

Federal Council for Sustainable Development (FRDO-CFDD)

Opinion on the federal plan product policy (summary)

The FCSD is fond of the publication of this project of federal plan. De council thinks this is an important initiative, but also thinks the text is not ambitious and concrete enough. The broad stakeholder dialogue that preceded this plan gives it an great chance for success. The government should rapidly approves the plan, so it can be implemented within the proposed time. This could be the beginning of an integral and integrated product policy on the federal level.

The council thinks it is positive that the project of plan has a implementation calendar and an evaluation process. The time for implementing actions, however, is little concrete. The council proposes to integrate a scheme for each of the 45 actions to indicate timing, responsables, means and participation of stakeholders. The council insists therefore on support by all actors.

The FCSD appreciates that the project of plan strives for an integral product policy (impact of a product from a life cycle perspective) and integrated product policy (besides environmental impacts also social, health and economical impact should be regarded. To fulfill these goals, a policy coordination in our country is necessary – horizontally (between policy areas) and vertically (between policy levels). The project of plan regards this integrated approach as a starting point, but could pay more attention to it when defining actions. For example, within the social dimension an important contribution from other governmental services is possible and desirable to enforce the horizontal dimension of the plan. Regarding the vertical dimension, the council asks for a better coordination with regional and European initiatives.

The FSCD esteems a thorough analyses is necessary to define which instrument is the most appropriate to book policy results. In many cases, not one instrument, but a combination of many instruments mutually enforcing each other, will lead to the best result. The council formulates some punctual remarks and suggestions concerning different instruments that are presented in the plan. Regarding priority products, an global vision is necessary. But for practical reasons the choice of making a list with priority products could be best for this plan. It is positive that for this list, the authors took in to account the results of scientific studies like the EU EIPRO/IMPRO study. To conclude the councils makes in this opinion reference to previous opinions on: procurement policy, eco-design, wood, eco-innovation, mobility The council will also look closer to 2fields of this plan in future opinions, namely green fiscality and sustainable food.