

**European Commission's stakeholder survey**  
**Your views on enhancing competitiveness for EU enterprises**  
**FEM Reply**

**Drivers**

**Key drivers for competitiveness**

**According to you, which drivers will mostly influence the performance and growth of businesses in Europe in the coming 5 years?**

|  | Ranking <b>(3 drivers)</b> |
|--|----------------------------|
| a) Energy, raw materials, environment                                  | <b>2</b>                   |
| b) Innovation and technology   | <b>1</b>                   |
| c) Regulatory and administrative environment, including the tax system | <b>3</b>                   |

**Challenges**

**1- Innovation and technology**

**According to you, which challenges related to **Innovation and technology** will mostly impact the performance and growth of businesses in Europe in the coming 5 years?**

|   | Ranking<br><b>(max. 3)</b> |
|---|----------------------------|
| a) Translating research results and new technologies into new or improved products and services | <b>2</b>                   |
| b) Investment in equipment and production technology  | <b>1</b>                   |
| c) Market demand for innovative products and services   | <b>3</b>                   |

**Related policy actions**

**Please describe your first (and most important) suggestion for a policy action at European level related to this key driver. maximum of 500 characters**

R&D must support materials handling equipment manufacturers' innovation capacity to maintain their leadership worldwide. Overinvestment of R&D budgets in support of EU-only requirements (and which do not provide any advantage outside) represents an obstacle but also a clear a danger to competitiveness. This is all the more crucial since extra-EU exports of materials handling equipment are growing steadily and will soon reach 50% of the EU production value. This consideration must always be included in impact assessments.

## 2- Energy, raw materials, environment

According to you, which challenges related to **Energy, raw materials, environment** will mostly impact the performance and growth of businesses in Europe in the coming 5 years?

|  | Ranking<br>(max. 3) |
|--|---------------------|
| a) Cost of energy                                | 1                   |
| b) Cost of raw materials                         | 3                   |
| c) Costs to comply with environmental regulation | 2                   |

### Related policy actions

Please describe your first (and most important) suggestion for a policy action at European level related to this key driver. maximum of 500 characters

Investment in / use of more environmentally-friendly equipment should be encouraged. For instance, Directive 97/68 sets lower exhaust emission limits for non-road mobile machinery. Most harmful emissions now come from old machinery; yet there is no scheme encouraging users to switch to new equipment.

Please describe your second suggestion for a policy action at European level related to this key driver. maximum of 500 characters

In impact assessments, compliance costs should be systematically evaluated with a focus on those requirements (notably environment-related) that do not apply outside Europe. It is too often considered that complying companies will de facto have a competitive advantage on non-EU markets. When the requirements in questions are completely ignored on non-EU markets, EU companies actually suffer from a loss of competitiveness.

### 3- Regulatory and administrative environment

According to you, which challenges related to **Regulatory and administrative environment** will mostly impact the performance and growth of businesses in Europe in the coming 5 years?

|  | Ranking<br><b>(max. 3)</b> |
|--|----------------------------|
| a) Stability of overall regulatory framework for businesses                    | <b>1</b>                   |
| b) Enforcement of regulation   | <b>2</b>                   |
| c) Cumulative cost to comply with applicable regulations (EU, national, other) | <b>3</b>                   |

#### Related policy actions

Please describe your first (and most important) suggestion for a policy action at European level related to this key driver. maximum of 500 characters

A decent level of legal certainty is a prerequisite to companies' investment decisions. Hence the importance of giving companies "sufficient time before setting new regulatory requirements. Therefore, each Directive or Regulation should include a minimum duration before revision.

Please describe your second suggestion for a policy action at European level related to this key driver. maximum of 500 characters

In impact assessments, other requirements applying to the same product should be systematically taken into account. This is to avoid regulatory overshoot (e.g. 2 sets of requirements coming into force at the same time) or even technically contradictory requirements (e.g. noise reduction and exhaust emissions reduction for non-road mobile machinery)

Please describe your third suggestion for a policy action at European level related to this key driver. maximum of 500 characters

In impact assessments, actual compliance and efficiency of market surveillance should be evaluated to have a comprehensive overview of the legislation's effectiveness. If there is too much non-conformity, it should then be addressed rather than rushing into making new or more stringent requirements that will mostly affect genuine complying companies.

## Interaction with stakeholders

Would you prefer to have more interactions with the European Commission, in particular DG Enterprise and Industry, to represent the interests of your stakeholders?

a) **yes**

What are in your opinion the 3 most efficient ways for the European Commission, in particular DG Enterprise and Industry, to interact with its stakeholders?

(1= most efficient way, 2 = second most efficient way, 3 = third most efficient way)

|                       | Ranking (3) |
|-----------------------|-------------|
| Expert panels         | <b>3</b>    |
| High-level fora       | <b>2</b>    |
| Face-to-face meetings | <b>1</b>    |

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