



UNION EUROPEENNE DE L'ARTISANAT ET DES PETITES ET MOYENNES ENTREPRISES  
EUROPÄISCHE UNION DES HANDWERKS UND DER KLEIN- UND MITTELBETRIEBE  
EUROPEAN ASSOCIATION OF CRAFT, SMALL AND MEDIUM-SIZED ENTERPRISES  
UNIONE EUROPEA DELL' ARTIGIANATO E DELLE PICCOLE E MEDIE IMPRESE

## UEAPME'S COMMENTS ON

### THE DRAFT REGULATION ON "LIFE +" AND THE FIRST DRAFT OF THE "LIFE +" +" MULTI-ANNUAL PLAN

UEAPME welcomes the Commission's draft Regulation on "LIFE+" and the first draft paper on the "LIFE +" Multi-annual plan and thanks DG ENV for giving us the possibility to put forward our views.

SMEs are particularly keen on funding opportunities in respect of environment and environmental technologies and hope that the new "LIFE+" programme will be particularly tailored towards SMEs.

In fact, small and medium-sized enterprises (SMEs) make up a large part of Europe's economy: there are some 23 million SMEs in the enlarged Union, which represent 99% of all enterprises (almost 60% of value added).

The 6<sup>th</sup> Environmental Action Programme calls for a specific compliance assistance programme for SMEs as part of its priority actions. Also in the larger framework of the renewed Lisbon Strategy SMEs enjoy an increased attention for their contribution to growth, jobs and **innovation**. Environmental considerations should be considered a priority in order to move towards more sustainable patterns of production and consumption.

After a first examination of the papers, however, UEAPME has not the impression that "LIFE+" sufficiently addresses SMEs. In particular, Art. 3.3 of the draft Regulation states criteria, which SMEs would NOT easily fulfil.

Therefore – as a first comment – UEAPME would invite DG ENV simply to better clarify the criteria taking more into consideration SMEs.

Moreover, as LIFE + shall support the implementation of the 6<sup>th</sup> EAP, we understand that it should also support the Environmental Compliance Assistance Programme (ECAP) for SMEs as part of EAP's priority actions. For example, the development of specific tools at MS level to **raise awareness** and **assist** SMEs in implementing environmental policies could be financed through "LIFE+".

We thank you for the consideration you may give to this UEAPME's first comments and remain at your disposal for any clarification you may need.

Brussels, July 2006