



## Deliverable 3.1

Participation experience of the process industry in the EU legislative and regulatory process


**Project HARMONI** “Harmonised assessment of regulatory bottlenecks and standardisation needs for the process industry”

Grant agreement: 768755

From August 2017 to October 2019

Prepared by: Cefic

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	<b>Document:</b>	D3.1. Participation experience of the process industry in the EU legislative and regulatory process		
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	<b>Document:</b>	D3.1. Participation experience of the process industry in the EU legislative and regulatory process		
	<b>Author:</b>	Cefic	<b>Version:</b>	1
	<b>Reference:</b>	HARMONI (768755)_D3.1	<b>Date:</b>	30/07/2018

## ABBREVIATIONS

**REFIT:** Regulatory Fitness and Performance

## PARTNERS SHORT NAMES

**CIRCE:** Fundación CIRCE – Centro de Investigación de Recursos y Consumos Energéticos

**CEFIC:** Conseil Européen de l'Industrie Chimique

**CEMBUREAU:** Association Européenne du Ciment

**A.SPIRE:** SPIRE

**DIN:** DIN DEUTSCHES INSTITUT FUER NORMUNG E.V.


**ECREF:** EUROPEAN CENTRE FOR REFRACTORIES gGMBH

**ECREF / FGF:** Forschungsgemeinschaft Feuerfest e.V.

**ECREF / VDFFI:** German Refractory Association

**ESTEP:** European Steel Technology Platform

**FEHS:** INSTITUT FUR BAUSTOFF-FORSCHUNG EV

	<b>Document:</b>	D3.1. Participation experience of the process industry in the EU legislative and regulatory process		
	<b>Author:</b>	Cefic	<b>Version:</b>	1
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## PUBLISHABLE SUMMARY

This report aims at analysing the current participation of the process industry in the EU legislative and regulatory process, by mapping the formal opportunities provided by EU institutions in the policy cycle and synthesising the experience of SPIRE Associations.

The report finds that most of the formalised consultation channels are organised by the Commission Services, both in the pre- and post- legislative phase. The European Parliament and the Council of the EU do not have such formalised consultation channels to collect stakeholder input on legislative proposals under negotiation.


The SPIRE Associations who took part into the HARMONI survey on participation in the legislative process confirmed that they participate to EU decision-making across the policy-cycle, both at pre-legislative and at implementation stage. In the area of innovation, the Associations seek regulatory levers in terms of both funding, regulatory incentives and removal of regulatory barriers.

The Associations find that the Commission's roadmaps and public consultations are good tools for transparency, but could be more effective to trigger effective contributions. Yet, where Associations have not been entirely satisfied with the regulatory outcome of the legislative process, the reasons identified are often unrelated to the availability of participation channels.

The main challenges reported by the Associations to engage with policy-makers to address regulatory barriers to innovation are as follows.


First, at pre-legislative stage, the Associations find that the Commission does not always integrate innovation priorities in project legislation (cf. 'innovation mainstreaming'). The Associations also encounter difficulties to proactively engage on regulatory barriers to innovation at that stage, due to timing issues but also difficulties to assess the cause and scale of problems reported to them.

Second, during the legislative process, the Associations reported challenges of a more political nature. When Associations detect regulatory barriers to innovation in long-standing cross-sectorial legislation, it will be all the more difficult to find political support for legislative change. This is because horizontal legislation intends to regulate the entire economy, and changing its provisions may have unintended effects. The Associations also perceive that innovation may not be among the top priorities of politicians in the negotiating process.

	<b>Document:</b>	D3.1. Participation experience of the process industry in the EU legislative and regulatory process		
	<b>Author:</b>	Cefic	<b>Version:</b>	1
	<b>Reference:</b>	HARMONI (768755)_D3.1	<b>Date:</b>	30/07/2018

## TABLE OF CONTENTS

<b>1</b>	<b>Introduction.....</b>	<b>6</b>
<b>2</b>	<b>General framework for Participation .....</b>	<b>6</b>
2.1	When new legislation is being developed .....	6
2.2	When EU legislation is being implemented .....	8
<b>3</b>	<b>Public participation experience .....</b>	<b>9</b>
3.1	Participation practices .....	9
3.1.1	Presence at all stages of the EU policy cycle .....	9
3.1.2	Procedure for defining Sector contributions.....	9
3.1.3	Participation in the area of Innovation .....	9
3.2	General appraisal of participation framework .....	10
3.2.1	Formal participation channels guarantee openness but not effectiveness.....	10
3.2.2	Importance of participation opportunities in the implementation phase.....	11
3.3	Main challenges experienced .....	11
3.3.1	At pre-legislative stage .....	11
3.3.2	During the legislative process .....	13
3.3.3	At implementation stage.....	14
<b>4</b>	<b>Conclusion .....</b>	<b>14</b>
<b>5</b>	<b>Annex .....</b>	<b>15</b>
5.1	Consultation template .....	15
5.2	Overview of Association procedures for defining Sector contributions to the EU legislative process.....	22

