

Delivering more Sustainable Consumption and Production

Do you wish your contribution to be made public? -single choice reply-(optional)	Yes
Are you replying as general public – consumer or a stakeholder or on behalf of an organisation (trade group, industry, SME, public body, interest group, industrial or consumer association, academic/research institution, etc.?) -single choice reply-(optional)	Stakeholder/organisation
Please indicate the name of your organisation: -open reply-(optional)	ANEC, the European consumer voice in standardisation
What is your field of activity? -single choice reply-(optional)	Environment
Please specify the type(s) of organisation you represent -single choice reply-(optional)	Non-governmental organisation
Please briefly describe your organisation, including geographic profile, size, affiliation, scope and field of activity, number of employees -open reply-(optional)	ANEC is the European consumer voice in standardisation, defending consumer interests in the processes of technical standardisation and conformity assessment as well as related legislation and public policies. ANEC was established in 1995 as an international non-profit association under Belgian law and represents consumer organisations from 31 European countries. ANEC is funded by the European Union and EFTA, with national consumer organisations contributing in kind. Its Secretariat is based in Brussels. Size: around 10 employees. Scope and field of activity: Environment, Services, ICT, Child Safety, Domestic Appliances, Traffic.
Please indicate an email address for correspondence -open reply-(optional)	anec@anec.eu
<p>QUESTIONNAIRE FOR THE STAKEHOLDER CONSULTATION WITHIN THE IMPACT ASSESSMENT OF THE ACTION PLANS ON SUSTAINABLE CONSUMPTION AND PRODUCTION AND ON SUSTAINABLE INDUSTRIAL POLICY</p>	
Which part of questionnaire are you interested in responding: -multiple choices reply-(optional)	Sustainable Consumption and Production (SCP) and Sustainable Industrial Policy (SIP) - Green Public Procurement (GPP) - Product Environmental Footprint (PEF) - Environmental Footprint of Organisations (OEF)

Sustainable Consumption and Production (SCP) and Sustainable Industrial Policy (SIP)

Ensuring better products on the EU market

Ensuring that resource efficiency, and in particular material resource efficiency (e.g. recyclability, reusability, upgradeability and durability) are considered more carefully when setting the requirements of the various EU SCP regulatory instruments **and policy measures***

* The terms included in the question can be defined as follows:

- Recyclability: Characteristic of materials that still have useful physical or chemical properties after serving their original purpose and that can, therefore, be reused or remanufactured into additional products.
- Durability: The quality of goods of continuing to be useful after an extended period of time and usage.
- Reusability: Ability of a good that allows it to be used repeatedly unlike a disposable good.
- Upgradeability: Capability of a good to be revised, almost always with the expectation that additional features or capabilities will be included

-single choice reply-(optional)

Very effective

Introduce mandatory requirements for products in a new legal framework instrument for sustainable products (e.g.: minimum, recyclability, reusability, upgradeability and durability)

-single choice reply-(optional)

Effective

Other (please specify)

-open reply-(optional)

ANEC calls on the Commission to set clear, ambitious targets related to resource efficiency and sustainability in the future Action Plan, based on measurable indicators. In this context, the development of harmonized methodologies to measure resource efficiency would be useful.

1.2 Please specify for what EU SCP regulatory instruments and policy measures you recommend to strengthen the requirements on material resource efficiency (e.g. recyclability, reusability, upgradeability, durability) -open reply-(optional)

Ambitious legal requirements for resource efficiency (including e.g. water, energy, biomass, land and materials) ought to be introduced in the various EU SCP instruments and policy measures. This holds true for the Ecodesign directive as well as every product specific implementing measures and related standards, the Energy labelling scheme and the EU Ecolabel. Resource efficiency targets should also be established for retailers (sector by sector) and in green public procurement policies and initiatives.

Use common evidence across all EU SCP regulatory instruments and policy measures to improve coordination in standard setting, by ensuring that the same preparatory studies (e.g.: on market, technical background for potential improvement, etc.) become a common ground for criteria setting for the different purposes

-single choice reply-(optional)

Very effective

Ensure consistent criteria for a given product category and/or product "family" under the

Effective

<p>various EU instruments addressing the environmental performance of products, notably through closer decision-making processes.</p> <p>-single choice reply-(optional)</p>	
<p>Align the process of developing and approving the requirements for the same product categories (e.g.: consultation process, etc.) to guarantee synergy and complementarity between EU SCP regulatory instruments and policy measures</p> <p>-single choice reply-(optional)</p>	Very effective
<p>Align the testing and verification methods used in the existing schemes, by agreeing on common approaches and modalities</p> <p>-single choice reply-(optional)</p>	Effective
<p>Carry out a joint review of the different EU SCP regulatory instruments and policy measures to increase synergies and clarify interactions</p> <p>-single choice reply-(optional)</p>	Effective
<p>Create a new legal framework instrument for sustainable products, i.e.: a new “package” substituting and integrating the existing EU SCP regulatory instruments and policy measures</p> <p>-single choice reply-(optional)</p>	Very effective
<p>Create a new legal framework instrument specifically for sustainable products, in addition and complementary to the existing EU SCP regulatory instruments and policy measures</p> <p>-single choice reply-(optional)</p>	Very effective
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	<p>There is a need for more consistency between instruments while maintaining (even leveraging) the level of ambition of each measure. In particular, the Ecolabel should continue to pave the way for developing mandatory minimum requirements for Ecodesign. This can be done by creating a new framework instrument for sustainable products but the EC needs to set out what this instrument would contain in order to enable stakeholders to judge its effectiveness. What counts is that the roles, principles and level of ambition of the various existing instruments should be preserved and possibly reinforced (even if their format is changed). The framework should be developed only with a view to increase consistency and speed up the various processes. It should allow for optimization of human and financial resources at the EC level and the MS, guaranteeing market certainties and ultimately bringing benefit to consumers and the environment.</p>
<p>Developing an “horizontal” implementing measure under the “Packaging Essential Requirement” legislation to optimise the resource efficiency of packaging</p> <p>-single choice reply-(optional)</p>	I don't know
<p>Continuing and strengthening the development of common guidelines on how to consider packaging in “criteria setting” for the specific product groups under the EU SCP regulatory instruments and policy measures -single choice reply-(optional)</p>	Effective

