

Delivering more Sustainable Consumption and Production

Do you wish your contribution to be made public? -single choice reply-(optional)	Yes
Are you replying as general public – consumer or a stakeholder or on behalf of an organisation (trade group, industry, SME, public body, interest group, industrial or consumer association, academic/research institution, etc.?) -single choice reply-(optional)	Stakeholder/organisation
Please indicate the name of your organisation: -open reply-(optional)	European Partnership for Energy and the Environment (EPEE)
What is your field of activity? -single choice reply-(optional)	Energy intensive industry
Please specify the type(s) of organisation you represent -single choice reply-(optional)	Industrial or trade association
Please briefly describe your organisation, including geographic profile, size, affiliation, scope and field of activity, number of employees -open reply-(optional)	The European Partnership for Energy and the Environment (EPEE) represents the refrigeration, air-conditioning and heat pump industry in Europe. Founded in the year 2000, EPEE's membership is composed of 40 member companies and national associations across Europe realising a turnover of over 30 billion Euros and employing more than 200,000 people in Europe. As an expert association, EPEE is supporting safe, environmentally and economically viable technologies with the objective of promoting a better understanding of the sector in the EU and contributing to the development of effective European policies. For more information please visit: www.epeeglobal.org .
Please indicate an email address for correspondence -open reply-(optional)	secretariat@epeeglobal.org
<h3 style="margin: 0;">QUESTIONNAIRE FOR THE STAKEHOLDER CONSULTATION WITHIN THE IMPACT ASSESSMENT OF THE ACTION PLANS ON SUSTAINABLE CONSUMPTION AND PRODUCTION AND ON SUSTAINABLE INDUSTRIAL POLICY</h3>	
Which part of questionnaire are you interested in responding: -multiple choices reply-(optional)	Sustainable Consumption and Production (SCP) and Sustainable Industrial Policy (SIP) - Green Public Procurement (GPP) - Product Environmental Footprint (PEF) - Environmental Footprint of Organisations (OEF)

Sustainable Consumption and Production (SCP) and Sustainable Industrial Policy (SIP)

Ensuring better products on the EU market

Ensuring that resource efficiency, and in particular material resource efficiency (e.g. recyclability, reusability, upgradeability and durability) are considered more carefully when setting the requirements of the various EU SCP regulatory instruments **and policy measures***

* The terms included in the question can be defined as follows:

- Recyclability: Characteristic of materials that still have useful physical or chemical properties after serving their original purpose and that can, therefore, be reused or remanufactured into additional products.
- Durability: The quality of goods of continuing to be useful after an extended period of time and usage.
- Reusability: Ability of a good that allows it to be used repeatedly unlike a disposable good.
- Upgradeability: Capability of a good to be revised, almost always with the expectation that additional features or capabilities will be included

-single choice reply-(optional)

Effective

Introduce mandatory requirements for products in a new legal framework instrument for sustainable products (e.g.: minimum, recyclability, reusability, upgradeability and durability)

-single choice reply-(optional)

Slightly effective

Other (please specify)

-open reply-(optional)

1.2 Please specify for what EU SCP regulatory instruments and policy measures you recommend to strengthen the requirements on material resource efficiency (e.g. recyclability, reusability, upgradeability, durability) -open reply-(optional)

Use common evidence across all EU SCP regulatory instruments and policy measures to improve coordination in standard setting, by ensuring that the same preparatory studies (e.g.: on market, technical background for potential improvement, etc.) become a common ground for criteria setting for the different purposes

-single choice reply-(optional)

Very effective

Ensure consistent criteria for a given product category and/or product "family" under the various EU instruments addressing the environmental performance of products, notably through closer decision-making processes.

-single choice reply-(optional)

Very effective

Align the process of developing and approving the requirements for the same product categories (e.g.: consultation process, etc.) to guarantee synergy and complementarity between EU SCP regulatory instruments and policy measures

-single choice reply-(optional)

Very effective

Align the testing and verification methods used in the existing schemes, by agreeing on common approaches and modalities

