



The Voice of Construction Crafts and SMEs in Europe

Mr. Marco MALACARNE
Head of Unit
SMEs : Clusters & emerging Industries
DG Enterprise
European Commission
B-1049 Brussels

Brussels, 6th December 2013

Re: Public Consultation on Green Action Plan for SMEs

Dear Mr. Malacarne,

The European Builders Confederation is the European umbrella organisation defending and promoting the interests of craftsmen and small and medium enterprises of the construction sector in Brussels. Through its national members, EBC represents 2 million micro, small and medium enterprises in Europe.

EBC was not able to reply to the questionnaire due to its format – questions not pertinent for a European organisation – and the fact that it was not adapted to the construction sector. Nevertheless, EBC would still like to briefly give its opinion on the most important points of the consultation for the construction sector.

The objective of the consultation is to enable SMEs to turn environmental challenges into business opportunities. EBC totally supports this objective but regrets that the consultation does not take into account the specificities of the construction sector. Indeed, in general contractors from the construction sector do not work in their workshop but on site, and most of the time use their workshop to keep their tools, equipment and machinery. Therefore, construction crafts and SMEs do not really perceive the necessity to perform an energy audit of their workshops. Moreover, there is very small room for improvement in energy saving during the construction phase of a project. If some energy savings can be made, it is upstream, for example in construction products manufacturing.

The real challenge lies in the buildings themselves during their use phase, and already many policy goals have been set and legal texts published by the European Commission during the last couple of years to tackle it.

One way of reducing the CO2 consumption of construction companies could be to reduce their journeys, but actually small construction enterprises only drive a very limited radius around their headquarters and workshops. However, at periodic intervals and when the construction works are completed, companies have to transport their waste. It is therefore important that landfills are accessible, and that workers do not have to drive too far to access them, especially for specific or hazardous waste.

If the objective of the Green Action Plan is really to help SMEs overcome the challenge of turning green, the Commission should treat SMEs as a family, i.e. willing to become greener but without the means, and especially without the financial means to do it.

Themes tackled by the consultation:

- **Support Services for Greening SMEs**

We believe that business organisations – especially at national and regional level – or chambers are trusted as they have been assisting SMEs for a long time and thus are well known by SMEs. They are a good channel to raise awareness, advice on funding possibilities, can inform about good and replicable practices and facilitate the cooperation between actors. To the best of our knowledge, construction crafts and SMEs do not use the services of the European Enterprise Network.

- **Access to finance**

Access to finance is a problem per se for SMEs. Due to a lack of knowledge of SMEs capacities private banks are reluctant to finance resource efficiency-related investments since they are perceived as non-profitable. In many instances, banks lack specialised staff to evaluate investments projects in resource efficiency for SMEs. The training of bank staff to objectively assess such investments is essential.

The Horizon 2020 programme, COSME and the Structural funds put the basis to greening the economy. The future challenge will be to ensure the priorities address SMEs concerns and are attainable by them. The implementation at national level of EU financing programmes should be closely monitored, to make sure the money is used and that SMEs can access that money.

- **Skills**

The consultation does not tackle the issue of skills which is crucial, especially in the construction sector. Construction enterprises are trying to face the new environmental and energy-related issues by becoming greener but the sector currently lacks skilled workers capable of meeting the energy efficiency challenges. Information and training plans must be developed so that construction crafts and SMEs are fully knowledgeable of the legislation, can carry out energy performance evaluation and advise the clients. Action should be taken at national level to quickly fine-tune diplomas in order to be adapted to these new needs. It is necessary to train more and better. In this sense, the Build Up Skills initiative is very promising.

We hope that these elements will be taken into account when reviewing the replies to the consultation,

Yours truly,

A handwritten signature in black ink, appearing to read 'Riccardo Viaggi', written in a cursive style.

Riccardo Viaggi
EBC Secretary General