

**UEAPME Amendments to the Commission's Proposal  
on the General Union Environment Action Programme  
2012/0337 (COD)**

## 1) FAVOURABLE FRAMEWORK FOR SMES and MICRO-ENTERPRISES

Since SMEs represent 99% of EU companies and provide 67% of all jobs, they are key players in the transition towards a resource-efficient and low-carbon economy. This has been confirmed in numerous occasions by the EU Commission representatives. UEAPME would thus like to see the role of SMEs strengthened within the Environment Action Programme (EAP) as it is the guiding programme for environment policy until 2020.

In addition to this, UEAPME believes that the EAP should foresee a favourable policy and regulatory framework to support SMEs and micro-enterprises in this transition. With such a framework, the EAP would set up the basis for the establishment of positive measures for SMEs and micro-enterprises through specific regulations and policies in order to tackle the SMEs needs in the environmental field (i.e. lack of awareness, lack of technical expertise, difficult access to finance, need for appropriate skills, etc.).

Adopting a favourable framework for SMEs within the EAP would on the one hand, enable SMEs to improve their environmental impact and remain competitive and on the other, would greatly contribute to the resource-efficiency and low-carbon goals.

Whereas:

- Proposal of the Commission

22. There is significant scope for reducing greenhouse gas emissions and enhancing resource efficiency in the Union. This will ease pressures on the environment and bring increased competitiveness and new sources of growth and jobs through cost savings from improved efficiency, commercialisation of innovations and better management of resources over their whole life cycle.

- UEAPME Amendment

22. There is significant scope for reducing greenhouse gas emissions and enhancing resource efficiency in the Union, **providing particularly to SMEs a favourable regulatory framework that will contribute to these objectives**. This will ease pressures on the environment and bring increased competitiveness and new sources of growth and jobs through cost savings from improved efficiency, commercialisation of innovations and better management of resources over their whole life cycle.

- Proposal of the Commission

**Priority objective 2: To turn the EU into a resource-efficient, green and competitive low-carbon economy**

33. Measures will also be taken to further improve the environmental performance of goods and services on the EU market over their whole life cycle through measures to increase the supply of environmentally sustainable products and stimulate a significant shift in consumer demand for these products. This will be achieved using a balanced mix of incentives for consumers and businesses, including SMEs, market-based instruments and regulations to reduce the environmental impacts of their operations and products. Existing product legislation such as the Ecodesign and Energy Label Directives and the Ecolabel Regulation will be reviewed with a view to improving the environmental performance and resource efficiency of products throughout their lifecycle, thus ensuring a more coherent framework for sustainable production and consumption in the EU50.

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- **Proposal of the Commission**

41. In order to turn the EU into a resource-efficient, green and competitive low-carbon economy, the programme shall ensure that by 2020:

d) (bis) Establishing a more coherent framework for sustainable production and consumption. Reviewing product legislation with a view to improving the environmental performance and resource efficiency of products throughout their lifecycle. Setting targets for the reduction of the overall impact of consumption.

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d) (bis) Establishing a more coherent framework for sustainable production and consumption. Reviewing product legislation with a view to improving the environmental performance and resource efficiency of products throughout their lifecycle. Setting targets for the reduction of the overall impact of consumption. **SMEs should rely on a favourable regulatory and policy framework so as to be able to follow the initiatives mentioned above.**

## 2) GREEN PUBLIC PROCUREMENT

UEAPME understands that public bodies can play a leading role in achieving the 2020 climate and energy targets and notably through the introduction of the green aspect in their purchasing decisions. In spite of this, public procurement based mainly on ecological considerations can be a threat for SMEs, increasing their difficulties to access public tenders. In this context, UEAPME proposes to delete the mention « to at least 50% » of the text of the Action Programme. Specific GPP targets should, if necessary, be defined by concrete environmental policies and regulations.

- **Proposal of the Commission**

36. In addition to mandatory green public procurement requirements for certain product categories, most Member States have adopted voluntary action plans and many have set targets for specific product groups. There is, however, considerable scope for administrations at all levels to further reduce their environmental impact through their purchasing decisions. Member States and regions should take further steps **to reach the target of applying green procurement criteria to at least 50% of public tenders.** The Commission will assess the possibility of introducing further sector-specific legislation to set mandatory green public procurement rules for additional product categories.

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impact through their purchasing decisions. Member States and regions should take steps **in view of applying green procurement and ensuring SMEs access to it**. The Commission will assess the possibility of introducing further sector-specific legislation to set mandatory green public procurement rules for additional product categories.

### 3) BEST AVAILABLE TECHNIQUES

Even though the Best Available Technique (BAT) is the technological application that best responds to sustainable development criteria, UEAPME is always wary of a general uptake of BAT. A generalisation of BAT could have important financial repercussions for SMEs and micro-enterprises. Therefore UEAPME proposes the following amendment to the Commission's proposal.

- Proposal of the Commission

41. b) (bis) **Generalising the application of 'Best Available Techniques'** and enhancing efforts to promote the uptake of emerging innovative technologies, processes and services.

- UEAPME Amendment

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