Industry and business organisations’ views on the new action programme

Twenty one responses were received, from national and European organisations, representing a range of businesses, sectors and professions. They are listed at the foot of this document, which sets out the main issues emerging from their input to consultation on the new environmental action programme. Many, more detailed proposals were made, which cannot be included in this summary, but which have all been noted by DG Environment.

Structure – few comment explicitly on the structure of the new programme or its relation with the sustainable development strategy. However, those that do, want to see a clear policy framework clarifying the fundamental principles guiding the work of DG Environment, such as proportionality, polluter pays, precautionary principle et al. The role of tools and actors should then be elaborated, but at this level targets should remain qualitative, leaving subsequent thematic plans to set down quantitative targets. Goals should also be defined and priorities identified.

Instruments – most submissions agree that legislation has a place in the policy toolbox but argue for more flexibility and “soft” policies, as opposed to traditional “command and control”. The primary concerns should be the cost-effectiveness of policies and to ensure that companies are not restricted in the ways in which they can respond to environmental problems. This means a move towards a broad range of non-legislative tools such as self regulation, voluntary agreement and negotiated settlements, which support companies in developing their own environmental initiatives through partnership approaches. Legislation is termed “too prescriptive” in some comments but there seems to be some agreement that “lean” legislation could ensure harmony in some areas such as definitions (eg of waste). Some comments conversely, request clear and comprehensive EU legislation to ensure consistency across Europe.

Market based instruments – there are a number of calls for the EU to take sole control of environmental taxation to avoid distortion of competition within Europe and to take a proactive stance in this field with the Member States.

Effective implementation – almost unanimously, the returns highlight poor implementation as a key concern, even suggesting that no new legislation be enacted until the Commission is satisfied with implementation of current legislation. The source of these concerns is the effect of varying degrees of implementation on the competitiveness of similar industries in different countries.

Subsidiarity – while some are pushing for leadership by the EU, there is a more common sentiment that the new programme should strengthen the principle of subsidiarity and push Member States and regional administrations to take the lead on environmental issues. Any legislation should be minimal, though clear, at a European level, giving Member States as much flexibility as possible to implement measures to fulfil the desired goals in the most appropriate way for each country.

Integration – this field is identified consistently as a continuing priority for the Commission, with most submissions commenting on the need to balance the three
“pillars”, or to integrate the environment into other issues. A couple of inputs make the point that integration is a two way process and that environment policy must also take on board the social and particularly economic dimension. A further concern is the effect of integration on competitiveness both within Europe and abroad: the Commission is urged to support Member States in pursuing integration, to ensure a level playing field at least across Europe. With regard to sectoral targets and objectives, responses suggest that where these are likely to be quantitative, they should be set by the sectors themselves with full stakeholder consultation.

**Dialogue** – the Commission’s wide-ranging consultation on the new programme is welcomed, and most responses stress the need for continuous dialogue with stakeholders both in the preparation phase of policy and through implementation. There are calls for the Commission to foster more innovative dialogue platforms. The point is made many times that industry constantly seeks new innovations and without consultation these are often overlooked in the policy making process. The result is that innovation and company-led initiatives are stifled.

**Sound science** – industry NGO’s are particularly keen for new policies to be scientifically justified hence numerous calls for the Commission to continue and increase support for research and innovation.

**Contributing Bodies**
Austrian Economic Chamber  
Confederation of Danish Industries  
Confederation of European Forest Owners (CEPF)  
European Brands Association (AIM)  
European Centre of Enterprises with Public Participation (CEEP)  
European Centre of Enterprises with Public Participation (CEEP) (Austrian section)  
European Chemical Industry Council (CEFIC)  
European Council of Civil Engineers (ECCE)  
European Crop Protection Association (ECPA)  
European Federation of Engineering Consultancy Associations (EFCA)  
European Union of Developers and Housebuilders (UEPC)  
European Union of National Associations of Water Suppliers and Waste Water Services (EUREAU)  
Foretagarnas Riksnorganisation (Sweden)  
Forum of Private Business (UK)  
International Organisation for the Protection of Human Rights – Social Education (Greece)  
International Road Transport Union (IRU)  
International Union of Railways (UIC)  
Kelda Group Plc (UK)  
Mullrik AB (Sweden)  
Union of Industrial and Employers’ Confederations of Europe (UNICE)  
Union of Waterboards (NL)