's clean air policy is to reduce the risk to public health from pollutants. It cannot, however, resolve conflicts such as those between environment and transport policymakers in Germany, which, in essence, come down to a question of which 'protected resource' is more valuable — protecting city-dwellers' health from particulate pollution, or drivers' right to free mobility.

3.6.2. LIFE's 'Urban Bees' project⁽³⁾ has done an outstanding job of making broad sections of the population more aware of the importance of pollinators, of the risks they face, and of what action can be taken to protect them. However, the risks presented, for example, by certain agricultural practices or the authorisation of insecticides that are potentially harmful to bees can only be eliminated if other EU departments pay sufficient attention to them and if the precautionary principle is consistently applied.

3.6.3. Since 1999, a total of EUR 45 million of public funding — some of which came from the LIFE programme — has gone to support a successful Austrian programme to protect the Danube salmon⁽⁴⁾, a globally threatened species of fish concentrated in the catchment area of the river Sava. A recent study has shown that around 600 hydroelectric power plants are set to be constructed in the Danube salmon's primary area of distribution, and experts expect these encroachments to lead to a fall of up to 70 % in the species' population. The construction of some of the power plants will also be supported by EU funds.

3.7. The EESC therefore also welcomes the fact that LIFE is now focusing more on improving the enforcement of legislation, not only in the authorities concerned, but also with regard to supervisory bodies.

The development of the LIFE programme

3.8. The EESC welcomes the high level of flexibility and capacity to adapt to new challenges and to experience gained that have characterised the LIFE programme in recent years. This is also reflected in the new financing period 2014-2020:

- Focus on countries where the implementation gap is bigger.
- Removal of national quotas.
- Increasing accessibility to businesses.
- Increasing focus on innovation.

⁽³⁾ <http://urbanbees.eu/>

⁽⁴⁾ Protected under Annex II of the Habitats Directive.

- Increasing synergies with other programmes, starting with the new integrated projects introduced in 2014. In this connection, the EESC welcomes the fact that its recommendation⁽⁵⁾ to precisely determine the financial resources allocated to 'traditional' and 'integrated' projects was taken on board.
- Use of completely new environmental financial instruments (PF4EE, NCFE).
- Introduction of a climate dimension.

4. EESC's recommendations

Maintain and strengthen LIFE

4.1. No programme is so good that it cannot be improved. Even so, the EESC would first of all reiterate⁽⁶⁾ its strong support for retaining this budgetarily separate funding programme beyond the current financing period. This is necessary because, despite considerable encouraging progress and despite landmark decisions such as the UN Agenda 2030, the Paris climate resolutions and the EU biodiversity strategy, environmental problems are still far from being solved and the shift to a resource-efficient, low-emissions and pro-biodiversity EU policy has not yet been successfully implemented. Quite the reverse: the Commission and the European Environment Agency themselves have produced various reports showing that in some cases the stresses are even increasing⁽⁷⁾.

4.2. The analyses undertaken as part of the REFIT process for the nature protection directives have made it clear that the legal framework is appropriate, but that there is nowhere near enough funding for target-based management of the Natura 2000 network. This fundamental element of biodiversity protection in Europe urgently needs adequate funding.

4.3. The permanence of the LIFE programme is paramount to the effectiveness and credibility of the EU's environmental policies, which must be safeguarded by the horizontal integration of the 7th Environment Action Programme, the UN's sustainability agenda and the Paris climate resolutions into all other European policy areas and funding programmes. The EESC would point out that it has also repeatedly called for a greener and fairer European Semester.

Impact of the changes made in 2014

4.4. The introduction of two new funding instruments into the LIFE programme as pilot projects was an innovation that the EESC welcomes. It is far too early to evaluate this approach, given that the first projects under the two facilities (the Natural Capital Financing Facility (NCFE) and the Private Finance for Energy Efficiency (PF4EE) instrument) have only just been chosen, and have not yet been implemented.

4.5. This approach breaks completely new ground in terms of creating innovative options for small private investors to finance nature conservation projects and energy efficiency projects. This is necessary because, in many cases, such projects failed with conventional funding.

4.6. It is at present difficult to gauge how successful this part of the programme will be, whether the cooperation initiated with the EIB will prove useful, and whether the application process will be simple enough and the financing conditions (including the use of risk capital) will be appropriate. The EESC therefore calls for this part of the new LIFE programme to be evaluated particularly closely in future.

4.7. The Commission should also examine in its own evaluation how, if possible, to improve the extent to which projects supported by LIFE can be turned into genuine 'model projects', i.e. replicated elsewhere in Europe (ideally without additional subsidies) with a focus on the transfer of know-how and economic feasibility. One possible step could be to ask the promoters of particularly successful projects to answer this question in a more in-depth stage of the project.

⁽⁵⁾ EESC opinion OJ C 191, 29.6.2012, p. 111.

⁽⁶⁾ EESC opinion OJ C 191, 29.6.2012, p. 111.

⁽⁷⁾ *The European environment — state and outlook 2015: synthesis report*, European Environment Agency, Copenhagen, 2015.

