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**UNICE COMMENTS ON THE COMMISSION'S  
GREEN PAPER ON ENERGY EFFICIENCY "DOING MORE WITH LESS"  
(COM 2005-265)**

**I. Introduction**

UNICE welcomes the green paper (GP) as a thought-starter in the search to a more energy-efficient and a more competitive Europe in line with the Lisbon agenda. UNICE furthermore welcomes the underlying message of the green paper which is that "industry has been the prime vehicle in developing Europe to the energy efficiency status of today and in creating the perspectives for tomorrow". UNICE shares the observation that industry in Europe has realised an economic efficiency revolution in the field of energy.

UNICE also acknowledges the Commission's new and more conceptual approach to energy efficiency (EE) issues, trying to move away from the search for essentially regulatory and bureaucratic solutions. UNICE welcomes in particular the willingness apparent in the green paper (1) to iron out obstacles that stand in the way of dissemination of advanced technologies and (2) to promote the offer of new services by energy service companies ("ESCO"). However, in so widening its field of vision, the Commission runs the risk of underestimating the potential and value of some singular key elements and overestimating the importance of others. This is a difficult balance and in some areas UNICE does not fully agree with the Commission's assessment. It addresses these points in more detail below.

It is positive that the Green paper has opened a wide debate at European level on EE issues, and that it has also revived the debate on this subject at national level. In order to stimulate these national debates as much as possible, UNICE requests the Commission to provide more detailed information about plans for actions to follow up the Green Paper debate.

This being said, UNICE considers that the GP has some important analytical weaknesses as a starting point for developing a new joint EU strategy for EE:

1. The Commission should be clearer regarding the ultimate objectives which it proposes to pursue through EE improvement. These objectives should be made explicit in reference to an overall energy strategy and to a clear vision for promoting sustainable development in the long term. They should be clarified taking account of the fact that some economic and environmental objectives targeted by EE policy can also be pursued through other approaches (use of nuclear energy, for instance).

If the precise objectives are made clear, this will also clarify where and how the most cost-efficient actions can be taken. It is important to remember that major opportunities for improving EE exist outside Europe, which can and

must be seized through more effective deployment of financial instruments such as CDM (Clean Development Mechanism),JI (Joint Implementation) and the financial guarantees offered by institutions like the EBRD..

A clear and coherent definition of the objective(s) pursued is indispensable for definition of any future priority action proposals, and the criteria for impact assessment that will have to be used to test them.

2. Some of the action methods considered in the GP for promoting EE are often likely to generate extra bureaucracy and burdens for companies, thereby harming the general climate for both general and RD investments, which is precisely the primordial element that needs to be improved to bring about progress in the area of EE. Examples of such action methods are the use of taxation instruments and of generally applicable saving targets for countries (with annual reviews of these targets).

As it has indicated in several position papers, UNICE is open to a discussion on economic instruments capable of delivering environmental progress at lower cost than traditional “command and control” regulation. UNICE has always underlined that these instruments should be debated as a function of clear criteria of environmental effectiveness, economic efficiency and policy coherence (coherence with the objective of sustainable development). UNICE is concerned that these criteria are not mentioned in point 1.1.4 of the green paper and that an interest is shown rather promptly in ideas such as “bringing excise rates on energy products and electricity consumed in production activities closer together, ... at the higher end of the scale”. The green paper shows an apparent lack of understanding of the negative effects of energy taxation. The Commission argues that price signals based on energy taxation could stimulate investments in improving energy efficiency. Business and industry do not subscribe to this idea. At individual company level: taxes and other financial burdens will reduce the resources available for investments. At European level: an increasing tax level will discourage multinational industries from investing in Europe.

Against that background a more productive route could be, within the general EU regulatory framework as well as the national frameworks, to analyse and reduce legislative measures which present obstacles to further development of EE. It would also be useful to examine what national measures need to be harmonised with a view to reducing these obstacles.

It is essential to turn the back to approaches adding legislative measures and bureaucracy because companies and households operate in a context where new pressures have emerged to encourage their EE efforts:

- precipitous price escalations for oil products
- higher electricity prices, due to a range of factors (increase in the price of fuel inputs, objectives decided at political level for the use of renewables to produce electricity, implementation of the European Emissions Trading System-ETS,...).