	<b>Document:</b>	D3.1. Participation experience of the process industry in the EU legislative and regulatory process		
	<b>Author:</b>	Cefic	<b>Version:</b>	1
	<b>Reference:</b>	HARMONI (768755)_D3.1	<b>Date:</b>	30/07/2018

## 1 INTRODUCTION

This report aims at analysing the current participation of the process industry in the EU legislative and regulatory process and respond to the following questions:

- how do associations prepare their contribution to the legislative process?
- what are the opportunities offered by the EU institutions to provide input?
- do these opportunities ensure effective participation?
- has participation achieved a positive outcome? if not why?

To respond to these questions, Cefic designed a questionnaire (cf Annex 5.1.) to collect input from the SPIRE associations involved in the HARMONI project, as well as two research and technology organisations (ceramic and steel).

Cefic circulated the questionnaire in April 2018 and received contributions from CEMBUREAU, CERAME UNIE (via ECREF), EUROFER and EUROSILAGS (via ESTEP), and Cefic (hereinafter, '**the Associations**'). Follow up interviews took place in May and June 2018, to deepen and clarify responses received. Contributions are synthesised in Section 3 below.


The main conclusions from this report will be the starting point for further work under deliverable D3.3, which aims essentially to define suggestions to improve participation of the process industry in the EU legislative and regulatory process. The report also informs the analysis under deliverable D3.2., as regulatory barriers may also be inherent to the legislative process and the way EU institutions interact with the public.

## 2 GENERAL FRAMEWORK FOR PARTICIPATION

### 2.1 When new legislation is being developed

In the areas of environment, energy and climate change, the EU legislators generally adopt new legislative acts according to the ordinary legislative procedure: the European Parliament and the Council of the EU adopt the EU piece of legislation based on a legislative proposal submitted by the European Commission, who retains the right of initiative.

In this context, most of the formalised consultation channels are organised by the Commission Services before the College of Commissioners adopts the legislative proposal and notify it to the European Parliament and the Council.

	<b>Document:</b>	D3.1. Participation experience of the process industry in the EU legislative and regulatory process		
	<b>Author:</b>	Cefic	<b>Version:</b>	1
	<b>Reference:</b>	HARMONI (768755)_D3.1	<b>Date:</b>	30/07/2018

Such consultations are required under the Commission's own Better Regulation Guidelines, of May 2015. According to the Better Regulation Guidelines, Commission Services preparing a legislative initiative must<sup>1</sup>:

- I. publish an Inception Impact Assessment, on which stakeholders may provide feedback during a period of 4 weeks
- II. carry out an internet-based public consultation of minimum 12 weeks
- III. gather feedback on the legislative proposal submitted to the Parliament and Council and the accompanying impact assessment during 8 weeks

All such steps must be reflected in a consultation strategy, as pictured in the below figure, extracted from the Commission Better Regulation Guidelines on Stakeholder Consultation.

