

## **ANEC final response to the EC consultation on the revision of the SCP/SIP Action Plan**

*IMPORTANT: This document needs to be read together with our response to the PDF questionnaire (where the detailed questions are visible)*

### **Section 1 – Sustainable consumption and production**

#### 1.1 Strengthening the requirements concerning resource efficiency, beyond energy

Q1 – Very effective

Q2 – Effective

Other – 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

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.

#### 1.3 Improving synergy and consistency between EU SCP regulatory instruments and policy measures

Q1 – Very effective

Q2 – Effective

Q3 – Very effective

Q4 – Effective



Q5 – Effective

Q6 – Very effective

Q7 – Very effective

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Other – We have long stressed the need to ensure more consistency between the SCP instruments and policy measures. We nonetheless insist on the importance of maintaining – and even leveraging – the specific level of ambition that corresponds to each measure. Although it is important to align the preparatory studies and methodologies for testing products, this should not translate into watering down the level of ambition of the various instruments nor the testing and verification methods they are measured against. The Ecolabel should remain a label of excellence, following a true life-cycle approach and addressing a wide range of environmental and health impacts, such as the use of hazardous chemicals. The Ecodesign process should then be used to set environmental performance requirements for the mass market products, eliminating the worst performing products from the market. Continuous improvement of these requirements, based on mandatory benchmarks, should be sought so as to steer the market towards better environmentally performing products. Aligning the EU Ecodesign and the EU Energy Labelling scheme with the Ecolabel can be beneficial if the Ecolabel standard continues to pave the way for developing mandatory minimum requirements for Ecodesign.

We believe that improving synergy and consistency between EU SCP regulatory instruments and policy measures can be done by creating a new framework instrument for sustainable products. However, the Commission needs to set out what this instrument would contain in order to enable stakeholders to judge its effectiveness. Whether this framework should consist of a new package substituting and integrating the existing EU SCP tools and instruments, or complementing them, does not really matter. 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).

Whatever the new framework, it should not jeopardize the effectiveness of the existing instruments and the ongoing implementation process. It should be developed only with a view to increase consistency and contribute to speeding up the various processes, avoiding inconsistencies. It should allow for the optimization of human and financial resources at the level of the Commission and the Member States, guaranteeing market certainties and ultimately bringing benefit to consumers and the environment.

#### 1.4 – Optimizing the resource efficiency of packaging



Q1 – Undecided

Q2 – Effective

Q3 – Very effective

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#### Q4 – Undecided

Other – Noting the deficits of the European standard on packaging prevention, developed following a Commission's mandate (M/317), ANEC has long been calling for a revision of the EU Packaging and Packaging Waste Directive 2004/12/EC, with a view to introduce ambitious legal requirements for reducing the use of packaging and ensuring its optimisation. Developing a horizontal implementing measure under the revised Directive could be envisaged, but we fear it will lead to only vague requirements. Instead it may appear useful to develop implementing measures for specific product categories: for instance, following the model of the Ecodesign process.

Also, it would be useful to tighten the provision of the Essential Requirements. At present, this 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'. We believe that this wording can make it difficult for enforcement bodies to take action against packaging that they consider to be excessive: for example, acceptance can be justified on the grounds of the attractive presentation of the product. We ask that the Commission undertake an analysis of the feasibility of making this provision more restrictive. To date, few successful enforcement actions have been taken, even though many consumers dislike excessive packaging.

#### 1.5 Strengthening the legal requirements and voluntary initiatives for product durability

Q1 – Effective

Q2 – Slightly effective

Q3 – Very effective

Q4 – Not effective at all

Q5 – Effective

Q6 – Slightly effective

Q7 – Effective

Q8 – Very effective

Other – We believe that a mandatory durability declaration for all consumer goods would be useful, provided it is combined with an extension of the mandatory

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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.

