

## 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
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What is your field of activity? -single choice reply-(optional)	Other
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Please specify the type(s) of organisation you represent -single choice reply-(optional)	Non-governmental organisation
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000 individuals. QCEA employs seven members of staff at Quaker House Brussels, located off Square Ambiorix.

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-open reply-(optional)

## QUESTIONNAIRE FOR THE STAKEHOLDER CONSULTATION WITHIN THE IMPACT ASSESSMENT OF THE ACTION PLANS ON SUSTAINABLE CONSUMPTION AND PRODUCTION AND ON SUSTAINABLE INDUSTRIAL POLICY

**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)

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)

While we welcome the Commission's flagship initiative entitled A resource-efficient Europe,

and more sustainable consumption and production policy development, we still consider the effort to be too vague. We also do not understand why the resource efficiency strategy has been included in the Europe 2020 Strategy. We consider the former to be a concrete expression of the sustainability strategy adopted in Gothenberg in 2001 and revised in 2006, if nothing else because the time-scale extends well beyond the year 2020. We call upon the Commission to revive a genuine sustainability strategy for the European Union, instead of trivialising its responsibilities in this very important regard. It is not fruitful to argue about the relative effectiveness of, say incentives versus regulations, as this consultation attempts. Early progress, and substantially increased investment levels are still recognised as vitally important to delivering a low-carbon, low-resource future for Europe.

**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)

We aren't the only organisation who has consistently (and frequently) called for a sustainable development strategy to provide the public with clear guidelines and thus qualitative and quantitative binding targets. These should form the basis for decisions to be taken in the short to medium term, and the target visions of the sustainable development strategy should guide all EU policy areas. An effective strategy would include a comprehensive range of measures to encourage sustainable consumption and production by all people and groups in society, recognising that they vary considerably in their motivations and the kinds of influence they respond to. To this end, and to start: establish a limited selection of particularly important high-level indicators in order to improve public visibility and focus attention for policy development; restore the link between resource inefficiency and price – the more a product/service consumes/waste/pollutes, the more it should cost.

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)

Effective

Ensure consistent criteria for a given product category and/or product "family" under the various EU instruments addressing the environmental performance of products, notably through closer decision-making processes.

-single choice reply-(optional)

Effective

<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>	I don't know
<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>	Slightly effective
<p>Create a new legal framework instrument for sustainable products, i.e.: a new “package” <b>substituting</b> and integrating the existing EU SCP regulatory instruments and policy measures</p> <p>-single choice reply-(optional)</p>	Slightly effective
<p>Create a new legal framework instrument specifically for sustainable products, <b>in addition and complementary</b> to the existing EU SCP regulatory instruments and policy measures</p> <p>-single choice reply-(optional)</p>	Not effective at all
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	<p>The Europe 2020 Strategy will not deliver sustainable consumption and production. To do so would require a radical re-alignment of all aspects of EU policy, to make reducing material resource efficiency the most urgent priority. As it stands, the key instruments of the Europe 2020 resource-efficiency strategy are extensions of existing directives. Although there are some provisions for education and public engagement, it contains only very limited initiatives to change consumption behaviours – and crucially, nothing like what is required. The Commission needs to realise that people are starting to get the impression that the numerous crises of recent months and years have demanded so much (undivided) attention from politicians that long-term policies have been put on the back burner as a consequence. To improve policy synergy and consistency, the Commission needs to revive its flagship sustainable initiative and show genuine leadership in this regard.</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>	Not effective at all
<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>	Slightly 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>	Effective

