



EUROPEAN COMMISSION

**PUBLIC CONSULTATION ON THE EUROPE 2020 STRATEGY**

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*Member State*

*Public authority*

*Registered organisation*

*Registered company*

*Individual citizen*

*Non-registered organisation/company*

*Other, please specify: Non-governmental organisation, aisbl*

**Main area(s) covered by your contribution:**

*Economic and financial affairs*

*Competitiveness*

*Industry*

*Single market*

*Employment*

*Research, development and innovation*

- Digital economy*
- Climate, energy and resource efficiency*
- Education*
- Poverty/social exclusion*
- Other, please specify:*

**Register ID number (if you/your organisation is registered in the Transparency register):**

0014082722-83

**Your reply:**

- can be published with your personal information*
- can be published in an anonymous way*
- cannot be published*

#### **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 energy<sup>1</sup>, education and the fight against poverty and social exclusion. The strategy also set out a series of action programs, 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. 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.

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<sup>1</sup> 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.

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 effectively proposed to initiate, with the consent of the European Council, 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?

The Europe 2020 Strategy is about strengthening the economic governance of member states and increasing the positive impact of reforms, capitalising on potential synergy. It also gives an opportunity, despite challenging economic conditions, to focus on growth and jobs.

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

It is clear that some of the targets have not yet been achieved. Despite that, an orientation of the whole EU to achieve certain goals allows or should allow for better alignment of implemented policies.

The ambitious targets set at the start of the decade were not going to be easily met in the approved deadline, but that does not mean that they should be abandoned as we approach the mid-term review and a new legislative term of the European institutions. On the contrary, efforts to deliver progress must be reinforced.

The assumption of the strategy was to draw the member states together in the pursuit of common goals and this objective has seemingly been achieved, although the pace and engagement differs according to each country. Nevertheless, the strategy cannot be separated from the targets as it could hinder the EU as a whole.

The pace of reforms and coherence of policies, however, should be strengthened to allow for further growth and necessary progress.

- 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.

As a European association, EUROCHAMBRES cannot respond to this question. Please consult the responses of national Chambers of Commerce and Industry to this consultation for further input.

- 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?

It is apparent from the interaction between members of EUROCHAMBRES' Europe 2020 Committee, established in 2010, that national Chamber associations benefit from discussions among peers on different governance and monitoring procedures for the strategy at member state level.

EUROCHAMBRES, as in previous years, has consulted national Chambers of Commerce & Industry (Chambers) on the level and nature of their involvement in procedures for the monitoring and governance of Europe 2020 at member state level. While improvement are reported in some member states, the overall picture reveals that Chambers - key intermediaries in the delivery of Europe 2020 through their role in education & training, business creation, market access, innovation coaching, energy efficiency support etc. – are often not consulted at national level.

Moreover, the Chamber network could play a more active role in the assessment process and in its communication plan.

### **National Reform Programmes (NRPs)<sup>2</sup>**

Only 60% of Chambers (from those who replied to a questionnaire) are consulted by their national administration in drafting National Reform Programmes, which is less than in previous years. 43% of them consider that these consultations take place sufficiently early in the process, which suggests some level of improvement as the deadlines were slightly prolonged. Where improvement has been noticed (Finland, Austria, Czech Republic, Poland), the consultation on NRPs has become more structured and better organised and cooperation with respective authorities more effective. In the case of Estonia, however, despite involvement in some cases, the consultation has become worse.

In some countries, such as Luxembourg, it has been noticed that there is a lack of public debate and discussion during the yearly update of the national NRPs and Stability and Growth Pact (SGP) - and thus during the actual implementation of the Europe 2020 strategy - at a time when detailed fiscal policy measures are still in a planning stage. Neither employers' organizations, nor trade unions or NGOs are consulted during the updating process. The strategic nature of the European Semester and the Europe 2020 strategy is thus not being fully recognized by national policy makers. The Luxembourg

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<sup>2</sup> Based on EUROCHAMBRES internal survey on involvement of Chambers in NRPs and CSRs at member state level

national budget discussion (early October – early December) benefits from a far greater media attention and social partners (including Chambers in this member state) are consulted. However, by this stage, the general framework of fiscal policy has already been set via the annual update of the SGP and the NRP. Starting 2013, the Chamber of Commerce is organizing a yearly press conference to present and discuss the underlying assumptions of the national NRP and SGP in the framework of the European Semester and the Europe 2020 strategy.

Other examples:

FI: Finnish Chamber experts are involved in specific thematic work related to competitiveness and business environment. However, there is no overall consultation in this issue. Finnish Governmental Economy Council is following the overall work related to Europe 2020. Finland Chamber is member of this Council.

LV: The Latvian Chamber is usually invited to participate and provide recommendations to national policy planning documents relevant to businesses, and also participated in drafting the NRP. The discussions were held regarding bottlenecks and reforms necessary to meet EU2020 targets.

AT: After a kick-off meeting organised by the Federal chancellery with all ministries, the social partners and other stakeholders we were invited to submit our contribution. Furthermore, Austrian Chamber has received the draft National Reform Programme with a deadline for comments.

