



Green growth through environmental policy

The new Commission's work programme is being shaped at a time of geopolitical transition period, with the EU facing demanding parallel challenges. Climate change must be mitigated, and the loss of biodiversity halted, while ensuring Europe's strategic autonomy in critical raw materials and the competitiveness of European businesses in global markets.

Environmental issues are becoming increasingly intertwined with climate and energy policies. Overall sustainability, cost-effectiveness, technology neutrality and competitiveness are increasingly linked to environmental policy decision-making.

➤ A MARKET-BASED CIRCULAR ECONOMY REQUIRES AN OPEN MARKET. THE CREATION OF AN INTERNAL MARKET FOR THE CIRCULAR ECONOMY SHOULD BE A PRIORITY FOR THE COMMISSION.

- The Commission should promote open markets, and also influence vis-à-vis third countries. Protectionism must be avoided in environmental legislation.
- Publicly owned and funded operators must leave room for private operators to compete.
- Companies cannot be burdened with an ever-increasing extended producer responsibility for the obligations belonging to the society.

BIODIVERSITY LOSS POSES A THREAT NOT ONLY TO THE ENVIRONMENT BUT ALSO TO THE ECONOMY. THE FIGHT TO STOP IT MUST CONTINUE.

- Companies must be given opportunities to identify the environmental impacts of their business activities.
- Voluntary and sector-specific roadmaps for mapping companies' nature dependencies must be developed.

➤ THE GREEN DEAL PROGRAMME MUST BE CONTINUED. SUSTAINABLE DEVELOPMENT GOALS SHOULD ALSO BE HIGH ON THE AGENDA OF THE NEXT COMMISSION .

- Effective implementation and harmonised interpretations of existing Green Deal legislative initiatives in different EU Member States must be ensured before new legislative initiatives are adopted.
- Decision-making must be based on scientific evidence and comprehensive impact assessments as well as overall environmental impact assessments.

➤ GREEN INVESTMENTS MUST BE PROMOTED WITH DETERMINATION. THE BARRIERS AND OBSTACLES CREATED BY EU ENVIRONMENTAL LEGISLATION MUST BE CLEARED.

- The Commission should continue to implement one-stop-shop permitting procedures.
- The predictability of permitting procedures must improve considerably from the current situation.
- It must be ensured that regulation leaves room for innovation and voluntary responsibility actions by companies.

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More detailed policy proposals for the EU's circular economy

A well-functioning internal market for the circular economy must be created in Europe, based on a business-driven digital product passport and ecodesign.

Innovation in the circular economy must be promoted either through a new innovation programme, or by making existing programmes more efficient. The solutions required by the circular economy are best created through competition and cooperation between companies.

The Commission's recently revised Horizontal Guidelines aiming to provide businesses with clearer and up-to-date guidance to help them assess the compatibility of their horizontal cooperation agreements with EU competition rules. The Guidelines also aim to make it easier for undertakings to cooperate economically desirable ways, contribute to the green and digital transitions and promote the resilience of the internal market. To ensure their proper implementation, the national competition authorities must support companies to interpret the Guidelines.

Publicly owned operators run by public funds must leave room for competition between private companies and refrain from operating in the market.

Harmonised end-of-waste criteria at EU level are an essential part of a well-functioning internal market. In addition, procedures relating to waste shipments must be smooth. End-of-waste approved in one Member State must also be directly applicable in other Member States.

Waste, chemicals and product legislation and their interpretations must be made to support the circular economy instead of divergent legislation creating barriers to the circular economy through inappropriate interpretations.

In waste management, priority must be given to methods that keep raw materials in circulation. We support risk-based assessment in the use of recycled materials, for example in terms of limit values for harmful substances.

The extended producer responsibility obligations imposed on producers must only apply to the waste management and recyclability of the product. The extended producer responsibility model should be updated to cover online marketplaces and other platform services. The marketplace operator must be responsible for the extended producer responsibility obligations of sellers established outside the EU and charge sellers for the costs involved.

In terms of the market surveillance, the creation of an EU-wide instrument must be promoted, obliging cross-border distance traders operating outside the EU borders to participate in the lifecycle costs of the sold products.

In order to promote sustainable consumption, opportunities must be explored to simplify information and other obligations applicable to the sale and rental of goods, without reducing the overall level of consumer protection.

The general conformity criteria for used and refurbished goods must be lower than for new goods, taking into account product safety (e.g. sales packaging, accompanying equipment, etc.).

It needs to be clarified whether the seller's liability for lack of conformity or other obligations towards the consumer can take better account of the consumer's failure to comply with the instructions for the use, care, or maintenance of the goods.

Goods donated by businesses for their own use must be exempt from VAT, while the right to deduct VAT on donated goods must be maintained.

A level playing field must be guaranteed by ensuring the conformity of goods, including those from outside the EU.

The right of withdrawal from a distance selling contract should be restricted in order to reduce abuse, for example by allowing the seller to refuse to conclude the contract or reimburse delivery costs to a consumer who repeatedly withdraws from the contract and returns the goods. Participation in the EU's internal market must require fair and equal compliance from all actors.

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More detailed policy proposals for the EU's biodiversity policies

More active support should be given to companies to mitigate biodiversity loss.

The EU should promote the development of voluntary and sector-specific roadmaps for mapping nature dependencies. A sectoral analysis will help to identify the specific characteristics of each sector in order to map out and measure nature impacts and dependencies.

The introduction of voluntary ecological compensations and the development of uniform practices should be promoted throughout the EU to strengthen the competitiveness of companies.

The next Commission should be actively involved in developing global biodiversity loss indicators and create transparent tools for assessing companies' environmental footprint.

Particular attention should be paid to increasing the expertise of small and medium-sized enterprises, and the support and tools they need for data collection, calculation, and reporting.

The Commission should create functional models for collecting, transferring and reporting emissions, biodiversity and other sustainability-related data. The Commission should develop commonly accepted databases to support footprint and handprint assessment for climate as well as biodiversity.

Companies must be provided with tools and training to ensure that the entire value chain, including commerce is able to meet sustainability and reporting requirements, including in terms of data access and calculation.

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