



EUROPEAN COMMISSION

PUBLIC CONSULTATION ON THE EUROPE 2020 STRATEGY

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- ☐ Registered company
- ☐ Individual citizen
- ☐ Non-registered organisation/company
- ☐ Other, please specify:

Main area(s) covered by your contribution:

- ☒ Economic and financial affairs
- ☒ Competitiveness
- ☒ Industry
- ☒ Single market

- ☒ *Employment*
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- ☒ *Climate, energy and resource efficiency*
- ☐ *Education*
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- ☐ *Other, please specify:*

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A) Background for the public consultation:



The Europe 2020 strategy was launched in [March 2010](#) as the EU's strategy for promoting smart, sustainable and inclusive growth. It aims to achieve a knowledge-based, competitive European economy while preserving the EU's social market economy model and improving resource efficiency. It was thus conceived as a partnership between the EU and its Member States driven by the promotion of growth and jobs.

The Europe 2020 strategy is built around five [headline targets](#) in the areas of employment, research and development, climate and energy¹, education and the fight against poverty and social exclusion. The strategy also set out a series of action programmes, called "[flagship initiatives](#)", in seven fields considered to be key drivers for growth, namely innovation, the digital economy, employment and youth, industrial policy, poverty and resource efficiency. The objectives of the strategy are also supported by action at EU level in areas such as the single market, the EU budget and the EU external agenda.

The Europe 2020 strategy is implemented and monitored in the context of the [European Semester](#), the yearly cycle of coordination of economic and budgetary policies at EU level.

¹ In January 2014 the Commission launched a [framework](#) for energy and climate policies up to 2030. A reduction in greenhouse gas emissions by 40% below the 1990 level, an EU-wide binding target for renewable energy of at least 27% and renewed ambitions for energy efficiency policies are among the main objectives of the new framework.

The European Semester involves discussion among EU institutions on broad priorities, annual commitments by the Member States and country-specific recommendations prepared by the Commission and endorsed at the highest level by leaders in the European Council. These recommendations should then be taken on board in the Member States' policies and budgets. As such, together with the EU budget, the country-specific recommendations are key instruments for the implementation of the Europe 2020 strategy.

After four years, the Commission has proposed, and the European Council of 20-21 March 2014 has agreed, to initiate a review of the Europe 2020 strategy. On 5 March 2014, the Commission adopted a Communication "Taking stock of the Europe 2020 strategy for smart, sustainable and inclusive growth" ([Communication](#)  and [Annexes](#) ). drawing preliminary lessons on the first years of implementation of the strategy. Building on these first outcomes and in a context of a gradual recovery of the European economies, it is time to reflect on the design of the strategy for the coming years.

Through these questions, we are seeking your views on the lessons learned from the early years of the Europe 2020 strategy and on the elements to be taken into account in its further development, in order to build the post-crisis growth strategy of the EU.

B) Questions:

1) Taking stock: the Europe 2020 strategy over 2010-2014

Content and implementation

- For you, what does the Europe 2020 strategy mean? What are the main elements that you associate with the strategy?

To the Confederation of Danish Industry (DI), the main elements of the strategy are related to growth and job creation, through improved competitiveness in the EU. A clear focus on improving competitiveness will have positive effects on all parts of the strategy.

Thus, this answer aims to contribute to the revision of the Europe 2020 strategy for growth. It underlines the need to ensure that the ongoing debate reflects the challenges created by the crisis. Creating new growth and jobs is closely interlinked with the industrial competitiveness of Europe. To ensure improved competitiveness, the revised strategy should include few, tangible and obtainable targets which can show the way towards a stronger European economy - to the benefit of European citizens.

Overview of possible targets, which can be included in the revised 2020 strategy:

1. An **investment target** to ensure that public spending is allocated to areas that create growth and jobs
2. A common goal for **EU export** to the rest of the world
3. A target which aims to **reduce administrative burdens** and simplify legislation
4. Three targets which increase **labour productivity, mobility and the size of the actual workforce** in the EU

In addition to the targets, this paper also introduces new concrete initiatives which can support the achievement of the revised 2020 strategy.