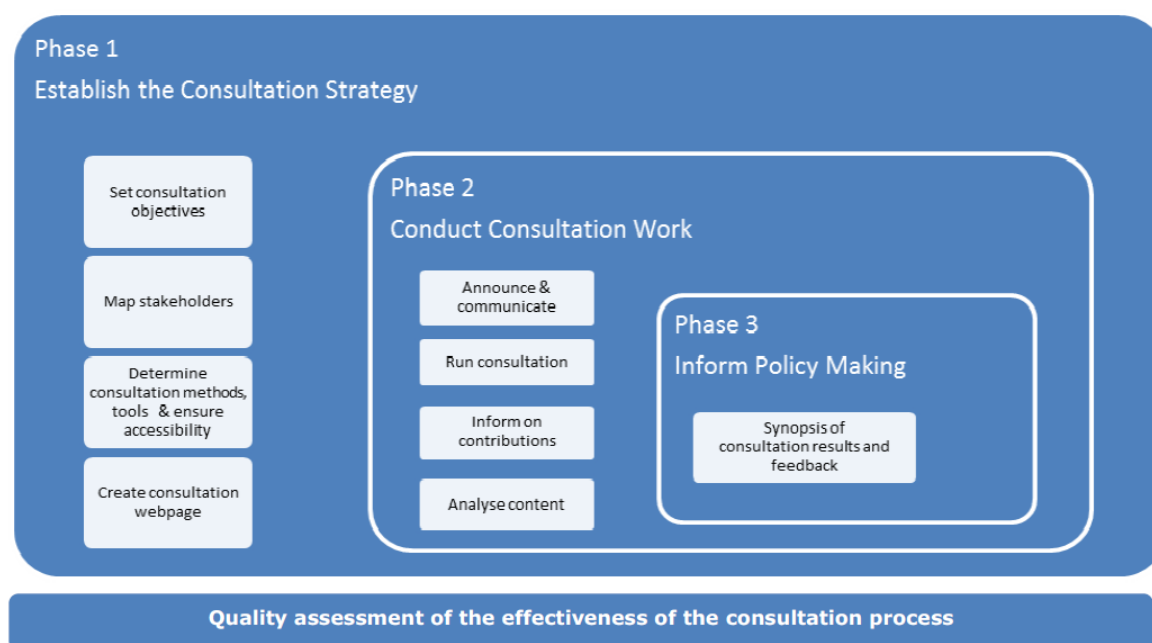



Figure 1: The interacting phases and key steps of the consultation process, Commission Better Regulation Guidelines on Stakeholder Consultation, 2017

Commission Services will normally include a synopsis report outlining the overall results of the consultation work and providing feedback to stakeholders on the consultation website and in the impact assessment accompanying the legislative proposal. The report should include a summary of the feedback received as well as other relevant input received in parallel to the formal consultation work<sup>2</sup>.

<sup>1</sup> Better Regulation Guidelines, Chapter VII, accessible online: <https://ec.europa.eu/info/sites/info/files/better-regulation-guidelines.pdf>

<sup>2</sup> Better Regulation Toolbox, Tool 55, accessible online: [https://ec.europa.eu/info/files/better-regulation-toolbox-55\\_en](https://ec.europa.eu/info/files/better-regulation-toolbox-55_en)

	<b>Document:</b>	D3.1. Participation experience of the process industry in the EU legislative and regulatory process		
	<b>Author:</b>	Cefic	<b>Version:</b>	1
	<b>Reference:</b>	HARMONI (768755)_D3.1	<b>Date:</b>	30/07/2018

The European Parliament and the Council of the EU do not have such formalised consultation channels to collect stakeholder input on legislative proposals under negotiation. However, stakeholders may approach these two institutions during the legislative procedure.

## 2.2 When EU legislation is being implemented

As Guardian of the Treaties, the European Commission has the obligation to monitor the application of EU law. Commission Services normally review the application of existing pieces of legislation every 5 years, either because the specific piece of legislation requires it ('review clause') or voluntarily on its own initiative, by planning a REFIT evaluation or a Fitness Check under the REFIT Programme.

A REFIT Evaluation is an evidence-based judgment of the extent to which an EU intervention (i.e. single piece of legislation) is effective, efficient, relevant, coherent and of EU added value.

A fitness check is an evaluation of a group of interventions which have some relationship with each other justifying a joint analysis.

In this context, Commission Services must seek Stakeholders' input via:

- I. publication of an Evaluation Roadmap on which stakeholders can post feedback during 4 weeks
- II. an internet-based public consultation of minimum 12 weeks


Another channel to involve stakeholders at implementation stage of EU legislation is through Commission expert groups (e.g. IED Article 13 Forum, High Level Group of Energy Intensive Industries). Expert groups are consultative bodies set up by the Commission to provide advice and expertise in a particular context (e.g. preparation of delegated legislation). Commission expert groups are registered in an online publicly accessible database<sup>3</sup>. Their creation and operation are subject to horizontal rules<sup>4</sup>.

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<sup>3</sup> <http://ec.europa.eu/transparency/regexpert/index.cfm?do=faq.faq&aide=2>

<sup>4</sup> Commission Decision of 30.5.2016 establishing horizontal rules on the creation and operation of Commission expert groups.



	<b>Document:</b>	D3.1. Participation experience of the process industry in the EU legislative and regulatory process		
	<b>Author:</b>	Cefic	<b>Version:</b>	1
	<b>Reference:</b>	HARMONI (768755)_D3.1	<b>Date:</b>	30/07/2018

## 3 PUBLIC PARTICIPATION EXPERIENCE

### 3.1 Participation practices

#### 3.1.1 Presence at all stages of the EU policy cycle

The Associations confirmed that they participate to EU decision-making across the policy-cycle, both at pre-legislative and at implementation stage, via different consultation channels described under Section 2.

The Associations highlighted that participation is resource-intensive: it requires time and expertise.

Hence, in view of the broad scope of EU action, prioritisation and focus is important. Some Associations have an early warning system screening new developments to involve their Members in priority setting and analysis.

#### 3.1.2 Procedure for defining Sector contributions

All Associations have working structures and procedures in place to define a common position of its Members, which will be the basis for any contribution in the EU legislative and regulatory process<sup>5</sup>.

These structures and procedures vary depending on each Association's statutes, by-laws and operating rules.