3. Finally, there is a lack of recognition of recently adopted or recently proposed measures. During the last two years a comprehensive amount of (EU) energy-related policies have been completed and are now in the phase of implementation. For instance: eco-design directive, directive on energy efficiency and energy services, buildings directive and ETS directive. As mentioned earlier a thorough analysis of the effects of these initiatives is still required, and must have priority over introduction of new regulatory measures.

The Commission should take better account of this, in order to be able to place the debate on firm foundations for any future measures.

## **II. Reminder of some key drivers in the process leading to EE improvement**

Any EU policy for EE must be developed taking due account of the following factors:

1. EE is very strongly linked to technological innovation, which is influenced by input factors (R&D, etc.) and by context elements (entrepreneurship, existence of wide markets, etc.).
2. The prevailing climate for business investments in general has a determinant influence on the rhythm of business investments specifically targeting EE.
3. The possibility of expanding EE in the domestic sector, public sector and utilities sector depends on the wealth available to citizens, public authorities and utilities to buy equipment and services favourable to EE. It is linked then to wealth creation and international competitiveness of the European economy.

A strong European economy is needed to ensure that citizens and public authorities can play the central role which belongs to them in any EE strategy. This central note derives in particular from the fact that buildings currently account for between 40 and 45% of all energy used in Europe.

## **III. UNICE basic views and priorities for developing EU initiatives in the area of EE**

Given the context outlined above, UNICE believes that any EU strategy in the area of EE must give a central position to the following elements:

1. Promotion of the competitiveness of European companies in line with the Lisbon agenda.
2. Supporting research and innovation. UNICE supports a strengthening of EU actions to promote RTD relevant to EE, in particular in the 7th RTDFP, insofar as the thematic direction of specific programmes is defined in

consultation with industry. It would be favourable to technical research and development if ability to honour energy efficiency goals was made a more dominant factor in the decision-making process for allocating funds for research and development projects generally at EU-level. In general, the achievement of EE goals would benefit from more focused work on the transition process from research to demonstration to market. Especially the latter seems to be necessary.

3. Taking action that is compatible with the imperative of “less and better regulation” which is recognised at European level.

Every effort must be made to avoid introducing bureaucratic systems which generate excessive administrative costs for companies, thus undermining their spontaneous efforts in the area of EE.

For this reason, UNICE is opposed to national or European targets (indicative or binding) being set at EU level for improving EE because such targets – as experience has shown – lead to highly prescriptive regulatory measures which do not respond well to the requirement of cost-effectiveness and flexibility. The initial proposal for a Council directive (doc. COM 2003-739) on energy services illustrates clearly the risk of possible interventionist slippage (e.g. the impractical idea of introducing an obligation on distribution companies to ensure that the offer of energy services represents at least 5% of their turnover, an idea which has subsequently been abandoned in the negotiations).

Applied to the area of EE, less and better regulation means:

- a) Eliminate obstacles to progress in EE such as:
  - i) lack of information to relevant partners in production and service chains like:
    - insufficient awareness of the importance of EE for combating climate change
    - obstacles to deployment of innovative financial instruments such as third-party funding
  - ii) obstacles to deployment of energy services, understood as offerings combining the delivery of energy and energy-efficient technology.
- b) Promote better overall conditions for developing new markets in the field of EE.
- c) Carry out rigorous impact analyses before proposing any legislative initiative. Policies and measures resulting in higher energy prices should not be used to promote EE in industry.
- d) Focus on cost-effective, proportionate and reasonable measures.

e) Avoid overlapping. It is also important to avoid overlaps between regulatory instruments pursuing the same objectives and making it more difficult for companies to formulate their strategic plans. By way of example, the companies covered by:

- the emissions trading directive, which is supposed to stimulate major progress on EE
- and/or the IPPC directive, which is also directed to stimulate such progress

should not fall within the scope of the energy end-use efficiency and energy services directive.

f) Support exchange of best practices at European level.

g) Refrain from introducing an EU plan for “white certificates” linked to obligatory objectives which would be imposed on companies for energy efficiency. The possibility of such a plan co-existing with the emissions trading system is not self-evident. Experience with ESCOs shows that an additional system with white energy efficiency certificates is not necessary. A system with white certificates will easily lead to bureaucracy and add to fiscal burdens and administrative constraints, such as binding or indicative targets for EE improvement.

h) Maintain fair competition between European manufacturers and non-European manufacturers which export to the EU. It is essential at all costs to avoid engaging in regulatory approaches whereby European industry would be subject to severe requirements and controls with regard to EE, and whereby imported products would not be subject to controls or only to controls without real meaning.

