



## More Information on the Resource Efficiency Consultation and QCEA's Response

QCEA has responded to the European Commission's public [Consultation on a Roadmap for a resource-efficient Europe](#), as part of its **Sustainable Energy Security** programme. Resource efficiency plays a crucial role in sustainable energy security, and it is vital that policy-makers appreciate the importance of resource efficiency and savings as the starting point for an overall energy policy for Europe.

View the consultation background document [here](#).

View a PDF of the consultation questionnaire [here](#).

The EU's 'Europe 2020' strategy (for "smart, sustainable and inclusive growth") includes seven flagship initiatives, one of which is **resource efficiency**. Its stated objective is to "decouple economic growth from the use of resources, support the shift towards a low-carbon economy, increase the use of renewable energy sources, modernise our transport sector and promote energy efficiency".

The European Commission will produce a roadmap for a resource-efficient Europe by June 2011. This consultation is part of the Roadmap preparatory work: engaging with stakeholders and citizens. Responses will be published online, and the Commission must take the consultation responses into consideration in the formulation of the roadmap i.e. the overarching policy and legislation to do with resource efficiency for the coming decade.

**Consultations typically get only between 50 and 300 responses**, in total, so responding to the consultation as an individual is a great opportunity for you to make your voice heard. The corporate lobby will certainly be having its say, so please use this opportunity to counter-act short term, profit-based logic with individual and community commitment to sustainability and reducing our resource (or ecological) footprints.

The consultation is multiple choice, and thus in large part serves as a statistical exercise. **You can answer as little or as much of the consultation as you see fit**: there is a "No opinion" option for each question (with the exception of Q.8, Section 2 - see below). Should you find that a question, or the available answers, do not represent your opinion adequately, or if you do not feel equipped to answer or sufficiently informed about a particular topic, then you can just answer "No opinion". Indeed, if you are unsure about the details, it is probably better not to give an opinion.

If you do not have a lot of time to go through the consultation, then you could stick to "no opinion" for the first two sections (general view and policy areas) - or use QCEA's response as a template (although of course it is not intended as a prescription) - and then concentrate on the third section - **individual attitudes**. In order to give you some indication as to why we have responded in the way we have, the following pages give a little explanation for some of our responses that may not be immediately obvious.

The **third section** of the consultation is about your personal views, attitudes and behaviour as a consumer. It thus offers a chance to provide a missing link between policy makers and individuals who are willing to make changes to their lifestyles to become more sustainable.

There is also an opportunity at the end of the consultation for **further comments and suggestions** (maximum 1000 characters, including spaces).

To answer the consultation as an individual citizen of the EU click [here](#).

The deadline is **Friday 22nd April**.

If you choose for your response to be public (i.e. published under your name) then please send us an email to let us know that you have answered the consultation, so we can view it online. Alternatively, if you choose to be anonymous, we'd appreciate if you could send us a pdf of your response. You can do this by clicking "VIEW" response, then going to print and saving as a pdf.

## QCEA's Response

QCEA's response starts from some basic principles which could be summarized as follows:

Europe consumes more than its fair share of the Earth's resources, in terms of today's global poor and future generations. Europe has a moral responsibility to reduce this – not just by greater resource efficiency, but by actively reducing consumer demand.

Business-as-usual is not an option for the environment or the economy. Resource and energy efficiency puts us in a better position vis-à-vis difficult supply issues, volatile prices and environmental degradation, including climate change. It is crucial to restore the link between resource inefficiency and price – the more a product/service consumes/wastes/pollutes, the more it should cost.

Indeed, we have made these points in the very short section allowed for additional comments at the end of the consultation questionnaire.

It may not always be clear how these principles translate into our responses. Below we outline some of the reasons for this to provide some background to our thinking when we agreed on our response to the questionnaire:

### The format of the questionnaire

This is very rigid, and many of the questions are unhelpfully structured, offering limited options of response which do not allow the differentiated kind of answer we would like to give. For example the choice between: "Significant **mainly** at national or EU or global level" makes it difficult to answer as this may be significant at all these levels, in different ways. In our response, we opted for 'mainly at EU level' for those areas where we think it would be helpful if the EU took the initiative to act.

In areas where the policy involved education or information, we opted for 'mainly at national level' because in our view people are more likely to trust and/or accept such instruction at that level.

This is not to say that we don't think that in an ideal world many of these things are significant at global level and, ideally, would be addressed at that level. But realistically, that stance in the response would lead to a view that we would not want the EU or Member State governments to act.

Thus, choosing our answers involved considering and discussing how they will be represented in a set of statistics, and what we would like to spur the EU to take action on.

Section 2, Q.8 is the only question in the consultation that **does not have a "no opinion" option**. Of the four available responses, QCEA chose "*Establish a limited selection of particularly important high-level indicators in order to improve public visibility and focus attention for policy development*". We did so because we are of the view that existing sustainable development indicators are not entirely adequate, and that simply adding more without ensuring implementation of the existing ones is insufficient. A key part of becoming more efficient and reducing our use of resources requires public engagement, for which a prerequisite is visibility and attention to the issues. Although indicators do add to administrative demands, without effective monitoring, indicators, targets and policies are futile.

### **The ambiguity of some of the questions**

For example, Q.4 in Section 1 asks the respondents to indicate the potential of very broad policy areas (eg. Agriculture). This ignores the distinction between the potential of policies as they *are* (e.g. not ambitious/comprehensive enough, lacking binding efficiency targets) and as they *could be* (i.e. the high potential that the policies areas of energy, agriculture, climate, environmental, industrial, trade, transport etc could have if they were more ambitious/comprehensive/complementary).

In this and similar cases, we took a middle ground and responded with “some potential” except in response to specific policy areas where we do not have expertise and made a comment to this effect in the “further comments” section at the end of the questionnaire.

### **The thinking behind the questions does not accord with our analysis**

Another example would be Q.5 in Section 1 where point 5.3 suggests that ‘lack of information on alternative options’. We answered “No opinion” and commented at the end of the section that it is not the lack of information on alternative options, but the array of sources/misinformation/propaganda that is the issue.

### **The very broad nature of the concepts under discussion**

“*Market-based measures*” is an umbrella term that can cover anything from taxes to trading in permits (for carbon emissions for example) - the questions using this term don’t recognize this differentiation, or provide scope for supporting some market-based measures but not others. However, where explicit examples were given which we felt we could broadly support we decided that it was important to support the principle that prices should reflect environmental impact and resource use rather than to object to the vague terminology.

“*Trade measures*” to ensure sustainable imports are, in theory, desirable. QCEA’s slightly reserved response to these questions reflects the fact that without fundamental changes in the rules and practices that govern global trade, the EU imposing such standards could have unintended negative consequences for small scale producers in developing countries who cannot meet/show that they meet such criteria.

### **Unhelpful examples given**

*Sustainability Criteria and Labeling*: Section 3, Q.3 uses a particular example of such criteria and labeling. QCEA chose to “Agree” rather than “Strongly agree”, because in this particular example (FSC) is based on voluntary sustainability standards without independent auditing which do not necessarily equate to meeting the demands of true social and environmental sustainability.