

Jean-Yves Muylle
Head of Unit – Retail Financial Services
and consumer policy
DG MARKT
European Commission
B-1049 Brussels

20 September 2012

Dear Mr. Muylle,

Object: Misleading statements on the environmental benefits of e-procurement

Our associations are part of the print value chain, including paper manufacturers, paper converting, printing and mail.

Following the publication of the European Commission's Communication on a *Strategy for e-procurement* on 20 April 2012, we would like to express our views regarding the misleading nature of some statements. Please note that we have addressed similar concerns to DG Enterprise regarding the Communication on *Reaping the benefits of electronic invoicing for Europe* issued end of 2011.

We welcome the development of digital communication in which our industries are also users of electronic technology and we acknowledge that there are many potential economic benefits in terms of increased competitiveness, speed and availability of access. We however assert that there are also many good social, economic and environmental benefits for retaining the use of paper in a multi-channel communication, which complements the European Commission's Digital Agenda.

Consequently, it is important to ensure a balanced perspective on the specific topic of electronic procurement and the related issue of electronic invoicing.

In the Communication on a strategy for e-procurement of 20 April 2012, it is argued that "*E-procurement also delivers significant environmental benefits by reducing paper consumption and transport, as well as the need for costly archiving space with its attendant energy consumption.*"

The Communication should take into serious consideration the growing understanding of the considerable environmental impact of electronic media. It is increasingly acknowledged that electronic communication and in particular the energy requirements of the increasing worldwide network of servers which are necessary to store all the information needed for immediate access, has a significant and increasing environmental footprint. This is in contradiction with your claim that the environmental benefit of e-procurement lies in the reduction of "*the need for costly archiving space with its attendant energy consumption*".

Moreover the Communication directly links the reduction of the use of paper to environmental benefits. There are, to our knowledge, no scientific arguments supporting such statement. Print and paper is based on wood, a renewable and recyclable material, and you may be surprised to know that forests in Europe, where 95% of European-consumed paper is made, are 30% bigger than they were in 1950 and have increased in size by 1.5 million football pitches every year. Moreover paper recycling reaches a rate of 70% in Europe.

We therefore urge that such statements – which negatively affect the image of European print, paper and mail industries – should be only made when supported by scientific arguments.

Even more so as the competitiveness of the European economy relies on the prosperity of all its industrial sectors.



We consider that the development of e-media and print media are compatible and they rather complement each other. It is important to ensure a balanced perspective.

We therefore urge the European Commission to respect full neutrality and fair competition principles in future communication and thus refrain from issuing comparative environmental statements lacking scientific evidence.

We thank you for considering the above and remain at your entire disposal for further discussion on this issue.

Yours sincerely,


Teresa Presas
Managing Director
 confederation of
european paper industries




Dieter Weng
President
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Martyn Eustace
Director
 Print and Paper
have a great
environmental
story to tell
www.twosides.info

Copy to:

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- Michel Catinat, Head of Unit, ICT for Competitiveness and Industrial Innovation, DG Enterprise & Industry, EU Commission