<p>Introduce mandatory requirements on packaging optimisation and minimisation by strengthening the existing EU regulatory instruments (e.g.: the EC Directive on Packaging and Packaging Waste)</p> <p>-single choice reply-(optional)</p>	<p>Very effective</p>
<p>Promote and support private or public initiatives and networks / consortia for the development of technical solutions to improve the recyclability and reusability of packaging waste</p> <p>-single choice reply-(optional)</p>	<p>I don't know</p>
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	<p>Noting the deficits of the European standard on packaging prevention, developed under EC mandate M/317, ANEC has long been calling for a revision of the Packaging Waste Directive 2004/12/EC with a view to introduce ambitious legal requirements for packaging use reduction and optimisation. A horizontal implementing measure under the Directive would bring no any added value as it would only contain vague requirements. Instead we should develop implementing measures for specific product categories following the Ecodesign model. The existing Essential Requirements should also be tightened. At present, it states that 'packaging volume and weight must be the minimum amount to maintain the necessary levels of safety, hygiene and acceptance for the packed product and for the consumer'. This wording makes it difficult for enforcement bodies to take action against excessive packaging. We ask for the EC to make this provision more restrictive.</p>
<p>Establish a mandatory durability declaration for the estimated time duration/number of uses for all products (except those intended for a single use)</p> <p>-single choice reply-(optional)</p>	<p>Effective</p>
<p>Establish such declaration for key products groups only</p> <p>-single choice reply-(optional)</p>	<p>Slightly effective</p>
<p>Extend the mandatory warranty period for all consumer goods*(now 2 years)</p> <p>*As defined in directive 1999/44/EC Art 2, par 2, letter b)consumer goods: shall mean any tangible movable item, with the exception of (i) goods sold by way of execution or otherwise by authority of law, (ii) water and gas where they are not put up for sale in a limited volume or set quantity electricity</p> <p>-single choice reply-(optional)</p>	<p>Very effective</p>
<p>Encourage and support the development of industry voluntary agreements and other initiatives to adopt durability declarations for specific product groups</p> <p>-single choice reply-(optional)</p>	<p>Not effective at all</p>
<p>Strengthen the requirements relating to the producer responsibility in the existing legislation</p> <p>-single choice reply-(optional)</p>	<p>Effective</p>
<p>Disseminate product design guides to help producers, retailers and designers understand the 'optimum life' of products and identify where the greatest environmental savings can be made</p> <p>-single choice reply-(optional)</p>	<p>Slightly effective</p>

<p>Encourage and support producers to focus on longer term <u>service</u> relationships, such as leasing or service/product substitution, rather than 'one off' <u>product</u> sales (e.g.: by promoting financial tools and business models, or by granting loan funds to enable exploring this option)</p> <p>-single choice reply-(optional)</p>	<p>Effective</p>
<p>Recommend Member States to incentivize and sustain (e.g. with direct subsidies) repair and maintenance activities and provide incentives for consumers to repair or upgrade products, instead of replacing them</p> <p>-single choice reply-(optional)</p>	<p>Very effective</p>
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	<p>We believe that a mandatory durability declaration for all consumer goods would be useful, provided it is combined with an extension of the mandatory warranty period. Moreover, economic operators should be required to offer key services to consumers, such as possibilities to repair items and to make replacement parts available for up to 10 years after the last item has been sold. Finally, we believe it key to widen the producer responsibility to cover the whole life cycle of products as opposed to just the end-of-life stage.</p>
<p>Recommend to Member States to remove environmentally harmful subsidies</p> <p>-single choice reply-(optional)</p>	<p>Very effective</p>
<p>Recommend to Member States to provide effective incentives for more environmental friendly products</p> <p>-single choice reply-(optional)</p>	<p>Very effective</p>
<p>Develop guidance for Member States on how to provide effective incentive measures, based on good practices with proven results</p> <p>-single choice reply-(optional)</p>	<p>Slightly effective</p>
<p>Link subsidies and incentives to reduction of the product environmental footprint (PEF) and of the environmental footprint of the organisations (OEF), based on the methodologies set by the European Commission (see the other sections of this questionnaire)</p> <p>-single choice reply-(optional)</p>	<p>Not effective at all</p>
<p>Recommend to Member States the reduction of direct taxation to producers, based on their efforts on the PEF and OEF, based on the methodologies set by the European Commission (see the other sections of this questionnaire)</p> <p>-single choice reply-(optional)</p>	<p>Not effective at all</p>
<p>Review funding programmes (e.g.: Structural and Cohesion funds) to introduce evaluation criteria based on resource efficiency as a conditionality to obtain funds</p> <p>-single choice reply-(optional)</p>	<p>Slightly effective</p>
<p>Review funding programmes (e.g.: Structural and Cohesion funds) to connect evaluation procedures and scoring systems to the efforts made on the PEF and OEF, based on the methodologies set by the European Commission (see the other sections of this questionnaire)</p> <p>-single choice reply-(optional)</p>	<p>Slightly effective</p>
<p>Support "permanent" initiatives to sustain producers in promoting and marketing their sustainable products (e.g.: EC web-enabled databases and e-commerce platforms)</p>	<p>Slightly effective</p>