- Overall, do you think that the Europe 2020 strategy has made a difference? Please explain.

To DI, the strategy is important and can make a difference. However, in particular when it comes to governance better results can be achieved in the future:

A review of the strategy must take the issue of governance into account. Unfortunately, it is evident that structural reforms in many member states are not progressing at a satisfactory pace due to insufficient targets and inadequate implementation of the Country Specific Recommendations (CSR's).

The CSR can generally be described as well-chosen and relevant, as they emphasize and enhance sound public finances, structural reforms and competitiveness in Europe. However, a survey conducted by BUSINESSEUROPE shows that only 23 per cent of the 150 recommendations are implemented in a satisfactory manner. This scenario is broadly confirmed by the Commission's own assessment. These conclusions call for better ownership of the European Semester in Member States. This will also improve the relevance and usefulness of the revised strategy as a driver for future growth, jobs and convergence in Europe.

Thus, it becomes obvious that the 2020 strategy has not ensured that the full benefits of structural reforms have been reached. Apparently a significant part of this challenge must be solved in Member States through better governance and better implementation. A revision of the 2020 strategy, including an overhaul of the current targets, can also enhance European competitiveness and investment, which can create the jobs and growth of the future. Furthermore, it is paramount that these targets are translated into ambitious national targets.

- Has the knowledge of what other EU countries are doing in Europe 2020 areas impacted on the approach followed in your country? Please give examples.

DI understands from civil servants in different Member States (in ministries of finance for instance) that the 2020 strategy and the CSR's are contributing to the agenda setting within public administration, even though the quality of implementation varies.

- Has there been sufficient involvement of stakeholders in the Europe 2020 strategy? Are you involved in the Europe 2020 strategy? Would you like to be more involved? If yes, how?

Please also see stakeholder involvement under point 2.

The 'EU 2020 Stakeholder Committee' has been established by the Danish government in order to involve relevant stakeholders in the national part of the European Semester. The

committee is a group of approximately 30 organisations, which represent Danish civil society ranging from business organisations and labour unions to NGOs – all of which are eager to influence the Danish and the European growth/job agenda.

The committee is chaired by the Ministry of Foreign Affairs. The initial idea was that the committee should be a forum for growth/job dialogue and possible consensus between stakeholders and the government. However, the committee members represent a large variety of interests and although respectful dialogue takes place in the committee, consensus is hardly achievable.

The committee meets four times a year to discuss European policy issues related to the growth/job agenda in Denmark and Europe. The first annual meeting is devoted to the annual National Reform Programme and consults the committee on the content of the draft programme. The government presents the draft programme at a committee meeting and invites members to provide input to the programme immediately at the meeting and subsequently in writing. However, at this point the programme has already been shaped and chances are small that stakeholders can influence the reform policies in the programme significantly.

In conclusion, as in many other cases, stakeholders who wish to influence the National Reform Programme must do so at an earlier stage before the programme has been drafted.

To complete the picture of stakeholder involvement in Denmark, it is worth mentioning that the government consults the Danish parliament with respect to the 2020 Strategy, the European Semester and the National Reform Programme according to a thorough consultation process.

Tools

- Do the current targets for 2020 respond to the strategy's objectives of fostering growth and jobs? [Targets: *to have at least 75% of people aged 20-64 in employment; to invest 3% of GDP in research and development; to cut greenhouse gas emissions by at least 20%, increase the share of renewables to 20% and improve energy efficiency by 20%; to reduce school drop-out rates to below 10% and increase the share of young people with a third-level degree or diploma to at least 40%; to ensure at least 20 million fewer people are at risk of poverty or social exclusion*].

The Europe 2020 strategy will succeed if it delivers growth and jobs. These must be the overall goals of this strategy. The 75% employment rate target remains fully adequate and an ambitious and realistic numerical target on growth should complement it.

A few, relevant indicators can help monitor progress in areas of key importance to reach these targets. Any selected indicators should be straightforward, directly impact on growth and jobs, and provide a good indication of progress, underlining the right direction of reform and helping to raise awareness of the strategy.

