Statement on the National Strategy on Sustainability of the German Government

Introductory remarks

The draft of the National Strategy on Sustainability describes a comprehensive strategy for modernisation of our society. It makes the term sustainability tangible through a variety of concrete connecting factors and projects. The draft supports the designing of political measures on sustainability that are fixed to quantified specifications as goals and indicators. In this manner, the draft is embarking on a path that the German Council for Sustainable Development (RNE) generally approves of.

The draft makes clear that it is not only about a contribution to the World Summit in Johannesburg. It has been possible to make the term sustainability more tangible and broaden it beyond the topics directly related to the environment and resources budget. The Council supports the concept of dealing with substantive themes in an integrative manner and interconnecting them within the comprehensive aspects of justice between the generations, social cohesion, international cooperation, and quality of life.

The broad composition of the draft with respect to the topics is welcomed. However, the broadness of the topics should not give the impression of being arbitrary. To maintain a strategic focus, we recommend that the number of indicators not be increased beyond 21. An accentuation within the topics could further strengthen the placement of the focus.

Strategic Orientation

National and international goals for action are closely knit together in the policy on sustainability; the national leading role and the political incorporation into international politics are reliable means, depending on the goal to be achieved. The draft underlines, in particular, the national level for action through orienting toward the contents of the substantive sections. Although references are made to the intertwining of German policy with the European and global level for action in several of the previously-mentioned passages, the draft generally conveys the impression

that the national level for action is the most important and that sustainability can be realised, solely or mostly, through political means in Germany. However, for many substantive issues, European and international treaties, politicians, and economic relations are decisive. This insufficient orientation of the strategy makes a negative impression when dealing with, for example, the widely discussed topic of the CO_2 goal. Credibility of the policy is, among other things, created so that the framework conditions for achieving goals can be clearly discussed from the beginning. This particularly holds true for energy policy as well as certain aspects of agricultural policy and for the movement of goods. The Council encourages the integration of national goals on sustainable development with the international dimension to be better clarified in the focussed topics.

In keeping with this, the Council also encourages that the connection between globalisation and sustainability and the Council's recommendation to promote the establishment of a UN World Commission on Globalisation and Sustainability in the Johannesburg process be put to discussion.

The draft particularly underlines the possibilities that the German Government has for taking action. The political competence for action is justifiably granted more importance for social development with increased sustainability. The draft also mentions the other players that would come into question in the respective areas. The Council would like to stress, however, that the overall orientation of the draft conveys the impression that sustainability is primarily a national affair. At least, it is suggested (surely involuntarily) that society can rely on the state in an expectant, passive manner and that all key topics on sustainability rely exclusively on federal policy. The responsibility of the civil society, including the industry, is seldom discussed and they are not required to fulfil their duty. The Council recommends that the boundaries of the national policies also be laid down more firmly and made clear in the draft, what the state can do at the various national levels and who must be satisfied with only being able to set framework conditions for other players.

In this context, the Council proposes to have the formulations on dialogue be broadened. The dialogue offers from the introductory section (on more intensive social dialogue; on developing a new generation contract) are relatively independent

of the substantive issues; in this manner, these formulations are more like a reference to the Rio Agenda and an "add-on". The Council encourages the statements on the dialogue character of sustainability to be linked to concrete offers and steps and construct a strategic connection, rather than to situate them outside of the standard means for shaping political opinion.

Furthermore, we recommend that the quality of the discussion on sustainability be discussed in a non-national context and that concrete suggestions be made. For example, a procedure to monitor the number and quality of the self-commitment could be introduced in the environment and social areas, including the voluntary commitments of economic players amongst themselves. The number of Agenda processes would, likewise, be an appropriate indicator.

Basic Rules

The international perspective should be explicitly laid down in the basic rules. Justice today cannot only be discussed here at home with respect to the passing of the generations; it must also be brought into context with the global justice within a generation.

Substantive Gaps

The Council refers to the results of the discussions held with the responsible departments on the incorporation of the Council's project recommendations.

The Council recommends including a section "Developing the culture of sustainability" in the concept of the National Sustainability Strategy and solidifying it with the announcement of an exhibition project through the German National Culture Foundation (*Bundeskulturstiftung*). The policy on sustainability is not adequately connected with subjects, topics, processes, and concepts from arts and culture. Art and cultural policy, for their part, have not yet dealt with the challenges and opportunities with respect to the social, political, and ecological aspects of sustainability as their own topics. It is an opportune time to change this situation. Contributions from contemporary art and culture would receive a central signalling force on a national level, demonstrating the cultural-political dimension of sustainability. This is primarily due to the change of set perceptions on society and

sustainability. The opening of a dialogue between art/culture and sustainability, where all can participate, promises new horizons in the ways of thinking.