Very effective

-single choice reply-(optional)	
Carry out a joint review of the different EU SCP regulatory instruments and policy measures to increase synergies and clarify interactions -single choice reply-(optional)	Effective
Create a new legal framework instrument for sustainable products, i.e.: a new “package” substituting and integrating the existing EU SCP regulatory instruments and policy measures -single choice reply-(optional)	Effective
Create a new legal framework instrument specifically for sustainable products, in addition and complementary to the existing EU SCP regulatory instruments and policy measures -single choice reply-(optional)	Slightly effective
Other (please specify) -open reply-(optional)	A legal framework must be in line with existing rules to guarantee reliability for industry. Moreover legislative requirements need to be harmonised throughout Member States and balanced regarding different technologies.
Developing an “horizontal” implementing measure under the “Packaging Essential Requirement” legislation to optimise the resource efficiency of packaging -single choice reply-(optional)	I don't know
Continuing and strengthening the development of common guidelines on how to consider packaging in “criteria setting” for the specific product groups under the EU SCP regulatory instruments and policy measures -single choice reply-(optional)	I don't know
Introduce mandatory requirements on packaging optimisation and minimisation by strengthening the existing EU regulatory instruments (e.g.: the EC Directive on Packaging and Packaging Waste) -single choice reply-(optional)	I don't know
Promote and support private or public initiatives and networks / consortia for the development of technical solutions to improve the recyclability and reusability of packaging waste -single choice reply-(optional)	I don't know
Other (please specify) -open reply-(optional)	
Establish a mandatory durability declaration for the estimated time duration/number of uses for all products (except those intended for a single use) -single choice reply-(optional)	
Establish such declaration for key products groups only -single choice reply-(optional)	
Extend the mandatory warranty period for all consumer goods*(now 2 years) *As defined in directive 1999/44/EC Art 2, par 2, letter b)consumer goods: shall mean any tangible movable item, with the exception of (i) goods sold by way of execution or otherwise by authority of law, (ii) water and gas where they are not put up for sale in a limited volume or set quantity electricity -single choice reply-(optional)	
Encourage and support the development of industry voluntary agreements and other initiatives to adopt durability declarations for specific product groups -single choice reply-(optional)	

Strengthen the requirements relating to the producer responsibility in the existing legislation -single choice reply-(optional)	
Disseminate product design guides to help producers, retailers and designers understand the 'optimum life' of products and identify where the greatest environmental savings can be made -single choice reply-(optional)	Very effective
Encourage and support producers to focus on longer term service relationships, such as leasing or service/product substitution, rather than 'one off' product sales (e.g.: by promoting financial tools and business models, or by granting loan funds to enable exploring this option) -single choice reply-(optional)	
Recommend Member States to incentivize and sustain (e.g. with direct subsidies) repair and maintenance activities and provide incentives for consumers to repair or upgrade products, instead of replacing them -single choice reply-(optional)	
Other (please specify) -open reply-(optional)	
Recommend to Member States to remove environmentally harmful subsidies -single choice reply-(optional)	
Recommend to Member States to provide effective incentives for more environmental friendly products -single choice reply-(optional)	Effective
Develop guidance for Member States on how to provide effective incentive measures, based on good practices with proven results -single choice reply-(optional)	Effective
Link subsidies and incentives to reduction of the product environmental footprint (PEF) and of the environmental footprint of the organisations (OEF), based on the methodologies set by the European Commission (see the other sections of this questionnaire) -single choice reply-(optional)	
Recommend to Member States the reduction of direct taxation to producers, based on their efforts on the PEF and OEF, based on the methodologies set by the European Commission (see the other sections of this questionnaire) -single choice reply-(optional)	
Review funding programmes (e.g.: Structural and Cohesion funds) to introduce evaluation criteria based on resource efficiency as a conditionality to obtain funds -single choice reply-(optional)	Effective
Review funding programmes (e.g.: Structural and Cohesion funds) to connect evaluation procedures and scoring systems to the efforts made on the PEF and OEF, based on the methodologies set by the European Commission (see the other sections of this questionnaire) -single choice reply-(optional)	Very effective
Support "permanent" initiatives to sustain producers in promoting and marketing their sustainable products (e.g.: EC web-enabled databases and e-commerce platforms) -single choice reply-(optional)	Effective
Pursue enhanced market access provisions for environmental goods and services,	Effective