-single choice reply-(optional)	
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 -single choice reply-(optional)	Slightly effective
Other (please specify) -open reply-(optional)	Packaging waste is an important and growing waste stream across Europe. A relative decoupling of waste generation and economic growth is possible if consistent, long-term and well-designed policies are implemented. However, internal market obligations, inconsistent funding and resources and short-term policies focusing on reducing packaging levels relative to changes in GDP are under-mining progress.
Establish a mandatory durability declaration for the estimated time duration/number of uses for all products (except those intended for a single use) -single choice reply-(optional)	Slightly effective
Establish such declaration for key products groups only -single choice reply-(optional)	Not effective at all
Extend the mandatory warranty period for all consumer goods*(now 2 years) *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 -single choice reply-(optional)	Effective
Encourage and support the development of industry voluntary agreements and other initiatives to adopt durability declarations for specific product groups -single choice reply-(optional)	Not effective at all
Strengthen the requirements relating to the producer responsibility in the existing legislation -single choice reply-(optional)	Slightly effective
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 -single choice reply-(optional)	Not effective at all
Encourage and support producers to focus on longer term <b>service</b> relationships, such as leasing or service/product substitution, rather than 'one off' <b>product</b> sales (e.g.: by promoting financial tools and business models, or by granting loan funds to enable exploring this option) -single choice reply-(optional)	Effective
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 -single choice reply-(optional)	Not effective at all
Other (please specify) -open reply-(optional)	The danger is, if redesign actually makes a product less durable, then it will be discarded and replaced more often, which could increase waste. Voluntary initiatives or covenants with retailers work, as long as long-term and

	well-designed policies are implemented. However, internal market obligations, inconsistent funding and resources and short-term policies focusing on reducing packaging levels relative to changes in GDP are under-mining genuine progress.
Recommend to Member States to remove environmentally harmful subsidies -single choice reply-(optional)	Not effective at all
Recommend to Member States to provide effective incentives for more environmental friendly products -single choice reply-(optional)	Not effective at all
Develop guidance for Member States on how to provide effective incentive measures, based on good practices with proven results -single choice reply-(optional)	Slightly effective
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) -single choice reply-(optional)	Effective
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) -single choice reply-(optional)	Not effective at all
Review funding programmes (e.g.: Structural and Cohesion funds) to introduce evaluation criteria based on resource efficiency as a conditionality to obtain funds -single choice reply-(optional)	Slightly effective
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) -single choice reply-(optional)	Slightly effective
Support “permanent” initiatives to sustain producers in promoting and marketing their sustainable products (e.g.: EC web-enabled databases and e-commerce platforms) -single choice reply-(optional)	Slightly effective
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)	Not effective at all
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)	European governments are currently spending massive sums to alleviate short-term economic crisis. This also represents an opportunity – to guide the ‘creative destruction’ process in ways that meet long-term social goals, and to invest in new technology and infrastructure

while the political mood is supportive of government spending. The Green New Deal Group in Britain advocates a massive change in government policy to address climate change and peak oil through a programme of public investment and institution building analogous to F.D. Roosevelt's New Deal in 1930s America. However, European governments are not generally focusing their recovery packages on green objectives, and have been more concerned to maintain jobs in existing sectors such as the car industry. What about augmenting competitive awards to include support for a radical reshaping of society towards a objective sustainability we can all recognise, rather than tweaking around the edges of the status quo?

### Promoting sustainable consumption

<p>Create a voluntary scheme for product environmental footprint (PEF) declaration, based on a third-party validation -single choice reply-(optional)</p>	<p>Not effective at all</p>
<p>Create a mandatory scheme for product environmental (PEF) declaration, based on a third-party validation -single choice reply-(optional)</p>	<p>Very effective</p>
<p>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)</p>	<p>Effective</p>
<p>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)</p>	<p>Effective</p>
<p>Promote voluntary agreements with retailers to support information campaigns on environmentally preferable products (e.g.: on the points of sale) -single choice reply-(optional)</p>	<p>Slightly effective</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) -single choice reply-(optional)</p>	<p>Slightly effective</p>
<p>Collect, coordinate and disseminate evidence on consumption patterns and their environmental impacts, in order to sensitise consumers and better inform their choices -single choice reply-(optional)</p>	<p>Slightly effective</p>
<p>Other (please specify) -open reply-(optional)</p>	<p>We do not subscribe to the Commission's theory that resource inefficiency is the result of no information being available. After all, the costs of looming climate change and of biodiversity loss are described in impressive terms in the Stern Report and the TEEB Report respectively. Yet nothing has</p>