In general, the Associations' common positions are defined at technical level, via specific working groups responsible for a specific policy area, and subsequently endorsed at strategic level, e.g. by the Association Board or Steering Committee.

Some Associations have lighter procedures, which do not require a formal endorsement at strategic level in case of consensus at technical level, or in case the draft position is consistent with a high level strategy defined upfront. These lighter procedures have the advantage to allow faster responses in case of sudden change of context, as can happen in the legislative process.


Others have chosen for more checks to be carried out prior to a position becoming official and public. Such procedures are usually justified by the need for quality, coherence and to avoid that the position is challenged by its membership after it becomes public.

#### 3.1.3 Participation in the area of Innovation

All Associations have channels to contribute to EU institutions in the area of research and innovation, via A.SPIRE and sector specific platforms (cf. the European Cement Research Academy (ECRA), the

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<sup>5</sup> An overview of the procedure followed by each Association is provided under Annex 5.2.

	<b>Document:</b>	D3.1. Participation experience of the process industry in the EU legislative and regulatory process		
	<b>Author:</b>	Cefic	<b>Version:</b>	1
	<b>Reference:</b>	HARMONI (768755)_D3.1	<b>Date:</b>	30/07/2018

European Technology Platform for Sustainable Chemistry (SusChem), the European Steel Technology Platform (ESTEP) and the European Center for Refractories (ECREF)).

Based on the activities carried out in these fora, the Associations have identified key innovation areas and technologies that would contribute to the circular economy and sustainability agenda at sector level and for which they seek regulatory levers.

The Associations seek regulatory levers in terms of both funding, regulatory incentives and removal of regulatory barriers. Their participation in the legislative process intends to address such levers, alongside other impacts.

## 3.2 General appraisal of participation framework


### 3.2.1 Formal participation channels guarantee openness but not effectiveness

The European Commission has established a system of formal participation opportunities under the better regulation guidelines, enabling all stakeholders to be aware of the policy work it undertakes at an early stage.

The Commission's roadmaps and public consultations are good tools to alert and trigger a discussion inside the Associations.

However, the Associations consider that these formal channels (cf. questionnaire-based online public consultation; inception impact assessment; roadmap) could be more effective to trigger substantive and meaningful contributions. This is because:

1. The format of public consultations sometimes call more for confirmation of assumptions (questions 'leading' to certain responses), rather than a call for new thoughts or solutions. This infers that the Commission's intention in terms of policy change is already clear at the stage where the consultation is launched, raising doubts on the usefulness of this step.
2. The Associations sometimes lack feedback from the Commission Services to the contributions provided in the formal participation channels before the legislative proposal is adopted. Some Associations feel this prevents a meaningful discussion. In some cases (e.g. waste framework directive review), several years pass between the public consultations and publication of the synopsis report.
3. The Commission does not make the draft impact assessment report available for discussion prior to formal adoption of the legislative proposal by the college of commissioners. Making this document available would help to provide more evidence-focused contributions from the Associations. The inception impact assessments do not provide sufficient details to provide input.

	<b>Document:</b>	D3.1. Participation experience of the process industry in the EU legislative and regulatory process		
	<b>Author:</b>	Cefic	<b>Version:</b>	1
	<b>Reference:</b>	HARMONI (768755)_D3.1	<b>Date:</b>	30/07/2018

### 3.2.2 Importance of participation opportunities in the implementation phase

The Associations consider participation in the implementation/evaluation phase of EU legislation as important as participation in the preparation phase of new legislation.

This is because the Commission will generally have less political pressure and more time to exchange with stakeholders on positive and negative aspects of the existing framework, but also because implementation details are often as decisive for innovation that the essential elements of the policy framework (cf. ETS Innovation Fund; End-of-Waste criteria).

In this respect, the Associations identified a number of good practices and trends, such as:

- The increased Commission public consultations in the context of policy evaluation and fitness checks, which provide an opportunity to identify unforeseen effects of existing legislation or problems that remain unaddressed.
- Targeted exchanges in the context of Expert Group meetings and implementation of existing legislation.

Yet, where Associations have not been entirely satisfied with the regulatory outcome of the legislative process, the reasons identified are often unrelated to the availability of participation channels. There are thus other challenges in the way of effective participation.

## 3.3 Main challenges experienced

### 3.3.1 At pre-legislative stage

#### *Innovation mainstreaming and coordination in Commission legislative proposals.*


The Associations would like innovation to be mainstreamed in all EU legislative initiatives and a better coordination to be ensured between different funding instruments.

