

Delivering more Sustainable Consumption and Production: ETUC response

QUESTIONNAIRE FOR THE STAKEHOLDER CONSULTATION WITHIN THE IMPACT ASSESSMENT OF

THE ACTION PLANS ON SUSTAINABLE CONSUMPTION AND PRODUCTION AND ON SUSTAINABLE

INDUSTRIAL POLICY

Which part of questionnaire are you interested in responding:

* (compulsory) (at least 1 answers)

- | | | | |
|--|--|---|--|
| <input checked="" type="checkbox"/> Sustainable Consumption and Production (SCP) and Sustainable Industrial Policy (SIP) | <input checked="" type="checkbox"/> Green Public Procurement (GPP) | <input checked="" type="checkbox"/> Product Environmental Footprint (PEF) | <input checked="" type="checkbox"/> Environmental Footprint of Organisations (OEF) |
|--|--|---|--|



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

Ensuring better products on the EU market

1.1 Please indicate your opinion on the effectiveness of the following options to strengthen the requirements concerning resource efficiency, beyond energy, into the various EU regulatory instruments

	Very effective	Effective	I don't know	Slightly effective	Not effective at all
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*	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* 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

(optional)

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




(optional)

Other (please specify)

(optional) (maximum 1000 characters; count: 0)

The urgency of addressing unsustainable production and consumption patterns in the EU is totally absent from the consultation. The time horizon is constrained by the EU2020-strategy which is now fast becoming a short-term approach, which is not nearly good enough to recast the current EU-SCP/Industry policy approach. By not addressing the urgency-issue the EU will put the EU-economies at a collective competition disadvantage by neglecting the sustainability challenges and the opportunities for investment, production and consumption. Without a strong social and employment dimension these policies will fail to engage Europe's citizens and workers. The Transition Platform announced by the Resource Efficiency Roadmap should be empowered to act as a High-Level Group on SCP. Environmental performance of products and organizations should be assessed together with social and governance performance (ESG) and be part of a comprehensive scheme. ESG integrated Reporting would be mandatory for listed Companies, Public and Private Financial Institutions, EMAS registered Companies and Public Procurement Agencies.

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)  (optional) (maximum 1000 characters)

Greater involvement of workers as actors and social dialogue to achieve goals. Binding EU targets on resource efficiency (3 Rs), rather than voluntary initiatives. Effective monitoring mechanisms involving trade union and NGO experts to ensure full implementation of SCP and EU waste legislation, and

sanctions on illegal trafficking of hazardous waste. Prevent the generation of waste at the beginning through improved product design and manufacturing in order to reduce the quantity and toxicity of waste, making products easily recyclable through 'cradle-to-cradle' approaches (requires a revision of the Ecodesign directive to include resource efficiency). Promote a green tax reform to change the economic framework to promote waste management options of reducing, reusing and recycling instead the end of pipe options (landfill, incineration, e.g. putting levies on incineration or eliminating the subsidies received). Improving public procurement rules to include social and environmental criteria.

1.3 Please indicate your opinion on the effectiveness of the following options to improve synergy and consistency between regulatory instruments and policy measures

	Very effective	Effective	I don't know	Slightly effective	Not effective at all
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) 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.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) 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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Align the testing and verification methods used in the existing schemes, by agreeing on common approaches and modalities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Carry out a joint review of the different EU SCP regulatory instruments and policy measures to increase synergies and clarify interactions	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Create a new legal framework instrument for sustainable products, i.e.: a new	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

“package” substituting and integrating the existing EU SCP regulatory instruments and policy measures

(optional)

Create a new legal framework instrument specifically for sustainable products, in addition and complementary to the existing EU SCP regulatory instruments and policy measures

(optional)

Other (please specify)

(optional) (maximum 1000 characters; count: 0)

EU SCP policies should include a strong social and employment dimension and additional measures on the participation of citizens and workers to contribute to and leverage ‘societal innovation’. There is no mention of training initiatives or social dialogue, which are key tools to change behavior (see ETUC-BusinessEurope-CEEP-UEAPME study 2011)