-single choice reply-(optional)	
Pursue enhanced market access provisions for environmental goods and services, especially in multilateral and bi-lateral trade negotiations with Non-EU countries, to enable a stronger environmentally sound “sourcing” -single choice reply-(optional)	Slightly effective
Strengthen the requirements concerning the quality and functionality of products in existing EU SCP regulatory instruments and policy measures, in order to avoid the misleading perception that products with a better environmental performance are of lower quality. -single choice reply-(optional)	Effective
Other (please specify) -open reply-(optional)	We agree that requirements for quality and functionality of products should be strengthened in the SCP framework, However we doubt these alone will lead to an increase in competitive rewards for sustainable goods. The answer is far more complex than the options proposed in this question. A mix of instruments is needed, including regulatory requirements for products and services and provision of incentives for companies to produce environmentally friendly products and for consumers to buy them. Moreover, past experiences with energy efficient light bulbs have shown that the minimum requirements did not pay sufficient attention to the importance of product performance in order to prevent disappointment from consumers e.g. regarding lifetime and brightness. This would need to be avoided in the future by introducing highly ambitious quality and functionality requirements and ensuring that environmental performance is improved hand-in-hand with product performance.
<u>Promoting sustainable consumption</u>	
Create a voluntary scheme for product environmental footprint (PEF) declaration, based on a third-party validation -single choice reply-(optional)	Not effective at all
Create a mandatory scheme for product environmental (PEF) declaration, based on a third-party validation -single choice reply-(optional)	Not effective at all
Introduce an obligation for producers to provide environmental data and information on specific aspects of the product (e.g.: extracts of environmental indicators and data from the PEF Methodology) -single choice reply-(optional)	Not effective at all
Consider additional information requirements on the environmental performance of products and develop necessary methods (e.g. ecological profiling of products done by the manufacturer under the Ecodesign Directive) -single choice reply-(optional)	Not effective at all
Promote voluntary agreements with retailers to support information campaigns on	Slightly effective

<p>environmentally preferable products (e.g.: on the points of sale)</p> <p>-single choice reply-(optional)</p>	
<p>Introduce mandatory requirements for producers to provide access to detailed and in-depth environmental information for interested stakeholders (e.g. by mentioning a dedicated webpage on the packaging or in advertising)</p> <p>-single choice reply-(optional)</p>	<p>Not effective at all</p>
<p>Collect, coordinate and disseminate evidence on consumption patterns and their environmental impacts, in order to sensitise consumers and better inform their choices</p> <p>-single choice reply-(optional)</p>	<p>Slightly effective</p>
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	<p>A mandatory scheme for the provision of environmental information could have an added value only if accepted by a broad range of stakeholders, independently and fully reviewed for robustness, subject to third-party verification and provided in a clear and comparable manner using a colour, graded scale. However this information should not be provided to all consumers and for all products through e.g. on-pack labelling. It should be developed for certain categories of products only and be made accessible to those consumers who are interested in such information, on request or via the Internet. The role of retailers is key but voluntary agreements with retailers have shown not be effective (e.g. the EU Retail Forum has not yet delivered transparent/comparable results for the sector). There is an urgent need for more demanding requirements to be imposed on retailers, following a sectoral approach (e.g. food retailers, DIY).</p>
<p>Integrate the current EU regulatory framework providing for that some selected words or expressions like “green”, “eco”, “natural” will be reserved to products that <u>meet specific requirements in terms of PEF – Product Environmental Footprint</u></p> <p>-single choice reply-(optional)</p>	<p>Not effective at all</p>
<p>Integrate the current EU regulatory framework providing for that the use of selected words or expressions like “green”, “eco”, “natural” must be associated to <u>environmental claims verified by third-party.</u></p> <p>-single choice reply-(optional)</p>	<p>Effective</p>
<p>Set up (an) EU-harmonised voluntary code(s) of conduct on the use of environmental claims in advertising and support its implementation / verification by joint independent bodies</p> <p>-single choice reply-(optional)</p>	<p>Not effective at all</p>
<p>Recommend Member States to strengthen and develop appropriate control measures in the area of misleading green claims</p> <p>-single choice reply-(optional)</p>	<p>Effective</p>
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	<p>We believe that the European Commission should revise its December 2000 Guidelines for the assessment of environmental claims. More importantly, the EC should consider</p>