-with regard to funding:

For a long time, the EU ETS did not have a solid innovation pillar to accompany companies from the process industry under duty to reduce greenhouse gas emissions. With the 2018 legislative reform<sup>6</sup>, the ETS Directive now has a legal basis to use emission allowances to provide financial support to accelerate large scale demonstration and deployment of both Carbon Capture and Storage (CCS) and Carbon Capture and Utilisation (CCU) facilities, new renewable energy technologies and

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<sup>6</sup> [EU Directive 2018/410 of 14 March 2018 amending Directive 2003/87/EC to enhance cost-effective emission reductions and low-carbon investments, and Decision \(EU\) 2015/1814](#)

	<b>Document:</b>	D3.1. Participation experience of the process industry in the EU legislative and regulatory process		
	<b>Author:</b>	Cefic	<b>Version:</b>	1
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industrial innovation in low-carbon technologies and processes for CO<sub>2</sub> stored or avoided on a sufficient scale.

The Associations welcome those developments. In fact, the effectiveness and positive impact of the Innovation Fund in the sectors represented by the Associations will depend on the implementation details to be worked out through the yet to be adopted delegated legislation on the ETS Innovation Fund operating rules.

On a more general level, the Associations face a lack of coordination and foreseeability. While the process industry welcomes the focus on low carbon technology funding in the Innovation Fund created under the EU ETS Directive as revised, for instance, it is still unclear how this funding relates to funding under the Horizon 2020 program for similar projects or how it can be combined with national funding.

The Commission has recently launched an initiative on identifying Important Projects of Common European Interest, which finds its origins in the application of state aid rules for such projects, but it is unclear what will be the consequences of priority areas /value chains selected (or not selected) under this exercise in relation to funding. Hence, bringing a project to the Boards of companies often brings uncertainties as to sources and level of funding and timing for the different funding applications. A one-stop-shop approach for funding that helps companies meet the obligations imposed by the ambitious targets that Europe has set in the area of climate change and environment, may be a useful step.

-with regard to regulatory incentives:

Despite the InnovREFIT initiative<sup>[1]</sup>, the systemic integration of the Commission's innovation priorities in the design of planned legislative initiatives remains a challenge.

Although access to funding is essential to accelerate the development of demonstration projects in Europe, it is not sufficient to achieve the ambitious EU targets in areas such as climate, circular economy, and growth.


This approach to financial risk-sharing needs to be complemented by a coherent policy framework - based on appropriate indicators and evaluation methodology – supporting effectively the deployment of (low-carbon and circular) technologies in Europe.

While CCU is covered by the scope of the ETS Innovation Fund, the ETS regulatory system does not foresee a clear mechanism enabling companies investing in CCU not to surrender CO<sub>2</sub> emissions that have been avoided. Such mechanism expected to be developed under the upcoming revision of the ETS Monitoring and Reporting Regulation would be an important incentive for the market deployment of these technologies.

***Difficulty for the Associations to engage proactively on regulatory barriers to innovation.***

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<sup>[1]</sup> [https://ec.europa.eu/research/innovation-union/pdf/innovrefit\\_staff\\_working\\_document.pdf](https://ec.europa.eu/research/innovation-union/pdf/innovrefit_staff_working_document.pdf)

	<b>Document:</b>	D3.1. Participation experience of the process industry in the EU legislative and regulatory process		
	<b>Author:</b>	Cefic	<b>Version:</b>	1
	<b>Reference:</b>	HARMONI (768755)_D3.1	<b>Date:</b>	30/07/2018

When the formal consultation procedures are launched, the Commission will usually already have defined the problem and preferred policy option to propose to the co-legislator. Hence it will be difficult to bring in additional aspects of the problem to be addressed at that (late) stage requiring a change of policy.

In addition, identifying precisely the cause of bottlenecks to innovation and anticipating how regulation will affect innovation activities is not straightforward. When a member company or federation reports a barrier, the Association will try to first identify the cause of the problem and estimate its scale. If the origin is regulatory, it may relate to EU legislation but also to the transposing national legislation and the specific way it is implemented at the local level. This is a difficult exercise, making the identification of the optimal policy option more challenging.

Associations struggle to take a proactive approach for addressing regulatory barriers to innovation, due to limited advocacy resources, the need to take account of the policy cycle, and the difficulty to convince companies to allocate resources without a clear political agenda on the side of authorities.

### 3.3.2 During the legislative process

#### *Challenges linked to transversal nature of energy and environmental legislation*

When Associations detect regulatory barriers to innovation in long-standing cross-sectorial legislation, such as legislation on industrial emissions, on waste or on water, it will be all the more difficult to find political support for legislative change. This is because horizontal legislation intends to regulate the entire economy, and changing its provisions will have effects on many sectors.


It is therefore extremely challenging to convince policy-makers to change the law (e.g. energy efficiency targets design; by-product criteria under waste legislation) to support sustainable solutions in a specific industrial sector.