### 1.6 Augmenting competitive rewards for environmentally friendly products

Q1 – Very effective

Q2 – Very effective

Q3 – Moderately effective

Q4 – Not effective at all

Q5 – Not effective at all

Q6 – Moderately effective

Q7 – Moderately effective

Q8 – Moderately effective

Q9 – Moderately effective

Q10 – Moderately effective

Other – Although we agree that requirements for quality and functionality of products should be strengthened in the SCP framework (note that they already form part of both the Ecodesign and Ecolabel tools), we do not see how these alone will lead to an increase in competitive rewards for environmentally friendly goods. In our view, 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 highly environmentally friendly products, and for consumers to buy ever better products.

Moreover, although we support that quality and functionality of products should be addressed in ecodesign implementing measures, 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. with regard to lifetime and maintaining 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. The one should not be done without the other, taking care that higher environmental performance does not mean poorer product performance for the consumer. That could lead to consumers finding 'green' products unattractive, as has happened with the reaction of some consumers to energy efficient lightbulbs.

### **Promoting sustainable consumption**

#### 1.7 Enabling purchasers to get better information on product environmental performance

Q1 – Not effective at all

Q2 – Not effective at all

Q3 – Not effective at all

Q4 – Not effective at all

Q5 – Slightly effective

Q6 – Not effective at all

Q7 – Slightly effective

Other – We believe that 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 on-pack labelling. It should instead be developed for certain categories of product only, when deemed necessary and be made accessible to only those consumers/purchasers who are interested in such information on request or via the Internet.

Although we agree that the role of retailers is encouraging sustainable purchasing behaviours, we do not have evidence that voluntary agreements with retailers are effective (for instance the EU Retail Forum has not delivered transparent and comparable results for the whole sector so far). There is an urgent need for more demanding requirements to be imposed on retailers. These requirements ought to be developed following a sectoral approach (e.g. food retailers, DIY).

#### 1.8 Further preventing misleading green claims

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Q1 – Not effective at all

Q2 – Effective

Q3 – Not effective at all

Q4 – Effective

Other – We believe that the European Commission should revise its December 2000 Guidelines for the assessment of environmental claims. More importantly, the EC should consider 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.

#### 1.9 Encouraging retailers to stimulate sustainable consumption

Q1 – Very effective

Q2 – Slightly effective

Q3 – Not effective at all

Q4 – Effective

Q5 – Not effective at all

Other – 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).

#### 1.10 Providing incentives for purchase of better performing products

Q1 – Very effective

Q2 – Very effective

Q3 – Effective

Q4 – Effective

Q5 – Effective

Q6 – Not effective at all

Q7 – Very effective

Other – We believe the proposed second option should be divided into two different actions which both deserve to be promoted. Firstly, VAT should be reduced for the most sustainable goods and services available on the market (e.g. products bearing the EU Ecolabel or the EU organic label), so as to make them more competitive and more accessible to consumers. Secondly, reduced rates should be eliminated for environmentally harmful products, as well as for the least sustainable ones (which may not be considered 'harmful' as such).

We also believe the internalisation of externalities under the SCP policy framework is key. It ought to be accompanied by Ecological Fiscal Reform (EFR) and the elimination of environmentally harmful subsidies (EHS). 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 since companies would pay less in labour taxes). This would sustain the revenue for the public purse through environmentally-related taxes.

#### 1.11 Strengthening the promotion of (and sensitization on) sustainable lifestyles towards citizens and communities

Q1 – Moderately effective

Q2 – Effective

Q3 – Effective

Q4 – Effective

Q5 – Effective

Q6 – Effective

Other – The EU and Member States should work to develop social marketing campaigns for the good of the environment, using behavioural segmentation techniques (i.e. dividing consumers into categories with e.g. similar needs, expectations and behaviours), and promoting the right messages to the right audience. For example, one could distinguish between consumers who are

already 'green' (e.g. those regularly buying sustainable products, such as those bearing the European Ecolabel) and those who have not even started to separate domestic waste. Of course, any campaign should always be combined with other policy instruments - using the 'stick and carrot' - to bring about permanent behavioural changes (e.g. tax refunds for purchase of 'greener' products).

To this aim, there is a need for a realistic understanding of consumers as they actually are, and not as we wish them to be. It implies the need for a better understanding of consumers in general, connecting with their concerns, desires and barriers for sustainability (see next point), consumer behaviour and purchasing decisions.