	<p>alternatives to ensure effective prevention and better control of misleading green claims. An option could be to modify the Unfair Commercial Practices Directive (UCPD) so as to cover misleading green claims most appropriately. Examples of “bad claims” could also be added on to the black list of claims to be considered misleading. Fines should also be applied to companies using misleading claims.</p>
<p>Set up the requirement that a reasonable percentage of products that are on the retailers’ shelves, in selected priority categories, would qualify as meeting pre-determined environmental performance benchmarks</p> <p>-single choice reply-(optional)</p>	<p>Very effective</p>
<p>Provide incentives to obtain that a reasonable percentage of products that are on the retailers’ shelves, in selected priority categories, would qualify as meeting pre-determined environmental performance benchmarks</p> <p>-single choice reply-(optional)</p>	<p>Slightly effective</p>
<p>Incentivise the use of “green marketing” tools by retailers to promote more environmental friendly products and inform consumers on the environmental features of the products they sell</p> <p>-single choice reply-(optional)</p>	<p>Not effective at all</p>
<p>Encourage and incentivise retailers to phase out from shelves less environmentally friendly products</p> <p>-single choice reply-(optional)</p>	<p>Effective</p>
<p>Enhance the role of existing multi-stakeholder platforms, such as the EU Retail Forum for Sustainability, to deliver on sustainable consumption objectives (for example the phasing-out of single-use carrier bags), and promote voluntary agreements or formal covenants to recognize results achieved by actors taking part in the platforms (e.g.: adoption of a Code of Conduct)</p> <p>-single choice reply-(optional)</p>	<p>Not effective at all</p>
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	<p>The EU Retail Forum has an important role to play in greening the supply chain. However, a new EC mandate is needed with a view to require all EU retailers to achieve common sector targets that can be measured and verified. Such a new mandate should be developed within a multi-stakeholder horizontal working group. If these sector targets are not achieved within a given period of time, the Commission should develop mandatory minimum requirements which should be achieved by all retailers based on a staged approach. More ambitious targets should be set regularly over time (similar to what is done with the product specific Ecodesign Implementing Measures).</p>
<p>Set up a scheme for monetisation of some environmental impacts* identified in the life-cycle assessment</p> <p>* These schemes are based on the internalisation of environmental external costs by way of an appropriate price mechanism, similar to that applied to environmental costs of air emissions in the</p>	<p>Very effective</p>

<p>Clean Vehicle directive 2009/33/EC</p> <p>-single choice reply-(optional)</p>	
<p>Apply VAT (and/or other product/commodities indirect taxation) on the basis of environmental performance of products, for instance by eliminating reduced rates environmental harmful products</p> <p>-single choice reply-(optional)</p>	<p>Very effective</p>
<p>Recommend Member States to incentivize and sustain private consumption “credit schemes” aimed at supporting sustainable purchasing by final consumers</p> <p>-single choice reply-(optional)</p>	<p>Effective</p>
<p>Create new financing tools at the <u>EU level</u> to fund and sustain environmental friendly purchasing (e.g.: vouchers or “eco-cheques”* for the final consumer to co-fund the purchase of more resource-efficient products)</p> <p>* The ecocheque is a wage premium, under certain conditions with social tax exemptions, focusing on environmentally-friendly and sustainable – so-called ‘green’ – consumer goods</p> <p>-single choice reply-(optional)</p>	<p>Effective</p>
<p>Promote the creation of new financing tools at <u>Member State level</u> to fund and sustain environmental friendly purchasing (e.g.: vouchers or “eco-cheques” for the final consumer to co-fund the purchase of more resource-efficient products)</p> <p>-single choice reply-(optional)</p>	<p>Effective</p>
<p>Introduce Awards for best products (from sustainability, attractiveness, innovation and cost efficiency points of view) in the framework of an existing EU business/consumer award scheme, e.g. the EU Business Award</p> <p>-single choice reply-(optional)</p>	<p>Not effective at all</p>
<p>Provide incentives for consumers and other end-users <u>not to consume</u> (e.g. for using public transport instead of buying a new car)</p> <p>-single choice reply-(optional)</p>	<p>Very effective</p>
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	<p>We believe the proposed 2nd option should be divided into 2 actions. Firstly, VAT should be reduced for the most sustainable goods and services available on the market (e.g. products bearing the Ecolabel), so as to make them more competitive and accessible to consumers. Secondly, reduced rates should be eliminated for environmentally harmful products and for the least sustainable ones (which may not be considered ‘harmful’ as such). Moreover the internalisation of externalities under the SCP framework is key. It should be accompanied by Ecological Fiscal Reform (EFR) and the elimination of environmentally harmful subsidies. The EFR should aim at shifting taxes from labour to environmental ‘bads’ and natural resources (including energy) so that the public would be helped by the expected creation of jobs (or at least the reduction in elimination of jobs as companies would pay less in labour taxes). This would sustain the revenue for the public purse through environmentally-related taxes</p>
<p>Promote in cooperation with Member States and other stakeholders, public initiatives</p>	<p>Effective</p>

<p>and sensitisation campaigns on sustainable lifestyles, notably to increase consciousness of the overall environmental, and social impacts of the current consumption habits</p> <p>-single choice reply-(optional)</p>	
<p>Support Member State policy makers by coordinating and disseminating evidence on the most effective tools for influencing behaviour change and overcoming barriers / activating drivers to change</p> <p>-single choice reply-(optional)</p>	Effective
<p>Recommend Member States to introduce in their educational curricula subjects, methods and materials encouraging more sustainable consumption, developing systemic as well as critical thinking and ensuring a better understanding that well-being does not necessarily depend on high consumption of material goods</p> <p>-single choice reply-(optional)</p>	Effective
<p>Support national, regional and local projects and initiatives to promote sustainable lifestyles, notably through dedicated EU funds, such as the Structural and Cohesion Funds and instruments like Life+ and Interreg funding programmes</p> <p>-single choice reply-(optional)</p>	Effective
<p>Use web-enabled tools to make training programmes, best practices and educational materials available for interested actors, such as teachers, consumer organisations, etc. (as an evolution of initiatives like Dolceta and the European Diary)*</p> <p>*See www.dolceta.eu and www.europadiary.eu</p> <p>-single choice reply-(optional)</p>	Effective
<p>Develop courses of capacity building for NGOs and consumer organisations to raise the know how and role-related abilities of the key stakeholders to promote sustainable lifestyles</p> <p>-single choice reply-(optional)</p>	Effective
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	<p>The EU and MS should develop social marketing campaigns for the good of the environment using behavioural segmentation techniques (e.g. dividing consumers into categories with similar needs, expectations & behaviours) and promoting the right messages to the right audience. These campaigns could be used to inform consumers of their responsibilities and these of other actors. They could enlighten them as to the impact of their everyday choices and how SCP can affect quality of life (e.g. cost savings by using energy-efficient light bulbs). Any campaign must be combined with other policy instruments to bring about permanent behavioural changes (e.g. tax refunds on greener products). There is thus a need for a realistic understanding of consumers as they actually are, connecting with their concerns, desires/barriers for sustainability, behaviour/purchasing decisions. Finally the EU should design and test (SCP) policies before adoption using the output of EC research resources (e.g. JRC).</p>