	<p>fundamentally changed. Consumption patterns are mostly “locked-in”, and although partly a consequence of a surprisingly limited number of criteria, motivations vary considerably, often in response to a web of contextual and circumstantial factors (social and cultural, habitual or addictive). To fundamentally enable purchasers to be better informed, simultaneous action and effort in recognising the ways in which social structure and culture, psychology and behaviour, economy and markets, and technology and innovation are inter-related is required. Restoring the link between resource inefficiency and price, which incorporates these to different extents, would be a good place to start.</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>Effective</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>Slightly 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>I don't know</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>Not effective at all</p>
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	<p>“Greenwashing” is, at least partly, successful because: there is as yet no real consensus in society about how (un)sustainable we / how certain sectors of the economy really are; there is also a considerable lack of clarity as to what sustainable development, a "green economy" or a "resource-efficient economy" therefore means in practice. Consequently, there is no clear, universally valid statement or definition of what this means for each individual policy area. There are – depending on one's interest-based standpoint – utterly divergent views as to what needs to change, both in quantitative and in qualitative terms, how things need to be done differently in the future compared to how they are done now, and how these changes will affect daily life and business. In the absence of actual leadership by the Commission, with a clear, consistent and constructive SCP policies and narrative, backed up with serious intent and investment,</p>



	it is going to be easier to get away with such nonsense.
<p><u>Set up the requirement</u> 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>	Slightly effective
<p><u>Provide incentives</u> 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>	Effective
<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>	Slightly effective
<p>Encourage and incentivise retailers to phase out from shelves less environmentally friendly products</p> <p>-single choice reply-(optional)</p>	Effective
<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>	Not effective at all
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	<p>The fact that there is now almost no political debate or communication on the sustainable development strategy sends a very bad signal to civil society, and retailers in particular. The Commission needs to realise that people are starting to get the impression that the numerous crises of recent months and years have demanded so much (undivided) attention from politicians that long-term policies have been put on the back burner as a consequence. At the same time, more and more people are wondering whether these crises that are accumulating across a range of very different policy areas a) are not interlinked or b) are a symptom and/or consequence of unsustainable economics. Commercial and social benefits are not mutually exclusive and can, with the right strategies, be brought closer together under the heading "shared value". To stimulate SCP, we need to know what specific behavioural changes on the part of retailers and consumers are considered necessary and how these can be speeded up?</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 Clean Vehicle directive 2009/33/EC</p>	Very effective

-single choice reply-(optional)	
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 -single choice reply-(optional)	Very effective
Recommend Member States to incentivize and sustain private consumption “credit schemes” aimed at supporting sustainable purchasing by final consumers -single choice reply-(optional)	Not effective at all
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) * The ecocheque is a wage premium, under certain conditions with social tax exemptions, focusing on environmentally-friendly and sustainable – so-called ‘green’ – consumer goods -single choice reply-(optional)	Slightly effective
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) -single choice reply-(optional)	Slightly effective
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 -single choice reply-(optional)	I don't know
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) -single choice reply-(optional)	Very effective
Other (please specify) -open reply-(optional)	
Promote in cooperation with Member States and other stakeholders, public initiatives and sensitisation campaigns on sustainable lifestyles, notably to increase consciousness of the overall environmental, and social impacts of the current consumption habits -single choice reply-(optional)	Slightly effective
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 -single choice reply-(optional)	Slightly effective
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 -single choice reply-(optional)	Not effective at all
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 -single choice reply-(optional)	Very effective
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)*	Slightly effective