These campaigns could also be used to better inform consumers of their responsibilities, and of the responsibilities and commitments of other actors, such as government. They could also enlighten consumers as to the impact of their everyday choices and as to how SCP can affect their quality of life in practical terms (e.g. cost savings by using energy-efficient light bulbs).

The European Commission should develop projects to this aim. Above all, it is key that the EU tests policy interventions and instruments before their adoption. In this context, the output of other Commission research resources, such as the JRC or the IEE programme, should be systematically considered by the Commission's policy-making directorates when designing (SCP) policies.

## **Sustainable industrial policy**

### 1.12 Improving waste management and recycling

Q1 – Moderately effective

Q2 – Very effective

Q3 – Slightly effective

Q4 – Effective

Other – We believe a new legislation to increase the opportunities of recycling critical materials is necessary. Among others, we consider it key to establish a deposit scheme for electrical and electronic products allowing precious and valuable metals. Moreover a new approach on chemicals in products is needed as their use can impact reusability and recyclability.



However, although we support the introduction of mandatory take back systems, we stress the need to ensure that the reuse of the products which are returned by consumers 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 European market, the environmental footprint of these bottles is huge. In this case, recycling the glass bottles in the country where they were sold could be more efficient from a financial and environmental point of view.

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.

#### 1.13 Helping SMEs contribute to a resource efficient economy

Q1 – Slightly effective

Q2 – Slightly effective

Q3 – Slightly effective

Q4 – Slightly effective

Q5 – Slightly effective

Q6 – Effective

Q7 – Effective

Q8 – Effective

Q9 – Not effective at all

Q10 – Slightly effective

Q11 – Not effective at all

Other –

#### 1.14 Promoting green business models and industrial symbiosis



Q1 – Moderately effective

Q2 – Moderately effective

Q3 – Effective

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Q4 – Effective

Other –

#### 1.15 Any other remark

We believe that the SCP framework should be considered an umbrella policy and be integrated with other EU policies, including consumer policies. Furthermore, a fundamental discussion on the relationship between economic growth and its potential to undermine measures that aim to enhance resource efficiency should take place. In this context, we believe that the Commission should take the lead in changing the mindsets of actors across the socio-economic spectrum. In particular, the Commission should aim at concrete and ambitious obligatory targets for reduced resource use and sustainability in the future SCP Action Plan.



Under the future SCP Action Plan, synergies and consistency among sustainability-related approaches - such as the EU Ecolabelling and Energy labelling schemes and Ecodesign approach - should be sought. An example of synergy could be to use the Ecolabel criteria as the benchmark for Ecodesign requirements that will become mandatory e.g. 5 years after the entry into force of a product-specific Ecodesign implementing measure. To this aim, we believe institutional changes to accommodate the revised SCP policy may be necessary. The EU institutions, and in particular the European Commission, 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. In our view, the rebound effect ought to be taken into account when analysing and developing new SCP policy instruments or encouraging green technologies. This could avoid partly, or entirely, offsetting the environmental improvements intended. In extreme cases, it could avoid overcompensation i.e. an increase of environmental burden. It should be noted that this is not primarily a consumer behavioural issue, but is often related to the growth paradigm. Considering the rebound effect in our understanding of consumer behaviour is also key to better adapting information campaigns and developing proper information tools (e.g. labelling schemes).

We also very much regret the absence of the social pillar in the SCP consultation. We must underline the importance of ensuring that environmental measures are socially just. The access of lower income groups to products of higher environmental performance must be ensured. Unfortunately, such products tend to be more expensive than their less able competitors. Moreover green products,

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such as organic produce, still represent a niche market. The SCP framework should therefore have the overall aim of increasing the number of sustainable products and increasing the number of purchasers for these products. There is a need for economic and financial policies to be shaped to support the extension of green products to all consumers. Moreover, less sustainable policies (such as subsidies paid to consumers to replace their car with a new one) need to be rethought. Adding welfare and happiness to the pure calculation of GDP is also key. This 'new thinking' is unfortunately absent from the SCP consultation paper.