Sustainable Industrial Policy (SIP)

Support the enforcement of new technologies for detection of illegal waste shipments -single choice reply-(optional)	Slightly effective
New legislation to increase the opportunities of recycling critical materials (e.g.: mandatory hand-back requirements, etc.) -single choice reply-(optional)	Very effective
Set up and/or promotion of voluntary agreements with industry to increase recycling of critical materials (e.g.: voluntary hand-back programmes, etc.) -single choice reply-(optional)	Slightly effective
Promote bio-products and bio-waste (end-of-waste criteria), including biological wastes as secondary raw materials allowing for their availability as an input for other sectors -single choice reply-(optional)	Effective
Other (please specify) -open reply-(optional)	A new legislation to increase opportunities of recycling critical materials is necessary. It could for instance foresee a deposit scheme for electrical & electronic products allowing recycling of valuable metals and a new approach for chemicals in order to ensure that their use does not hamper reuse and recycling. Mandatory take back systems must however guarantee that the reuse of the products which are returned does not cause any environmental harm. For instance, if empty glass bottles returned by consumers are sent to non-European countries to be washed and refilled before being put back on to the EU market, the environmental footprint of these bottles is huge. In a true sustainable system, all producers should be required to use the same critical materials, especially for packaging (e.g. beverage industry should be required to use the same glass bottles with just the content and labelling being different) as this facilitates re-use considerably.
Launch new actions to provide SMEs with targeted information on life-cycle environmental impacts of priority products and production processes and on related opportunities for cost savings -single choice reply-(optional)	Slightly effective
Support projects and initiatives to promote resource efficiency in SMEs through first-level advisory services (e.g.: company visits) -single choice reply-(optional)	Slightly effective
Support projects and initiatives to promote resource efficiency in SMEs through second-level advisory services(e.g. in-house training, full diagnostics, etc.) -single choice reply-(optional)	Slightly effective
Use more frequently the SME networks to consult on key environmental topics -single choice reply-(optional)	Slightly effective
Establish partnership agreements to help SMEs with technology transfer (e.g.: to adopt more energy efficient systems) and eco-innovative technology providers to increase their market entry	Slightly effective

-single choice reply-(optional)	
Reinforcing the initiatives to support the environmental legal compliance and improvement of SMEs by means of ICT and web-enabled instruments (e.g.: continuous update on legal requirements, compliance check up tools, BATs databases, best practices, etc.) -single choice reply-(optional)	Effective
Transforming the ECAP – Environmental Compliance Assistance Programme, into a permanent co-ordination EC task-force to simplify adoption of SCP product-related regulatory instruments by SMEs, in line with the “think small first” principle of the Small Business Act -single choice reply-(optional)	Effective
Providing funds to SMEs (e.g.: vouchers) to gain access to environmental auditing services at reduced rates or free of charge, technical assistance at very low costs and easily accessible credit schemes -single choice reply-(optional)	Effective
Ensure that forthcoming environmental legislation will seek wherever possible to alleviate the regulatory burden on SMEs -single choice reply-(optional)	Not effective at all
Set up a “one-stop-shop” for the provision of information and services on environmental-related issues (e.g.: legislation in force and criteria for applying to subsidies; fulfilment of administrative requirements, list with contact details of environmental advisors and service providers and available training,...) -single choice reply-(optional)	Slightly effective
Introduce regulatory relief and simplification measures for SMEs and micro companies (e.g.: streamlining the environmental permit procedures, simplification of environmental reporting, etc.) -single choice reply-(optional)	Not effective at all
Other (please specify) -open reply-(optional)	
Promoting and supporting “experience exchange”, by collecting Member States good practices with green business models and make them available to producers -single choice reply-(optional)	Effective
Launch new actions and support / fund initiatives to promote resource efficiency locally (e.g. through industrial symbiosis and clustering of producers) -single choice reply-(optional)	Effective
Support the development of eco-industrial parks and clusters aimed at accelerating the innovation process -single choice reply-(optional)	Effective
Promote development of new business models and industrial symbiosis through structural EU Funds and other funding programmes (e.g.: LIFE+, 7th Framework programme, Interreg...) -single choice reply-(optional)	Effective
Other (please specify) -open reply-(optional)	
1.15 Do you have any other remark, comment or suggestion concerning the issues related to Sustainable Consumption	The EC should aim at concrete and ambitious obligatory targets for reduced resource use and sustainability in the future SCP AP.

and Production? -open reply-(optional)

Synergies and consistency between SCP instruments should be sought such as the use of the Ecolabel criteria as the benchmark for Ecodesign requirements that will become mandatory e.g. 5 years after the entry into force of an Ecodesign implementing measure. To this aim, the EC must raise and secure adequate financial and human resources to support the challenge of an ambitious SCP policy. Furthermore, we regret that the consultation document does not mention the rebound effect. The rebound effect should be taken into account when analysing and developing SCP policy instruments. This could avoid offsetting the environmental improvements intended, or even overcompensation i.e. an increase of environmental burden. Finally considering the rebound effect in our understanding of consumer behaviour is key to developing proper information tools and campaigns.