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**Annex: Answers to the questions in the Green Paper on Energy Efficiency**

*Note: the answers given below should be read in the light of UNICE's general strategic comments on the green paper.*

1. How could the Community and the Commission in particular, better stimulate European investment in energy efficiency technologies? How could funds spent supporting research in this area be better targeted? (Section 1.1)

*Better investment climate will lead to more investments in new innovative technologies. Hence, actions at both EU and national level that stimulates investments will fit in with the aims of the Commission. For R&D there is already the 7<sup>th</sup> framework programme and Intelligent Energy Europe, which provides solutions for implementation problems and helps customers buy the most efficient technology. A better targeting of funds would be to give priority to areas in which the transition process from technology development to market place is in focus.*

2. The emission trading mechanism is a key tool in developing a market-based response to meeting the goals of Kyoto and climate change. Could this policy be better harnessed to promote energy efficiency? If so, how? (Section 1.1)

*The aim of the climate change policy is to reduce CO<sub>2</sub> emissions and emissions trading is an instrument to realise this in a flexible way. In the primary allocation of emission allowances there is not much benefit for energy-efficiency. Allocation is in most cases based on historical emissions and not on the level of an installation's energy efficiency. In other words, there is a benefit for CO<sub>2</sub> efficiency or savings but that is not always in line with energy savings at installation level.*

3. In the context of the Lisbon strategy aiming to revitalise the European economy, what link should be made between economic competitiveness and a greater emphasis on energy efficiency? In this context, would it be useful to require each Member State to set annual energy efficiency plans, and subsequently to benchmark the plans at community level to ensure a continued spread of best practice? Could such an approach be used internationally? If so, how? (Section 1.1.3)

*The broad field of EE offers numerous opportunities for creating new products and services, and new companies. The barriers which hold back the development of new business should be identified and removed with a view to contributing to revitalisation of the European economy. To achieve this same objective, the EU should take actions to facilitate creation and development of new businesses. In addition, EE should receive strong attention in research, development and demonstration programmes at both national and European level. These efforts to promote innovation and its*

*dissemination will improve Europe's competitiveness, notably through increased exports of EE equipment and services, and through lower energy bills.*

*It is important that these efforts are genuinely developed in the spirit of the objectives decided in Lisbon, taking a correctly proportioned position in the range of efforts that need to be made to achieve these objectives. These efforts should not be deployed on the basis of the idea (sometimes aired) that future progress in EU competitiveness will flow on principally from statutory requirements in the area of environment and energy efficiency.*

*Exchange of information about best practices for energy-efficiency is a different issue.. Benchmarking can be a good tool when it is used properly - that means when benchmarking is used as a tool for learning from other situations but not as an instrument forcing implementation of solutions. Generally, the provision of adequate information to the market will lead to EE improvement. Instruments that can bridge the information gap are welcomed by business and industry as long as these instruments are not too bureaucratic. Anyway, the implementation of benchmarking, from an operating point of view, should appropriately consider the significant complexities involved in its application, trying to avoid the opposite dangers of oversimplification on one side and of impracticality on the other side*

4. Fiscal policy is an important way to encourage changes in behaviour and the use of new products that use less energy. Should such measures play a greater role in European energy efficiency policy? If so, which sort of measures would be best suited to achieve this goal? How could they be implemented in a manner that does not result in an overall increase in the tax burden? How to really make the polluter pay? (Section 1.1.4)

*Companies will not improve their processes and products because of higher taxes. It must not be forgotten that in international competition, companies cannot pass on their higher production costs due to energy taxes. Higher taxes work counterproductively. When companies lose market share because of unduly high national or European energy taxes, there will be major negative effects in terms of both economic and ecological impact.*

5. Would it be possible to develop state aid rules that are more favourable to the environment, in particular by encouraging eco-innovation and productivity improvements? What form could these rules take? (Section 1.1.5)

*State aid rules should not prevent stimulation of new and better technology, stimulation of better solutions in the market, or prevent giving grants for energy-efficiency projects with the aim of overcoming the difference between plant-level paybacks and those of society*