The Council views the subject 'Ethics and Sustainability' as an important one which is dealt with more or less clearly across the board in all substantive sections of the strategy – in terms of the ethics of responsibility, value judgments and attitudes, content of life of elderly people, motivation of consumers, etc.. The Council encourages discussion on the important aspects "outside of the parentheses" and, thus, grant them more importance.

The cost and benefit of measures on sustainable development, and their omission, represent an important field of the societal-political controversy over sustainability. These are in part quantified and quantifiable and in part only roughly estimated and qualitatively describable cost and benefit parameters. The systematic limits of placing a monetary value of costs and benefits are particularly clear (recording, assigning, and balancing external costs, assessment of benefit effects, in particular of future or missed benefits). Without disregarding or not appreciating these problems, the Council encourages that clear statements also be made where costs/benefits can be determined and can therefore contribute to the transparency of the proposed measures. In the long-term, the strategy should focus on a process that makes the cost-benefit connection clear (monitoring).

Indicators

The System

Goal conflicts exist between the goals and indicators in some parts without it contradicting the concept of quantifying goals and indicators. The Council calls for the goal conflicts to at least be generally discussed.

The Council supports the concept of the strategy with respect to a two-year report on the indicators made by the German Government. Furthermore, it encourages, however, that the reporting on the indicators to be supplemented by an independent evaluation of the status of sustainable development in politics and civil society,

possibly occurring at the same time as the experts' reports on the general economic situation.

Editorial note: The readability of the indicators can be improved by using supplementary notes on common indicators of international statistical recording, the OECD, or national reporting.

Efficient Use of Resources

Energy and raw material intensity is not sufficient for use as an indicator for the efficient use of resources. The absolute energy and raw material consumption must also be taken into consideration (the aspect of thriftiness which is discussed in the sub-heading of the indicator). The goal of decreasing primary energy consumption should be targeted with this indicator. The reduction of the energy demand in buildings and with respect to stand-by switching systems discussed in the strategy at another point should also be assigned to this indicator.

Social indicators

The indicators on family policy, on gender equality and on integration depict an essential part of the political statements on social cohesion. However, the Council is concerned that the strategy on pages 25 ff. as well on the third stage of life (p. 205 ff) draws a substantive circle that is much broader reaching. The strategy is accurate in mentioning several basic issues in the political shaping of the social sustainability with the keywords acid test for the social state, active social state, lively solidarity, new balance between individualism and social responsibility, new identities in the third stage of life. The Council considers depicting these kinds of basic development issues of society with the indicators to be important.

Climate protection

The Council's recommendation on the CO_2 goals for 2020 and 2050 were not adopted. It does not appear to be reasonable to lay down energy goals only until 2010, and not mid-term until 2020 and long-term until 2050. After all, the re-investment periods of energy plants are 30 to 40 years; even the development of the energy policy in European politics (keyword – supply security) requires a longer goal and planning horizon. The European dimension should pick up the concept of a

national climate goal and link a national contribution with European conditions. In order to not encourage the development of a "free-rider" stance by other European countries with the laying down of an ambitious German goal, the mid-term and long-term national climate protection goals can be coupled to the condition that the other EU member countries pursue comparably ambitious goals. Pointing to the higher CO_2 reduction costs in Germany as compared to other countries is, on the one hand, correct, however it neglects the importance of comprehensive structural adaptations by the national economy to the greenhouse gas reductions required in this century from the perspective of climate protection. A strategy which would exclusively rely on the reasonably priced "low hanging fruits" in other countries would not lead to the mid-term and long-term goals. The Kyoto mechanisms that also make an ambitious goal - as the Council recommended – feasible, with a mix of national and international measures, would have to be implemented for a CO_2 goal by 2020.

The statements on energy policy are stranded at the level of the measures implemented previously, and hardly offer any perspective approaches. Moreover, they hardly make a strategic link to the statements in the other substantive themes. A linking (integration) is required in order to determine the central importance of energy for sustainable development.

The Council criticises the fact that no statements on coal subsidies have been included and brings forth its request that the coal subsidies be halted by 2010.

