



## Response to the European Commission's Working Document: Consultation on the future "EU 2020" strategy

The European Branded Clothing Alliance (EBCA) welcomes this opportunity to provide input to the European Commission's working document that will contribute to a new agenda for competitiveness and growth for the European Union.

The European Branded Clothing Alliance is a coalition of European retail clothing brands which represents more than 40 brands and employs over 150,000 people in our European operations. EBCA showcases the contribution of clothing retailers to European competitiveness and employment, and seeks to ensure a more predictable business environment, a positive trade agenda, and a better deal for European consumers.

EBCA represents companies typical of the new globalised economy. These are global brands but with a significant European presence. They do not follow traditional patterns but rather have embraced diversified and complex global supply chains. Using this approach, they have located high value activities in the European Union, for example research, innovation and design. This is emblematic of the areas in which the EU can be most competitive and innovative. We also strongly believe that these are the areas in which there are the strongest opportunities for creating value by basing growth on knowledge. These are the elements which should be the engine of the new growth agenda in Europe.

To this end, EBCA welcomes the Commission's efforts to formulate a new growth strategy for Europe and calls for a strong focus on both the completion of the single market to maximise possibilities for growth and employment internally, and an external drive to guarantee more open and barrier-free trade to take advantage of the possibilities in the global marketplace.

### Promoting External Trade and Market Access

The EU has always played an instrumental role in achieving free and open trade, both at a bilateral and multilateral level. This policy has paid dividends in allowing European companies better access to global markets and has also helped European consumers by guaranteeing them better choice and fairer prices.

EBCA members believe this role must be reinforced in order to prevent any shift towards a protectionist approach amongst the EU's trading partners. There are a number of areas which should be addressed to ensure this:

- Renewed pressure to conclude the Doha Development Agenda : Achieving a multilateral agreement remains the single highest priority for all our members. Achieving this would act as an impetus to global trade which would in turn stimulate growth and development on a global scale.
- Successful conclusion of Free Trade Agreements: On a bilateral basis, the recent proliferation of bilateral agreements with trading partners has provided excellent opportunities for expansion into new markets. EBCA encourages the Commission to maintain its efforts to conclude far -reaching trade agreements.
- Market Access: EBCA encourages the Commission to tackle persistent trade barriers in third countries, in a continuation of the excellent efforts currently undertaken by DG Trade's Market Access Unit.
- Trade Facilitation: EBCA encourages the Commission to press for the removal of excessive administrative and financial burdens due to licensing and tax regimes, and other undue regulatory arrangements.
- Customs Procedures: One area which EBCA members believe could be substantially improved is the harmonisation of customs procedures in member states. While there presently exists a customs union with identical customs regulations existing in each state, in practice the differences faced by economic operators seeking to import into more than one member state still present a substantial challenge. Without fully harmonised measures it is a challenge for companies to source materials, parts and products from outside the EU, and to make economies of scale and promote fast access to markets, when a circuitous route is sometimes needed to enter certain markets at an economically viable cost.

## Conclusions

EBCA strongly believes that the EU's competitiveness and growth strategy should look outwards as well as inwards, and that a strong focus on promotion of international trade will serve European interests in the global market place. European companies have excellent products and services to share with the world. Our own borders must also be easily accessible if we are to facilitate trade in an era of increasingly complex global supply chains where it is no longer simply a case of designating a product as 'made in Europe' or 'made elsewhere'.