

Consultation on the EU2020 flagship on Industrial Policy

1. General Information	
1.1 Please enter your name, address, and e-mail address. -open reply-(compulsory)	EuSalt (European Salt Producers' Association), Avenue de l'Yser 4, B-1040 Brussels, Belgium
1.2 Who do you represent? -single choice reply-(compulsory)	Business organisation
1.3 In which sector(s) do you operate? -multiple choices reply-(compulsory)	Manufacturing
2. Policy Priorities facing European Industry	
2.1 In your experience, which of the following policy-related factors are most important for the competitiveness of European business? Please select a maximum of three factors: -multiple choices reply-(compulsory)	Technologies, standards, design and innovation - Better and more consistent regulation - Resource efficiency including recycling
2.3.1 Technologies, standards, design and innovation: please explain the importance of the issue, giving examples and evidence. -open reply-(compulsory)	
<p>Innovation and high quality standards are keys to better, sustainable growth and competitiveness. Furthermore, with regard to EU ambition to move towards a low-carbon economy and achieve green growth, we believe innovation and eco-design are essential and worth investing in. Using resources and energy the way we currently do, seem little compatible with sustainability and bigger share of renewable energies. As an authority the EU has the power to impulse such investments in innovation and provide a favorable framework for new approaches. This is for instance the case of eco-labeling and life cycle of products that could improve the impact of industrial activities and products on the environment and create new business opportunities, provided that an harmonized methodology is used throughout Europe in establishing those indicators.</p>	
2.3.2 Technologies, standards, design and innovation: how can businesses themselves better respond to these issues? -open reply-(compulsory)	
<p>Businesses are at the heart and main drivers of innovation, first of all for the competitive edge and profit it brings. This however requires investments, which could be thwarted in times of economic crisis as well as in case of burdensome regulations increasing pressure on industry. Besides, innovation, design and technologies are long-term investments and cannot be abandoned or re-allocated overnight. For this reason policy objectives aiming at the European economy and industry making a U-turn within 10 years are very ambitious and appealing, but may sometimes neglect the possibility of the various industrial sectors to follow that trend. Business can promote high standards and level up national as well as European and international standards. This requires a favorable legislative framework.</p>	
2.3.3 Technologies, standards, design and innovation: what can policymakers do to address the issues at Member state, local or regional level? -open reply-(compulsory)	
<p>Whether at Member States, local or regional level, policymakers need to ensure the best coordination possible in order to create a level playing field throughout the European territory. Access to innovation and technologies and compliance with high quality standards first require reducing discrepancies between regions. Furthermore more and most importantly, policymakers need to promote and support innovation, and avoid putting excessive constraints on industry.</p>	
2.3.4 Technologies, standards, design and innovation: what can policymakers do to address the issues at EU level? -open reply-(compulsory)	
<p>At EU level better coordination and harmonization between Member States is needed. The EU is supportive of research and innovation and therefore provides a good incentive for businesses with this regard. However, ambitions and objectives related to different policy areas, mainly energy, industry and environment, may sometimes counteract with one another. For instance, innovation is dependent on the ability of businesses to invest. On the other hand, increased taxes weighing on industry thwarts investment possibilities and the profitability of their activities.</p>	

2.7.1 Better and more consistent regulation: please explain the importance of the issue, giving examples and evidence.

-open reply-(compulsory)

Coordination between different policy areas that interact with one another is essential in order to avoid distortions as observed under the EU ETS Directive. Indeed the EU industrial policy promotes better competitiveness of EU industry. However, initiatives such as the EU ETS Directive installed the taxation on CO2 emissions (which is implemented at European level alone for the time being), holding financial pressure on European industry. Furthermore, the ETS system has stirred competition concerns within certain industrial sectors, among which the salt sector. Indeed, two non- interchangeable technologies, both related to the production of evaporated salt, ended up competing with each other, which led one technology to receive free allocations for direct CO2 emissions, while the other couldn't benefit from financial compensation for indirect CO2 costs. This penalized innovating companies that had recently invested in full electric plants in the name of energy efficiency.