The 3% of GDP spending on research and innovation remains a very important output indicator, which contributes to reaching the growth and jobs targets. Further progress will be

required as the latest data shows that many member states are not on track to reach this indicator. Beyond a strict quantitative approach, more attention should also be paid to quality and efficiency of spending.

The 20-20-20 targets of the energy and climate package include overlapping objectives and do not take price competitiveness and security of supply into account, which are key issues for growth. Europe must instead put cost-competitiveness, security of supply and climate objectives on an equal footing. This will be achieved by a leading greenhouse gas target of 40 %, supplementary EU-wide targets of 27% renewable energy, 30% energy efficiency in 2030 and maintaining the ETS as the cornerstone of EU climate and energy policy, as currently proposed by the Commission. It should also be considered to complement the Commission's proposal with cost-competitiveness and energy security indicators. Such an approach will ensure a more cost-effective transition of the economy, fostering both jobs, growth and sustainability for Europe.

- Among current targets, do you consider that some are more important than others? Please explain.

DI finds that the targets related to improving competitiveness are the most relevant, as achieving these targets can improve chances of reaching the overall objective put forward in the strategy. Thus, in a revised strategy, DI would like to propose new targets. These are mentioned under point 2.

- Do you find it useful that EU-level targets are broken down into national targets? If so, what is, in your view, the best way to set national targets? So far, have the national targets been set appropriately/too ambitiously/not ambitiously enough?

National targets are vital to improve CSR's and structural reforms for growth and jobs in member states. National contributions to targets that take account of the different realities of member states are an important aspect of the current Europe 2020 strategy and this should be maintained. This is particularly important in the aftermath of the crisis that resulted in great divergence across member states. Some improvements could be however foreseen:

1. To be relevant, national targets should combine a realistic appraisal of a given country's situation and the required effort to reach them.
2. National contributions need to be updated regularly, though with a realistic approach, in particular when Member States have met them, to ensure that they continuously play a role in mobilising political will for reforms.
3. Moreover, in order to raise awareness and respect of national targets, member states should explain a failure to attain the indicators set. The idea to set intermediate indicators in this exercise could be further explored.

- What has been the added value of the seven action programmes for growth? Do you have concrete examples of the impact of such programmes? [*"Flagship initiatives": "Digital agenda for Europe", "Innovation Union", "Youth on the move", "Resource efficient Europe", "An industrial policy for the globalisation era", "Agenda for new skills and jobs", "European platform against poverty"*].

The concept of flagship initiatives is difficult to grasp and even more to explain to citizens and entrepreneurs. These flagships are placed together under Europe 2020, disconnected from their broader policy field, which inevitably provides an incomplete picture of the extent of the effort required to reach growth and jobs. Moreover, the actions set out in several flagships were sometimes even contrary to the objectives of the 2020 strategy. We have identified a number of important inconsistencies and shortcomings with various initiatives:

As mentioned, EU's approach to energy and climate policy so far put the competitiveness of European companies at stake and failed to address the important issue of energy security. A resource-efficiency and low carbon economy can only be increased through increased competitiveness of European business, since it will require enormous private sector investments.

The skills and jobs flagship did not address the important issue of external flexibility for companies to create jobs. Moreover, other actions such as the guiding principles to promote enabling conditions for job creation, of fundamental importance, were never done. Although in 2012 BUSINESSEUROPE welcomed the emphasis put on job creation in the employment package, this was not enough to trigger the necessary reforms. As a result Europe is moving away from reaching the employment rate target of 75% by 2020.

The flagship against poverty and social exclusion failed to be a strategic agenda, rather focusing on specific topics. We do however welcome the Social Investment Package focusing on the need for social protection systems to deliver more with less or stable resources.

"Youth on the move" had several proposals initiated, but the youth employment initiative and the youth guarantee were taken over as the main priorities. While the youth employment initiative is welcome, it cannot be limited to establishing youth guarantee schemes and must be flanked by long term structural reforms. Otherwise, it will not solve the youth unemployment problem.