4.8. The EESC views LIFE as a financing facility for implementing EU measures and policies, not as a programme primarily intended for funding projects that are in the national interest. There may well be cases where, for example, LIFE projects proposed by civil society organisations mainly serve the European interest, and the national interest only to a lesser extent. Therefore, co-financing must in future be designed so that such projects do not fail because they are refused national co-financing (the EESC is aware of cases where this has occurred). In addition, the EESC urges the Commission to assess the extent to which even higher co-financing rates could be used, especially for NGOs, for which the own contribution is often a barrier that is difficult to surmount. Moreover, these contributions often come from public budgets and the co-financing providers are evidently pursuing a 'selection policy'.

Integrated projects/complementarity with other EU policies

4.9. 'Integrated projects' are a specific project type developed within LIFE, the importance of which the EESC particularly appreciates. One outstanding example is the Belgian Nature Integrated Project (BNIP), which covers the whole territory of Belgium, involves 28 stakeholders, and supports 18 specific conservation projects, 48 clearly defined actions and a total of more than 300 management plans (e.g. for Natura 2000 sites). The project has brought together 52 staff in seven different teams, and has managed to build bridges between the various available EU funding pots and with national resources.

It is precisely this kind of substantive and structural links that should be further strengthened in future, for example by creating potential synergies between LIFE and a greener CAP.

New tasks for LIFE

4.10. However, not only is there room for improvement in terms of the links between the substantive elements of LIFE and the CAP, but significant administrative and budgetary reform is needed in any event.

4.11. To date, the EU's regional development funds and the second pillar of the CAP have been the key instrument for funding the Natura 2000 network; this can be traced back to a proposal made by the Commission in 2004⁽⁸⁾. At the time, the Committee supported this proposal on condition that sufficient appropriately earmarked resources would also be made available within the said funds. This has not been the case, and the EESC therefore considers that approach to be unsatisfactory⁽⁹⁾.

4.12. The resources provided so far do not even come close to covering the amount needed to compensate for nature conservation requirements, develop management plans and implement the necessary measures. Natura 2000 is an area that traditionally falls within the EU's remit, and the budget therefore also needs to provide clarity here.

4.13. The Committee instead suggests that, for the next funding period, all resources needed to implement and maintain the Natura 2000 network should be provided from the LIFE programme and that its budget should be increased accordingly. It also asks the Commission to clarify internally whether LIFE might also be the right instrument for implementing the Trans-European Network for Green Infrastructure⁽¹⁰⁾. The necessary funding should be calculated and added to the budget. It is important in this connection to ensure coherence between all support measures, i.e. to avoid any conflict between or duplication of support from other EU funds.

4.14. The EESC stresses that funding for the Natura 2000 network constitutes a fundamental investment in an important part of Europe's green infrastructure that will pay off not only in the form of higher quality of life and higher environmental quality, but also in higher local incomes.

4.15. Incorporating the SDGs, i.e. the UN's 2030 Agenda, into European policy will entail a number of truly fundamental changes to European policy approaches⁽¹¹⁾. It will also require:

- (a) a change in mindset — in some cases a radical one — particularly in those Commission services whose activities have to date not been particularly focused on sustainable development policy;

⁽⁸⁾ COM(2004) 431 of 15.7.2004 on financing Natura 2000.

⁽⁹⁾ See EESC opinion OJ C 487, 28.12.2016, p. 14.

⁽¹⁰⁾ http://ec.europa.eu/environment/nature/ecosystems/strategy/index_en.htm

⁽¹¹⁾ See EESC opinion OJ C 117,30.4.2004, p. 22 and EESC opinion OJ C 487, 28.12.2016, p. 41.

(b) a completely new approach to governance, requiring much closer involvement from civil society stakeholders and much more bottom-up approaches.

4.16. The EESC recommends that the Commission set up new activities and project opportunities in the next phase of LIFE post-2020, in order to strengthen the required elements referred to in point 4.15.

4.17. Conventional research projects of the kind partly funded by LIFE in the past should be examined to determine whether they might in future be better served by the Commission's conventional research programmes. This would clearly distinguish LIFE from Horizon 2020.

4.18. The strand of the LIFE programme relating to climate action should in future be further developed, particularly with regard to possible adaptation measures that could be taken by the individuals, farmers, cities/municipalities and regions particularly affected.

Brussels, 23 February 2017.

The President
of the European Economic and Social Committee
Georges DASSIS

APPENDIX
to the Committee opinion

The following amendment, which received at least a quarter of the votes cast, was rejected during the discussion:

Point 3.6.2

Amend as follows:

LIFE's 'Urban Bees' project ⁽¹²⁾ has done an outstanding job of making broad sections of the population more aware of the importance of pollinators, of the risks they face, and of what action can be taken to protect them. However, the risks presented, for example, by ~~certain~~ inappropriate agricultural practices or the authorisation of insecticides that are potentially harmful to bees can ~~only~~ be eliminated if other EU departments pay sufficient attention to them and if the precautionary principle is ~~consistently~~ properly applied.

⁽¹²⁾ <http://urbanbees.eu/>

Reason

There can be no doubt that European agriculture observes the strictest compliance with rules on environmental preservation, animal welfare, environmental protection, and land and water management, as it is subject to the highest global standards and 'conditionality' (i.e. compliance with these criteria) is a binding provision for all European farmers.

Moreover, the authorisation of plant protection products is also subject to verification processes and monitoring by the European Food Safety Authority; thus the criteria must be scientific and based on an analysis of the likelihood to cause harm. This same basis should guide the proper application of the precautionary principle.

Result of the vote

For	75
Against	95
Abstentions	33