2.7.2 Better and more consistent regulation: how can businesses themselves better respond to these issues? -open reply-(compulsory)

As responsible stakeholders business can identify areas where regulation is needed, or when there are too many, not well coordinated regulations. Also industry can inform decision-makers about what can be achieved with strong, unanimous commitments on a voluntary basis.

2.7.3 Better and more consistent regulation: what can policymakers do to address the issues at Member state, local or regional level?

-open reply-(compulsory)

Following our previous responses, good coordination between the different levels of governance is essential. This is the best way to ensure a level playing field for industry in Europe.

2.7.4 Better and more consistent regulation: what can policymakers do to address the issues at EU level? -open reply-(compulsory)

Policymakers at EU level need to ensure the highest level of coordination between Member States and region by providing clear, consistent framework and guidance for an industrial policy. Besides, as already stated better coordination between the different policy areas within the European Union is important in order to create a stable, supporting setting for EU industry. Most importantly environment/climate action, energy and industry and entrepreneurship are fields closely interconnected and therefore require more integrated approaches and initiatives.

2.10.1 Resource efficiency including recycling: please explain the importance of the issue, giving examples and evidence.

-open reply-(compulsory)

Resource efficiency has to be a cornerstone of European policy and industry. Whether related to resources, energy or water, efficiency is key to a more sustainable economy. For this purpose, we support the objectives of the new energy efficiency directive. We also believe that developing life cycle analysis for products is a good instrument to improving our environmental impact, provided that a harmonized methodology is elaborated. Also we believe that recycling holds opportunities for better resource efficiency and consider projects looking at waste recycling promising. However, we do not consider resource taxation a good nor efficient instrument for tackling resource efficiency. Resource taxation will weigh additional burden on industry. Besides, the increase in the number of taxes and tools measuring efficiency and environmental impacts (eco-labeling, LCA) create more confusion for consumers than incentives for industry.

2.10.2 Resource efficiency including recycling: how can businesses themselves better respond to these issues? -open reply-(compulsory)

As a responsible stakeholder, the salt industry considers that resource efficiency is crucial for EU industry. For instance, certain technologies in salt production use the same energy source (vapor for instance) several times. In addition, we believe that recycling holds opportunities for better resource efficiency. Indeed projects looking at waste or CO2 emissions recycling as a resource could be very promising, although expensive. This is the reason why the EU must provide a framework favorable to investments. On the other hand, we do not consider resource taxation a good nor efficient instrument for tackling resource efficiency. Resource taxation will weigh additional burden on industry. Besides, the increase in the number of taxes and tools measuring efficiency and environmental impacts (eco-labelling, LCA) create more confusion for consumers than incentives for industry.

2.10.3 Resource efficiency including recycling: what can policymakers do to address the issues at Member state, local or regional level?

-open reply-(compulsory)

Following our previous responses, good coordination between the different levels of governance is essential. This is the best way to ensure a level playing field for industry in Europe. We need to ensure a consistent approach of resource efficiency throughout the European territory.

2.10.4 Resource efficiency including recycling: what can policymakers do to address the issues at EU level? -open reply- (compulsory)

Policymakers at EU level need to ensure the highest level of coordination between Member States and region by providing clear, consistent framework and guidance for an industrial policy. There again we need to ensure better consistency both between and within the different policy areas. An idea such as resource taxation clearly seems incompatible with the need for better competitiveness of the EU industry.

2.16 If you have further comments on this consultation or suggestions please write them in the box below(max 1000 characters). -open reply-(optional)

2.17 Do you want to upload a longer written response or background documents? -open reply-(optional)

3. Publication of contributions

3.1 Please indicate here if you wish your contribution to be anonymous. Unless you specify otherwise, your contribution will be published on the Commission's website together with your identity. -single choice reply-(optional)

Please publish this contribution under the name given