CZ: Chamber was invited together with other relevant stakeholders to the series of meetings organised by the Working Team on the EU of the Council of Economic and Social Agreement (tripartite body) where the draft of NRP was discussed from its early phase till the end of the process.

ES: Unfortunately, the contacts are neither on a regular basis, nor with a systemic approach.

PL: Polish Chamber participates in the work of the Committee for the Europe 2020 Strategy (Committee at the Ministry of Economy)

### **Country-specific recommendations (CSRs)<sup>3</sup>**

The European Commission liaises with only half of those Chambers who replied to our questionnaire before developing Country-specific Recommendations, of which 43% of them consider that these consultations take place sufficiently early in the process. This very moderate change comparing with previous year (47%) also implies some positive changes in the process of consultation.

After developing Country-specific Recommendations, however, the European Commission liaises with only 36% of Chambers, a decline compared to previous years.

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<sup>3</sup> Based on EUROCHAMBRES internal survey on involvement of Chambers in NRPs and CSRs at member state level

Examples:

The European Commission reaches out to Chambers during their annual fact finding missions (DE, AT, ES, NL) or via direct dialogue what is very valued and should be maintained also in the coming years. Some Chambers, however, get a high number of questionnaires/consultations which due to limited capacity have no possibility to answer or to get feedback on time from their companies. In case of smaller stakeholders with limited resource capacity the European Commission should consider better adaptation of timing and giving the Chambers a real consideration. It happens as well the Chambers receive no feedback about the reports the European Commission Delegation prepares after the meetings.

After the adoption of the CSRs, Chambers are usually invited by the Commission representative to exchange views, provide technical briefings, present and explain the CSRs and listen to comments and remarks. The European Commission also consults selected Chambers (LU) before issuing its spring or autumn economic forecasts.

According to the Commission, only 10% of the CSRs for 2013 have been fully implemented; while 45 % of CSRs have seen limited or no progress. Better involvement of stakeholders such as Chambers would be of benefit for implementation of CSRs.

## **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*].

### **On 20-20-20 Energy and Climate targets**

In light of the economic crisis, inconsistencies in the current European energy and climate targets have been revealed. The debate on the CO<sub>2</sub> price, which inter alia resulted from the decline in production, the lack of international ambition, the increased use of renewable energy sources and improved energy efficiency, provide a perfect example of conflicting objectives. Moreover, the 20-20-20 framework has insufficiently taken into account the increase in energy prices, the decrease of industrial production and the risk of carbon leakage.

In order to preserve Europe's prosperity and a healthy environment, climate actions and growth policies must be developed and pursued conjunctionally. EU climate and energy policy must not run counter to the efforts to regain competitiveness in the global market. Policies must be flexible and designed to allow energy intensive industries to prosper in Europe and provide them with a long-term framework for cost-effective production conditions within the EU. This is not only a basic requirement for Europe to prevail in global competition, but also to secure growth and employment for the years to come.

## On Employment and Education

The Europe 2020 targets related to employment and education are important and relevant as they address the need for higher skills (40% university attainment) and the risk of leaving parts of society behind (early school leaving target). Nevertheless, the economic crisis has strongly influenced in the attainment of the targets, especially in some countries with relevant difficulties in their job market.

However, vocational training - and apprenticeships in particular - are a blind spot within Europe 2020 and even the Education and Training 2020 communication. CEDEFOP has forecasted that almost half of all jobs (46.6%) in Europe will require medium-level skills, i.e those that are particularly taught in vocational training programmes. However, only 3.7% of the youth population (aged 15-29) in the EU undertakes an apprenticeship, the most successful form of vocational training combining school and work-based learning. Strengthening vocational education and training would also improve the employment opportunities for the large number of low achieving adults in literacy and numeracy (around 20%) that was identified by the PIAAC survey in 2013. Without increasing the quality and quantity of apprenticeship programme in the EU, it will be impossible to reach the target of a 75% employment rate. Therefore, **EUROCHAMBRES suggests the creation of a new “Flagship initiative on apprenticeships” to help member states increase the share of apprenticeships among VET programmes to 50% by 2020.** Such a Flagship initiative should ensure that apprenticeships schemes are systematically and continuously evaluated through the Country Specific Recommendations, ask the agency Cedefop to follow up on the CSRs through national joint action teams and use the European Alliance for Apprenticeships as an open and inclusive platform to coordinate the initiatives. Furthermore, funding within Erasmus+ and the ESF should be earmarked for apprenticeships.<sup>4</sup>

The methods used to measure progress should be reviewed in some cases - the most prominent example being tertiary education attainment. In Europe, several countries (Germany, Austria) have developed successful examples of higher vocational education and training that allow students with a vocational diploma to attain tertiary level education as well. These programmes are neither fully respected in ISCED nor in other OECD data collections. The result being that the rate of tertiary education attainment attributed to Austria and Germany is constantly flawed. The importance of higher vocational education for Europe’s competitiveness cannot be underestimated. Therefore, the CSRs should take such specificities better into account.

