

UNICE

THE VOICE OF BUSINESS IN EUROPE

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European Commission
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Dear Director-General

re: revision of EU Regulation 58/97 structural business statistics and proposed EU Regulation (COM 99/31) on waste management statistics

At present, the revision of EU-Regulation 58/97 concerning structural business statistics has entered into its decisive phase. From industry's perspective, the proposed amendments with regard to the collection of data on investment in integrated environmental protection technologies as well as on current expenditure for the environment are of crucial importance.

In general, UNICE welcomes the inclusion of those data in business statistics, since this may lead to a more accurate and realistic picture of the efforts being undertaken by industry in order to protect the environment. This is especially true in light of the fact that current expenditures and investment in other than end-of-pipe-technologies, i.e. integrated technologies, represent a growing proportion of the overall expenses related to environmental protection. However, industry has two major concerns with regard to the proposed amendments.

- 1.) Most importantly, **no satisfactory methodology** for the recording of investments and current expenditures for integrated environmental protection has been developed so far. However, binding rules that ensure a uniform and consistent approach throughout Europe are essential, since without them, the collected data would be both misleading and not comparable between Member States (and consequently result in a distorted picture of the environmental efforts being undertaken).

The existing proposals formulated by experts commissioned by EUROSTAT must be rejected from UNICE's point of view as they only take account of the measures carried out in the line of legal obligations, which would ignore the wider context within which integrated protection technologies are developed and applied. Furthermore the proposal puts forward a blanket procedure to cover the environmental proportion of an investment simply by looking at the

additional costs involved as compared with less efficient technologies, while overlooking existing opportunities to obtain more precise statistics.

UNICE holds the view that companies cannot be expected to bear the additional costs and administrative burdens involved in collecting further complex data if the latter cannot be used appropriately. In other words, adequate methodological rules constitute a precondition for extension of the types of structural business statistics to be collected.

- 2.) Second and related to the first point, the timetable envisaged in the proposal according to which the relevant figures for the reporting year 2000 would have to be collected by national statistical agencies in 2001 is not acceptable, since it would entail considerable costs as well as technical difficulties for companies that have to provide the relevant information. Instead UNICE proposes a **transitional period** during which companies would have the time to set up internal reporting systems. At the same time, the data collected during this "trial phase" should be assessed in terms of their accurateness, meaningfulness and comparability throughout Europe (see above). The results of this evaluation could serve as a basis for deciding whether and how such data should be collected in the future.

Further, we are aware of a proposed regulation on waste management statistics which envisages a physical census of the different categories set out in the very detailed nomenclature drawn up specifically for these environmental problems. We would like to point out at the outset that the existing administrative statements need to be streamlined and aggregated before the launch of any extremely unwieldy and exhaustive statistical monitoring. Moreover, the expenditure associated with the detailed analytical accounts required for statistical surveys is already high, and additional recording of physical quantities would add considerably to industrial unit costs. We therefore have serious reservations about this draft on waste management statistics.

UNICE is prepared to enter into dialogue with all stakeholders and is convinced that it can contribute a great deal to solution of the problems outlined above. We would appreciate if you could take our concerns into account and would be happy to provide any further information you might require.

Yours sincerely

Daniela Israelachwili
Acting Secretary General