As far as concrete measures are concerned, we do agree with having a methodology to allow the benchmarking of products and organizations, accompanied by compulsory declarations and requirements. However we disagree with using the PEF methodology to this aim because it is based on the environmental footprint of products (see ANEC position paper for more detailed explanations).

## **Section 2 - Green public procurement**

### GPP criteria and GPP guidance

2.1 Is the Buying Green Handbook useful?

Yes, but it could be improved

2.2 If yes, how?

More guidelines, in particular additional legal explanation for authorities, should be developed on how to use GPP in practice.

2.3 Do you see a need to improve the EU GPP criteria?

Yes

2.4 If yes, how?

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 What type of respondent are you?

Other

→ Questionnaire goes directly to 2.16

### Barriers to the uptake of GPP

2.16 Barriers to the uptake of GPP criteria (*rank from 1 to 5 – 1=very important; 5=irrelevant*)

- Lack of awareness of the benefits of green products\_\_5
- Higher cost of green products\_\_1
- Too few products or suppliers complying with the criteria\_\_1
- Perceived low quality of environmentally friendly products\_\_3
- Legal complexities and lack of legal clarity about what can be done to include green criteria \_\_3
- Lack of knowledge on how to verify green criteria\_2
- Unavailable or inadequate information and training\_2
- Lack of political support\_\_\_\_2
- Low communication between public procurers in different authorities \_\_2
- Too high ambition of the EU GPP criteria \_\_\_\_5
- Too low ambition of the EU GPP criteria \_\_\_\_1

### 2.17 Other barriers

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?

No → Directed to question 2.22

### Potential policy options

### 2.22 What is the most appropriate approach?

Strengthen or modify the current approach

### 2.23 Your opinion on the effectiveness of the proposed actions

Q1 – Very effective

Q2 – Very effective

Q3 – Effective

Q4 – Very little effective

Q5 – Not effective



Q6 – Effective

Q7 – Effective

Q8 – Very effective

Q9 – Effective

Other –

2.24 Additional comments or suggestions?

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.

### **Section 3 Product Environmental Footprint**

#### 3.1 Increasing the uptake of green products and improving the environmental performance of products

Q1 – Strongly disagree

Q2 – Agree

Q3 – Disagree

Q4 – Strongly disagree

Q5 – Strongly disagree

Q6 – Disagree

Q7 – Strongly disagree

Other – With reference to the first option, ANEC has long supported the EU Ecolabel as a reliable label of excellence. The strengths of the Ecolabel include that it is a multi-criteria label, based on a life-cycle approach and developed by a multi-stakeholder panel in a transparent way, and that it is third-party verified. This label is getting more and more well-known among European consumers and allows them to quickly identify best performing products. It has also shown to contribute to steering the market towards more sustainable products by giving visibility to front runners and supporting new technologies, materials or other environmental alternatives. Consumer organisations will oppose attempts that would water down the ambitions of the Ecolabel, such as the use of simplified environmental criteria.

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We also disagree with the proposal to have a mandatory measure included in a new legislative framework that sets requirements and targets related to product environmental performance. Our rationale can be found in answer to question 1.1.

As far as benchmarks are concerned, the revision of the Ecodesign Directive should see some improvements. First, there is a need to make it obligatory for the legislators to consider benchmarks when both establishing and revising the implementing measures for specific product groups based on the Ecodesign methodology (not on the PEF methodology). Manufacturers should also be required (in Annex I part 2) to report how the design of a product is performing compared with the benchmarks of the Implementing Measure. Moreover, benchmarks should cover aspects other than energy efficiency. Last but not least, the role of benchmarks should be clarified vis-à-vis Member State support for instruments for sustainable consumption such as GPP, and financial incentives such as taxes and subsidies.

Finally we are against any kind of voluntary information or communication schemes on product environmental performance, whether or not based on the PEF methodology.

As we have severe doubts about the added value of the PEF methodology in its current form, 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.