One of the aims of the Digital Agenda flagship was to provide a stable legal framework that stimulates investments in an open and competitive high speed internet infrastructure and in related services. This was not fully accomplished, and significant barriers remain in the digital single market. Moreover, while the use of personal data is key for the development of the digital single market, the proposed EU regulation on data protection does not strike the right balance between protecting personal data and enabling their free movement in the digital single market, and may put significant burdens on business with the risk to hamper the development of the digital economy – and not only - in Europe.

Research and innovation (Innovation Union) is crucial for sustainable economic growth and job creation in Europe. Europe can only develop and promote new technologies in an innovation friendly environment.

The major challenge for Europe and for European businesses is to bridge the gap from research to commercial success. As shown clearly by the Commission's 'High Level Group on Key Enabling Technologies' the lion's share of R&D investment in Europe goes to basic and applied research. Less than 10 per cent of R&D budgets are allocated for development activities. On the contrary, the US, China and Korea allocate almost half of R&D budgets for development activities. Europe needs to re-establish clear links between research and business development in order for European businesses to regain competitiveness.

As new solutions are needed in response to the societal challenges we are facing, DI also supports the adoption of an Innovation Principle in European risk management and regulatory practice.

New objectives in the revised strategy should insist more on the link between innovation/development and improved competitiveness. This could be done by a dual focus on the allocation of GDP. Focus should still be on the total amount allocated, though an equally important aspect is the level of cooperation between researchers and businesses to the mutual benefit of both business and society.

Increased business participation should therefore be at the very heart of Horizon 2020 - moving forward aiming at closing the current gap between research and market deployment.

A revised 2020 strategy must discard all these inconsistencies and ensure full coherence of policy objectives in the different areas. As mentioned, it should also focus its action on propelling structural reforms, single market integration and industrial competitiveness.

2) Adapting the Europe 2020 strategy: the growth strategy for a post-crisis Europe

Content and implementation

- Does the EU need a comprehensive and overarching medium-term strategy for growth and jobs for the coming years?

Yes. The current consultation and a possibly revised strategy should underline the need to ensure that the 2020 strategy reflects the challenges created by the crisis. Creating new growth and jobs is closely interlinked with the industrial competitiveness of Europe. To ensure improved competitiveness, the revised strategy should include few, tangible and obtainable targets which can show the way towards a stronger European economy - to the benefit of European citizens.

- What are the most important and relevant areas to be addressed in order to achieve smart, sustainable and inclusive growth?

The 2020 strategy - or a new, alternative strategy – its targets and the national targets derived from the strategy can work as a driver for sustainable growth and job creation in Europe.

However, a revised strategy must reflect the challenges created by the crisis. It must focus on restoring European competitiveness and revitalise Europe as the world's hub for high quality manufacturing. In fact, creating a better environment for business is the most feasible way to enforce growth and create jobs in Europe.

In general, the revised strategy for growth should ensure:

1. A more competitive level of costs
2. A balanced public economy, which is efficient, productive and delivers more
3. A sufficient qualified labour force to occupy the jobs of the future
4. An increase in European productivity
5. A strategy to exploit the opportunities of globalisation

- What new challenges should be taken into account in the future?

The objective of the strategy is important – to create growth and jobs. This should be the main focus in the future as well. The main challenge is clear. The EU must improve competitiveness to achieve a prosperous and job rich future.

- How could the strategy best be linked to other EU policies?

A new, revised strategy should refrain from the inclusion of too many and diverse policy areas. To make the strategy and national implementation work, the strategy should only focus on policies that have a large effect on growth, jobs and competitiveness.

- What would improve stakeholder involvement in a post-crisis growth strategy for Europe?
What could be done to increase awareness, support and better implementation of this strategy in your country?

Please, also see stakeholder involvement under point 1.

Social partners play an important role in helping to identify and address gaps and inadequacies in labour market policies. The importance of an effective involvement of EU social partners is recognised and incentivised in the Europe 2020 strategy and this feature should continue. Involvement of social partners must take place in the stage of consultation, but also when assessing and monitoring the effect of different measures.

