



UNION EUROPEENNE DE L'ARTISANAT ET DES PETITES ET MOYENNES ENTREPRISES
 EUROPÄISCHE UNION DES HANDWERKS UND DER KLEIN- UND MITTELBETRIEBE
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UEAPME Position Paper on the Communication on Green public Procurement – GPP

On 16 July 2008, the European Commission has proposed a Sustainability Package. UEAPME has already commented about it in the course of the elaboration and consultation process.

The Package comprises the following initiatives:

1. Action Plan Sustainable Consumption and Sustainable Industrial Policy
2. Proposal for an amendment of the Eco-design Directive 2005/32/EC
3. Proposal for a revised Eco Label Regulation 1980/2000
4. Proposal for a revised EMAS Regulation 761/2001
5. Communication on Green Public procurement

Please, find below UEAPME comments on the Communication on Green Public procurement – GPP.

Communication on Green Public procurement

In the Communication on public procurement for a better environment the Commission proposes a political target of 50% Green public procurement (GPP) to be reached by the Member States by the year 2010. The target is linked to a process for setting common -voluntary- Green public procurement criteria, recommended for inclusion in tender documents for a series of priority product and service groups.

A first set of criteria has been developed for 10 product and service groups, The criteria have been based on existing European and national ecolabel criteria where appropriate, as well as on information collected from stakeholders of industry and civil society. The Commission has started to develop a second set of GPP criteria for another 10 product groups such as windows, heaters/boilers, climate control systems/airco, hard floor coverings and thermal insulation.

UEAPME would like a non-binding criteria catalogue to further elaborated, but the EU Commission should set up a consultation scheme in the preparation of the new criteria, which really puts SME organisations in the condition to react and give their contributions (i.e. avoid technical, long documents in English with very short deadlines to reply).

The level of technical skills to react to these documents is such that only the manufacturers of the products concerned by the consultation or independent external technicians with expertise in the field could respond. It is clear that, because of time constraints and language problems, it is impossible for small manufacturers to react directly.

On the other side, it is very difficult to find the above-mentioned technical expertise inside SME organisations. The only solution is, therefore, for SME organisations to pay for external technicians for this job. This is clearly not possible on a continuous basis and there is a high risk that often no response is given to the consultation documents.

UEAPME is of the opinion that no rigorous, product specific targets should be set, since they could lead to a narrowing of the market as well as distortion of competition. By no means may GPP lead to discrimination against small and medium-sized enterprises. SMEs often cannot afford complex and costly external and internal audit systems or certification measures. Moreover UEAPME further argues against fixed limits such as the 50% limit for green procurement, since such limits are often inappropriate and hard to implement in practise.

Moreover UEAPME is of the opinion that, when local governments set up criteria for green public procurements, they should take existing initiatives on reaching a more sustainable economy as the starting point. This is particularly true for experiences already developed in the different sectors. Criteria which are not based on existing initiatives should be avoided, since they can be unrealistic and difficult to implement by companies, particularly SMEs.

Conclusions:

- By no means may GPP lead to discrimination against small and medium-sized enterprises. In fact SMEs often cannot afford complex and costly external and internal audit systems or certification measures.
- UEAPME further argues against fixed limits such as the 50% limit for green procurement, since such limits are often inappropriate and hard to implement in practise.
- Criteria should be based on existing initiatives

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