This problem is illustrated by the experience of Cefic, EUROFER and CEMBUREAU in the context of the legislative revision of the Waste Framework Directive, initiated in 2015. Cefic and EUROFER had specific proposals concerning the scope of the by-product concept, to facilitate further use of co-generated materials. CEMBUREAU proposed to incentivize material recycle of minerals by having it count towards national recycling targets. In most cases, the Associations did not achieve the desired legislative change but a commitment to have such options considered in the future or through harmonized implementation.

#### *Limited possibility to introduce changes not foreseen in the Commission proposal*

Once the Commission adopts the legislative initiative, it is up for the Parliament and the Council to agree on the text. As a rule, the ability for non-institutional stakeholders to suggest changes to the text reduces as the text progresses through the different readings.

The Associations also perceive that innovation in specific sectors is not a political priority for the co-legislator. For instance, in the latest legislative revision of the ETS Directive, the Innovation Fund was not a real topic for discussion between the Parliament and the Council, as the discussion focused on other - more contentious - political priorities.

	<b>Document:</b>	D3.1. Participation experience of the process industry in the EU legislative and regulatory process		
	<b>Author:</b>	Cefic	<b>Version:</b>	1
	<b>Reference:</b>	HARMONI (768755)_D3.1	<b>Date:</b>	30/07/2018

Hence, as the file progresses through the legislative procedure, Associations often find themselves obliged to focus on other issues, especially if the envisaged amendments raise more fundamental competitiveness concerns.


### 3.3.3 At implementation stage

One challenge reported with regard to Commission expert groups concerns the eligibility to participate. While the Associations are welcome to participate in expert groups dealing with certain issues (e.g. energy efficiency, CO2 emission reduction from our production etc), it is difficult to participate in expert groups addressing areas where the sectors represented by the Associations can offer solutions (e.g. energy storage, energy efficiency in other sectors).

## 4 CONCLUSION


The consultation of the Associations and analysis of participation experience have evidenced the following main conclusions:

- All Associations participate in the EU legislative and regulatory process, both a pre-legislative and implementation stage. This is done via the preparation and internal endorsement of common positions agreed by the membership, usually by consensus.
- The formal consultation and feedback opportunities provided under the European Commission's better regulation guidelines ensure transparency over the legislative initiatives being undertaken. Such opportunities could be improved to enable more effective participation and support innovation mainstreaming in legislative initiatives.
- Key challenges to successfully engage with policy-makers to address regulatory barriers to innovation can be synthesised as follows:
  - (i) lack of innovation mainstreaming in legislative proposals
  - (ii) difficulty to identify precisely the regulatory mechanism causing the problem;
  - (iii) constraints linked to the policy cycle and the legislative procedure (cf. timing issues; limitations of formal public consultations); and
  - (iv) political challenges (e.g. where the aim is to achieve legislative change in long-standing cross-sectorial pieces of legislation; priorities of institutional stakeholders).

	<b>Document:</b>	D3.1. Participation experience of the process industry in the EU legislative and regulatory process		
	<b>Author:</b>	Cefic	<b>Version:</b>	1
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## 5 ANNEX

### 5.1 Consultation template

	<b>Document:</b>	D3.1. Participation experience of the process industry in the EU legislative and regulatory process	
	<b>Author:</b>	Cefic	<b>Version:</b> 1
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## QUESTIONNAIRE TO SPIRE ASSOCIATIONS Task 3.1 (WP3)