1.4 Please indicate your opinion on the effectiveness of the following options to optimise the resource efficiency of packaging

	Very effective	Effective	I don't know	Slightly effective	Not effective at all
Developing an “horizontal” implementing measure under the “Packaging Essential Requirement” legislation to optimise the resource efficiency of packaging	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) 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 (optional)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) 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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

(optional)

Other (please specify)

(optional) (maximum 1000 characters; count: 0)

Tackling excessive packaging and ensuring recycling and reuse of materials are essential. A supply chain approach is therefore needed with extended producer responsibility and accountability principles. Recognition that dealing with waste is a public responsibility and strengthening of the capacity of public authorities and public services to enforce the 3Rs strategy is needed. Circular economy and Zero Waste Objectives should be part of the EU Sustainable Consumption and Production & Sustainable Industrial Strategy – addressing sustainability and life-cycle material management in packaging will be key to achieving this.

1.5 Please indicate your opinion on the effectiveness of the following options to strengthen the legal requirements and voluntary initiatives for product durability

	Very effective	Effective	I don't know	Slightly effective	Not effective at all
Establish a mandatory durability declaration for the estimated time duration/number of uses for all products (except those intended for a single use)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Establish such declaration for key products groups only	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(optional) Extend the mandatory warranty period for all consumer goods*(now 2 years)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Encourage and support the development of industry voluntary agreements and other initiatives to adopt durability declarations for specific product groups	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(optional) Strengthen the requirements relating to the producer responsibility in the existing legislation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(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	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

(optional)

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)

**(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**

(optional)

Other (please specify)

(optional) (maximum 1000 characters; count: 0)

1.6 Please indicate your opinion on the effectiveness of the following options, aimed at the producers, to augment competitive rewards for environmentally friendly products

	Very effective	Effective	I don't know	Slightly effective	Not effective at all
Recommend to Member States to remove environmentally harmful subsidies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Recommend to Member States to provide effective incentives for more environmental friendly products	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Develop guidance for Member States on how to provide effective incentive measures, based on good practices with proven results	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) 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)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Recommend to Member States the reduction of direct taxation to producers,	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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)

(optional)
Review funding programmes (e.g.: Structural and Cohesion funds) to introduce evaluation criteria based on resource efficiency as a conditionality to obtain funds

(optional)
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)

(optional)
Support “permanent” initiatives to sustain producers in promoting and marketing their sustainable products (e.g.: EC web-enabled databases and e-commerce platforms)

(optional)
Pursue enhanced market access provisions for environmental goods and services, especially in multilateral and bilateral trade negotiations with Non-EU countries, to enable a stronger environmentally sound “sourcing”

(optional)
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.

(optional)

Other (please specify)

(optional) (maximum 1000 characters; count: 0)

Fiscal incentives and regulation should promote and support innovation and product development in-line with a closed-loop or circular economic model, therefore environmentally sound products designed to address new societal needs (ageing population, sustainable mobility, etc.) should be promoted. However, the social dimension must be better integrated into SCP policies – therefore a Just Transition agenda is essential alongside these market measures to ensure the anticipation and management of change, as well as the quality of employment.

Social and environmental reporting should be mandatory to access fiscal advantages or public funds (national or EU).

Promoting sustainable consumption

1.7 Please indicate your opinion on the effectiveness of following options to enable purchasers to get better information on product environmental performance

	Very effective	Effective	I don't know	Slightly effective	Not effective at all
Create a voluntary scheme for product environmental footprint (PEF) declaration, based on a third-party validation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(optional) Create a mandatory scheme for product environmental (PEF) declaration, based on a third-party validation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) 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)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) 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)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Promote voluntary agreements with retailers to support information campaigns on environmentally preferable products (e.g.: on the points of sale)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) 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)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Collect, coordinate and disseminate evidence on consumption patterns and	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

their environmental impacts, in order to sensitise consumers and better inform their choices

(optional)

Other (please specify)

(optional) (maximum 1000 characters; count: 0)

Promote greater worker engagement and awareness raising, through enhanced information and consultation rights (e.g. Green/Sustainable Reps programmes) and training programmes on SCP. Recognise the workplace as an arena for action to increase awareness on unsustainable consumption and production.

