

Mr. Daniel Calleja Crespo  
Director General  
DG Environment  
European Commission

Brussels, 6<sup>th</sup> October 2015

**Re: Public consultation on Circular Economy**

Dear Mr. Calleja Crespo,

The undersigned organisations, representing the craftsmen, small and medium-sized enterprises, wish to express their deep dissatisfaction with the public consultation on the circular economy launched by DG Environment on 28<sup>th</sup> May 2015.

Through consultations the European Commission aims to “*become more transparent, accountable, and effective*”, but the present consultation will not achieve any of these objectives.

First of all, the consultation proposes **only multiple choice questions** which are available **exclusively in English** and is over 25 pages long. Knowing and appreciating your deep knowledge and understanding of enterprises, in particular SMEs, we believe you would agree that this is not the proper way to consult businesses and their representative organisations.

Furthermore, the consultation is ill conceived and does not take into account the variety of stakeholders that have an interest in replying to the consultation. Indeed, the circular economy will have an impact on the society as a whole, therefore the questions should allow for a variety of answers which is impossible with multiple choice questions. The consequent lack of an adequate number of answers from different types of actors will necessarily affect the quality of the results.

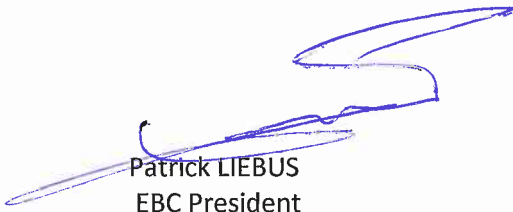
In addition, some of the questions are very vague, often asking for an opinion, rather than the assessment of certain options. We deem that a public consultation leading to possible legislation should not take the shape of an opinion poll. The consultation should have had differentiated questionnaires for different responders' groups, such as individual citizens, public authorities, European stakeholders organisations or SMEs directly.

Taking all these elements into consideration it was very challenging for our organisations to answer to the consultation.

Two and a half years ago, similar discontent was made public to DG Environment about the consultation on sustainable buildings. It was a similar consultation, to which SMEs were unable to reply. Today we are in the same situation. We are confident that in your new function of Director General of DG Environment you will be able to address and improve this DG's track record in accessible, transparent and relevant consultations.

We remain at your disposal for further comments and considerations.

Kindest regards,



Patrick LIEBUS  
EBC President



Gunilla ALMGREN  
UEAPME President

#### **About EBC**

Established in 1990, the European Builders Confederation - EBC - is a European professional organisation representing national associations of micro, small and medium-sized enterprises working in the construction sector. Through its national members, EBC represents 2 million construction microenterprises and SMEs.

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#### **About UEAPME:**

UEAPME is the employers' organisation representing exclusively crafts, trades and SMEs from the EU and accession countries at European level. UEAPME incorporates around 80 member organisations from 34 countries. UEAPME represents more than 12 million enterprises, which employ around 55 million people across Europe.

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