6. Public authorities are often looked to for an example. Should legislation place specific obligations on public authorities, for example to apply in public buildings the measures that have been recommended at Community or national level. Could or should public authorities take account of energy



efficiency in public procurement? Would this help build viable markets for certain products and new technologies? How could this be implemented in practice in a way that would promote the development of new technologies and provide incentives to industry to research new energy efficient products and processes? How could this be done in a manner that would save money for Public authorities? As regards vehicles, please see question 20. (Section 1.1.6)

*Generally it is important that public authorities promote energy efficiency measures through demonstration and follow “best practices”. This also applies when it comes to public procurement. However it is important to bear in mind that public procurement must not result in practices that distort competition at either European or national level, even if the purpose is claimed to be related to energy efficiency goals.*

7. Energy efficiency funds have in the past been used effectively. How can the experience be repeated and improved? Which measures can be adopted usefully at:
- international level
  - EU level
  - national level
  - regional and local level?

(Section 1.1.7. See also question 22)

*Establishment of an “energy efficiency fund” creates a new subsidy situation and in this situation it is mandatory to adopt the best lessons learned from the administration and development of past energy efficiency funds if this route is pursued again at European level. Generally, if a member state is convinced that it has a good system then it can exchange its experience with other EU member states. But subsidiarity is important. It is not necessary for the EU to take over and impose systems on member states.*

8. Energy efficiency in buildings is an area where important savings can be made. Which practical measures could be taken at EU, national, regional or local level to ensure that the existing Community Buildings Directive is a success in practice? Should the Community go further than the existing Directive, for example extending it to smaller premises? If so, how could the appropriate balance be achieved between the need to generate energy efficiency gains and the objective of limiting new administrative burdens to the minimum possible? (Section 1.2.1)

*The question is a little bit premature. The Community Buildings Directive has just come into force and full implementation is just under way in member states. We expect that this directive will give an innovation impulse to building companies. We are waiting the calculations on the eco efficiency of this directive.*

9. Giving incentives to improve the energy efficiency of rented accommodation is a difficult task because the owner of the building does not normally pay the energy bill and thus has no economic interest in investing in energy efficiency



improvements such as insulation or double glazing. How could this challenge be best addressed? (Section 1.2.1)

*UNICE has no particular view to offer on this issue.*

10. How can the impact of legislation on the performance of energy-consuming products for household use be reinforced? What are the best ways to encourage the production and consumption of these products? Could, for instance, present rules on labelling be improved? How could the EU kick-start research into and the subsequent production of the next generation of energy efficient products? What other measures could be taken at:
- international level
  - EU level
  - national level
  - regional and local level?
- (Section 1.2.2)

*The energy-using product directive – relating to a number of products – has just come into force. We should see how this directive works out in practice. Part of this directive is information to consumers. At this moment a revision of the ecolabel directive is also under way. Business and industry suggests waiting for the results instead of disturbing the implementation and/or revision processes.*

11. A major challenge is to ensure that the vehicle industry produces ever more energy efficient vehicles. How can this best be done? What measures should be taken to continue to improve energy efficiency in vehicles and at which level? To what extent should such measures be voluntary in nature and to what extent mandatory?
- (Section 1.2.3)

*There is a major voluntary agreement between the European Commission and the European car industry (ACEA). Energy efficiency of vehicles is a major part of this agreement. Business and industry suggest waiting for the results of this agreement.*

12. Public information campaigns on energy efficiency have shown success in certain Member States. What more could and should be done in this area at:
- international level
  - EU level
  - national level
  - regional and local level?
- (Section 1.2.4)

*The Commission has started an information campaign on sustainable energy consumption. There are experiences in different member states on public information campaigns. At EU level, best practices could be collected and experiences could be exchanged and evaluated with a focus on national needs*

13. What can be done to improve the efficiency of electricity transmission and distribution? How to implement such initiatives in practice? What can be done to improve the efficiency of fuel use in electricity production? How to further promote distributed generation and co-generation? (Sections 2.1-2.3)

*This question assumes that there is an internal electricity market that functions properly. In practice the situation is that the internal market is not working as it should due to different or insufficient implementation of the directive for the internal energy market by Member States. In practice production installations participate in the ETS. This could lead to a higher level of efficiency in conversion. It is doubtful if that is the situation today. For transmission and distribution the situation is also complex. In some member states transmission and distribution sector are highly regulated. In these member states the loss rate has become part of the quality parameter for grid performance. A large loss rate will be penalised so this will automatically lead to efficient transmission and distribution. For CHP there is already a directive that has recently come into force. Further to this, there is a registry for R&D projects so there can be an easy exchange of experiences.*

14. Encouraging electricity and gas providers to offer an energy service (i.e. agreeing to heat a house to an agreed temperature and to provide lighting services) rather than simply providing energy is a good way to promote energy efficiency. Under such arrangements the energy provider has an economic interest that the property is energy efficient and that necessary investments are made. Otherwise, electricity and gas companies have an economic interest that such investments are not made, because they sell more energy. How could such practices be promoted? Is a voluntary code or agreement necessary or adequate?

