

From: Rosa Solanes [mailto:r.solanes@UEAPME.com]
Sent: Monday, April 04, 2011 4:49 PM
To: ENV 6EAP
Cc: Guido Lena
Subject: Comments on 6th EAP

Dear all,

First of all, I would like to thank you for the interesting Stakeholder Consultation Meeting that took place on the 29th March.

I hereby would like to reiterate my message on the gaps the current 6th EAP presents as far as SMEs are concerned.

The 6th EAP does not foresee a special role to SMEs and it should be noticed that the processes put forward by recent EU strategies and flagship initiatives aiming to a more sustainable Europe represent a revolution in the way SMEs have to manufacture their products and provide their services.

Micro and small businesses in particular find it difficult to adapt to this new regulatory and policy framework and thus to follow the trend towards a sustainable economy. However, as SMEs represent the 99% of European companies, there is no doubt they must join these strategies and flagship initiatives for them to be successful. In order to be able to do so, SMEs need a smooth transition towards these new production and service providing methods.

The following Environmental Action Plan should foresee the setting up of a **favourable framework to allow SMEs to take up the challenge of a resource-efficient economy** and to reap its potential as stated in the Review of the Small Business Act for Europe released in February. Also important, the EAP should take into account the "Think Small First" principle envisaged by the SBA. That's to say, by designing legislation keeping in mind SMEs, instead of making exemptions for them or excluding them.

The Environmental Compliance and Assistance Programme (ECAP) also contributes to the creation of a favourable framework for SMEs. The new EAP must strengthen the role given to this programme by integrating **a revised and reinforced ECAP with a higher profile at EU and Member States level**. Only by doing this, the potential of ECAP will be fully unlocked. Moreover, the current situation in which ECAP stands alone as the only SME-oriented instrument should change with its revision. If the SME-friendly instruments of ECAP were transferred both to the overarching philosophy behind the EAP and to the single pieces of legislation and action plans or roadmaps deriving from it, a much higher level of consistency would be achieved and the participation of SMEs to the program would be enhanced.

I hope you can take these comments into account in the upcoming EAP.

Please do not hesitate to contact me should you have any questions.

Kind regards,

Rosa Solanes
Advisor for Sustainable Development
European Association of Crafts and Small and Medium-Sized Enterprises (UEAPME)
Rue Jaques de Lalaing, 4
B-1040 Brussels
Ph: +32 2 230 75 99
Fax: +32 2 230 78 61
E-mail: r.solanes@ueapme.com
[EC register for interest representatives](#): identification number 55820581197-35