



Response from the Danish Government to the public consultation on the Green Action Plan for SMEs

Denmark appreciates the opportunity to set forth our views on beneficial green support measures for SMEs as a source of inspiration for the Green Action Plan for SMEs.

Denmark recognizes the Small Business Act as a fundamental cornerstone for European SME policy and is supportive of ensuring an equally high level of implementation of the ten principles within the act across the Member States. This includes principle 9 regarding enabling SMEs to turn environmental challenges into opportunities. We find that a Green Action Plan for SMEs is a constructive step towards implementing this principle and ensuring the competitiveness of European SMEs in a global context.

Today and henceforth the industry is highly dependent on access to raw materials. However, the resources are scarce causing increased global prices on resources. This makes resource efficiency a significant factor for the competitiveness of SMEs.

In order to strengthen the resource efficiency among European SMEs an ambitious Green Action Plan is necessary. On these grounds, Denmark finds that the action plan should strive for a focus on the following measures.

- *Improve recycling of industrial waste*

Recycling is a crucial element when focusing on enhancing the resource efficiency for SMEs. It is important to ensure suitable framework conditions for exploring new ways of recycling as well as the right incentives for the industry to improve its recycling efforts. In that respect, Denmark emphasises a need for an ambitious European recycling strategy – especially regarding industrial waste. Furthermore, a recycling strategy should stress the need for increased upcycling of waste into new materials or products of better quality or of better environmental value.

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- *Industrial symbiosis*

When aiming at enhanced resource efficiency we need to challenge our regular mindsets. We need to think in new ways of exploiting our resources – including what is to be perceived as resources. Denmark highlights the need to focus on commercial cooperation between companies, where the excess resources such as energy, water or waste from one company can become a valuable input resource for another company. Industrial symbiosis is a way of ensuring increased competitiveness for all SMEs involved.

- *Greening value chains*

Focusing on green innovation across value chains holds a great potential for European economic growth and job creation, as well as addressing environmental challenges. SMEs often need support in establishing greener value chains, for instance in order to fully utilize and resell scrap and waste material. It is proposed that the Commission focuses on the potentials for resource optimization across the value chain.

- *Green business models*

Denmark urges the Commission to focus on creating awareness and supporting knowledge sharing between SMEs on the potentials within green business models, such as product-service system (also known as a function-oriented business model), Cradle-to-Cradle product innovation and take-back systems. Green business models can lower businesses' impact on the environment while being economically viable.

- *Green standardisation*

The single market is the driver of European growth and has brought benefits and new opportunities to European SMEs throughout more than 20 years. Lately, especially the European green industry has grown significantly – a development that is still ongoing. Denmark views the creation of a single market for green products by further development of green standards at EU level as a constructive way of enhancing growth in this sector.

Denmark is looking forward to the launch of the Green Action Plan for SMEs and to participating in the further discussions on this important subject.