<p>especially in multilateral and bi-lateral trade negotiations with Non-EU countries, to enable a stronger environmentally sound “sourcing”</p> <p>-single choice reply-(optional)</p>	
<p>Strengthen the requirements concerning the quality and functionality of products in existing EU SCP regulatory instruments and policy measures, in order to avoid the misleading perception that products with a better environmental performance are of lower quality.</p> <p>-single choice reply-(optional)</p>	Effective
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	
<h3><u>Promoting sustainable consumption</u></h3>	
<p>Create a voluntary scheme for product environmental footprint (PEF) declaration, based on a third-party validation</p> <p>-single choice reply-(optional)</p>	Effective
<p>Create a mandatory scheme for product environmental (PEF) declaration, based on a third-party validation</p> <p>-single choice reply-(optional)</p>	
<p>Introduce an obligation for producers to provide environmental data and information on specific aspects of the product (e.g.: extracts of environmental indicators and data from the PEF Methodology)</p> <p>-single choice reply-(optional)</p>	Slightly effective
<p>Consider additional information requirements on the environmental performance of products and develop necessary methods (e.g. ecological profiling of products done by the manufacturer under the Ecodesign Directive)</p> <p>-single choice reply-(optional)</p>	
<p>Promote voluntary agreements with retailers to support information campaigns on environmentally preferable products (e.g.: on the points of sale)</p> <p>-single choice reply-(optional)</p>	
<p>Introduce mandatory requirements for producers to provide access to detailed and in-depth environmental information for interested stakeholders (e.g. by mentioning a dedicated webpage on the packaging or in advertising)</p> <p>-single choice reply-(optional)</p>	Slightly effective
<p>Collect, coordinate and disseminate evidence on consumption patterns and their environmental impacts, in order to sensitise consumers and better inform their choices</p> <p>-single choice reply-(optional)</p>	
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	
<p>Integrate the current EU regulatory framework providing for that some selected words or expressions like “green”, “eco”, “natural” will be reserved to products that <u>meet specific requirements in terms of PEF – Product Environmental Footprint</u></p> <p>-single choice reply-(optional)</p>	
<p>Integrate the current EU regulatory framework providing for that the use of selected words or expressions like “green”, “eco”, “natural” must be associated to <u>environmental claims verified by third-party</u>.</p> <p>-single choice reply-(optional)</p>	
<p>Set up (an) EU-harmonised voluntary code(s) of conduct on the use of environmental</p>	

<p>claims in advertising and support its implementation / verification by joint independent bodies</p> <p>-single choice reply-(optional)</p>	
<p>Recommend Member States to strengthen and develop appropriate control measures in the area of misleading green claims</p> <p>-single choice reply-(optional)</p>	
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	
<p><u>Set up the requirement</u> that a reasonable percentage of products that are on the retailers' shelves, in selected priority categories, would qualify as meeting pre-determined environmental performance benchmarks</p> <p>-single choice reply-(optional)</p>	
<p><u>Provide incentives</u> to obtain that a reasonable percentage of products that are on the retailers' shelves, in selected priority categories, would qualify as meeting pre-determined environmental performance benchmarks</p> <p>-single choice reply-(optional)</p>	
<p>Incentivise the use of "green marketing" tools by retailers to promote more environmental friendly products and inform consumers on the environmental features of the products they sell</p> <p>-single choice reply-(optional)</p>	
<p>Encourage and incentivise retailers to phase out from shelves less environmentally friendly products</p> <p>-single choice reply-(optional)</p>	
<p>Enhance the role of existing multi-stakeholder platforms, such as the EU Retail Forum for Sustainability, to deliver on sustainable consumption objectives (for example the phasing-out of single-use carrier bags), and promote voluntary agreements or formal covenants to recognize results achieved by actors taking part in the platforms (e.g.: adoption of a Code of Conduct)</p> <p>-single choice reply-(optional)</p>	
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	
<p>Set up a scheme for monetisation of some environmental impacts* identified in the life-cycle assessment</p> <p>* These schemes are based on the internalisation of environmental external costs by way of an appropriate price mechanism, similar to that applied to environmental costs of air emissions in the Clean Vehicle directive 2009/33/EC</p> <p>-single choice reply-(optional)</p>	
<p>Apply VAT (and/or other product/commodities indirect taxation) on the basis of environmental performance of products, for instance by eliminating reduced rates environmental harmful products</p> <p>-single choice reply-(optional)</p>	
<p>Recommend Member States to incentivize and sustain private consumption "credit schemes" aimed at supporting sustainable purchasing by final consumers</p> <p>-single choice reply-(optional)</p>	
<p>Create new financing tools at the <u>EU level</u> to fund and sustain environmental friendly purchasing (e.g.: vouchers or "eco-cheques"* for the final consumer to co-fund the purchase of more resource-efficient products)</p>	