An effective involvement of stakeholders at large can also be very important for a successful outcome in specific areas. However, when too many stakeholders – often with little representation – are brought into the discussion, it makes it impossible to reach consensus and one can also undermine the role of social partners. This is for instance the case in Denmark, where hearings in the large 'EU 2020 Stakeholder Committee' do not suffice as a forum for in-depth and detailed consultation of stakeholders.

In Denmark an idea could be to introduce a smaller and more focused stakeholder committee, including social dialogue partners. This should of course be done without compromising the current work of the 'EU 2020 Stakeholder Committee'.

Tools

- What type of instruments do you think would be more appropriate to use to achieve smart, sustainable and inclusive growth?

DI would like to propose the following four targets, which could help to obtain the overall objective – to create growth and jobs. When choosing new targets a rigorous impact assessment of how different targets interact and how they influence the competitiveness of European businesses is a vital procedure if the strategy is to succeed.

1. An **investment target** to ensure that public spending is allocated to areas that create growth and jobs:

While reduced public spending and managing of public debt is central to restore sound public finances, public spending still plays a central role to ensure a prosperous European community. Reaching this goal implies investment in areas which create added value and growth - and money spent by governments in Europe can be used better.

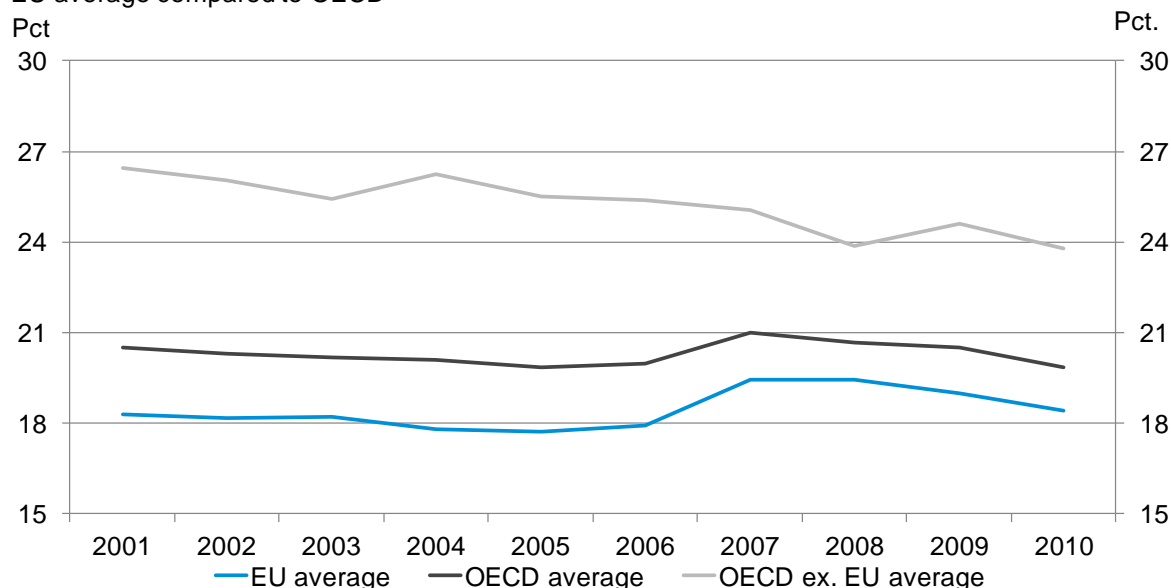
DI therefore proposes that the revised strategy for growth should include a clear overall target which ensures that a certain percentage of Member State public spending is allocated for areas that support future growth. In particular, this includes expenditures on education, research, development, and investments in infrastructure and other areas which add value to the economic development of the EU and support future growth.

In 2010 the average expenditure of EU member states on education, R&D and public investments was 18.7 pct. of primary expenditure, *cf. figure*.

In comparison OECD countries directed 19.9 pct. of total primary expenditure to these areas in 2010. The difference reflects in part that South Korea directs more than 35 pct. of primary expenditure to education, R&D and public investments in total. However, EU falls behind the OECD on average even disregarding South Korea.

