

PRO EUROPE Comments

The commissions consultation document on the planned thematic strategy on the sustainable use of natural resources

1. Gathering and access to knowledge

1.3.1.

What benefits could arise for your sector/area of interest from such knowledge capacity (indirectly by better informed policy making, directly by access to the knowledge)?

PRO EUROPE believes that sound, effective policies can only be formulated by basing policy decisions on reliable and complete data. Therefore having access to knowledge leads in turn to good business planning and policies developed without relying on pre-conceived ideas with no scientific basis.

1.3.2.

On the basis of your experience, how would you rank these options in terms of factors such as independence, cost, likely response time to questions, avoidance of duplication, and credibility with particular regard to your organisation/business?

PRO EUROPE would give emphasis to the following options as laid down in the Commission consultation document:

Option 1: giving the same task to the Commission's statistical office (Eurostat) and/or to the European Environment Agency (EEA), perhaps by broadening the remit of the latter's existing network of European Topic Centres (ETCs).

Option 2: creating a virtual network of existing bodies, perhaps including, amongst others, Eurostat, the EEA and national geological services. Its structure could be similar to the network of European Topic Centres, but with access to a large network of, for example, institutes and databanks.

Option 3: establishing a new European Resources Institute to gather information on resource production and use at European and, where relevant, international level. It would be funded by the EU budget and would exploit existing sources of information and ensure that up-to-date knowledge is available to policy-makers.

PRO EUROPE would support allocating one single organisation the responsibility for a given project, therefore ensuring that organisation is answerable should any problems arise. Using an existing body, such as the EEA or Eurostat, has the advantage of allowing access to existing know-how and expertise, and consequently costs are likely to be lower by using an existing infrastructure rather than financing the creation of a new one.

1.3.3.

Who could/should run and/or participate in the network in the first option? Would your organisation be able/willing to perform such a role? What particular expertise does it have in this area?

Yes, in relation to the suggestion of creating a “virtual network” of existing bodies, PRO EUROPE would be in favour of such a body. We would envisage it consisting of the EEA, the Commission as well as representatives of the national environment agencies. We would encourage the participation of all relevant business associations, and on an initial assessment we would offer the expertise and experience of PRO EUROPE and its members in this venture.

2. Awareness raising on resource issues

Information and education are key in achieving a long-term change in consumer behaviour towards a sustainable society. PRO EUROPE’s member organisations have carried out numerous environmental awareness campaigns and education partnerships with other actors which, in the area of packaging waste, have led to a change in the awareness of the consumer with regard to environment.

A recent relevant example at the European level is last year’s European Eco-Youth Parliament (EYEP). This initiative brought together young Europeans to attempt to find solutions for local environmental problems, such as waste and water issues, as well as to seek solutions at the European level. For more information on this initiative, please see our website www.eyep.info/.

2.3.1.

How effective in communicating the Strategy’s vision would each of these options be: (i) publication of a European newsletter and educative website for the general public, to be accompanied by supporting educational curriculum activities from Member States; (ii) support to awareness campaigns addressed to target audiences, e.g. local authorities, producers, consumers, retailers etc; (iii) development of a web-based exchange facility for professionals, such as those working in municipalities, licensing agencies etc.

Are you likely to make use of any of these options? If so, in what way?

Regarding the use of a newsletter as a means of communicating the Strategy’s vision, PRO EUROPE would advise that such a newsletter may be more effective if it is targeted towards experts and interested parties, rather than towards consumers. Awareness campaigns are also valuable tools provided they receive support from the Member States, i.e. from both the national and local levels, which ultimately can help them to be successful. We would add that encouraging increased involvement of industry in these projects is likely to increase their success rate.

As we stated above, education and awareness raising are issues which PRO EUROPE has long placed importance on. We have gained valuable experience in the organisation and implementation of several awareness campaigns and projects at the EU level, including:

- **European Recycling Week:** launched in 2001, this event saw a number of sorting and recycling facilities in eleven European countries open their doors to the public, resulting in hundreds of thousands of consumers throughout Europe learning more about the recycling process. The second European Recycling Week in 2004 was once again hosted by PRO EUROPE.