<p>* The ecocheque is a wage premium, under certain conditions with social tax exemptions, focusing on environmentally-friendly and sustainable – so-called ‘green’ – consumer goods</p> <p>-single choice reply-(optional)</p>	
<p>Promote the creation of new financing tools at <u>Member State level</u> to fund and sustain environmental friendly purchasing (e.g.: vouchers or “eco-cheques” for the final consumer to co-fund the purchase of more resource-efficient products)</p> <p>-single choice reply-(optional)</p>	
<p>Introduce Awards for best products (from sustainability, attractiveness, innovation and cost efficiency points of view) in the framework of an existing EU business/consumer award scheme, e.g. the EU Business Award</p> <p>-single choice reply-(optional)</p>	Effective
<p>Provide incentives for consumers and other end-users <u>not to consume</u> (e.g. for using public transport instead of buying a new car)</p> <p>-single choice reply-(optional)</p>	
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	
<p>Promote in cooperation with Member States and other stakeholders, public initiatives and sensitisation campaigns on sustainable lifestyles, notably to increase consciousness of the overall environmental, and social impacts of the current consumption habits</p> <p>-single choice reply-(optional)</p>	
<p>Support Member State policy makers by coordinating and disseminating evidence on the most effective tools for influencing behaviour change and overcoming barriers / activating drivers to change</p> <p>-single choice reply-(optional)</p>	
<p>Recommend Member States to introduce in their educational curricula subjects, methods and materials encouraging more sustainable consumption, developing systemic as well as critical thinking and ensuring a better understanding that well-being does not necessarily depend on high consumption of material goods</p> <p>-single choice reply-(optional)</p>	
<p>Support national, regional and local projects and initiatives to promote sustainable lifestyles, notably through dedicated EU funds, such as the Structural and Cohesion Funds and instruments like Life+ and Interreg funding programmes</p> <p>-single choice reply-(optional)</p>	
<p>Use web-enabled tools to make training programmes, best practices and educational materials available for interested actors, such as teachers, consumer organisations, etc. (as an evolution of initiatives like Dolceta and the European Diary)*</p> <p>*See www.dolceta.eu and www.europadiary.eu</p> <p>-single choice reply-(optional)</p>	
<p>Develop courses of capacity building for NGOs and consumer organisations to raise the know how and role-related abilities of the key stakeholders to promote sustainable lifestyles</p> <p>-single choice reply-(optional)</p>	
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	
<h2>Sustainable Industrial Policy (SIP)</h2>	

Support the enforcement of new technologies for detection of illegal waste shipments -single choice reply-(optional)	
New legislation to increase the opportunities of recycling critical materials (e.g.: mandatory hand-back requirements, etc.) -single choice reply-(optional)	Slightly effective
Set up and/or promotion of voluntary agreements with industry to increase recycling of critical materials (e.g.: voluntary hand-back programmes, etc.) -single choice reply-(optional)	Effective
Promote bio-products and bio-waste (end-of-waste criteria), including biological wastes as secondary raw materials allowing for their availability as an input for other sectors -single choice reply-(optional)	
Other (please specify) -open reply-(optional)	
Launch new actions to provide SMEs with targeted information on life-cycle environmental impacts of priority products and production processes and on related opportunities for cost savings -single choice reply-(optional)	
Support projects and initiatives to promote resource efficiency in SMEs through first-level advisory services (e.g.: company visits) -single choice reply-(optional)	
Support projects and initiatives to promote resource efficiency in SMEs through second-level advisory services(e.g. in-house training, full diagnostics, etc.) -single choice reply-(optional)	
Use more frequently the SME networks to consult on key environmental topics -single choice reply-(optional)	
Establish partnership agreements to help SMEs with technology transfer (e.g.: to adopt more energy efficient systems) and eco-innovative technology providers to increase their market entry -single choice reply-(optional)	
Reinforcing the initiatives to support the environmental legal compliance and improvement of SMEs by means of ICT and web-enabled instruments (e.g.: continuous update on legal requirements, compliance check up tools, BATs databases, best practices, etc.) -single choice reply-(optional)	
Transforming the ECAP – Environmental Compliance Assistance Programme, into a permanent co-ordination EC task-force to simplify adoption of SCP product-related regulatory instruments by SMEs, in line with the “think small first” principle of the Small Business Act -single choice reply-(optional)	
Providing funds to SMEs (e.g.: vouchers) to gain access to environmental auditing services at reduced rates or free of charge, technical assistance at very low costs and easily accessible credit schemes -single choice reply-(optional)	
Ensure that forthcoming environmental legislation will seek wherever possible to alleviate the regulatory burden on SMEs -single choice reply-(optional)	
Set up a “one-stop-shop” for the provision of information and services on	