Green Public Procurement (GPP)

GPP criteria and GPP guidance

2.1 The Buying Green Handbook gives guidance on GPP to policy makers, public authorities and suppliers (http://ec.europa.eu/environment/gpp/pdf/buying_green_handbook_en.pdf).

Do you consider the handbook as useful guidance?

-single choice reply-(optional)

Yes, but it could be improved

2.3 Do you see a need to improve the existing EU GPP criteria? -single choice reply-(optional)

Yes

2.4 If yes, how could the EU GPP criteria be improved? -open reply-(optional)

We believe that there is a need for more ambitious and binding GPP targets for authorities. Turning the GPP Directive into a Regulation could also be an option to increase coherence, provided a high level of ambition is ensured. GPP should be better aligned with environmental labelling of ISO type1 such as the EU Ecolabel.

2.5 Please indicate what type of respondent you are -single choice reply-(optional)

Other

Barriers to the uptake of GPP

Lack of awareness of the benefits of green products

-single choice reply-(optional)

5 (irrelevant)

Higher cost of green products -single choice reply-(optional)	1 (very important)
Too few products or suppliers complying with the criteria -single choice reply-(optional)	1 (very important)
Perceived low quality of environmentally friendly products -single choice reply-(optional)	3
Legal complexities and lack of legal clarity about what can be done to include green criteria -single choice reply-(optional)	3
Lack of knowledge on how to verify green criteria -single choice reply-(optional)	2
Unavailable or inadequate information and training -single choice reply-(optional)	2
Lack of political support -single choice reply-(optional)	2
Low communication between public procurers in different authorities -single choice reply-(optional)	2
Too high ambition of the EU GPP criteria -single choice reply-(optional)	5 (irrelevant)
Too low ambition of the EU GPP criteria -single choice reply-(optional)	1 (very important)
2.17 Could you suggest other barriers not mentioned above and score their importance? -open reply-(optional)	A lack of legal clarity and certainty also contributes to slowing down the uptake of GG criteria.
2.18 Are you a supplier to the public sector? -single choice reply-(optional)	No
Other (please specify and please rank from 1-5) -open reply-(optional)	
<u>Potential policy options</u>	
2.22 What would you consider the most appropriate approach at EU level to increase the role of Green Public Procurement in promoting environment friendly consumption -single choice reply-(optional)	Strengthen or modify the current approach
Strengthen the ambition level of common GPP criteria for products and services -single choice reply-(optional)	Very effective
Enlarging the scope of the priority sectors/product groups -single choice reply-(optional)	Very effective
Facilitate more exchanges between public authorities on GPP, including joint procurement, and networks of public procurement officers -single choice reply-(optional)	Effective
Provide detailed training material in all EU languages to procurers and business associations with a particular focus on SMEs	Slightly effective

-single choice reply-(optional)	
Develop easy-to-use Life Cycle Costing (LCC) methodologies for relevant product groups (for example a tool how public authority can calculate Life Cycle Costs based on indications from the supplier e.g. on the energy use of a product) -single choice reply-(optional)	Not effective
Widen the scope of GPP by including social criteria and move to Sustainable Public Procurement -single choice reply-(optional)	Effective
Make the inclusion of certain environmental criteria mandatory in EU Funding programmes -single choice reply-(optional)	Effective
Set a new target for the uptake of GPP at EU level -single choice reply-(optional)	Very effective
Make the inclusion of certain environmental criteria in tendering procedures obligatory in sector specific legislation, like in the Energy Star Regulation or the Clean Vehicles Directive -single choice reply-(optional)	Effective
2.24 Do you have any other remark, comment or suggestion concerning the issues related to Green Public Procurement? -open reply-(optional)	The scope of GPP should be extended to more products and services so as to widen the range of choice of sustainable solutions for public procurers.
Product Environmental Footprint (PEF)	
Improving the EU Ecolabel through simplified environmental criteria (limited to 3-4 most important environmental impact indicators) -single choice reply-(optional)	Strongly disagree
Increase marketing budget and efforts for awareness raising of the EU Ecolabel -single choice reply-(optional)	Agree
Integrating the PEF methodology into the EU SCP regulatory instruments and policy measures -single choice reply-(optional)	Disagree
Voluntary scheme on communication and benchmarking of product environmental performance based on PEF methodology -single choice reply-(optional)	Strongly disagree
Voluntary agreement with stakeholders that sets targets on product environmental performance based on PEF methodology -single choice reply-(optional)	Strongly disagree
Mandatory measure included in a new legislative framework that sets requirements and targets related to product environmental performance based on PEF methodology -single choice reply-(optional)	Disagree
None of the above -single choice reply-(optional)	Strongly disagree
Other (please specify) -open reply-(optional)	ANEC will oppose any attempts to water down the EU Ecolabel, such as the use of simplified criteria. We also disagree with having a

