



To: DG ENV, unit C1, ENV.C.1 - Sustainable Production and Consumption

Brussels, March 30th, 2012

Dear Sir/Madam,

**Re: Consultation on EU action plan on sustainable consumption and production and sustainable industrial policy**

Representing 60 million workers across Europe, the European Trade Union Confederation (ETUC) has long argued for strong European action to address sustainable consumption and production (SCP) patterns.

Therefore, we welcome the 2012 public consultation and the opportunity to press for the strengthening of the EU's ambitions in this field. However, since an on-line limited space consultation does not provide adequate room to address what is lacking in the Commission's questionnaire, we have chosen to accompany our submission with this letter.

Our main concern relate to the fact that the social dimension of the Commission's analysis and SCP proposals is extremely limited. Everything is placed in terms of the individual without any reference to specific position of workers, the role of social dialogue or the workplace as a location of action on SCP and resource efficiency.

This is despite several national, regional and sectoral programmes of workplace action demonstrating the value of a joint employer-union approach to resource efficiency, e.g. TUC Green workplaces or North-Rhein Westphalia's Resource Efficiency Network (further examples are available in this Interprofessional Social Dialogue study from 2011: <http://www.etuc.org/a/8865>).

Worker information, consultation and participation are tools to ensure the sustainable running of companies and this should be better recognised in Commission initiatives in this area. There is no mention of the importance of education and training systems and institutions. This is a major gap. There is much emphasis placed on the individual without any of the collective tools needed. Moreover, there is clear evidence of the importance of union-based training as a means of reaching the poorly skilled in the workforce and influencing behaviour inside as well as outside the workplace (e.g. UK Dept BIS evaluation of UnionLearn programme).

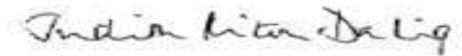
A real European sustainable industrial policy is dependent on these elements being taken into account. Changes in SCP patterns must reduce the damaging effects of unsustainable production on workers, the environment and communities, and include the Just Transition strategy to deal with potential challenges in the process of transforming our societies.

This demands respect for fundamental workers rights, strong and effective social dialogue and engagement. Clearly this is with the aim of enhancing the potential of SCP policies to promote job maintenance (e.g. in reclaiming and recycling) and the creation of decent jobs in emerging sustainable sectors. For further details, please see our Resolution in advance of Rio+20: <http://www.etuc.org/a/9162>

Without a strong social and employment dimension these policies will fail to engage Europe's citizens and workers, particularly at a time of intense anxiety about the economic situation and high unemployment.

We hope that these concerns, along with our responses to the Commission's questions, will be given due attention by the Commission's services in developing future legislation and policy in this area.

Yours sincerely

A handwritten signature in cursive script, appearing to read "Judith Kirton-Darling".

Judith Kirton-Darling

ETUC Confederal Secretary