<p>environmental-related issues (e.g.: legislation in force and criteria for applying to subsidies; fulfilment of administrative requirements, list with contact details of environmental advisors and service providers and available training,...)</p> <p>-single choice reply-(optional)</p>	
<p>Introduce regulatory relief and simplification measures for SMEs and micro companies (e.g.: streamlining the environmental permit procedures, simplification of environmental reporting, etc.)</p> <p>-single choice reply-(optional)</p>	
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	
<p>Promoting and supporting “experience exchange”, by collecting Member States good practices with green business models and make them available to producers</p> <p>-single choice reply-(optional)</p>	<p>Very effective</p>
<p>Launch new actions and support / fund initiatives to promote resource efficiency locally (e.g. through industrial symbiosis and clustering of producers)</p> <p>-single choice reply-(optional)</p>	<p>Very effective</p>
<p>Support the development of eco-industrial parks and clusters aimed at accelerating the innovation process</p> <p>-single choice reply-(optional)</p>	<p>Effective</p>
<p>Promote development of new business models and industrial symbiosis through structural EU Funds and other funding programmes (e.g.: LIFE+, 7th Framework programme, Interreg...)</p> <p>-single choice reply-(optional)</p>	<p>Effective</p>
<p>Other (please specify)</p> <p>-open reply-(optional)</p>	
<p>1.15 Do you have any other remark, comment or suggestion concerning the issues related to Sustainable Consumption and Production? -open reply-(optional)</p>	<p>- To be successful, business needs policy which offers certainty, consistency and simplicity. - Policy should not replicate, block, or prevent further innovation and progress. It should help cultivate the right knowledge base making sure that the complexity of the issue is correctly handled. - Businesses are already using different approaches to boosting green demand, such as raising consumer awareness, using government incentives to influence behaviour or providing greater information and choice for consumers (e.g. A-G labelling scheme for energy consumption by white goods). - Policy has to go with the grain of this drive and look toward incentivising continuing activity. A mandatory approach in areas where this labelling may not be suitable runs the risk of stifling this progress in addition to becoming quickly outdated and burdensome.</p>

Green Public Procurement (GPP)

GPP criteria and GPP guidance

2.1 The Buying Green Handbook gives guidance on GPP to policy makers, public authorities and suppliers (http://ec.europa.eu/environment/gpp/pdf/buying_green_handbook_en.pdf). Do you consider the handbook as useful guidance? -single choice reply-(optional)	I don't know the handbook
2.3 Do you see a need to improve the existing EU GPP criteria? -single choice reply-(optional)	
2.5 Please indicate what type of respondent you are -single choice reply-(optional)	Supplier
2.13 Do you operate in more than one country? -single choice reply-(optional)	Yes
2.15 Do you offer different products to different contracting authorities on the basis of those criteria? -open reply-(optional)	

Barriers to the uptake of GPP

Lack of awareness of the benefits of green products -single choice reply-(optional)	2
Higher cost of green products -single choice reply-(optional)	2
Too few products or suppliers complying with the criteria -single choice reply-(optional)	2
Perceived low quality of environmentally friendly products -single choice reply-(optional)	3
Legal complexities and lack of legal clarity about what can be done to include green criteria -single choice reply-(optional)	1 (very important)
Lack of knowledge on how to verify green criteria -single choice reply-(optional)	2
Unavailable or inadequate information and training -single choice reply-(optional)	2
Lack of political support -single choice reply-(optional)	2
Low communication between public procurers in different authorities -single choice reply-(optional)	
Too high ambition of the EU GPP criteria -single choice reply-(optional)	
Too low ambition of the EU GPP criteria -single choice reply-(optional)	

2.17 Could you suggest other barriers not mentioned above and score their importance? -open reply-(optional)	
2.18 Are you a supplier to the public sector? -single choice reply-(optional)	Yes
2.19 To what extent do you agree with the following statements?	
Differences between EU GPP and Member State criteria create difficulties to take part in tenders -single choice reply-(optional)	
Environmental requirements of EU GPP criteria are not ambitious enough to foster innovation -single choice reply-(optional)	
Procurers are not aware of products with good environmental performance on the market -single choice reply-(optional)	
2.20 Which elements of GPP criteria are more difficult to comply with? Rank each element from 1 (very difficult) to 5 (not difficult at all)	
Energy-efficiency requirements -single choice reply-(optional)	
Low levels or absence of hazardous substances -single choice reply-(optional)	
Recycled content in a product -single choice reply-(optional)	
Recyclability of a product -single choice reply-(optional)	
Implementation of environmental management measures to be applied when performing the contract -single choice reply-(optional)	
Other (please specify and please rank from 1-5) -open reply-(optional)	
2.21 Which measures would facilitate your bidding in a GPP tender? -open reply-(optional)	
<u>Potential policy options</u>	
2.22 What would you consider the most appropriate approach at EU level to increase the role of Green Public Procurement in promoting environment friendly consumption -single choice reply-(optional)	Continuation of current action (revision of existing and development of new GPP criteria, provision of guidance and information)
Strengthen the ambition level of common GPP criteria for products and services -single choice reply-(optional)	
Enlarging the scope of the priority sectors/product groups -single choice reply-(optional)	