'Growth supporting' expenditures as a share of primary expenditure

EU average compared to OECD



Source: OECD

Note: EU countries includes: Austria, Belgium, Czech Republic, Denmark, Finland, France, Germany, Hungary, Ireland, Italy, Netherlands, Poland, Portugal, Slovenia, Spain and Sweden. Other countries includes: Iceland, Israel, Japan, Korea, Norway and Switzerland

DI recommends that at least 20 pct. of primary expenditure should be directed to expenditures supporting future growth, notably education, R&D and public investments.

It is important that the spending target incentivizes a sound and sustainable prioritization of public spending. Thus, the spending target must be accompanied by an overall cap on public spending as a share of GDP and/or a target on the public budget balance. Otherwise the target could induce an unwelcome rise in overall public expenditure.

2. A common goal for **EU export** to the rest of the world:

Globalisation and the world's emerging markets can improve European growth. A feasible path to increase competitiveness and possibilities for exports outside the EU could be linked to a new target which sets a common goal for EU export to the rest of the world – framed as share of contribution to European GDP.

3. A target which aims to **reduce administrative burdens** and simplify legislation

In order to keep the momentum for reduction of administrative burdens a new quantitative target for **reduction of administrative burdens** in the EU would serve as a natural follow-up to initiatives already put in place. Such an objective will ensure the necessary political attention and readiness to simplify legislation.

4. Three targets which increase **labour productivity, mobility and the size of the actual workforce** in the EU

Europe has specific long-term challenges in terms of an aging population and a decrease in the labour supply. The possibility of creating a prosperous future is, to a large extent, depen-

dent on whether or not Europe will carry through the necessary reforms to ensure **well-functioning labour markets and education systems**.

This calls for a **strengthening of the European Semester**, where reform contracts would be linked to the European Social Fund to cover part of the initial costs when reforming towards mobile, dynamic and open labour markets and dual learning systems. This should be done in order to ensure strong incentives to carry through the necessary reforms and support member states in developing labour markets.

The European Semester and the implementation of Country-Specific Recommendations in particular should be strengthened and made more binding with respect to labour market reforms. The 2020 strategy can improve this by introducing new objectives. They can help to ensure that the current target which seeks to reach employment of 75% of the 20-64-year-old is reached. The new objectives are:

- A target which aims to **increase European labour productivity**.
- A target which measures **labour mobility** in the EU.
- A target which increases the **actual workforce** in the EU, through structural reforms.

The targets related to employment could also distinguish between public and private sector jobs and thereby emphasize the importance of where future jobs should be created.

- What would best be done at EU level to ensure that the strategy delivers results? What would best be done at Member State level?

In general, an increased national ownership, better stakeholder involvement and better governance. See several other relevant points in this document.

- How can the strategy encourage Member States to put a stronger policy focus on growth?

Creating growth is about creating the right framework for companies to be competitive. This requires a horizontal and integrated approach to industrial policy, where industrial competitiveness is prioritized and mainstreamed throughout all policy areas (energy, climate, environment, innovation etc.), decision-making levels (European Commission, European Parliament, European Council, implementation by Member States) and along the entire industrial value chain.

Member State obligations regarding the improvement of competitiveness should be integrated into the European Semester. This would allow the Country Specific Recommendations to focus more on industrial competitiveness and make reforms at the national level more enforceable.

Competitiveness proofing must become an integral part of the 2020 strategy. Account should also be taken of the cumulative effects of the different parts of the strategy. Thus, the Commission should develop measures to ensure competitiveness proofing in all flagship programmes.

- Are targets useful? Please explain.

In general, targets are useful as they ensure an effective method to maintain the overall focus of the strategy. Even though the underlying substance is obviously what matters, a strategy without targets will alone be an extensive declaration of intents which will not set a clear course for the coming years.

However, to make sure that the overall strategic goals can be attained only few central targets should be set up. General targets can however be supported by other concrete objectives within various policy fields or flagship initiatives.

While realistic targets and concrete measures are important, it is even more essential that the debate is framed to support the agenda for growth, jobs and competitiveness.

Furthermore, DI finds it paramount that the strategy is achievable this time around. Both the current strategy and the precursor – the Lisbon strategy – have not delivered the expected results, which has created unintended dissatisfaction with the EU.