Renewable Energy Sources

The Council welcomes the goal of the German Government to double the proportion of renewable energies by 2010. Reference to a 50 percent share of the worldwide energy consumption by 2050 is, however, not conclusive in conjunction with an indicator for the National Sustainability Strategy. The Council requests that at least half of the energy demand in Germany to be covered by renewable energy sources by the middle of this century, in order to be consistent with the goal for worldwide energy consumption.

Biodiversity

The statements on the protection of biological diversity and on its importance for the National Sustainability Strategy are supported by the Council. It is also correct to select an indicator which is easy to represent, such as the case with a number of selected bird species. However, the choice of species is not quite correct. The "species basket" should be chosen such that the most important habitats (land specified for agricultural use, forests, marshes, settlement areas) can be represented easily. A corresponding recommendation from experts based on the protection of nature has been made in the appendix of this statement.

We call for the creation of a national biotope compound system by 2007, with 10-15 percent of national territory being a further goal (not indicator).

National Debt

The Council supports the idea of making solid national finances a key topic of the policy on sustainability. High national debt does not only burden coming generations in economic terms, it removes their ability to react to crises and challenges. Ecological, social, and economic requirements placed on sustainability are closely connected. Industrialised countries with high debts would mean an additional burden for solving global problems.

In view of this, the Council supports reducing national debt to zero by 2006 and, afterwards, continuing to repay debts. An additional statement should be made on whether all debts should be repaid in the long term or what is an acceptable debt quota.

Economic Provisions for the Future (Investment Quota)

The investment quota is not an adequate indicator for economic provisions for the future, because it assumes that investments generally create economically solid framework conditions and prevent the improper allocation of funds. The strategy does not include this assumption, but the indicator can be misunderstood in this manner.

The Council encourages that the indicator on investment quota be replaced with another indicator. An indicator depicting the investment behaviour of the funds

(ethical investment, sustainability rating) rated according to sustainability values is worth considering. The strategy could build on the unofficial trend of orienting the management of companies toward criteria of social responsibility and sustainability. It would also be possible to establish a link to the UN initiative for a Global Compact.

Innovation

In the Council's view, the registration of patents would be an appropriate indicator for establishing the innovative ability of society. The total costs for research and development are especially an indicator when the outflow of funds stagnates or decreases, as occurred a few years ago. It shows that research policy is being disregarded in politics. As the indicator shows, the expenses for research have increased in the past two years. In this respect, it shows a readiness for innovation. Since it is not "directed" and the expenses alone do not stand for success in the innovation policy, the Council requests that the registering of patents be used as an indicator.

Air Pollution

The indicator is considered to be fine in its present form. However, the goal of a 70 percent reduction by 2010 does not seem ambitious enough.

Development Cooperation

The formulations on developmental topics are substantially superficial compared to those on energy, mobility, etc. for unknown reasons. A silent political attitude is lurking here that is not held by the Council and which could lead to the false assumption that Germany is marginalising its global responsibility.

The Council recognises that other issues cannot be represented in more detail when it places the, principally correct, focus where it does. However, this can only be applied as a methodical principle with similar issues, in other words: as long as national issues for sustainability are being dealt with, the focus placement seems to be justified at the expense of issues not situated in the focus. Development cooperation is, however, an explicitly international issue that is not affected by the national placement of the focus.

The time periods and manner of achieving the internationally adopted goal of 0.7 percent of the national income to be used for public development cooperation has not been sufficiently laid down. The Council considers it necessary to achieve this goal by 2007. For this, a time schedule for an incremental increase should be proposed in the strategy.

We recommend that formulations be included on the import share of processed products compared to that for raw materials and agricultural products in order to respond to necessary measures for creating more fair trade opportunities.

Agriculture

The strategy repeats the essentials of the common arguments on course adjustments in agricultural policy. New and feasible concepts are not being developed. The paper from the Council is only reflected in marginal sub-sections.

The goal of the German Government to increase the amount of ecologically farmed land to 20 percent is not suitable as an indicator for sustainable agricultural land use. This indicator grants a kind of exclusiveness to organic farming that it does not require. It orients sustainability only to organic farming. However, good management is a prerequisite for ecological, economic, and social manageability in the future, not only in organic but also in conventional farming. Sustainability is a necessary condition for the entire use of land for agricultural purposes. The indicator currently does not permit a sustainability evaluation for 97 percent of the remaining conventionally farmed land, which should be evaluated based on, but not only, the revitalisation of nature, added value, creation of offers, jobs (quantity and structure), self-sufficient structures. An indicator for sustainable development must take into consideration primarily the conventionally farmed land due to its continuing dominance in the future.

