

March 16th 2009

Position paper on the European Commission's Strategy on Sustainable Consumption and Production

Executive Summary

AmCham EU welcomes the Sustainable Consumption and Production Package and believes that its impact on business may be positive and negative at the same time:

- Positive: If this package works as intended, it could stimulate an EU-wide and global market for environmentally better products and accelerate their market uptake.
- Negative: If the criteria or methodologies, tools and instruments are inappropriate or not applied consistently, they will cause unnecessary constraints on the design, production and marketing of products and therefore on competitiveness.
- Possible impacts on trade must also be considered. To support and promote international trade in innovative products and global product standards, the package should help create a global market for environmental goods. It must be ensured that the criteria do not create a barrier to trade through discriminatory or inflexible measures
- By doing so, the package could help foster the creation of lead markets.

Moreover, AmCham EU believes that:

- Creating an EU and global market for trade in environmental goods is key to improving the way companies design, manufacture and deal with products at their end of life;
- Only via harmonised standards can measuring and reporting of environmental data enable the benchmarking of environmental benefits and disadvantages of products;
- The EU eco-label scheme must remain voluntary and any eco-label criteria for products should be standardised not only within the EU but also globally to avoid trade barriers;
- Public authority spending in the EU (worth around 16% of EU Gross Domestic Product - €2,000 billion), should be used to promote the purchase of 'green services' and products, with uniform purchasing criteria across the EU;
- The revision of the EU Eco-Management and Audit Scheme (EMAS) will bring few benefits, as EMAS has very low brand recognition among industry and the public. We recommended no further expenditure on resources for further development of EMAS;
- Eco-design directives: We support the Commission's proposal to extend the scope to energy-using to energy related products and the associated implementation
- The Retailer Forum should be extended to include representatives from the entire supply chain and ensure an active voice and equal role for stakeholders of the value chain.

The package, through a combination of appropriate voluntary and regulatory measures, can enhance the competitiveness of the industry while reducing the environmental footprint of goods.

General Introduction

On July 16 2008 the European Commission presented a series of proposals on sustainable consumption and production, with the objective of improving the environmental performance of products and increasing the demand for more sustainable goods and production technologies. These proposals are an integral part of the European Union's renewed [Sustainable Development Strategy](#) which reinforces the EU's long-standing commitment to meet the challenges of sustainable development and builds on initiatives and instruments at EU and international level such as the [United Nations](#).

The policy package includes the revision of several policies.

- Proposal for the extension of the Ecodesign Directive
- Proposal for the revision of the Ecolabel Regulation
- Proposal for the revision of the EMAS Regulation
- Communication on Green Public Procurement

Followed by the:

- Proposal for the revision of the Energy Efficiency Labelling Directive
- Proposal for a Regulation for an Environmental Technology Verification scheme.

The proposals will go through the "co-decision" procedure, in which the European Parliament adopts legislation jointly with the Council.

The American Chamber of Commerce to the European Union (AmCham EU) is a strong and active supporter of measures that favour the single market and bring about greater consistency, coherence and transparency to the regulatory environment in which its members operate. AmCham EU welcomes the Communication from the European Commission on the Sustainable Consumption and Production (SCP) and the Sustainable Industrial Policy Action Plan as it aims to provide a single EU framework to build synergies from various fragmented existing EU legislation or member state initiatives.

The SCP package will impact the way companies design, produce and place a large proportion of their products on the market, as well as mechanisms for the disposal or remanufacture of these products when they reach the end of their life cycle. The impacts on business may be both positive and negative:

- Positive: If this package works as intended, it could stimulate an EU-wide and global market for environmentally better products and accelerate their market uptake.
- Negative: If the criteria or methodologies, tools and instruments are inappropriate or not applied consistently, they will cause unnecessary constraints on the design, production and marketing of products and therefore on competitiveness.
- Possible impacts on trade must also be considered. To support and promote international trade in innovative products and global product standards, the package should help create a global market for environmental goods. It must be ensured that the criteria do not create a barrier to trade through discriminatory or inflexible measures
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Sustainable consumption and production

AmCham EU also welcomes that SCP recognises the need for consistent data and methods to allow a comprehensive assessment of the overall environmental performance of products and to ensure follow-up after they are placed on the market.

The European Commission should consider the use of standards for data collection methods that will allow a consistent overview within the industry and will facilitate informed decision-making and evidence-based strategy planning for policy-makers and for industry.

Harmonised standards for consistent measuring and reporting will enable the identification of benchmarks on environmental performance. As the Action Plan underlines, it will be important to look at international standards within this process to avoid fragmentation of markets and negative impacts on the competitiveness of this industry.

AmCham EU member companies are highly innovative global solution providers who are helping to accelerate the transition to more sustainable consumption and production patterns.

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The American Chamber of Commerce to the European Union (AmCham EU) is the voice of companies of American parentage committed to Europe towards the institutions and governments of the European Union. It aims to ensure an optimum business and investment climate in Europe. AmCham EU facilitates the resolution of EU – US issues that impact business and plays a role in creating better understanding of EU and US positions on business matters. Total US investment in Europe amounts to €702 billion, and currently supports over 4.1 million jobs