*Experiences with ESCOs (Energy Service Companies) have been very positive so far. Regular energy companies which have experience or would like to do so, can contribute to the free market of energy services. The prejudice that these companies are not interested in reducing the volumes of their sales may disappear when we consider that the business of energy services could compensate the loss of sales. To promote this approach, it's important that every actor may participate to the energy services market without any discrimination, as recommended by the proposal of directive on energy end-use efficiency and energy services and repealing Council Directive 93/76/EE. Only with the involvement of the energy companies it will be possible to obtain significant reduction of energy consumption, in particular in the domestic sector that is so far from a good level of efficiency. The best way to promote this involvement is creating a good legislative framework at the Community level that may support the energy companies and all the actors in the market to develop this business, avoiding any bureaucratic regulation.*

15. In a number of Member States, white (energy efficiency) certificates have been or are being introduced. Should these be introduced at Community level? Is this necessary given the carbon trading mechanism? If they should be introduced, how could this be done with the least possible bureaucracy? How could they be linked with carbon trading mechanism? (Section 2.4)

*Experiences with ESCOs show that an additional system with white energy efficiency certificates is not necessary. A system with white certificates will easily lead to bureaucracy and add to administrative constraints, such as imperative or indicative targets for EE improvement. UNICE recalls that industry is already paying high prices for its energy supplies.*

16. Encouraging industry to take advantage of new technologies and equipment that generate cost-effective energy efficiencies represents one of the major challenges in this area. In addition to the carbon trading mechanism, what more could and should be done? How effective have been the steps taken so far through voluntary commitments, non-binding measures adopted by industry, or information campaigns? (Section 3)

*UNICE emphasises again that a good investment climate and a good climate for R&D are the most vital conditions for progress in energy saving through investment. Other options or ideas seem less relevant. Until now energy cost in itself has been a powerful force towards efficiency for industry and energy intensive industries have implemented a lot of non-binding (but effective) measures.*

17. A new balance between modes of transport – a major theme of the strategy set out in the White Paper that the Commission adopted in 2001 on a European transport policy for 2010 – is still a top priority. What more could be done to increase the market share of rail, maritime and inland waterway transport? (Section 4.2)

*It is important that the regulatory framework ensures free and fair competition in the different modes of Transport. Enhancing the quality of services offered, the level of competition between operators and the inter-connections between the various modes would all help improve the chances of rail, maritime and inland-waterway securing more market share.*

*More focus on encouraging transport logistical development, sensible transport growth and increasing transport efficiency would also be steps in the direction of tackling the problems that rail, maritime and inland waterways currently experience when trying to increase market share.*

*Allowing 25.25 meter modular truck combinations throughout the EU is an example of promising option that deserves to be carefully considered. It would lead to a number of advantages, some which are directly related to politically stipulated objectives that are currently difficult to achieve: 1) fuel consumption decreases by about 15% 2) carbon/ dioxide emissions are reduced 3) other harmful emissions are reduced 4) road congestion is reduced 5) opens up for efficient intermodal solutions."*

18. In order to improve energy efficiency it is necessary to complete certain infrastructure projects from the trans-European transport network. How should the investments needed for infrastructure projects be developed, using what sources of financing? (Section 4.2)

*Without an efficient transport system and transport network the completion of the Internal Market and its effective, efficient functioning are threatened, together with EU growth, employment and wealth. Therefore the construction of the TEN-T infrastructure projects requires adequate financial measures in order to be completed on time.*

*Public investment in infrastructure has a positive effect on the economy. In the current public deficit situation of most developed and developing countries it is not enough. In this situation private financing becomes a means for public action. Public Private Partnerships (PPPs) for instance are a means to this end. In addition to the boost PPPs give to private investment, they also lead to more employment and leverage of real income. Consequently the Commission and the Member States should redouble their efforts to attract private capital and promote PPPs in order to increase the catalyst effect of Community support.*