- Would you recommend adding or removing certain targets, or the targets in general? Please explain.

Various other points cover the answer to this question. To sum up, DI proposes four new targets in the revised strategy:

1. An **investment target** to ensure that public spending is allocated to areas that create growth and jobs
2. A common goal for **EU export** to the rest of the world
3. A target which aims to **reduce administrative burdens** and simplify legislation
4. Three targets which increase **labour productivity, mobility and the size of the actual workforce** in the EU

- What are the most fruitful areas for joint EU-Member State action? What would be the added value?

The single market is one of the EU's biggest accomplishments and a steady engine for growth. However, the integration of the single market has stalled. An emphasis in the new strategy on how to revitalize the single market can deepen integration and improve enforcement. Today, a lack of a common understanding of and commitment to its function and aim represents the biggest challenge to the well-functioning part of the single market.

Thus, what is needed in order to ensure competitiveness in the EU is not only smarter or better regulation. We need to create a greater focus at national and local level on how to ensure that those who put policy into practice – authorities but also the private sector – share a common understanding of the functioning and aim of the single market. Today, we are frequently faced with divergences between the original policy initiative and the actual practice

by which it is implemented in different Member States. This problem cannot be solved by more legislation.

Implementation

Until now, focus has been on developing legislation and ensuring formal transposition. Time has come to put more pressure on Member States to ensure European thinking in practice. In the 2020 strategy, this can be ensured if pressure is put on Member States to ensure proper knowledge and understanding of the objectives and principles of the single market.

An improvement of the current situation can partly be solved through the establishment of a specific **training programme at European level** for national officials in order to ensure best practice implementation at national level.

As a result of the Single Market Act I and II, the Commission has launched a high number of initiatives and concrete legislative acts. The decision making process is still ongoing for some areas and correct and timely implementation is to be seen before the benefits can be harvested. Therefore, **implementation** must be the key word when formulating a revised growth strategy for Europe.

More consistent follow-up on correct and timely implementation should be performed at national level as a way to improve national ownership. Such follow-up should include a proper assessment of the impact of any national deviation from the European legislative instrument. This would lead to higher commitment by national politicians and at the same time serve as an instrument for the European Commission to put pressure on Member States to fulfill their obligations.

Simplification – smarter regulation

DI would like to promote the idea of establishing a ‘**European Company Forum**’ on regulatory simplification and de-bureaucratization. The forum could serve as a political platform at European level where businesses and interest organisations can suggest, discuss and qualify concrete proposals for simplification. Through clusters in the Member States, companies should be able to deliver concrete and real life experiences focusing on legislation or initiatives that do not deliver the intended results and thus create administrative burdens or other unintended outcome.

The ‘European Company Forum’ could work as an advisory body to the Commission. The establishment of such a political platform to suggest and discuss proposals for simplification must be followed by a principle to “**comply or explain**” by which the Commission commits itself to assess all incoming proposals. If the proposals are not followed, the Commission should be obliged to explain why changes are undesirable or impossible.

In order to keep the momentum for reduction of administrative burdens a new quantitative target for **reduction of administrative burdens** in the EU would serve as a natural follow-up to initiatives already put in place. Such an objective will ensure the necessary political attention and readiness to simplify legislation.

Problem solving within the single market

Today, it is costly and lengthy to complain about infringements of mutual recognition, in particular for SMEs. The SOLVIT system provides a useful solution, but cannot solve problems created by national legislation due to lack of competence to overrule policies created by other ministries. Therefore, a possible addition to SOLVIT could be an **alternative fast-track complaint system** set up at European level for businesses. This will ensure quick guidance and ruling if market surveillance authorities in different countries come up with divergent assessments of a product, possibly based on a national regulation.

3) Do you have any other comment or suggestion on the Europe 2020 strategy that you would like to share?

The Confederation of Danish Industry (DI) is of course willing to further explain ideas and proposals if wished for.

Thank you for completing the questionnaire. Please send your contribution, along with any other documents, to SG-EUROPE2020-CONSULTATION@ec.europa.eu.