<p>*See <a href="http://www.dolceta.eu">www.dolceta.eu</a> and <a href="http://www.europadiary.eu">www.europadiary.eu</a></p> <p>-single choice reply-(optional)</p>	
<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>	Slightly effective
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	<p>A wide selection of studies find that three areas where consumption cause the majority of environmental impacts on a life-cycle basis: food and drink housing and personal travel. These areas account for 70-80% of the environmental impact of all products. Within them, the largest impacts comes from 1) residential heating, 2) car and air travel, 3) meat and dairy production. Existing EU legislation targets buildings and travel, however there is relatively weak legislation addressing food and agriculture (at present, the livestock of Europe require an area of vegetation seven times the size of Europe to keep them in feed). We need to acknowledge that existing policies are inadequate even to achieve their stated goals. Great care should also be taken not to load too much responsibility onto consumers, as there is a limit to their capacity (and willingness) to address these complex issues without persuasive leadership and a clear vision of what we are striving to achieve.</p>
<h3>Sustainable Industrial Policy (SIP)</h3>	
<p>Support the enforcement of new technologies for detection of illegal waste shipments</p> <p>-single choice reply-(optional)</p>	Effective
<p>New legislation to increase the opportunities of recycling critical materials (e.g.: mandatory hand-back requirements, etc.)</p> <p>-single choice reply-(optional)</p>	Effective
<p>Set up and/or promotion of voluntary agreements with industry to increase recycling of critical materials (e.g.: voluntary hand-back programmes, etc.)</p> <p>-single choice reply-(optional)</p>	Slightly effective
<p>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</p> <p>-single choice reply-(optional)</p>	Slightly effective
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	<p>Waste management policy works, but waste prevention is key. EU waste management policy has developed substantially since 1990 and, as a result, recycling and composting have increased, and landfill use has decreased. However, the overall amount of waste generated has increased and, across the EU, progress on recycling and landfill targets is extremely variable. A proactive</p>

	<p>policy is needed to manage waste and recycling. Greater emphasis on eco-design, durability and reusability and product standards could help Member States meeting existing targets for landfilling of household and similar wastes. It is about time the Commission cracked down on MS who failed to transpose into national law existing directives. Regardless, waste prevention and a genuine “recycling society” must be a priority. Restoring the link between resource inefficiency and externalities/price would be a good place to start.</p>
<p>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</p> <p>-single choice reply-(optional)</p>	Slightly effective
<p>Support projects and initiatives to promote resource efficiency in SMEs through first-level advisory services (e.g.: company visits)</p> <p>-single choice reply-(optional)</p>	Effective
<p>Support projects and initiatives to promote resource efficiency in SMEs through second-level advisory services(e.g. in-house training, full diagnostics, etc.)</p> <p>-single choice reply-(optional)</p>	Slightly effective
<p>Use more frequently the SME networks to consult on key environmental topics</p> <p>-single choice reply-(optional)</p>	Not effective at all
<p>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</p> <p>-single choice reply-(optional)</p>	Slightly effective
<p>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.)</p> <p>-single choice reply-(optional)</p>	Slightly effective
<p>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</p> <p>-single choice reply-(optional)</p>	Not effective at all
<p>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</p> <p>-single choice reply-(optional)</p>	Slightly effective
<p>Ensure that forthcoming environmental legislation will seek wherever possible to alleviate the regulatory burden on SMEs</p> <p>-single choice reply-(optional)</p>	Not effective at all
<p>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</p>	Not effective at all

<p>environmental advisors and service providers and available training,...)</p> <p>-single choice reply-(optional)</p>	
<p>Introduce regulatory relief and simplification measures for SMEs and micro companies (e.g.: streamlining the environmental permit procedures, simplification of environmental reporting, etc.)</p> <p>-single choice reply-(optional)</p>	<p>Not effective at all</p>
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	<p>Because the majority of the private sector is made up of SMEs it will be crucial to engage these businesses in SCP. It is increasingly understood that the cumulative environmental impact of SMEs is large, with some estimates suggesting that SMEs are responsible for as much as to 70% of industrial pollution. In a recent study in the UK, only 15% of SMEs considered that their business activities could have an impact on the environment. This percentage rose significantly when the businesses were prompted on the potential environmental impact of specific activities. Key success factors in SME capacity building and demonstration initiatives included top management commitment and integration with existing management systems, a clear business case communicated to companies, appointed environmental champions, involvement of wider design community, inter-agency and business support service endorsement and a project team with the right skills and commitment.</p>
<p>Promoting and supporting “experience exchange”, by collecting Member States good practices with green business models and make them available to producers</p> <p>-single choice reply-(optional)</p>	<p>Slightly effective</p>
<p>Launch new actions and support / fund initiatives to promote resource efficiency locally (e.g. through industrial symbiosis and clustering of producers)</p> <p>-single choice reply-(optional)</p>	<p>Slightly effective</p>
<p>Support the development of eco-industrial parks and clusters aimed at accelerating the innovation process</p> <p>-single choice reply-(optional)</p>	<p>Slightly effective</p>
<p>Promote development of new business models and industrial symbiosis through structural EU Funds and other funding programmes (e.g.: LIFE+, 7th Framework programme, Interreg...)</p> <p>-single choice reply-(optional)</p>	<p>Slightly effective</p>
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	<p>It is certainly unlikely that the EU can achieve some of the long term goals of SCP through improvements in production cycles alone. Future efforts in decoupling pressures from economic growth will need to focus more on changing the mix of goods being consumed by national populations (that is, focus on consumption-based measures and policy). Customer pressure can be an effective</p>

