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## **Position paper on the Revision of the EU Eco-Management and Audit Scheme EMAS Regulation**

The EU Eco-Management and Audit Regulation (EMAS) is a voluntary registration tool for companies and other organisations to evaluate, report and improve the environmental performance of their manufacturing operations.

AmCham EU members have substantial experience and expertise in the field of leaner and cleaner manufacturing. Much work has already been done at the manufacturing level to reduce the environmental impact through enhanced process efficiency alongside waste, water and emission reductions. Often, such environmental measures have also shown a cost benefit besides the environmental benefits gained.

The EMAS scheme was originally established in 1993 and available for participation by companies however registrations have decreased due to low public brand recognition and the availability of other standards such as ISO 14001.

AmCham EU believes that the additional requirement of EMAS versus the current certification ISO14001 leads to the necessity to produce a public Environmental Statement and have this Statement verified externally by certifying body. AmCham EU is concerned however that this minor additional contribution does not justify the additional administrative burden for companies which already have to deal with, for example, complex manufacturing and supply chain issues as well as other existing regulatory and administrative burdens.

From a global manufacturing prospective, ISO 14001 is universally accepted and internationally recognised by customers as well as the public. Due to the very low brand recognition of EMAS, most companies do not see the added value or the environmental benefit of EMAS registration. Consumers also have little interest in EMAS certification.

AmCham EU believes that in order to increase the uptake of EMAS, the EU has to create an added value which is recognised by customers, key stakeholders and the public and which provides certain advantages of participation.

In general, for many ISO14001 certified manufacturing plants or sites it would require a minimal additional effort to become registered for EMAS. AmCham EU members do not see the added value of this scheme due to its low recognition amongst consumers and customers. If the EU was trying to achieve a successful revitalisation, it would need to create the added value and incentives for companies to register.

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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.*