1.8 Please indicate your opinion on the effectiveness of following options to further prevent misleading green claims

	Very effective	Effective	I don't know	Slightly effective	Not effective at all
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>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) 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> .	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Set up (an) EU-harmonised voluntary code(s) of conduct on the use of environmental claims in advertising and support its implementation / verification by joint independent bodies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(optional) Recommend Member States to strengthen and develop appropriate control measures in the area of misleading green claims	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

(optional)

Other (please specify)

(optional) (maximum 1000 characters; count: 0)

1.9 Please indicate your opinion on the effectiveness of the following options to encourage retailers to stimulate sustainable consumption

	Very effective	Effective	I don't know	Slightly effective	Not effective at all
<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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) <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	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) 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	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Encourage and incentivise retailers to phase out from shelves less environmentally friendly products	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) 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)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

(optional)

Other (please specify)

(optional) (maximum 1000 characters; count: 0)

1.10 Please indicate your opinion on the effectiveness of the following options to provide incentives for purchase of better performing products

	Very effective	Effective	I don't know	Slightly effective	Not effective at all
Set up a scheme for monetisation of some environmental impacts* identified in the life-cycle assessment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* 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

(optional)

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

<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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(optional)

Recommend Member States to incentivize and sustain private consumption “credit schemes” aimed at supporting sustainable purchasing by final consumers

<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
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(optional)

Create new financing tools at the EU level 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)

<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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* The ecocheque is a wage premium, under certain conditions with social tax exemptions, focusing on environmentally-friendly and sustainable – so-called ‘green’ – consumer goods

(optional)

Promote the creation of new financing tools at Member State level 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)

<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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(optional)

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

<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
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EU Business Award

(optional)

Provide incentives for consumers and other end-users not to consume (e.g. for using public transport instead of buying a new car)

(optional)

Other (please specify)

(optional) (maximum 1000 characters; count: 0)

Social dialogue is essential to determine the modalities of initiatives such as eco-cheques or incentives to workers/consumers not to consume, to avoid negative social consequences or an unfair distribution of costs to workers. Increased investment in quality public services (e.g. public transport infrastructure) is crucial to avoid penalizing those without alternatives. The needs of SMEs and their workers should be taken into account also.

1.11 Please indicate your opinion on the effectiveness of following options to strengthen the promotion of (and 12behavior12tion on) sustainable lifestyles towards citizens and communities

	Very effective	Effective	I don't know	Slightly effective	Not effective at all
Promote in cooperation with Member States and other stakeholders, public initiatives and 12behavior12tion campaigns on sustainable lifestyles, notably to increase consciousness of the overall environmental, and social impacts of the current consumption habits	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Support Member State policy makers by coordinating and disseminating evidence on the most effective tools for influencing 12behavior12tion change and overcoming barriers / activating drivers to change	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) 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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) 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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

instruments like Life+ and Interreg funding programmes

(optional)

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)*

*See www.dolceta.eu and www.europadiary.eu

(optional)

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

(optional)

Other (please specify)

(optional) (maximum 1000 characters; count: 0)

The workplace and trade unions should be recognised as key actors influencing consumer behaviour from collectively agreed measures (e.g. eco-cheques) to training programmes which reach workers/consumers directly (e.g. development of worker-specific training tools in Unionlearn or ETUC Green Workplaces projects). The Commission should better recognize the need to strengthen union capacity on sustainable consumption and production.