impetus for managing industrial environmental performance, when those customers are located in countries with stronger environmental standards and cultures. Restoring the link between resource inefficiency and externalities/price is also a powerful motivator.

**1.15 Do you have any other remark, comment or suggestion concerning the issues related to Sustainable Consumption and Production?** -open reply-(optional)

SCP is perhaps the broadest, most ambitious aim of the EU environmental policy. However, the Europe 2020 resource-efficiency Strategy is itself mostly small policy changes. The most important policy instruments also fall within other policy areas and “action plans”. A viable, coherent approach to SCP would be much more ambitious, bringing together different institutions, people, institutions, communities and countries, and would function at all scales, from the individual to the United Nations, and engage all the forces of technological, economic, cultural, psychological and social change. You'd likely agree, this isn't happening at the moment. We need to acknowledge that existing policies are inadequate even to achieve their stated goals. Also, too much emphasis is focused on resource efficiency rather than demand reduction. Any vision of sustainable development must recognise that eradicating poverty and social injustice is inextricably linked to ecological stability and renewal.

## 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](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)

I don't know

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

Contracting authority or entity involved in green public procurement

**2.6 For which products / services do you use green**

Copying and graphic paper - Cleaning products and services - Office IT

<b>criteria?</b> (multiple answers possible) -multiple choices reply-(optional)	equipment - Construction - Transport - Furniture - Electricity - Food and catering services - Textiles - Gardening products and services - Windows, glazed doors and skylights - Thermal insulation - Hard floor coverings - Wall Panels - Mobile phones
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**Barriers to the uptake of GPP**

Lack of awareness of the benefits of green products -single choice reply-(optional)	1 (very important)
Higher cost of green products -single choice reply-(optional)	2
Too few products or suppliers complying with the criteria -single choice reply-(optional)	3
Perceived low quality of environmentally friendly products -single choice reply-(optional)	4
Legal complexities and lack of legal clarity about what can be done to include green criteria -single choice reply-(optional)	5 (irrelevant)
Lack of knowledge on how to verify green criteria -single choice reply-(optional)	3
Unavailable or inadequate information and training -single choice reply-(optional)	4
Lack of political support -single choice reply-(optional)	1 (very important)
Low communication between public procurers in different authorities -single choice reply-(optional)	3
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)

<b>2.17 Could you suggest other barriers not mentioned above and score their importance?</b> -open reply-(optional)	Acknowledging that existing policies are inadequate even to achieve their state environmental goals = 1 (very important). Unfortunately, EU directives appear to have, at present as least, little or no impact: in the EU only 3% of direct public purchases, and 4-7% of purchases through local importers, have supposedly been made by firms from another member state. Moreover, 85% of contracting authorities, including local authorities, do not comply with the directives' publication and transparency requirements. An effective EU
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	strategy would be comprehensive, including measured to encourage recognising that organisations vary considerably in their motivations and the kinds of influence they response to = 1 (very important).
<b>2.18 Are you a supplier to the public sector?</b> -single choice reply- (optional)	No
Other (please specify and please rank from 1-5) -open reply-(optional)	
<b>Potential policy options</b>	
<b>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</b> -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)	Very effective
Provide detailed training material in all EU languages to procurers and business associations with a particular focus on SMEs -single choice reply-(optional)	Slightly effective
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)	Slightly 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)	Very effective
Set a new target for the uptake of GPP at EU level -single choice reply-(optional)	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)	Very effective
<b>2.24 Do you have any other remark, comment or suggestion concerning the issues related to Green Public Procurement?</b>	There is a basic tension between the goal of sustainability and most governments' overriding priorities of economic growth, employment and international competitiveness. However, Treaty Article 6,



