



**DET KONGELIGE
MILJØVERNDEPARTEMENT**

Nærings- og handelsdepartementet
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Deres ref
201003921-2/PSN

Vår ref
201004956-/KIE

Dato

19 JAN 2011

Kommentarer til Europakommisjonens melding om det indre marked

Det vises til brev av 10. november 2010. Miljøverndepartementet mener at Europakommisjonens melding om det indre marked med sine 50 initiativ har betydning for EUs ambisjon om å utvikle en ressurseffektiv og grønn økonomi som beskrevet i Europa 2020-strategien. Mange av tiltakene har direkte og indirekte betydning for miljøtilstanden, og MD er positive til flere av tiltakene som Kommisjonen foreslår.

Vi har ikke kommentarer til meldingene om næringspolitikk og innovasjon i denne omgang. Det siste flaggskipet om ressurseffektivitet under Europe 2020 er ventet den 26. januar. Denne meldingen vil sannsynligvis berøre flere områder som er relevante for innovasjon og næringspolitikk, og vi vil se nærmere på dette når flaggskipet legges frem.

I tråd med EU-traktaten artikkel 3, som fastslår bærekraftig utvikling som et overordnet mål for EU som skal integreres på alle EUs politikkområder, er bærekraftig vekst, herunder bærekraftig bruk av naturressurser, en av de tre prioriteringene for Europa 2020-strategien. Flere av forslagene til tiltak er direkte rettet inn mot å bidra til en vekst som er bærekraftig, mens bidraget til en slik vekst for andre av forslagene vil avhenge av deres nærmere utforming.

Norge bør vektlegge betydningen av at forslagene innrettes på en bærekraftig måte., Økosystemtjenester og naturmangfoldets betydningen for næringsliv og økonomisk utvikling bør fremheves. Den globale studien "The Economics of Ecosystems and Biodiversity" (TEEB) vektlegger næringslivs rolle og ansvar, se rapport:

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<http://www.businessofbiodiversity.co.uk/docs/teebd3report.pdf>.

Under følger Miljøverndepartementets innspill til NHDs høringsbrev. Disse bygger bl.a. på tidligere innspill til Monti-rapporten og Europe 2020 strategien.

Innspill til høringsbrev - Public consultation on the Single Market Act

Introduction

Sustainable development is an overarching objective for the European Union which is to be integrated in all policy areas of the Union. Sustainable growth is a priority in the Europe 2020 Strategy.

It is an objective for the European Union to promote, both internally and internationally, a green and sustainable economy. A single market that contributes to fulfilling social and environmental objectives and supports the transition to a low-carbon and resource efficient economy, is important for creating sustainable paths to jobs and increased welfare. Providing such models for middle-income and developing countries' economic development is key to reaching global sustainability.

In accordance with this objective and priority, some of the proposals in the Communication "Towards a Single Market Act - For a highly competitive social market economy" aim at contributing to sustainable growth, such as for instance proposals 8, 10, 11, 16, 19, 27 and 38. However, the text in the first half of the paper, emphasizing harmonization and rationalization of standards, reduced transaction costs and access to international markets, does not adequately reflect the safeguards in the last part of the document where protecting consumers, health and environment as well as public participation is underlined. The contribution to this objective and priority of these and other proposals such as proposals 4, 6 and 23 will depend on how they are designed and implemented.

Norway would like to put forward comments to the following proposals:

Standardization (proposal 6)

Standardization must be based upon the aim of the European Union of a high level of protection and improvement of the quality of the environment, and contribute to securing citizens high-quality goods and services that are not harmful to health and the environment

Ecological footprint on products (proposals 10)

The text introducing proposal 10 points out that companies face higher costs marketing in countries that set environment standards for the entire product life-cycle, but does not mention that countries without such regulations contribute to less environmental safety.

