



Mr. Kaarle Kupiainen

Chair

OECD Environment Policy Committee

31 July 2026

Business at OECD (BIAC) Priorities for the EPOC Work Programme

Dear Mr. Kupiainen,

As the OECD's institutional private sector stakeholder, *Business at OECD* (BIAC) and its members have been closely engaged in discussions on the Organisation's future *Programme of Work and Budget* related to the *Environment Policy Committee* (EPOC), as well as in its work and activities throughout. We are writing to underline business views in this area, with a view to supporting a pragmatic, focused and consensus-based outcome and way ahead.

Let us underline upfront that *Business at OECD* has been calling on the OECD and its Member governments earlier this year to drive an ambitious and comprehensive [*Simplification Agenda for Growth, Productivity and Competitiveness*](#). More than ever, we need the OECD to effectively address compliance complexities, reduce regulatory divergences, and ensure a level playing field across borders – not least to mitigate the severe risks associated with escalating trade tensions. As environmental policies also shape these conditions, EPOC can and should make a stronger, more effective contribution to this *Agenda*.

Business at OECD believes that resolving the current deadlock requires commitment to a shared EPOC vision that works towards ensuring global economic growth that is environmentally sustainable. We would like to underline that the private sector remains committed to moving from ambition to action. However, one point must be clear: this requires policy frameworks that enable viable business cases, support profitability, and create conditions for companies to invest, innovate and scale environmental solutions.

Against this background, we would like to underline that growth is a term regrettably absent from the 2022 EPOC Ministerial Declaration. As we work towards the 2027 Ministerial, the current discussions on the future work programme provide a critical opportunity to place sustainable economic growth back at the heart of EPOC's vision and work, recognising that growth is the indispensable foundation for the investment, innovation and deployment of solutions needed to achieve lasting environmental progress.

As *Business at OECD* has underlined at recent EPOC meetings, translating this vision into practice should be the guiding principle for the future work programme:

- **Relevance requires alignment with economic and operational realities.** The work programme should more consistently reflect competitiveness, investment dynamics, energy and implementation constraints faced by companies and markets. Without this grounding, policy risks being disconnected from the dynamic conditions under which it must deliver.
- **Focus requires clear prioritisation of the most pressing challenges.** The current breadth of the programme risks stretching resources and losing focus. Concentrating on a limited

number of strategic priorities and addressing them more comprehensively will strengthen coherence and support delivery and implementation.

- **Credibility requires balanced and comprehensive processes.** This includes more effective consultation with relevant OECD Committees on cross-cutting issues to enhance policy coherence. It also requires continued, structured and meaningful engagement with the private sector represented by *Business at OECD*, alongside a firm commitment to the neutrality of the Secretariat. This neutrality is particularly important where OECD analysis feeds into active international negotiations, such as those on plastics, so that outputs reflect the full range of Member positions and the underlying evidence.
- **Impact requires meaningful engagement across OECD Member governments.** More systematic interaction among governments will be essential to build common understanding and ensure that outcomes provide a broadly supported basis for follow-up action. Impact also depends on maintaining the OECD's unique value as a consensus-based forum. When the scope of work expands into areas that command support from only a smaller subset of Members, the usefulness of OECD outputs as common reference points risks being diminished.

Business therefore encourages a more focused programme of work capable of attracting broad Member support and reinforcing the OECD's credibility, influence and brand. On this basis, *Business at OECD* holds that the private sector can greatly benefit from EPOC's outputs – be it through the provision of market information and strategic foresight; the promotion of evidence-based policy recommendations; or, where appropriate, the setting of international standards. We take this opportunity to underline that we see high value in the following proposed EPOC output areas:

- **Data and Indicators (2.3.1.1):** It must be a priority to ensure that policies are not only environmentally effective, but also economically efficient. To this end, we are interested in contributing to the IFCMA discussions and underline the value of work on **Quality Data, Information, Accounts and Databases (2.3.1.1.1)**. We also **Support Analytical Work (2.3.1.3.1)** on the effects of cross-border spillovers.
- **Enhancing Resilience (2.3.2.1):** Business welcomes the OECD's work to promote an enabling environment for **Innovative Technologies (2.3.2.1.4)**. Further analysis is needed of the different strategies to support their development and deployment, the respective roles of sound enabling policies, targeted industrial strategies, and strong private sector engagement. This work should also assess how to safeguard these efforts from distortions arising from unfair competition. Business also values the OECD's **Technical Platforms Supporting International Cooperation on Environmental Issues (2.3.2.1.8)**, including the opportunity to participate in the CCXG Global Forum. Governments should ensure that the interests of their domestic business communities are effectively represented.
- **Resources, Waste, Plastics and the Circular Economy (2.3.4.1):** Particular importance should be attached to **Transboundary Movements of Waste (2.3.4.1.4)**. Improving implementation of the OECD Decision, including prior informed consent procedures, is essential to support trade, environmental outcomes and supply security, including for critical minerals. Business has long called for progress in this area; delivery now needs to accelerate. In relation to plastics in the environment, including the next edition of the **Global Plastics Outlook (2.3.4.1.1)**, business underlines that this work must remain methodologically neutral, evidence-based and grounded in a full lifecycle perspective. Given the ongoing intergovernmental negotiations towards an instrument on plastic pollution, OECD analysis, projections and data should inform, but not pre-judge, the outcome of those negotiations. With respect to **Economic Instruments for a Circular Economy, including Extended Producer Responsibility (2.3.4.1.2)**, business supports the proposed empirical, ex-post analyses of plastic taxes, fees and EPR schemes, provided they objectively assess effectiveness, administrative burden and impacts on competitiveness, investment and supply security.

Business at OECD and our members stand ready to continue working closely with the OECD, EPOC and Member governments to support a pragmatic and consensus-based work programme that expressly reinstates economic growth at its core in line with the OECD vision. We remain committed and engaged in bringing forward practical business expertise to help ensure that policies are implementable, coherent and supportive of private sector leadership on environmental outcomes, and underline the importance of close dialogue with the business community.

We look forward to maintaining this constructive engagement and contributing to effective outcomes in support of shared environmental and economic objectives.

Best regards,



Hans-Jörn Weddige

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