-open reply-(optional)	stresses that there should be no conflict between the free market for goods and services and the "greening" of public calls for tender. The Commission should also consider whether provisions should be made for excluding suppliers which fail to meet local, regional, national or European environmental standards from being eligible to supply public goods or services. By taking sustainable development into account in public procurement, local and regional authorities can make a decisive contribution not only to the medium- and long-term profitability and efficiency of their services, but also to social justice and sustainable development.
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## 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)	Undecided
Integrating the PEF methodology into the EU SCP regulatory instruments and policy measures -single choice reply-(optional)	Agree
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)	Strongly agree
None of the above -single choice reply-(optional)	Disagree
Other (please specify) -open reply-(optional)	The current social prosperity model of the western world is too heavily based on the use of cheap energy and on a rising, often inefficient, input and turnover of materials. It would perhaps be useful to conduct a coherent analysis of why some resources are still being used so inefficiently. The challenge is how to develop a collective sense of responsibility towards future generations amongst those alive today, such that they engage in the purchasing of green products; in other words, how to build up pressure for real change that may involve sacrifices? It is absolutely crucial that civil society are properly included in this

	process from the outset. Allocating more staff and resources to the policy implementation group could also be of great assistance, because we know progressives efforts such as SCP are usually starved of staff and resources by the Commission hierarchy.
Development of product category rules starting from priority products -single choice reply-(optional)	Agree
Development of products' benchmarks -single choice reply-(optional)	Agree
Development of alternative communication options (from on-pack labelling to extensive deployment of advanced IT technologies) -single choice reply-(optional)	Undecided
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)	Agree
Defining SME approach and simplification of procedures to support them -single choice reply-(optional)	Disagree
International coordination - work towards acceptance and international harmonisation of methodologies for environmental footprint calculation -single choice reply-(optional)	Agree
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)	Agree
Other (please specify) -open reply-(optional)	The Eco-Management and Audit scheme (EMAS) should be extended to local areas and public offices, and should be improved and tailored to the issues and demands of sustainable development, taking into account the economic, ecological and social dimensions. In this context, further consideration should be given to the possibility of taking the environmental benefits of locally-produced goods and services into account.
"I do not understand the significance of the environmental information that is being communicated" -single choice reply-(optional)	Strongly disagree
"Knowing the environmental impact of what I buy is important" -single choice reply-(optional)	Strongly agree
"There are too many different labels" -single choice reply-(optional)	Agree
"I prefer buying products that have a lower environmental impact" -single choice reply-(optional)	Strongly agree
"Price and quality are the only things that I look at" -single choice reply-(optional)	Strongly disagree
"I always prefer buying from brands that have an environmental label" -single	Strongly agree

choice reply-(optional)	
“My own consumption has no impact on the environmental state of the planet” -single choice reply-(optional)	Strongly disagree
“Not enough information is available on the environmental performance of the products I use” -single choice reply-(optional)	Undecided
<b>3.9 Do you have any other remark, comment or suggestion concerning the issues related to Product Environmental Performance?</b> -open reply-(optional)	

## Environmental Footprint of Organisations (OEF)

### Barriers and drivers

Opportunity to identify financial savings (e.g. from more efficient resource use) -single choice reply-(optional)	Agree
Strategic importance for future competitiveness (e.g. due to rising resource prices) -single choice reply-(optional)	Agree
Support a business case for investment in resource efficiency measures -single choice reply-(optional)	Disagree
Keep up with what competitors are doing -single choice reply-(optional)	Disagree
Demonstrating market leadership -single choice reply-(optional)	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)	Strongly disagree
Anticipation of future regulation -single choice reply-(optional)	Disagree
Pressure from other external stakeholders -single choice reply-(optional)	Strongly disagree
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)	Disagree
Lack of understanding on how and what to report -single choice reply-(optional)	Disagree
Cost of assessing, displaying and benchmarking environmental performance -single choice reply-(optional)	Disagree