<p>Facilitate more exchanges between public authorities on GPP, including joint procurement, and networks of public procurement officers</p> <p>-single choice reply-(optional)</p>	
<p>Provide detailed training material in all EU languages to procurers and business associations with a particular focus on SMEs</p> <p>-single choice reply-(optional)</p>	
<p>Develop easy-to-use Life Cycle Costing (LCC) methodologies for relevant product groups (for example a tool how public authority can calculate Life Cycle Costs based on indications from the supplier e.g. on the energy use of a product)</p> <p>-single choice reply-(optional)</p>	
<p>Widen the scope of GPP by including social criteria and move to Sustainable Public Procurement</p> <p>-single choice reply-(optional)</p>	
<p>Make the inclusion of certain environmental criteria mandatory in EU Funding programmes</p> <p>-single choice reply-(optional)</p>	
<p>Set a new target for the uptake of GPP at EU level</p> <p>-single choice reply-(optional)</p>	
<p>Make the inclusion of certain environmental criteria in tendering procedures obligatory in sector specific legislation, like in the Energy Star Regulation or the Clean Vehicles Directive</p> <p>-single choice reply-(optional)</p>	
<p>2.24 Do you have any other remark, comment or suggestion concerning the issues related to Green Public Procurement?</p> <p>-open reply-(optional)</p>	<p>The proliferation of national labels impose requirements that are uniform/harmonized. The current proposal aims to introduce a direct reference to labels which risks encouraging even more national labels. Have concerns about a disconnect between DG IMCO (direct referral to labels - EU Ecolabel or any other) and DG ENVI, who are developing GPP criteria deliberately lower than the Ecolabel criteria. If there is direct use of labels in GPP, we wonder if this would change the nature of the EU Ecolabel (from voluntary to quasi mandatory) We would welcome a joint clarification from DG ENVI and DG IMCO on how they see the relationship between the EU Ecolabel criteria and the EU GPP criteria currently under development and the use of/direct referral to labels under the umbrella of the currently proposed recast PP directive. To meet the GPP objectives, there must be harmonized requirements, harmonized methodologies, harmonized criteria and harmonized labels.</p>
<p>Product Environmental Footprint (PEF)</p>	
<p>Improving the EU Ecolabel through simplified environmental criteria (limited to 3-4 most important environmental impact indicators)</p>	<p>Strongly agree</p>

-single choice reply-(optional)	
Increase marketing budget and efforts for awareness raising of the EU Ecolabel -single choice reply-(optional)	Agree
Integrating the PEF methodology into the EU SCP regulatory instruments and policy measures -single choice reply-(optional)	Agree
Voluntary scheme on communication and benchmarking of product environmental performance based on PEF methodology -single choice reply-(optional)	Agree
Voluntary agreement with stakeholders that sets targets on product environmental performance based on PEF methodology -single choice reply-(optional)	Agree
Mandatory measure included in a new legislative framework that sets requirements and targets related to product environmental performance based on PEF methodology -single choice reply-(optional)	Disagree
None of the above -single choice reply-(optional)	Undecided
Other (please specify) -open reply-(optional)	
Development of product category rules starting from priority products -single choice reply-(optional)	Undecided
Development of products' benchmarks -single choice reply-(optional)	Disagree
Development of alternative communication options (from on-pack labelling to extensive deployment of advanced IT technologies) -single choice reply-(optional)	Agree
Creating tools that make it easier for companies to apply the PEF methodology (e.g. calculation tool; database development encouraged, coordinated) -single choice reply-(optional)	Agree
Defining SME approach and simplification of procedures to support them -single choice reply-(optional)	
International coordination - work towards acceptance and international harmonisation of methodologies for environmental footprint calculation -single choice reply-(optional)	Agree
Implementation of financial incentives/mechanism to assist and encourage SMEs in developing green products and for public authorities to oversee activities at local level) -single choice reply-(optional)	
Other (please specify) -open reply-(optional)	
Financial incentives -single choice reply-(optional)	
A standard methodology for measurement with appropriate guidance -single choice reply-(optional)	Agree
Measures for SMEs to simplify the procedures for measurement	

-single choice reply-(optional)	
The existence of a helpdesk to provide guidance and best-practices -single choice reply-(optional)	
Demonstration that it improves the company's image -single choice reply-(optional)	
Increased competitiveness of these products on the market -single choice reply-(optional)	
It will foster sustainable production and consumption through improving the environmental performance of products. -single choice reply-(optional)	
It will provide leverage for innovation by stimulating the development and commercialisation of greener products -single choice reply-(optional)	
It will create a dynamic and fair internal market for better environmentally performing product by establishing a common methodological approach -single choice reply-(optional)	
It will increase the market share of products with more environmentally performing features -single choice reply-(optional)	
It will create a transparent and robust benchmarking tool for SMEs and other sized companies -single choice reply-(optional)	
It will ensure better understanding of consumer behaviour and provide better information on the environmental footprints of products -single choice reply-(optional)	
It will be costly to implement -single choice reply-(optional)	
There will be technical difficulties related to the use of the methodology -single choice reply-(optional)	
There will be difficulties related to monitoring, enforcement, and verification -single choice reply-(optional)	
Consumers will not be aware of the pay-off of environmentally better performing products -single choice reply-(optional)	
Consumers will not understand the environmental information being conveyed -single choice reply-(optional)	
It will be in competition with other environmental methodologies used within and outside of EU -single choice reply-(optional)	Agree
It will increase the competitiveness of products within the EU -single choice reply-(optional)	
3.9 Do you have any other remark, comment or suggestion concerning the issues related to Product Environmental Performance?	We have concerns about the focus on the product foot printing methodology (PEF) and the organisation foot printing methodology (OEF) given that these methodologies are still