	<p>mandatory measure included in a new legislative framework that sets requirements and targets related to product environmental performance. Moreover the revision of the Ecodesign Directive should require legislators to consider benchmarks when establishing and revising the implementing measures (IM), based on the ErP methodology (not on PEF). Manufacturers should be required to report how the product design is performing compared with the benchmarks. We are also against any kind of voluntary information or communication schemes on product environmental performance, whether or not based on the PEF methodology. Finally, we urge that PEF should not be used or linked to labelling schemes or marketing information. In any case, we believe nothing should be done until the methodology and any outputs have been rigorously reviews, examined and tested on consumers.</p>
<p>Development of product category rules starting from priority products -single choice reply-(optional)</p>	Undecided
<p>Development of products' benchmarks -single choice reply-(optional)</p>	Strongly agree
<p>Development of alternative communication options (from on-pack labelling to extensive deployment of advanced IT technologies) -single choice reply-(optional)</p>	Disagree
<p>Creating tools that make it easier for companies to apply the PEF methodology (e.g. calculation tool; database development encouraged, coordinated) -single choice reply-(optional)</p>	Strongly disagree
<p>Defining SME approach and simplification of procedures to support them -single choice reply-(optional)</p>	Strongly disagree
<p>International coordination - work towards acceptance and international harmonisation of methodologies for environmental footprint calculation -single choice reply-(optional)</p>	Strongly disagree
<p>Implementation of financial incentives/mechanism to assist and encourage SMEs in developing green products and for public authorities to oversee activities at local level) -single choice reply-(optional)</p>	Agree
<p>Other (please specify) -open reply-(optional)</p>	
<p>"I do not understand the significance of the environmental information that is being communicated" -single choice reply-(optional)</p>	Disagree
<p>"Knowing the environmental impact of what I buy is important" -single choice reply-(optional)</p>	Undecided
<p>"There are too many different labels" -single choice reply-(optional)</p>	Strongly agree

<p>"I prefer buying products that have a lower environmental impact"</p> <p>-single choice reply-(optional)</p>	Strongly agree
<p>"Price and quality are the only things that I look at"</p> <p>-single choice reply-(optional)</p>	Strongly disagree
<p>"I always prefer buying from brands that have an environmental label" -single choice reply-(optional)</p>	Disagree
<p>"My own consumption has no impact on the environmental state of the planet"</p> <p>-single choice reply-(optional)</p>	Strongly disagree
<p>"Not enough information is available on the environmental performance of the products I use"</p> <p>-single choice reply-(optional)</p>	Disagree
<p>3.9 Do you have any other remark, comment or suggestion concerning the issues related to Product Environmental Performance?</p> <p>-open reply-(optional)</p>	<p>Consumers do have concerns about the number of environmental claims and their lack of reliability and clarity. The only labels that are trusted and often used by consumers for making decisions include the EU Ecolabel, the EU organic label and the (old) EU Energy Label thanks to their simplicity, clarity, credibility and usability. These labels merit to be supported strongly both politically and financially. We therefore stress again the need to strengthen existing ISO type I environmental labels, such as the EU Ecolabel as well as the Energy Label. We however condemn the various attempts from all sides to make these labels disappear or replace them with complicated labels with unreliable information based on complex figures or meaningless numbers (e.g. carbon footprint or PEF values). A new labelling scheme on the environmental performance of products would prove useless for consumers and would make them return to other decision criteria, such as price or packaging.</p>

Environmental Footprint of Organisations (OEF)

Barriers and drivers

<p>Opportunity to identify financial savings (e.g. from more efficient resource use)</p> <p>-single choice reply-(optional)</p>	Agree
<p>Strategic importance for future competitiveness (e.g. due to rising resource prices)</p> <p>-single choice reply-(optional)</p>	Agree
<p>Support a business case for investment in resource efficiency measures</p> <p>-single choice reply-(optional)</p>	Agree
<p>Keep up with what competitors are doing</p> <p>-single choice reply-(optional)</p>	Agree
<p>Demonstrating market leadership</p> <p>-single choice reply-(optional)</p>	Agree

Building an environmentally sensitive brand -single choice reply-(optional)	Agree
Pressure from investors -single choice reply-(optional)	Agree
Pressures from current legislation -single choice reply-(optional)	Agree
Anticipation of future regulation -single choice reply-(optional)	Agree
Pressure from other external stakeholders -single choice reply-(optional)	Agree
Other (please specify) -open reply-(optional)	
Lack of understanding of the importance of environmental performance information for other business objectives (e.g. competitiveness) -single choice reply-(optional)	Agree
Lack of understanding on how and what to report -single choice reply-(optional)	Agree
Cost of assessing, displaying and benchmarking environmental performance -single choice reply-(optional)	Agree
Confusion regarding which measurement/ reporting approach to adopt -single choice reply-(optional)	Agree
Lack of consistency between existing initiatives in this area -single choice reply-(optional)	Agree
Lack of awareness of advantages (e.g. cost savings) -single choice reply-(optional)	Agree
Lack of time or expertise -single choice reply-(optional)	Agree
Insufficient market reward for good environmental performance -single choice reply-(optional)	Disagree
Insufficient understanding of company/organisation stakeholders of environmental issues and performance -single choice reply-(optional)	Agree
Other (please specify) -open reply-(optional)	
<u>Problem definition</u>	
Multiple initiatives in the EU (e.g. different Member States have different reporting initiatives) -single choice reply-(optional)	Agree
Multiple ways of reporting asked by different company stakeholders -single choice reply-(optional)	Undecided
Incomplete information on performance with respect to certain environmental impacts means that not all risks/ opportunities are captured along the value chain -single choice reply-(optional)	Agree
Insufficient information on how to improve environmental performance means less	Disagree