The Council therefore recommends that the amount of nitrogen [kgN/ha*a] be used as an indicator for sustainable agricultural land use. The reasoning for this is explained in more detail in the appendix.

Furthermore, the Council criticises the fact that concepts tailored to players, such as consumer information legislation or legislation on competition, are missing. The Council has made a number of recommendations here that have not been incorporated into the draft on national sustainability.

Mobility

The Council recommends that a design for the international transportation of goods (e.g. East-West transit) be announced. The Council believes this is an area where the future-oriented policies on rail-borne transportation of goods have not been exploited.

The Council supports the indicator for the transportation of goods (transportation intensity measured as traffic performance per 1,000 € GDP; as is also the case for the modal-split indicators, such as the share of rail traffic in the transportation of goods volume). The indicator recommended in the strategy on transportation of people (transportation intensity) is not considered to be goal-oriented. The Council recommends instead using the modal-split for all types of transportation, whereas the basis should be the methods used and not the traffic performance. Non-motorised traffic should be taken into consideration in the modal-split calculation.

The indicators for resource efficiency, such as specific energy consumption and specific emissions per performance unit (tons kilometres and people kilometres), are important for all areas. The Council also recommends that the statements on the CO_2 reduction goal be broken down for the individual sectors and made more precise. Additionally, the number of traffic accidents with personal injuries per 1,000 inhabitants should not be excluded in the subject area of health, in order to adequately account for the protection of the freedom from injury.

The endeavoured doubling of rail-borne goods transportation is welcomed by the Council as a goal (and not an indicator). However, the concrete starting points are still lacking in the political aspect.

On the whole, the goals for transportation policy are not sufficiently cushioned by measure programmes. The strategy itself points out that several measures such as

the travel distance lump sum are to be considered counterproductive to the declared goals. The planned compensation of toll charges for heavy vehicles is another example. When planning the new Federal Transportation Route System, the goals must be established such that they can be achieved using suitable measures and instruments.

Appendix

The Indicator – Biodiversity

From the perspective of environmental protection, the following species should be included as indicator species, along with the recommended ones – white stork, red kite, and little tern:

White stork (wet open ground/marshes, carving up the landscape)

Red kite (deciduous forests, field undergrowth)

Little tern (coastal areas, tourism)

Skylark (intensity of agricultural use)

Grey partridge (pesticides, open country including farmland, wasteland)

Lapwing (wet open ground/marshes)

Black-backed shrike (agricultural land rich on insects and structures, extensive land usage)

Barn swallow (village structures, sealing up of land)

House sparrow (change of structure in settled areas–from village to city)

Middle spotted woodpecker (mature and decline phases in deciduous forests, especially oak)

Capercaillie hen (mountainous and alpine regions: forests in near-natural state, climate change, tourism)

Lesser spotted eagle (wet forests, old-growth forests, extensive agricultural land use, tourism, carving up of landscape)

Little grebe (quiet water, reeds, floodplains)

Bean goose (important winter guest and migrating bird: rest areas in agricultural land)

Furthermore, it would make more sense to include a broader spectrum of species. The following species are excellent candidates for this:
Seal, otter, lesser horseshoe bat, sea trout, and Apollo moth.

The Indicator – Nitrogen Input (Agriculture)

The following is a detailed explanation to justify the indicator:
It is very relevant for the environment.
Securing the innovation capability in society for the long-term is a necessary criterion for sustainability. The management systems of ecologically-oriented companies can be continually improved and more strictly tailored to the tasks of society.
Using a neutral, scientifically based indicator that applies for the entire agricultural sector opens up the opportunity for improving sustainability for ecological farming as well as for conventional or integrated forms of farming.
In favour of the nitrogen input indicator is that its methodology is simple and scientifically backed. Additionally, it can be easily conveyed. Consumers are already aware of the problem surrounding nitrogen input in the ground water; as a consequence, the need to reduce this input has been accepted by consumers as a goal of sustainable agriculture.
The data required is already available in great quantities and excellent quality. Missing data can be added at acceptable costs. A tie to existing legal framework conditions (e.g. fertilizer regulation) already exists or can easily be established. The indicator is currently being used in a number of EU member states such as Denmark and the Netherlands.