A new strategy for the new single market should include references to resource efficiency in general and an understanding of the economic value of ecosystem services in particular. The Economics of Ecosystems and Biodiversity (TEEB) study gives us new tools to enhance coherence between economic and environmental policies. With EUs strong initiative and support for this work, it should also be referred to when exploiting the potential of the single market to develop a resource efficient economy. Following up on the Convention of Biological Diversity CoP-9 decision IX/26 on promoting business engagement, Norway recognizes the importance of involving the private sector in biodiversity protection and has decided to set up an initiative to engage and encourage the private sector to integrate biodiversity concerns into their core activities and corporate strategies including decision-making processes. The initiative objective is to raise biodiversity awareness and support a process towards a more responsible corporate behavior through showcasing best practice examples and holding workshops.

Greener public procurement (proposal 17)

It is important to promote the development and accelerate the market uptake of eco-innovations. Greener public procurement would stimulate more energy-efficient products and services, as well as less use of hazardous substances and reduced loss of biodiversity.

Norway agrees that EU rules should allow public procurement as a tool to achieve policy objectives related inter alia to climate change and energy efficiency, innovation or working conditions. However, many additional binding requirements designed to achieve such broader policy goals may lead to more challenging procurement. Therefore, it is important to develop tools that make such procurement practices simpler and predictable.

International trade agreements (proposal 23)

According to the proposal the EU will pursue negotiations for international trade agreements on the basis of the twofold objective to promote regulatory convergence, including promoting equivalence of third-country regimes where possible, and to push for wider adoption of international standards. The proposal 23 does however not refer to

the level of protection on which standards should be based. As the EU has stated in its Trade Policy Strategy "Trade, Growth and World Affairs", we believe that also international trade agreements should contribute to green growth and thus a sustainable development. Regulatory convergence and international standards should therefore be based upon a high level of protection which should be continuously improved.

Green Paper on Corporate Governance (proposal 38)

We fully support the need for businesses to demonstrate the utmost responsibility towards not only their employees and their shareholders but also towards society at large. We also support the need to focus on improving transparency, particularly in the areas of human rights and sustainable development, in order to strengthen corporate governance and corporate social – and even societal – responsibility. The Norwegian Government therefore presented a Report to the Parliament on Corporate Social Responsibility in a global economy in January 2009¹. The report set out the aims, ambitions and expectations of the Government in this area. It was based on the premise that Norwegian companies should be among the best at practicing Corporate Social Responsibility, thereby helping to strengthen the status of human rights, create decent working conditions, protect the environment and combat corruption. It defined three key areas for action; exercising social responsibility in the Government's own activities, conveying society's expectations to Norwegian companies, and developing and influencing the framework for CSR, both nationally and internationally. Norway therefore appreciates that the European Union also focus on Corporate Governance/Corporate Social Responsibility and we are interested in cooperating closely with the European Union in their development of initiatives in this area.

Product safety (proposal 39)

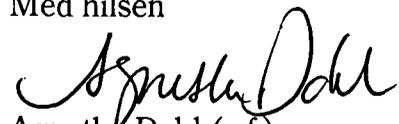
European regulations that are based on a high level of protection of human health and the environment is the best way to avoid differing standards in this regard and to promote a Common European policy on Product Safety. Strengthened market surveillance and a revision of the Product Safety Directive may indeed contribute to better protection of health and the environment throughout the EU. In addition, a strong and efficient chemicals regulation, in particular the REACH regulation and the RoHS Directive, regulate the chemical safety of products and are similarly necessary for the protection of human health and the environment at European level. This could be highlighted in the Communication.

¹ The Report in English:
http://www.regjeringen.no/pages/2203320/PDFS/STM200820090010000EN_PDFS.pdf

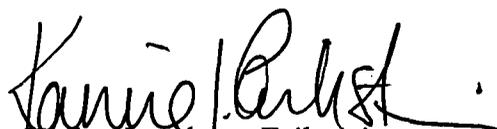
Interaction with civil society (proposal 48)

Norway supports the Commission's suggestion to increase the consultation and dialogue with civil society in the preparation and implementation of texts, as such interaction enhances the quality and support for the texts

Med hilsen



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