Confusion regarding which measurement/ reporting approach to adopt -single choice reply-(optional)	Undecided
Lack of consistency between existing initiatives in this area -single choice reply-(optional)	Undecided
Lack of awareness of advantages (e.g. cost savings) -single choice reply-(optional)	Strongly disagree
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)	Disagree
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)	Disagree
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)	Undecided
Insufficient information on how to improve environmental performance means less action is taken -single choice reply-(optional)	Strongly disagree
Inconsistent approach to verification of reported information -single choice reply-(optional)	Disagree
Insufficient market signals/reward for assessment and display of performance -single choice reply-(optional)	Undecided
Insufficient market signals/ reward for good environmental performance -single choice reply-(optional)	Undecided
Other (please specify) -open reply-(optional)	
Encourage organisations to assess (measure) environmental performance based on a common approach -single choice reply-(optional)	Undecided
Encourage organisations to display (report) environmental performance based on a common approach -single choice reply-(optional)	Agree
Encourage benchmarking of performance at a sectoral level based on a common approach -single choice reply-(optional)	Agree

Incentivise/ encourage improvements in environmental performance by organisations -single choice reply-(optional)	Agree
Incentivise/ encourage measurement and reporting of environmental performance by organisations -single choice reply-(optional)	Agree
Coordination of incentives between EU and Member States -single choice reply-(optional)	Agree
Improve reliability of environmental information (e.g.through verification ) -single choice reply-(optional)	Strongly agree
Participate in efforts to align approaches internationally -single choice reply-(optional)	Agree
Other action (Please specify) -open reply-(optional)	
It is necessary to develop sectoral footprint rules starting from priority sectors -single choice reply-(optional)	Undecided
The development of OSFRs should be led by the EC, with the contribution of industrial associations and other relevant stakeholders EU-wide -single choice reply-(optional)	Disagree
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 -single choice reply-(optional)	Strongly disagree
OSFRs should be developed based on relevant 3 <sup>rd</sup> party studies -single choice reply-(optional)	Strongly agree
OSFR 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)	Disagree
OSFR 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)	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)	Important to provide at local/regional level
Support to SMEs on measuring and improving their environmental performance	

-single choice reply-(optional)	Important to provide at national level
Other (please specify) -open reply-(optional)	
<b>4.7 With respect incentives, please state your opinion below:</b>  Companies and organisations should receive meaningful incentives to improve their performance -single choice reply-(optional)	Strongly agree
Regulatory incentives (e.g. reducing compliance cost of other regulation) -single choice reply-(optional)	Important to provide at regional/local level
Reputational incentives (e.g. league tables of environmental performance at a sector level) -single choice reply-(optional)	Important to provide at national level
Access to finance at advantageous rates (e.g. loans, guarantees, venture capital) -single choice reply-(optional)	Important to provide at regional/local 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 -single choice reply-(optional)	Disagree
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)	Strongly disagree
Mandatory instrument for larger organisations in priority sectors -single choice reply-(optional)	Strongly agree
Mandatory instrument for larger organisations in all sectors -single choice reply-(optional)	Strongly 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	Agree

-single choice reply-(optional)	
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)	Mandatory
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
<b>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?</b> -open reply-(optional)	
<b>4.12 Do you have any other remark, comment or suggestion concerning the issues related to the improvement of Organisation Environmental Performance?</b> -open reply-(optional)	The European Commission has shown its incompetence and/or a lack of serious intent by not prioritising the SCP rules in the past, and in its latest inclusion in Europe 2020, though the effects are much further reaching. The fact that there is now almost no political debate or communication on the sustainable development strategy sends a very bad signal to civil society, and retailers in particular. The Commission needs to realise that people are starting to get the impression that the numerous crises of recent months and years have demanded so much (undivided) attention from politicians that long-term policies have been put on the back burner as a consequence. At the same time, more and more people are wondering whether these crises that are accumulating across a range of very different policy areas a) are not interlinked or b) are a symptom and/or consequence of unsustainable economics.