Sustainable Industrial Policy (SIP)

1.12 Please indicate your opinion on the effectiveness of the following options to improve waste management and recycling

	Very effective	Effective	I don't know	Slightly effective	Not effective at all
Support the enforcement of new technologies for detection of illegal waste shipments	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) New legislation to increase the opportunities of recycling critical materials (e.g.: mandatory hand-back requirements, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Set up and/or promotion of voluntary agreements with industry to increase recycling of critical materials (e.g.: voluntary hand-back programmes, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

(optional)

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

(optional)

Other (please specify)

(optional) (maximum 1000 characters; count: 0)

Ensure reliable and accessible information on the generation and management of hazardous and non-hazardous waste. The creation of an “organism, committee or agency” at the European level with union, social and environmental participation, responsible for monitoring the objectives of the Directive 2008/98/EC on waste (Waste Framework Directive) to ensure its implementation. Promote a green tax reform to change the economic framework to promote waste management options of reducing, reusing and recycling instead the end of pipe options (landfill, incineration). For instance, putting levies on incineration or eliminating the subsidies received. Implement tracking, monitoring, sanction and compensation systems to better address illegal trafficking of hazardous waste. Introduce extended producer responsibility and accountability. Treat waste as close to the source as possible. Improve job quality and ensure decent working conditions in this sector. Recognise that workers carry out dangerous, unskilled and low paid work.

1.13 Please indicate your opinion on the effectiveness of the following options to help SMEs contribute to a resource-efficient economy

	Very effective	Effective	I don't know	Slightly effective	Not effective at all
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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Support projects and initiatives to promote resource efficiency in SMEs through first-level advisory services (e.g.: company visits)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Support projects and initiatives to promote resource efficiency in SMEs through second-level advisory services(e.g. in-house training, full diagnostics, etc.)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Use more frequently the SME networks to consult on key environmental topics	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Establish partnership agreements to help SMEs with technology transfer (e.g.: to adopt more energy efficient systems) and eco-innovative technology providers to	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

increase their market entry

(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.)

(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

(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

(optional)

Ensure that forthcoming environmental legislation will seek wherever possible to alleviate the regulatory burden on SMEs

(optional)

Set up a “one-stop-shop” for the provision of information and services on 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,...)

(optional)

Introduce regulatory relief and simplification measures for SMEs and micro companies (e.g.: streamlining the environmental permit procedures, simplification of environmental reporting, etc.)

(optional)

Other (please specify)

(optional) (maximum 1000 characters; count: 0)

1.14 Please indicate your opinion on the effectiveness of the following options to “promote green business models & industrial symbiosis”

	Very effective	Effective	I don't know	Slightly effective	Not effective at all
Promoting and supporting “experience exchange”, by collecting Member States good practices with green business models and make them available to producers	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Launch new actions and support / fund initiatives to promote resource efficiency locally (e.g. through industrial symbiosis and clustering of producers)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Support the development of eco-industrial parks and clusters aimed at accelerating the innovation process	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Promote development of new business models and industrial symbiosis through structural EU Funds and other funding programmes (e.g.: LIFE+, 7th Framework programme, Interreg...)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

(optional)

Other (please specify)

(optional) (maximum 1000 characters; count: 0)

1.15 Do you have any other remark, comment or suggestion concerning the issues related to Sustainable Consumption and Production? (optional) (maximum 1000 characters; count: 0)



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?

*** (compulsory)**

- Yes
- Yes, but it could be improved
- No
- I don't know the handbook

2.3 Do you see a need to improve the existing EU GPP criteria? (optional)

- Yes
- No
- I don't know

2.5 Please indicate what type of respondent you are* (compulsory)

- Contracting authority or entity involved in green public procurement
- Policy maker in the field of public procurement
- Supplier
- Other

Barriers to the uptake of GPP

2.16 Rank from 1(very important) to 5 (irrelevant) the following barriers for an increased uptake of green public procurement criteria

	1 (very important)	2	3	4	5 (irrelevant)
Lack of awareness of the benefits of green products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

(optional)

Higher cost of green products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					
Too few products or suppliers complying with the criteria	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					
Perceived low quality of environmentally friendly products	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					
Legal complexities and lack of legal clarity about what can be done to include green criteria	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					
Lack of knowledge on how to verify green criteria	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					
Unavailable or inadequate information and training	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					
Lack of political support	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					
Low communication between public procurers in different authorities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					
Too high ambition of the EU GPP criteria	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(optional)					
Too low ambition of the EU GPP criteria	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					

2.17 Could you suggest other barriers not mentioned above and score their importance? (optional)
(maximum 2000 characters; count: 0)