*Additionally, responsibility and genuine financial commitment from Member States are also a pre-condition for the TEN-T to become reality. Clear commitment must be given by all Member states within their multi-annual budgets to also try and attract private investments to the projects.*

19. Among the measures that could be adopted in the transport sector, which have the greatest potential? Should priority be given to technological innovations (tyres, engines...), particularly through standards defined jointly with the industry, or to regulatory measures such as a limit on fuel consumption of cars? (Sections 4.3-4.5)

*Legislators should adhere to the principle of “applying alternative measures” to transport before implementing operational restrictions such as limiting the fuel consumption of cars.*

*Alternative measures can be understood in terms of technological research and development, increasing the efficiency of traffic control systems, eliminating bottlenecks, better design of vehicles etc.*

*Measures such as these rather than regulatory ones would have a more effective and lasting impact.*

20. Should public authorities (state, administrations, regional and local authorities) be obliged in their public procurement to buy a percentage of energy efficient vehicles for their fleets? If so, how could this be organised in a manner that is technology neutral (i.e. it does not result in distorting the market towards one particular technology)? (Section 4.3)

*Competition for the most economically advantageous bid must be the yardstick for public procurement. This principle still allows for social and environment-related*

*criteria to be taken in to account - but these must always be directly linked to the object of the contract.*

*The European institutions, Member State governments and individual authorities however should take care to ensure a balanced and focussed approach. They must avoid distorting public procurement away from the goal of the most economically advantageous tender - which combines good-quality service with good value for money. Procurement policy should not be used for other purposes than those inherently connected with the work, supply or service itself.*

21. Infrastructure charging, notably paying to use roads, has started to be introduced in Europe. A first proposal was made in 2003 to strengthen the charging of professional road transport. Local congestion charges have now been introduced in some cities. What should be the next steps in infrastructure charging? How far should “external costs” such as pollution, congestion and accidents be directly charged to those causing them in this manner? (Section 4.4)

*As explained in its opinion dated 28 January 2004 on the proposal to amend the Eurovignette directive, UNICE is open to discussion on innovative approaches which seek to change the entire structure of taxes and charges levied on road freight transport with a view to achieving greater economic efficiency and environmental effectiveness than is currently the case. Well thought-out Community measures are desirable in this area, with the aim of preventing isolated national initiatives from holding back the development of common approaches at European level. Any Community instrument should ensure that the burden of taxes and charges on road freight transport does not increase.*

*Any economic instrument should be incorporated in a diversified and coherent policy mix reflecting the three dimensions (economic, social and environmental) characterising the challenges and channels of actions in the area of sustainable development. Market signals given by economic instruments must result from a holistic approach for solution to environmental problems and go beyond a simple attempt to match external environmental costs with the financial costs imposed on players.*

22. In certain Member States, local or regional energy efficiency project financing schemes, managed by energy efficiency companies, have proven very successful. Should this be extended? If so, how? (Section 5.1)

*This question is linked to question number 7. An exchange of experiences is always useful but it is not necessary that local original energy efficiency financial schemes are taken over by other authorities. Public money must be managed in a careful way.*

23. Should energy efficiency issues be more integrated in the Union’s relationships with third countries, especially its neighbours? If so, how? How can energy efficiency become a key part of the integration of regional markets? Is it necessary to encourage the international financial institutions to pay more attention to demand management issues in their technical and

financial assistance to third countries? If so, what could be the most effective mechanisms or investments? (Section 6)

*UNICE has no particular view to offer on this issue.*

24. How could advances in energy efficiency technology and processes in Europe be put to effective use in developing countries? (Section 6.3)

*Information and technology transfer should become a major part of the overall climate change policy. UNICE has commented on this issue in particular in its Opinion (18.10.2005) on the Clean Development Mechanism (CDM).*

25. Should the Union negotiate tariff or non tariff advantages within the WTO for energy efficient products and encourage other members of WTO to do the same? (Section 6)

*UNICE calls for caution regarding the above policy line, which echoes similar ideas discussed on market access for environmental goods. UNICE has commented on these ideas in a letter to DG Trade dated 17 January 2005. A major concern lies with the difficulty of defining environmental goods, which can lead to different interpretations and attitudes vis-à-vis products at the border.*