- **PRO EUROPE Congress:** as a central part of European Recycling Week, PRO EUROPE's Congress (in Madrid in 2001 and Berlin in 2004) is a key information and discussion forum for interested participants from over thirty countries to take part in.
- **European Youth Eco-Parliament** (please see above).

We would also welcome using a web-based exchange programme to be accessed by experts, practitioners and companies, as well as by government experts, in order to facilitate the exchange of best practice among these actors.

2.3.2.

Would your organisation be willing to further highlight the content and purpose of the Strategy at the national level to your members?

Yes, PRO EUROPE counts on the active support of its members, which in turn work in partnership with local authorities, and in many cases directly with the public. These relations could be used to facilitate communicating the content and aims of the Strategy.

3. Developing indicators for resource use

3.3.1.

Would the development of a weighted indicator or a set of indicators of material flows that reflect environmental impacts gather support from your organisation/ business?

PRO EUROPE considers the development of indicators helpful as long as it remains possible to assess the effectiveness of the policies introduced. Nevertheless, we believe it is necessary to bear in mind that an indicator might give too simplistic a picture of a more complex reality. Therefore, the basis of such an indicator and the conditions under which it would be used should be developed on a scientific basis and in agreement with industry, NGOs, local authorities and other relevant actors.

3.3.2.

What are the scientific, technical or economic reasons hindering the development of indicators in your business sector/area of activity? How could these reasons be overcome?

PRO EUROPE believes that discussions on the environment are very often dominated by ideology, for example, the continued debate on the use of mandatory deposits on beverage packaging in Germany. Frequently, these discussions take away from what should be the main concern, that of sustainable resource use and minimising environmental impact. PRO EUROPE is concerned that the environment argument can often be misused as a justification for adopting protectionist measures for domestic markets. The use of eco taxes (in Belgium and Malta for example) can arguably be seen as one way of protecting the national market, rather than effectively contributing to lessening the environmental impact of a product and thus saving resources.

4. Spurring progress towards decoupling

4.3.1.

What should be in the aforementioned resource management plans - should it broadly be the information indicated above, i.e. (1) data on material flows, land-use intensity and eco-efficiency, (2) future demand and supply security needs are identified (including the international dimension), (3) plans to improve the eco-efficiency of resource use (domestically extracted and imported), (4) plans to develop economic instruments to reduce environmental impacts of resource use, (5) how they will monitor the decoupling of environmental impacts of resource use from economic growth.

Should any other major element be added or removed from the list?

PRO EUROPE feels one element which should be added to the list of factors included in the resource management plans ought to be identifying best practice in all business sectors. The drafting of best-practice guides help to avoid already known mistakes and to increase the speed of finding appropriate solutions.

Furthermore, over a period of time the environmental impact could be reduced enormously once a culture of basing decisions on know-how and best practice is developed and implemented via resource management plans and/or action plans.

PRO EUROPE would recommend carrying out full assessments of possible resource management plans and/or action plans prior to the implementation of any concrete measure. In this way, the potential costs and benefits can be clearly identified. In addition, once it the plans have been implemented, it would be necessary to periodically assess the results and outcomes in order to verify whether the goals and targets of the plans have been achieved. This would allow for more efficiency and reliability in the short, medium and long-term term.

5. International panel on decoupling

5.3.1.

What are the pros and cons of each of these two options for your organisation/ business: (1) an ad-hoc network of experts that the Commission can call upon to discuss internationally relevant problems related to the use of natural resources; (2) a multidisciplinary team with a permanent membership, analogous in intent and purpose to the International Panel on Climate Change (IPCC).

PRO EUROPE's experience in co-ordinating such networks with its own members, as well as with similar international organisations, has demonstrated that the involvement of all stakeholders is a key factor for success in tackling the issue of resource use. In our view, the co-operation of industry and authorities within the packaging sector has shown that it is possible to build up sensible and sustainable structures to reduce the negative impact of packaging on the environment and to save natural resources. It could be demonstrated that such joint action programmes lead to a de-coupling between economic growth and the amount of packaging, for example in Austria, France and Germany.