EU procurement rules should promote good quality employment and the provision of quality services, goods and works in Europe and abroad. When public authorities buy sustainable products and services this contributes to the EU objectives of sustainable development and the EU 2020 strategy. Value for money/best value in public contracting is not achieved by going for lowest price. It is achieved only when wider social, ethical and environmental benefits are given clear weight in public procurement decisions. Currently this is not the case. Whether a product or service is produced through a sustainable production process—including social sustainability considerations—is essential to any comprehensive assessment of whether or not a product or service contributes to or hinders sustainable development objectives. However, the EC interpretation of the current Procurement Directives treats most aspects of the production process as if they are not characteristics of the product or service. This is clear barrier to sustainable procurement rules. EU rules are currently under review, this should be addressed.

2.18 Are you a supplier to the public sector?* (compulsory)

- Yes
 No

Other (please specify and please rank from 1-5)

(optional) (maximum 1000 characters; count: 0)

Potential policy options

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* (compulsory)

- Continuation of current action (revision of existing and development of new GPP criteria, provision of guidance and information)
- Strengthen or modify the current approach
- GPP is an ineffective tool to promote environment friendly consumption, therefore, EU should significantly reduce own effort on this policy instrument
- The development of GPP policies at EU level is ineffective as practices differ strongly across MS

2.24 Do you have any other remark, comment or suggestion concerning the issues related to Green Public Procurement?

(optional) (maximum 1000 characters; count: 0)

Sustainable consumption and production demands an equal attention to the social and environmental dimensions. Therefore in addressing public procurement as a tool both dimensions should be taken into account. In December 2011, the Commission adopted the revised framework for public procurement comprising a general directive on public procurement, a specific directive applying only to water, energy, transport and postal services, and a directive on the award of concession contracts. The ETUC deplors that the aim to better integrate social considerations in public procurement has not been met. The Commission has favoured a voluntary approach meaning that it would be optional for public authorities to take social considerations into account. The Commission has also failed to address the incompatibility between EU law and ILO Convention 94. By allowing public buyers to go constantly for the cheapest option, current EU rules allow authorities to miss the best value in the long term, socially and environmentally since they are integrally bound.



Product Environmental Footprint (PEF)

3.1 In your opinion, which of the following policy tools or combination of policy tools at EU level, could effectively increase the uptake of "green" products and improve the environmental performance of products?

	Strongly agree	Agree	Undecided	Disagree	Strongly disagree
Improving the EU Ecolabel through simplified environmental criteria (limited to 3-4 most important environmental impact indicators)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Increase marketing budget and efforts for awareness raising of the EU Ecolabel	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Integrating the PEF methodology into the EU SCP regulatory instruments and policy measures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Voluntary scheme on communication and benchmarking of product environmental performance based on PEF methodology	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Voluntary agreement with stakeholders that sets targets on product environmental performance based on PEF methodology	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Mandatory measure included in a new legislative framework that sets requirements and targets related to product environmental performance based on PEF methodology	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) None of the above	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					

Other (please specify)

(optional) (maximum 1000 characters; count: 0)

3.2 In your opinion, which of the following supporting actions at EU level, could effectively increase the uptake of "green" products and improve the environmental performance of products?

Strongly Agree Undecided Disagree Strongly

	agree				disagree
Development of product category rules starting from priority products	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Development of products' benchmarks	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Development of alternative communication options (from on-pack labelling to extensive deployment of advanced IT technologies)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Creating tools that make it easier for companies to apply the PEF methodology (e.g. calculation tool; database development encouraged, coordinated)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Defining SME approach and simplification of procedures to support them	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) International coordination - work towards acceptance and international harmonisation of methodologies for environmental footprint calculation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Implementation of financial incentives/mechanism to assist and encourage SMEs in developing green products and for public authorities to oversee activities at local level)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other (please specify)

(optional) (maximum 1000 characters; count: 0)



3.3 To what extent do you agree with the following statements in terms of environmental information on products?



	Strongly agree	Agree	Undecided	Disagree	Strongly disagree
“I do not understand the significance of the environmental information that is	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

being communicated”

(optional)

“Knowing the environmental impact of what I buy is important”

(optional)

“There are too many different labels”

(optional)

“I prefer buying products that have a lower environmental impact”

(optional)

“Price and quality are the only things that I look at”

(optional)

“I always prefer buying from brands that have an environmental label” (optional)

“My own consumption has no impact on the environmental state of the planet” (optional)

“Not enough information is available on the environmental performance of the products I use”

(optional)

3.9 Do you have any other remark, comment or suggestion concerning the issues related to Product Environmental Performance?