### 3.2 Which actions could increase the uptake of green products and improve the performance of product

Q1 – Undecided

Q2 – Strongly agree

Q3 – Disagree

Q4 – Strongly disagree



Q5 – Strongly disagree

Q6 – Strongly disagree

Q7 – Agree

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Other –

### 3.3 Statements regarding environmental information on products

Q1 – Disagree

Q2 – Undecided

Q3 – Strongly agree

Q4 – Strongly agree

Q5 – Strongly disagree

Q6 – Disagree

Q7 – Strongly disagree

Q8 – Disagree

Other – *Note that we could not answer as an individual consumer. Our response is thus the response of an organization defending the consumers' interests. We have tried to pass on the views that consumers express at national level.*

Consumers do have concerns about the number of environmental claims that can be found on the EU market as well as about their lack of reliability and clarity. However, there exist a number a claims that are trusted due to their simplicity, clarity, credibility and usability. In particular, consumers today understand and base their purchasing decision more and more on the EU Ecolabel, the EU organic label and the EU Energy Label. Some of these very successful labels are under threat due to a lack of political and financial support, and strong lobbying from business and some governments to leave more room for (potentially misleading) self-claims, including more and more (confusing) information. 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 to replace them with complicated labels that contain unreliable information based on complex figures or meaningless numbers (e.g. carbon footprint values). These are useless for consumers.

We believe 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, packaging or even colour.



3.4-3.9 Questions for companies and public authorities only

3.9 Any other remark

**Section 4 – Improving the environmental performance of organisations**

**Barriers and drivers**

4.1 Drivers for assessing and reporting your environmental performance (as an organization)

Q 1 – Agree

Q 2 – Agree

Q 3 – Agree

Q 4 – Agree

Q 5 – Agree

Q 6 – Agree

Q 7 – Agree

Q 8 – Agree

Q 9 – Agree

Q 10 – Agree

Other –

4.2 Barriers to assessing and reporting your environmental performance (as an organization)

Q 1 – Agree

Q 2 – Agree

Q 3 – Agree

Q 4 – Agree

Q 5 – Agree

Q 6 – Agree

Q 7 – Agree

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Q 8 – Disagree

Q 9 – Agree

Other –

#### Problem definition

#### 4.3 Factors which may contribute to the current problems

Q 1 – Agree

Q 2 – Undecided

Q 3 – Agree

Q 4 – Disagree

Q 5 – Strongly agree

Q 6 – Undecided

Q 7 – Disagree

Other –

#### 4.4 Possible further action from the EU to benefit the environmental performance of organizations

Q 1 – Undecided

Q 2 – Disagree

Q 3 – Agree

Q 4 – Undecided

Q 5 – Agree

Q 6 – Agree

Q 7 – Strongly agree

Q 8 – Undecided

Other – 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).



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#### 4.5 Organisation Sectoral Footprint Rules (OSFR)

Q 1 – Strongly disagree

Q 2 – Strongly disagree

Q 3 – Strongly disagree

Q 4 – Strongly disagree

Q 5 – Strongly disagree

Q 6 – Strongly disagree

Other –

#### 4.6 Helping SMEs

Q 1 – Not important

Q 2 – Not important

Q 3 – Important to provide at national + Important to provide at regional/local level

Q 4 – Not important

Q 5 – Important to provide at all levels

Other –

#### 4.7 Should companies and organisations receive incentives?

Agree

#### 4.8 State your opinion about the proposed incentives

Q 1 – No opinion

Q 2 – No opinion

Q 3 – Important to provide at national level

Q 4 – Important to provide at national level

Other –

#### Policy Options

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4.9 What actions at EU level to improve the environmental performance of organisations

Q 1 – Disagree

Q 2 – Disagree

Q 3 – Disagree

Q 4 – Disagree

Q 5 – Agree

Q 6 – Strongly agree

Other –

4.10 Suitability of specific activities

Q 1 – Mandatory

Q 2 – (*none*)

Q 3 – Mandatory

Q 4 – Mandatory

4.11 Which policies would be suitable for such an approach and why?

n.a.

4.12 Any other remark concerning the issues related to the improvement of Organisation Environmental Performance?

n.a.