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## TABLE OF CONTENTS

1	Introduction.....	3
2	Association internal process and overall experience with EU regulatory/legislative processes.....	3
	<i>Q1. Please describe the internal process of your Association to define the position/input provided to policy-makers in the context of the EU regulatory/legislative process. ....</i>	3
	<i>Q2. Does your Association have appropriate channels to provide input to EU institutions when deciding on regulatory initiatives that matter for innovation? .....</i>	3
	<i>Q3. In your opinion, what are the main factors preventing effective participation in the regulatory/legislative Process (to support Innovation)? .....</i>	3
	<i>Q4. What could EU Institutions and Sector Associations do to foster better participation in the regulatory/legislative Process (to support Innovation)? .....</i>	4
	<i>Q5. In the past, what has helped your Association achieve a positive regulatory outcome for innovation? Please provide an example. ....</i>	4
3	Experience in Specific Areas.....	4
3.1	EU Emissions Trading System Reform 2015-2018 .....	4
	<i>Q6. What were the key asks/demands from your Association to uphold innovation? .....</i>	4
	<i>Q7. Have these asks/demands to uphold innovation been met by policy-makers? If not, can you explain why? ....</i>	4
	<i>Q8. Did your Association experience problems with the public participation channels organised by policy-makers, e.g. in terms of timing, format, questions? .....</i>	4
	<i>Q9. What factors helped your Association achieve a positive impact (for innovation)? .....</i>	4
	<i>Q10. What could have been done to achieve a better impact (for innovation)? .....</i>	5
3.2	Clean Energy Package 2015-2018.....	5
	<i>Q11. What were the key asks/demands from your Association to uphold innovation? .....</i>	5
	<i>Q12. Have these asks/demands to uphold innovation been met by policy-makers? If not, can you explain why? ..</i>	5
	<i>Q13. Did your Association experience problems with the public participation channels organised by policy-makers, e.g. in terms of timing, format, questions? .....</i>	5
	<i>Q14. What factors helped your Association achieve a positive impact (for innovation)? .....</i>	5
	<i>Q15. What could have been done to achieve a better impact (for innovation)? .....</i>	5
3.3	Waste Framework Directive Revision 2015-2018.....	6
	<i>Q16. What were the key asks/demands from your Association to uphold innovation? .....</i>	6
	<i>Q17. Have these asks/demands to uphold innovation been met by policy-makers? If not, can you explain why? ..</i>	6
	<i>Q18. Did your Association experience problems with the public participation channels organised by policy-makers, e.g. in terms of timing, format, questions? .....</i>	6
	<i>Q19. What factors helped your Association achieve a positive impact (for innovation)? .....</i>	6
	<i>Q20. What could have been done to achieve a better impact (for innovation)? .....</i>	6

	<b>Document:</b>	D3.1. Participation experience of the process industry in the EU legislative and regulatory process		
	<b>Author:</b>	Cefic	<b>Version:</b>	1
	<b>Reference:</b>	HARMONI (768755)_D3.1	<b>Date:</b>	30/07/2018

## 1 INTRODUCTION

Cefic prepared the below questionnaire to collect the feedback of SPIRE Associations under Task 3.1.

Please return the filled in questionnaire to Liesbeth Timmermans ([lti@cefic.be](mailto:lti@cefic.be)) by 23/03/2018 COB.

Task 3.1. requires analysing the current participation of the process industry in the EU legislative and regulatory process and respond to the following questions, based on the experience on a number of specific cases identified in WP2:

- how do associations prepare their contribution to the legislative process?
- what are the opportunities offered by the EU institutions to provide input?
- do these opportunities ensure effective participation?
- has participation achieved a positive outcome? if not why?

Section 2 aims at collecting the SPIRE associations's overall experience when participating to EU regulatory/legislative processes. Section 3 will collect experience in the context of 3 recent specific legislative revisions, closely related to the 9 problematic areas identified in the Commission call:

- EU Emissions Trading System Reform 2015-2018
- Clean Energy Package 2015-2018
- Waste Framework Directive Revision 2015-2018

## 2 ASSOCIATION INTERNAL PROCESS AND OVERALL EXPERIENCE WITH EU REGULATORY/LEGISLATIVE PROCESSES

*Q1. Please describe the internal process of your Association to define the position/input provided to policy-makers in the context of the EU regulatory/legislative process.*

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*Q2. Does your Association have appropriate channels to provide input to EU institutions when deciding on regulatory initiatives that matter for innovation?*

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*Q3. In your opinion, what are the main factors preventing effective participation in the regulatory/legislative Process (to support Innovation)?*

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	<b>Document:</b>	D3.1. Participation experience of the process industry in the EU legislative and regulatory process		
	<b>Author:</b>	Cefic	<b>Version:</b>	1
	<b>Reference:</b>	HARMONI (768755)_D3.1	<b>Date:</b>	30/07/2018

*Q4. What could EU Institutions and Sector Associations do to foster better participation in the regulatory/legislative Process (to support Innovation)?*

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.....

.....

*Q5. In the past, what has helped your Association achieve a positive regulatory outcome for innovation? Please provide an example.*

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.....

### 3 EXPERIENCE IN SPECIFIC AREAS

#### 3.1 EU Emissions Trading System Reform 2015-2018

*Q6. What were the key asks/demands from your Association to uphold innovation?*

.....

.....

.....

*Q7. Have these asks/demands to uphold innovation been met by policy-makers? If not, can you explain why?*

Key ask	Achieved/not Achieved	Reasons
[...]	[...]	[...]
[...]	[...]	[...]
[...]	[...]	[...]

*Q8. Did your Association experience problems with the public participation channels organised by policy-makers, e.g. in terms of timing, format, questions?*

.....

.....


.....

*Q9. What factors helped your Association achieve a positive impact (for innovation)?*

.....

.....

.....

