

## BIBM comments on Green Action Plan for SMEs (COM(2014)0440)

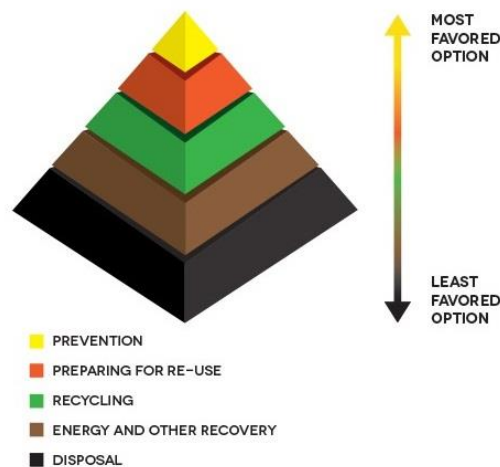
BIBM supports the objective of the Communication: enable SMEs to turn environmental challenges into business opportunities

### The key points for our sector that should be maintained:

- The importance of the education attitude of the Communication in the terms of provision of **practical information** to SMEs and their customers, as well as the accent put on creating “**green entrepreneurship**”
  - If the expertise would on the contrary be paying external consultants, this would result in no added value for the manufacturing sector
- The **financial instruments** put in place for achieving resource efficiency
  - There is a need to ensure that the allocated funds will be effectively used by SMEs, and make sure that SMEs can fulfil the necessary administrative requirements in order to gain access to these funds

### Proposal for improvement

1. Greening SMEs for more competitiveness and sustainability: it could be worth including the picture of the “**resource efficiency pyramid**” (please see below an example) to show where the best options should be looked for;



2. Green entrepreneurship for the companies of the future. Upcycling is presented as a fancy and trendy concept. However, cases may be different in practice. Upcycling, recycling and downcycling possibilities should be assessed on a **case by case basis** considering the global aspect of the choice and not only the short term appealing. Downcycling may indeed in some cases direct the most appropriate material for a given use whilst reducing the total extraction of virgin materials. On the contrary, recycling (for the same use) may in some cases lead to additional energy use and CO2 emissions
3. Opportunities for SMEs in a Greener Value chain: It appears that SMEs may have additional issues in setting up processes for the reuse of scrap material outside their



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boundaries. As an alternative, internal reuse of resources (including water) should be encouraged and awarded in a similar way and may be easier to implement

As a general remark, the Communication misses the opportunity of addressing one key “problem” of SMEs when it comes to turn environmental challenges into business opportunities; this is the duplication of initiatives at EU, national and local level.

- o On one side, it creates confusion in the SMEs and their customers, obliging SMEs either to make a choice or to invest into several schemes that may reveal useless or redundant
- o On the other hand, it obliges SMEs to require the intervention of external experts and certification schemes that are expensive and finally reduce the profitability of the business instead of enhancing it.

Existing instruments (in particular those achieved through standardisation, where all stakeholders are present or represented) should be favoured for its practical, easy and quick application.

BIBM understood that this Communication concentrates only on the environmental axe of sustainability, while some social pillars (jobs and skills) are covered by the Green Employment Initiative (COM 5214) 446). However, it should be stated, that the different pillars and actions of sustainability (considering the economic pillar as well) should be taken into account when assessing the possible outcome/impact of each initiative (interconnections).

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BIBM (from the French acronym “Bureau International du Béton Manufacturé”) is the Federation of the European Precast Concrete industry, established in 1954, represents the interest of precast concrete industry of 15 European countries with a combined industry turnover of 22 billion Euro, directly employing approximately 170,000 European citizens.