(optional) (maximum 1000 characters; count: 0)



Environmental Footprint of Organisations (OEF)

Barriers and drivers

4.1 In the absence of further action, it is likely that some organisations will adhere to existing initiatives related to assessing and reporting their environmental performance in response to existing drivers. Please state your agreement with the following drivers

Strongly agree Agree Undecided Disagree Strongly disagree

Opportunity to identify financial savings (e.g. from more efficient resource use)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					
Strategic importance for future competitiveness (e.g. due to rising resource prices)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					
Support a business case for investment in resource efficiency measures	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					
Keep up with what competitors are doing	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					
Demonstrating market leadership	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					
Building an environmentally sensitive brand	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					
Pressure from investors	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					
Pressures from current legislation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					
Anticipation of future regulation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					
Pressure from other external stakeholders	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					

Other (please specify) (optional) (maximum 1000 characters; count: 0)

4.2 In the absence of further action, it is likely that many organisations will not assess, display and benchmark their environmental performance due to the existence of barriers. Please state your agreement with the following barriers

	Strongly agree	Agree	Undecided	Disagree	Strongly disagree
Lack of understanding of the importance of environmental performance information for other business objectives (e.g. competitiveness)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					

- Lack of understanding on how and what to report**
- (optional)
- Cost of assessing, displaying and benchmarking environmental performance**
- (optional)
- Confusion regarding which measurement/ reporting approach to adopt**
- (optional)
- Lack of consistency between existing initiatives in this area**
- (optional)
- Lack of awareness of advantages (e.g. cost savings) (optional)**
- Lack of time or expertise**
- (optional)
- Insufficient market reward for good environmental performance**
- (optional)
- Insufficient understanding of company/organisation stakeholders of environmental issues and performance**
- (optional)

Other (please specify) (optional) (maximum 1000 characters; count: 0)

Problem definition

4.3 Please state your agreement with the following factors which may contribute to the current problems associated with existing activities to assess, display and benchmark environmental performance

- | | Strongly agree | Agree | Undecided | Disagree | Strongly disagree |
|---|-----------------------|----------------------------------|----------------------------------|-----------------------|-----------------------|
| Multiple initiatives in the EU (e.g. different Member States have different reporting initiatives) | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| (optional) | | | | | |
| Multiple ways of reporting asked by | <input type="radio"/> | <input type="radio"/> | <input checked="" type="radio"/> | <input type="radio"/> | <input type="radio"/> |

different company stakeholders

(optional)

Incomplete information on performance with respect to certain environmental impacts means that not all risks/opportunities are captured along the value chain

(optional)

Insufficient information on how to improve environmental performance means less action is taken

(optional)

Inconsistent approach to verification of reported information

(optional)

Insufficient market signals/reward for assessment and display of performance

(optional)

Insufficient market signals/ reward for good environmental performance

(optional)

Other (please specify)

(optional) (maximum 1000 characters; count: 0)

4.4 For each of the activities described below, please state your agreement as to whether further action from the EU would be beneficial for the environmental performance of organisations.

