



Speaking Points for the OECD Environment Policy Committee

April 2026

Item 3. Strategic Priorities for the EPOC Programme of Work 2027-30

[Speaker] tbc

- Thank you, Chair.
- *Business at OECD* (BIAC) appreciates the opportunity to comment on the proposed Strategic Priorities for EPOC.
- I would also like to thank Jaime and congratulate him on his appointment as Environment Director.
- BIAC and its members look forward to continuing constructive, fact-based and pragmatic engagement with the Environment Directorate under your leadership.
- Turning to what matters most for business, let me make a few general points:
- BIAC strongly supports the OECD's core strengths reflected in this Programme of Work:
 - Data, indicators, evidence-based analysis and standard-setting that support international policy coherence.
 - The OECD's horizontal approach linking environment with trade, finance, industry and economic policy is essential.
- That said, we would encourage EPOC to reflect on three structural issues:
 - **First, prioritisation.**
 - Despite references to high-priority areas, the Programme

remains very broad. From a business perspective, this risks diluting impact.

- Sharper focus would enable more meaningful engagement and stronger outcomes.

- **Second, economic impact.**

- While present, economic impact analysis is not yet systematic. In many countries, competitiveness is under pressure, and issues such as regulatory burden, cumulative impacts, SMEs and trade effects need stronger attention.
- These elements should be more explicitly and consistently integrated, including in Environmental Performance Reviews and cross-cutting work.

- **Third, energy security and affordability.**

- The recent conflict in the Middle East has created significant supply disruption in global oil, gas and other markets. This is the current top concern of many businesses.
- As the second major fossil fuel price shock in four years, this highlights the need for policies that are ambitious but also cost-effective, coherent and resilient.
- The PWB, including the section on resilience, should better reflect recent developments and promote security, affordability and diversification.

- Let me highlight three specific priority areas in the PWB where BIAC sees high value:

- **First, the circular economy**, notably transboundary movements of waste and critical raw materials (paras. 101-103).
 - Improving the OECD Decision, including prior informed

consent procedures, is key to facilitating well-regulated trade in recyclables.

- Advancing circular models for critical raw materials is vital for environmental outcomes and supply security.
- This work would benefit from closer engagement with trade delegates, including the Joint Working Party on Trade and Environment.

- **Second, innovation and the environment.**

- Paragraph 68 rightly notes innovative technologies. Rather than selecting specific technologies, the focus should be on effective instruments and principles such as technology neutrality.
- Work on AI (para. 108) is also highly relevant, particularly its potential to simplify implementation, reduce compliance costs and improve policy effectiveness.

- **Third, climate and finance.**

- BIAC supports the useful role of the OECD-IEA Climate Change Expert Group Global Forum.
- We also welcome work on finance and investment for environmental objectives, including analysis of market uncertainty linked to shifting policy priorities. Predictability and coherence are critical for long-term investment.

- Last, let me also note here that the OECD Chemicals Programme delivers clear economic and regulatory value by cutting unnecessary chemical safety testing

- In conclusion, *Business at OECD* sees strong foundations in the proposed Programme of Work. Clearer prioritisation, stronger economic integration and greater attention to energy security would further enhance its impact.

Item 5. Meeting of EPOC and CBC at Ministerial Level

[Speaker] tbc

- *Business at OECD (BIAC)* welcomes the proposal for a joint EPOC-CBC Ministerial meeting and strongly supports the focus on integrated environment policies for growth, prosperity and resilience.
- From a business perspective, integration is essential to reduce fragmentation, manage costs and provide the policy coherence and predictability needed to sustain competitiveness and long-term investment.
- BIAC and its members stand ready to contribute private-sector experience to the Ministerial preparations, helping ensure that outcomes are evidence-based, implementable and deliver environmental progress alongside economic resilience.
- Thank you.