-open reply-(optional)	in development. Utilising the PEF methodology within the EU could put European business at a disadvantage when competing with non-EU products and services due to differing global methodologies. An EU methodology for corporate foot printing, with significantly different scope, definitions, and terminology to that currently used by a number of widely accepted international standards could lead to confusion and fragmentation at the global level. The International Integrated Reporting Council should not be undermined by EU or national developments. To support EU businesses becoming more resource efficient whilst maintaining global competitiveness, the EU must seek a global level playing field with regard resource efficiency requirements on business.
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Environmental Footprint of Organisations (OEF)

Barriers and drivers

Opportunity to identify financial savings (e.g. from more efficient resource use) -single choice reply-(optional)	Agree
Strategic importance for future competitiveness (e.g. due to rising resource prices) -single choice reply-(optional)	Agree
Support a business case for investment in resource efficiency measures -single choice reply-(optional)	
Keep up with what competitors are doing -single choice reply-(optional)	Agree
Demonstrating market leadership -single choice reply-(optional)	Agree
Building an environmentally sensitive brand -single choice reply-(optional)	Agree
Pressure from investors -single choice reply-(optional)	Undecided
Pressures from current legislation -single choice reply-(optional)	Agree
Anticipation of future regulation -single choice reply-(optional)	Agree
Pressure from other external stakeholders -single choice reply-(optional)	Undecided
Other (please specify) -open reply-(optional)	
Lack of understanding of the importance of environmental performance information for other business objectives (e.g. competitiveness) -single choice reply-(optional)	Disagree

Lack of understanding on how and what to report -single choice reply-(optional)	Disagree
Cost of assessing, displaying and benchmarking environmental performance -single choice reply-(optional)	Agree
Confusion regarding which measurement/ reporting approach to adopt -single choice reply-(optional)	Undecided
Lack of consistency between existing initiatives in this area -single choice reply-(optional)	Agree
Lack of awareness of advantages (e.g. cost savings) -single choice reply-(optional)	Disagree
Lack of time or expertise -single choice reply-(optional)	Undecided
Insufficient market reward for good environmental performance -single choice reply-(optional)	Agree
Insufficient understanding of company/organisation stakeholders of environmental issues and performance -single choice reply-(optional)	Disagree
Other (please specify) -open reply-(optional)	
<u>Problem definition</u>	
Multiple initiatives in the EU (e.g. different Member States have different reporting initiatives) -single choice reply-(optional)	Agree
Multiple ways of reporting asked by different company stakeholders -single choice reply-(optional)	Agree
Incomplete information on performance with respect to certain environmental impacts means that not all risks/ opportunities are captured along the value chain -single choice reply-(optional)	Undecided
Insufficient information on how to improve environmental performance means less action is taken -single choice reply-(optional)	
Inconsistent approach to verification of reported information -single choice reply-(optional)	
Insufficient market signals/reward for assessment and display of performance -single choice reply-(optional)	
Insufficient market signals/ reward for good environmental performance -single choice reply-(optional)	
Other (please specify) -open reply-(optional)	
Encourage organisations to assess (measure) environmental performance based on a common approach -single choice reply-(optional)	Agree
Encourage organisations to display (report) environmental performance based on a common approach	Agree