	Strongly agree	Agree	Undecided	Disagree	Strongly disagree
Encourage organisations to assess (measure) environmental performance based on a common approach	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Encourage organisations to display (report) environmental performance based on a common approach	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Encourage benchmarking of performance at a sectoral level based on a common approach	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

(optional)
Incentivise/ encourage improvements in environmental performance by organisations

(optional)
Incentivise/ encourage measurement and reporting of environmental performance by organisations

(optional)
Coordination of incentives between EU and Member States

(optional)
Improve reliability of environmental information (e.g.through verification)

(optional)
Participate in efforts to align approaches internationally

(optional)

Other action (Please specify)

(optional) (maximum 1000 characters; count: 0)

4.5 Please state you agreement with the following statements relating to the OSFR (Organisation Sectoral Footprint Rules)

	Strongly agree	Agree	Undecided	Disagree	Strongly disagree
It is necessary to develop sectoral footprint rules starting from priority sectors	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) The development of OSFRs should be led by the EC, with the contribution of industrial associations and other relevant stakeholders EU-wide	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) 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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(optional) OFSRs should be developed based on	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

relevant 3rd party studies

(optional)

OFSR 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

(optional)

OFSR development should be led by a balanced panel of different stakeholders involved, with the EC having an overseeing and final decision makers' role

(optional)

Other (please specify)

(optional) (maximum 1000 characters; count: 0)

4.6 Please choose actions you consider important to help SMEs realise the opportunities (e.g. cost savings, better access to green markets, incentives) from the assessment display and benchmarking of their environmental performance, whilst also limiting the costs

	Important to provide at EU level	Important to provide at national level	Important to provide at local/regional level	Not important	No opinion
Development of a simplified approach to environmental footprinting for SMEs	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					
Development of a differentiated approach for micro, small and medium sized organisations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(optional)					
Provision of targeted incentives for SMEs	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					
Provision of targeted information for SMEs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					
Support to SMEs on measuring and improving their environmental performance	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					

Other (please specify)

(optional) (maximum 1000 characters; count: 0)

4.7 With respect incentives, please state your opinion below:

Companies and organisations should receive meaningful incentives to improve their performance

*** (compulsory)**

- Strongly agree
- Agree
- Undecided
- Disagree
- Strongly disagree

4.8 With respect to following types of incentives, please state you opinion below

	Important to provide at EU level	Important to provide at national level	Important to provide at regional/local level	Not important	No opinion
Regulatory incentives (e.g. reducing compliance cost of other regulation)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					
Reputational incentives (e.g. league tables of environmental performance at a sector level)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					
Access to finance at advantageous rates (e.g. loans, guarantees, venture capital)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					
Facilitated access to funding (e.g. grants)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional)					

Other (please specify)

(optional) (maximum 1000 characters; count: 0)

Do you have any comments on incentives, also reflecting the special need of SMEs?

(optional) (maximum 1000 characters; count: 0)

4.9 In your opinion, which of the following actions, that could be considered at an EU level, are able to effectively improve the environmental performance of organisations

	Strongly agree	Agree	Undecided	Disagree	Strongly disagree
No need for further EU Action	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
(optional) EU promotion of the common methodology on a voluntary basis providing possibility for sectoral benchmarking and access to incentives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Recommendation to Member States to use the common methodology for initiatives related to the measurement, reporting, benchmarking or incentivising environmental performance	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Mandatory instrument for larger organisations in priority sectors	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Mandatory instrument for larger organisations in all sectors	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(optional) Expansion and/ or strengthening of existing policy instruments (e.g. Industrial Emissions Directive/ E-PRTR*) to drive increased measurement and reporting of environmental performance	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* 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

(optional)

Other (please specify) (optional) (maximum 1000 characters; count: 0)

4.10 Certain activities to support the more systematic measurement, reporting and management of environmental performance might be better suited to one policy option than another. Please state the suitability of each of the activities to form part of a voluntary policy, or as part of a mandatory requirement (e.g. Directive or Regulation) or either?

	Voluntary	Mandatory	Either
Approach to assessment (measurement) of environmental performance	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(optional)			
Approach to displaying environmental performance (reporting)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(optional)			
Approach to benchmarking of performance at a sectoral level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
(optional)			
Approach to verification of environmental performance (optional)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

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?

(optional) (maximum 1000 characters; count: 0)

4.12 Do you have any other remark, comment or suggestion concerning the issues related to the improvement of Organisation Environmental Performance?

(optional) (maximum 1000 characters; count: 0)

[SUBMIT](#)