



Brussels, 16 May 2006
SD/em

Representatives of the EU Member States

sent via e-mail

Re: Comments on the draft sustainable development strategy proposed by the Austrian presidency – Council Paper 8946/06 of 4 May 2006.

Dear Sir or Madam,

The European Trade Union Confederation (ETUC) has been able to read the draft renewed EU sustainable development strategy (EU SDS) as submitted by the Austrian Presidency. The ETUC would like to use this opportunity to comment on the proposal and provide you with suggestions for improvements.

We would like to draw your attention on the attached ETUC's position paper which was adopted by the ETUC's executive committee in June 2005. The ETUC was also involved in the drafting of the EESC's opinion on the review of the EU SDS, as well as in the various stakeholders consultations on the subject.

The ETUC welcomes the following points of the proposed revised EU SDS :

- The inclusion of the “declaration on guiding principles for sustainable development” agreed by the European Council in June 2006.
- The recognition that investment in human capital, social and environment capital are necessary to make the transition to a more sustainable society;
- The introduction of a priority area on sustainable production and consumption;
- The stress put on relevant education and training activities suited to the needs of sustainable development, with access for all and openness of system and institutions to society;

However, the proposed SDS contains a number of weaknesses that may undermine the legitimacy and the power of the EU SDS to induce the required structural changes. In general, we regret that the results of the public consultation as well as the strong points of the Commission's paper on “The 2005 review of the EU SDS: initial stocktaking and future orientations” (SEC (2005) 37) have not been sufficiently taken on board.

EUROPEAN TRADE UNION CONFEDERATION
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1. Social sustainability and sustainable development

The ETUC is concerned that the draft SDS lacks clear vision of “social sustainability”. Such a vision should be based on the promotion of fundamental rights, including workers’ rights, and the fight against all form of discrimination. It should also be acknowledged that social justice and workers’ rights are a powerful force for structural change by making change more acceptable. Unfortunately, such a vision can not be found in the operational objectives of the chapter on “social exclusion, demography and migration”. This stands in contradiction to the Declaration on guiding principles for sustainable development.

We would also have liked the Austrian Presidency’s document to make a richer contribution to analysing the interrelationships between social sustainability and economic and environmental sustainabilities. We urge the Austrian Presidency to consider the recommendations of the Commission’s staff working paper entitled “The link between employment policies and environment policies” (SEC(2005)1530).

2. Consistency between the Lisbon strategy and the SDS

The contributions to the public consultation on the review of the EU SDS in 2004 “broadly agreed that at present the SDS and the Lisbon strategy do not complement each other”¹.

Despite this clear assessment, the proposed SDS fails to clarify how the natural “tension” between the Lisbon strategy and the SDS can be bridged. Once again, the potential synergies are taken for granted, and the potential trade-offs are not addressed (§6 and 7). Regarding the EU energy policy for instance, it is obvious that, to a certain extent, the completion of the internal energy market stands in contradiction with the long term sustainability of the EU energy model. Therefore, it can be feared that the SDS will not be able to stop short term policies and measures that directly contradicts its stated aim.

The ETUC therefore asks to clarify the processes by which the consistency between both strategies will be monitored and the necessary trade-offs will be made. As a first condition, it should be made clearer that :

- impact assessment are “**integrated**” impact assessments (IAA) (§9)
- and that IIA should be guided by the EU SDS as the reference standard. All policy proposals, including those devised under the Lisbon strategy, should meet the standards of the EU SDS.

3. Targets and commitments

The draft SDS is still weak on the targets and commitments for the EU. The respective responsibilities and competencies of the EU and the Member states in the implementation of the strategy should be described, and the wording “examples of actions” should be replaced by “actions to be undertaken”.

4. Mobilising the actors

The ETUC asks for recognising and supporting the particular contribution made by workers’ representatives - trade unions - which explicitly include progress towards sustainable development among their objectives. Trade unions, as social partners recognised by the EU treaty, are natural actors of the European economic, employment and social cohesion policies, as well as of the EU health and safety legislation.