	<b>Document:</b>	D3.1. Participation experience of the process industry in the EU legislative and regulatory process		
	<b>Author:</b>	Cefic	<b>Version:</b>	1
	<b>Reference:</b>	HARMONI (768755)_D3.1	<b>Date:</b>	30/07/2018

*Q10. What could have been done to achieve a better impact (for innovation)?*

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### 3.2 Clean Energy Package 2015-2018

*Q11. What were the key asks/demands from your Association to uphold innovation?*

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*Q12. Have these asks/demands to uphold innovation been met by policy-makers? If not, can you explain why?*

Key ask	Achieved/not Achieved	Reasons
[...]	[...]	[...]
[...]	[...]	[...]
[...]	[...]	[...]

*Q13. Did your Association experience problems with the public participation channels organised by policy-makers, e.g. in terms of timing, format, questions?*

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*Q14. What factors helped your Association achieve a positive impact (for innovation)?*

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*Q15. What could have been done to achieve a better impact (for innovation)?*

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	<b>Document:</b>	D3.1. Participation experience of the process industry in the EU legislative and regulatory process		
	<b>Author:</b>	Cefic	<b>Version:</b>	1
	<b>Reference:</b>	HARMONI (768755)_D3.1	<b>Date:</b>	30/07/2018

### 3.3 Waste Framework Directive Revision 2015-2018

*Q16. What were the key asks/demands from your Association to uphold innovation?*

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*Q17. Have these asks/demands to uphold innovation been met by policy-makers? If not, can you explain why?*

Key ask	Achieved/not Achieved	Reasons
[...]	[...]	[...]
[...]	[...]	[...]
[...]	[...]	[...]

*Q18. Did your Association experience problems with the public participation channels organised by policy-makers, e.g. in terms of timing, format, questions?*

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*Q19. What factors helped your Association achieve a positive impact (for innovation)?*

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*Q20. What could have been done to achieve a better impact (for innovation)?*

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## 5.2 Overview of Association procedures for defining Sector contributions to the EU legislative process

**Cefic.** The association's policy positions are developed in five Programme Councils (PC): the Climate Change & Energy PC; the HSE, Responsible Care & Supply Chain PC; the Industrial Policy PC; the Product Stewardship PC; and the Innovation PC<sup>7</sup>.

The internal process to develop a policy position is as follows. First, the Issue Team, i.e. a time-limited expert-led group in charge of a specific advocacy topic proposes a draft policy position through a series of exchanges and internal consultations. Second, the Legal Forum, the Sustainability Forum and the Advocacy Forum (all composed of Cefic Members) review the draft position and advise the Programme Council if the stance taken is politically feasible and achievable; legally sound; and fitting Cefic's sustainability strategy. Finally, the Programme Council approves the policy position by consensus. In the absence of consensus or if the Fora's advice is not followed, the Executive Committee takes the final decision.

**CEMBUREAU.** Once prioritised, regulatory initiatives are discussed in four Working Groups where representatives of national associations and companies meet four times per year. The four Working Groups cover Climate and Energy (WG A), Resources and Processes (WG B), Health & Safety (WG C) and Markets and Products (WG D)<sup>8</sup>.

On that basis a position is developed in the Steering Committee which is composed of the Co-Chairs (2 per Working Group) and Board Sponsor of each Working Group and is presided by the Vice President of the Association. The Steering Committee allows for a cross-Working Group input and discussion and prepares the Board meetings.

It is ultimately the Board that decides and approves final position papers. The Board and Steering Committee also meet four times a year.

**CERAME-UNIE.** Regulatory initiatives are discussed in six main working groups: the Environment Committee, the Climate & Energy Working Group, the Chemical Agents Working Group, the Trade Working Group, the BREF Task Force and the Research Working Group<sup>9</sup>.


Based on those discussions, it is the Chair of each group who will draft Cerame-Unie's position, with the support of the association's secretariat.

No formal approval is required at a higher level (Committee of Directors; or, even higher, the Board of Presidents), if a consensus is reached in the working group.

<sup>7</sup> <http://www.cefic.org/About-us/How-Cefic-is-organised/>

<sup>8</sup> [https://cembureau.eu/media/1485/cembureau\\_structure.pdf](https://cembureau.eu/media/1485/cembureau_structure.pdf)

<sup>9</sup> <http://cerameunie.eu/association/structure/>

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**EUROFER.** Regulatory initiatives are discussed in four main committees: Environment; Energy and Climate; International Affairs; and Specialty Steels<sup>10</sup>.

Based on the contributions of the committee participants, the association's secretariat drafts the sector's policy position.

If the position is approved by consensus at committee level, the Board is not involved in the endorsement process.

**EUROSLAGS.** Regulatory initiatives are discussed and policy positions developed in the association's expert groups, namely the expert group on Dangerous Substances and the expert group on Fertilizers, and in the Board of Directors.

The policy positions are formally endorsed by the General Assembly of the association.

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<sup>10</sup> <http://www.eurofer.be/About%20us/About%20EUROFER.fhtml>