<p>action is taken</p> <p>-single choice reply-(optional)</p>	
<p>Inconsistent approach to verification of reported information</p> <p>-single choice reply-(optional)</p>	Strongly agree
<p>Insufficient market signals/reward for assessment and display of performance</p> <p>-single choice reply-(optional)</p>	Undecided
<p>Insufficient market signals/ reward for good environmental performance</p> <p>-single choice reply-(optional)</p>	Disagree
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	
<p>Encourage organisations to assess (measure) environmental performance based on a common approach</p> <p>-single choice reply-(optional)</p>	Undecided
<p>Encourage organisations to display (report) environmental performance based on a common approach</p> <p>-single choice reply-(optional)</p>	Disagree
<p>Encourage benchmarking of performance at a sectoral level based on a common approach</p> <p>-single choice reply-(optional)</p>	Agree
<p>Incentivise/ encourage improvements in environmental performance by organisations</p> <p>-single choice reply-(optional)</p>	Undecided
<p>Incentivise/ encourage measurement and reporting of environmental performance by organisations</p> <p>-single choice reply-(optional)</p>	Agree
<p>Coordination of incentives between EU and Member States</p> <p>-single choice reply-(optional)</p>	Agree
<p>Improve reliability of environmental information (e.g.through verification)</p> <p>-single choice reply-(optional)</p>	Strongly agree
<p>Participate in efforts to align approaches internationally</p> <p>-single choice reply-(optional)</p>	Undecided
<p>Other action (Please specify)</p> <p>-open reply-(optional)</p>	Although we agree that the benchmarking of performance would be useful, we consider it should be made mandatory (see more details on our position under 3.1).
<p>It is necessary to develop sectoral footprint rules starting from priority sectors</p> <p>-single choice reply-(optional)</p>	Strongly disagree
<p>The development of OSFRs should be led by the EC, with the contribution of industrial associations and other relevant stakeholders EU-wide</p> <p>-single choice reply-(optional)</p>	Strongly disagree
<p>The development of OSFRs should be led by industrial organisations, with the involvement of other relevant stakeholders EU-wide with the EC having an overseeing and final decision makers' role</p> <p>-single choice reply-(optional)</p>	Strongly disagree
<p>OSFRs should be developed based on relevant 3rd party studies</p> <p>-single choice reply-(optional)</p>	Strongly disagree

OFSR development should be led by an executive agency specifically set up for this purpose, with the involvement of other relevant stakeholders EU-wide with the EC having an overseeing and final decision makers' role -single choice reply-(optional)	Strongly disagree
OFSR development should be led by a balanced panel of different stakeholders involved, with the EC having an overseeing and final decision makers' role -single choice reply-(optional)	Strongly disagree
Other (please specify) -open reply-(optional)	
Development of a simplified approach to environmental footprinting for SMEs -single choice reply-(optional)	Not important
Development of a differentiated approach for micro, small and medium sized organisations -single choice reply-(optional)	Not important
Provision of targeted incentives for SMEs -single choice reply-(optional)	Important to provide at local/regional level
Provision of targeted information for SMEs -single choice reply-(optional)	Not important
Support to SMEs on measuring and improving their environmental performance -single choice reply-(optional)	Important to provide at local/regional level
Other (please specify) -open reply-(optional)	
4.7 With respect incentives, please state your opinion below: Companies and organisations should receive meaningful incentives to improve their performance -single choice reply-(optional)	Agree
Regulatory incentives (e.g. reducing compliance cost of other regulation) -single choice reply-(optional)	No opinion
Reputational incentives (e.g. league tables of environmental performance at a sector level) -single choice reply-(optional)	No opinion
Access to finance at advantageous rates (e.g. loans, guarantees, venture capital) -single choice reply-(optional)	Important to provide at national level
Facilitated access to funding (e.g. grants) -single choice reply-(optional)	Important to provide at national level
Other (please specify) -open reply-(optional)	
Do you have any comments on incentives, also reflecting the special need of SMEs? -open reply-(optional)	
No need for further EU Action	Disagree

-single choice reply-(optional)	
EU promotion of the common methodology on a voluntary basis providing possibility for sectoral benchmarking and access to incentives -single choice reply-(optional)	Disagree
Recommendation to Member States to use the common methodology for initiatives related to the measurement, reporting, benchmarking or incentivising environmental performance -single choice reply-(optional)	Disagree
Mandatory instrument for larger organisations in priority sectors -single choice reply-(optional)	Disagree
Mandatory instrument for larger organisations in all sectors -single choice reply-(optional)	Agree
Expansion and/ or strengthening of existing policy instruments (e.g. Industrial Emissions Directive/ E-PRTR*) to drive increased measurement and reporting of environmental performance * The European Pollutant Release and Transfer Register (E-PRTR) is the Europe-wide register of environmental data from industrial facilities in European Union, as set up in the Industrial Emission Directive -single choice reply-(optional)	Strongly agree
Other (please specify) -open reply-(optional)	
Approach to assessment (measurement) of environmental performance -single choice reply-(optional)	Mandatory
Approach to displaying environmental performance (reporting) -single choice reply-(optional)	Either
Approach to benchmarking of performance at a sectoral level -single choice reply-(optional)	Mandatory
Approach to verification of environmental performance -single choice reply-(optional)	Mandatory
4.11 One option available to support the more systematic measurement, reporting and management of environmental performance would be to extend existing EU instruments that already include an environmentally reporting element. Which policies do you consider would be suitable for such an approach and why? -open reply-(optional)	
4.12 Do you have any other remark, comment or suggestion concerning the issues related to the improvement of Organisation Environmental Performance? -open reply-(optional)	