Therefore, the exclusive focus on “business leaders” in paragraph 28 contradicts the Declaration on guiding principles for sustainable development which explicitly refers to the

¹ Commission staff working document « Summary of the public consultation for the review of the European sustainable development strategy 2001», SEC(2005) 451.

need to “involve the social partners” and “to enhance social dialogue to achieve sustainable production and consumption”.

5. Implementation, monitoring and follow up

The ETUC regrets that the proposed EU SDS, in paragraph 34, does not recognise the need to directly consult the civil society organisations on sustainable development. In that respect, the role of the EESC should not be overestimated.

Building a broad consensus on sustainable development pathways requires the direct involvement of the democratic and representative civil society organisations, including the social partners and some non-governmental organisations.

The ETUC strongly urges that the EU SDS takes on board the Commission’s commitments “to explore how to create effective partnerships with industry, trade unions, non governmental organisations and consumer interests, particularly with the view to discussing ways of helping to curb the unsustainable trends identified in the context of the review” (COM (2005) 37). Such partnerships are essential in order to identify “who is responsible for what action at what point in time and who will bear the costs”.

The ETUC asks for setting up a European advisory council on sustainable development, whose tasks would be to stimulate debate, assist in the preparation of the EU SDS and contribute to the EU progress reviews. The EU advisory council would also help to involve EU civil society in sustainable development matters.

6. Climate change and clean energy

The following operational objectives and targets should be added :

- Ensuring that the EU energy policy contributes in a balanced way to security of energy supply, job creation, social cohesion, competitiveness and environmental sustainability.
- The EU will aim for a 15-30% cut in greenhouse gas emissions by 2020, and for a 60-80% cut by 2050 compared to the 1990 levels referred to in the Kyoto Protocol.
- Ensuring an equitable transition to a low carbon economy, so that the already deprived groups and households do not pay the costs and workers are not forced to pay through the loss of their livelihood.

7. Social exclusion, demography and migration

The following operational objectives should be added :

- Supporting the MS in their effort to modernise social protection **and to improve its adequacy to the new needs, notably** demographic ageing.
- Increasing the overall employment rate to 70% while guaranteeing high quality employment.
- Substantially reduce the gender pay gap by 2010
- Ensuring access for all to quality and affordable services of general interest

8. Public health

The following operational objectives should be added:

- Reducing health inequalities, including those related to working conditions and environmental pollution, and ensuring access for all to quality and affordable public health services.

- Ensuring a strong REACH regulation that genuinely improves the health protection of workers exposed to chemical products.

9. Global poverty and development challenges

The following operational objectives should be added:

- Promoting a coherent and integrated approach to questions relating to globalisation in the World trade organisation (WTO), international financial institutions (IFI) and across UN bodies,
- Strengthening the International Labour Organisation (ILO)'s labour standards and the international environmental standards.

Examples of actions, add :

- In this context, all EU trade or cooperation agreements at regional or bilateral level should include provisions relating to the implementation of environmental standards **and ILO labour standards**.

10. Sustainable production and consumption

General remark:

The ETUC strongly disagrees with the approach taken by the Austrian presidency, which limits SCP to its environmental dimension. Sustainable production refers to the production and exchange of commodities with minimal environmental impacts, under socially fair conditions and ensuring the long term economy viability.

Moreover, sustainable consumption refers basically to the availability of a disposable income which stands above the poverty line.

The proposed objectives should therefore be broadened to touch upon all these issues. It should also include an economic criteria, which relates to economic diversity, level of innovation, etc...

Regarding operational objectives and targets, the following inclusion should be considered:

- Consider setting environmental **and social** performance targets for products and processes and encouraging their uptake by business and consumers.

The above elements are key for workers and trade unions, who are eager to contribute to a balanced global sustainable development. I hope that you will give the closest attention to our contribution,

Yours sincerely,



John Monks
General Secretary

Annexe : Resolution on the review of the EU sustainable development strategy, adopted by the ETUC's Executive Committee of 14-15 June 2005.