-single choice reply-(optional)	
Encourage benchmarking of performance at a sectoral level based on a common approach -single choice reply-(optional)	Agree
Incentivise/ encourage improvements in environmental performance by organisations -single choice reply-(optional)	Agree
Incentivise/ encourage measurement and reporting of environmental performance by organisations -single choice reply-(optional)	Agree
Coordination of incentives between EU and Member States -single choice reply-(optional)	Strongly agree
Improve reliability of environmental information (e.g.through verification) -single choice reply-(optional)	Agree
Participate in efforts to align approaches internationally -single choice reply-(optional)	Agree
Other action (Please specify) -open reply-(optional)	
It is necessary to develop sectoral footprint rules starting from priority sectors -single choice reply-(optional)	Agree
The development of OSFRs should be led by the EC, with the contribution of industrial associations and other relevant stakeholders EU-wide -single choice reply-(optional)	Disagree
The development of OSFRs should be led by industrial organisations, with the involvement of other relevant stakeholders EU-wide with the EC having an overseeing and final decision makers' role -single choice reply-(optional)	Strongly agree
OSFRs should be developed based on relevant 3 rd party studies -single choice reply-(optional)	Undecided
OSFR development should be led by an executive agency specifically set up for this purpose, with the involvement of other relevant stakeholders EU-wide with the EC having an overseeing and final decision makers' role -single choice reply-(optional)	Agree
OSFR development should be led by a balanced panel of different stakeholders involved, with the EC having an overseeing and final decision makers' role -single choice reply-(optional)	Disagree
Other (please specify) -open reply-(optional)	
Development of a simplified approach to environmental footprinting for SMEs -single choice reply-(optional)	No opinion
Development of a differentiated approach for micro, small and medium sized organisations -single choice reply-(optional)	No opinion
Provision of targeted incentives for SMEs -single choice reply-(optional)	

Provision of targeted information for SMEs -single choice reply-(optional)	
Support to SMEs on measuring and improving their environmental performance -single choice reply-(optional)	
Other (please specify) -open reply-(optional)	
4.7 With respect incentives, please state your opinion below: Companies and organisations should receive meaningful incentives to improve their performance -single choice reply-(optional)	Strongly agree
Regulatory incentives (e.g. reducing compliance cost of other regulation) -single choice reply-(optional)	Important to provide at EU level
Reputational incentives (e.g. league tables of environmental performance at a sector level) -single choice reply-(optional)	Important to provide at EU level
Access to finance at advantageous rates (e.g. loans, guarantees, venture capital) -single choice reply-(optional)	Important to provide at EU level
Facilitated access to funding (e.g. grants) -single choice reply-(optional)	Important to provide at EU level
Other (please specify) -open reply-(optional)	
Do you have any comments on incentives, also reflecting the special need of SMEs? -open reply-(optional)	SMEs have lessened capacity to comply with the regulatory burden of the PEF and OEF methodologies. Resource efficiency policies must make sense to medium-sized businesses. Governments and other bodies do not always fully understand mid-sized businesses. It is important that policy here is understandable to medium-sized businesses as they put a lot of emphasis on innovation, a key requirement of a future resource efficient economy. EU policy must recognise that all industry – whether resource-intensive or not – has a role in securing sustainable economic growth. Energy intensive industries, for example, provide a range of materials which help build our low-carbon power sources, construct more efficient and sustainable buildings, vehicles, and other white goods. Policy has to be developed which enables industry to become more resource efficient without unduly impacting their ability to generate growth and jobs.
No need for further EU Action -single choice reply-(optional)	Disagree

<p>EU promotion of the common methodology on a voluntary basis providing possibility for sectoral benchmarking and access to incentives</p> <p>-single choice reply-(optional)</p>	Agree
<p>Recommendation to Member States to use the common methodology for initiatives related to the measurement, reporting, benchmarking or incentivising environmental performance</p> <p>-single choice reply-(optional)</p>	Strongly agree
<p>Mandatory instrument for larger organisations in priority sectors</p> <p>-single choice reply-(optional)</p>	Strongly disagree
<p>Mandatory instrument for larger organisations in all sectors</p> <p>-single choice reply-(optional)</p>	Strongly disagree
<p>Expansion and/ or strengthening of existing policy instruments (e.g. Industrial Emissions Directive/ E-PRTR*) to drive increased measurement and reporting of environmental performance</p> <p>* The European Pollutant Release and Transfer Register (E-PRTR) is the Europe-wide register of environmental data from industrial facilities in European Union, as set up in the Industrial Emission Directive</p> <p>-single choice reply-(optional)</p>	Disagree
<p>Other (please specify) -open reply-(optional)</p>	
<p>Approach to assessment (measurement) of environmental performance</p> <p>-single choice reply-(optional)</p>	Voluntary
<p>Approach to displaying environmental performance (reporting)</p> <p>-single choice reply-(optional)</p>	Voluntary
<p>Approach to benchmarking of performance at a sectoral level</p> <p>-single choice reply-(optional)</p>	Voluntary
<p>Approach to verification of environmental performance -single choice reply-(optional)</p>	Mandatory
<p>4.11 One option available to support the more systematic measurement, reporting and management of environmental performance would be to extend existing EU instruments that already include an environmentally reporting element. Which policies do you consider would be suitable for such an approach and why?</p> <p>-open reply-(optional)</p>	
<p>4.12 Do you have any other remark, comment or suggestion concerning the issues related to the improvement of Organisation Environmental Performance?</p> <p>-open reply-(optional)</p>	