### Optional ideas

For the field of education and training, the situation is quite complex. The issues are not covered by the articles that form the legal basis of the country-specific recommendations (Articles 121 and 148 of the Treaty on the European Union). However, the Commission still formulates CSRs for these issues and these CSRs should be addressed not only to the employment ministries, but also to the education ministries. This lack of a legal basis may also explain why Europe 2020 and Education and Training 2020 (ET 2020) are not

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<sup>4</sup> More information is available here: <http://www.eurochambres.eu/content/default.asp?PageID=1&DocID=6539>

fully coherent, with the latter covering a broader range of issues to address in Europe from a strategic viewpoint.

### **On Innovation**

Innovation Union sets the target of investing 3% of EU GDP in R&D by 2020. Currently the EU is spending only around 0.8% of its GDP on innovation; whereas the US and Japan are investing twice as much on innovation. Reaching the 3% target will be crucial for growth in Europe. It will be particularly important to reduce the “innovation divide” among EU countries. Whereas some countries have developed excellent funding and policy to foster innovation (Denmark, Finland, Germany, Sweden and the UK), the vast majority of EU countries is lagging behind in innovation. The crisis seems to have widened the gap between EU countries in public R&I expenditure. When evaluating innovation policies and funding, the Commission should particularly assess three growth-delivering dimensions of innovation: private sector investment in innovation, the innovation potential of SMEs and the necessity to foster applied research. Cutting red tape in innovation-related funding and legislation is of course a pre-condition for success.

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

There is infinite scope to debate the pros and cons of the various targets included in Europe 2020, as well as to argue for the inclusion of other targets. Nonetheless, EUROCHAMBRES considers that this would ultimately prove fairly unhelpful and believes that the targets defined when the strategy was announced should be retained in the interests of continuity, bearing in mind the circular dependence between the targets and growth itself.

- 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?

No answer

- 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”*].

### **On resource efficient Europe**

In the context of the seven flagship initiatives, the Commission has tabled numerous proposals affecting various political areas. The added value of these initiatives is, in many cases, difficult to assess as the economic impact of the proposed actions has not sufficiently been taken into consideration. This can be epitomised by the Resource Efficiency Flagship initiative and the roadmaps linked to it:

While seeking ways for becoming more resource efficient, the Commission has to be careful not to adversely affect the competitiveness of the European economy. Transforming the economy onto a resource-efficient one by applying highly sensitive



instruments like environmental taxation or a phase-out of certain subsidies could have far-reaching consequences. Before following up on these issues, the costs and benefits must be identified and evaluated. Also, many initiatives tabled by the roadmaps have not been discussed with stakeholders so far and their current status is unclear.

### **On Innovation Union**

The results of the Innovation Union Flagship initiative are mitigated. Positive elements are the process of identifying a clear agenda and transparent stock taking for the mid-term review. However, Europe is still very much far away from investing 3% of Europe GDP into Research and Development. The current 0.8% of GDP investment in R&D indicate that the Innovation Union has so far had little to no impact.

### **On Youth on the Move, Agenda for New Skills and Jobs**

The added value of the flagship initiatives in the field of education and employment has been limited. Not only did these initiatives lack a clear agenda and a strategy for the steps to take, they were also not high enough on the political agenda, despite the crisis and its effect on employment. Reforming our education and training systems and labour markets requires urgent attention. Therefore EUROCHAMBRES suggests creating a “Flagship initiative on apprenticeships in VET” (see above).

## **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. It is important and urgent for the EU to have a mid-term strategy and a long-term vision. In a rapidly evolving global economy, EU policy measures have a strong impact on Europe’s ability to compete and these measures need to be defined and pursued in the framework of a broader and medium-long term strategy for growth and jobs in order to increase coherence and improve the overall impact. The strategy must have enough resources, with clear and fast concrete actions, not for just becoming a mere statement or communication activity.

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

From a business perspective, growth is most likely to be achieved if:

1. Access to markets and resources (human, financial and natural) are assured;
2. Regulatory and administrative burdens are minimized;
3. Entrepreneurship, creativity, skills and innovation are stimulated and encouraged.

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

## Completion of the Single Market

Economic evidence suggests that the 20% industrial target is unlikely to be achieved as the manufacturing share of GDP has been gradually decreasing since the mid-eighties. Such relative decline reflects in part improved productivity in this specific branch of economy. Instead of focusing only on the 20% goal, the EU and member states should increase their efforts to maximise the benefits and completion of the single market.

## Evidence-based approach to policy-making

EUROCHAMBRES strongly advocates an evidence-based approach to policy making, highlighting the importance of properly conducting impact assessments based on non-biased expertise. There is no doubt that the Commission's impact assessments have improved significantly since 2005. Nevertheless the current system has a number of deficiencies, which often lead to finding the evidence to justify a legislative proposal, while it should be the contrary. We believe that the new EC mandate, and notably the appointment of a First Vice-President dedicated to a Better Regulation agenda, represents a great opportunity to disconnect the Commission's evidence gathering processes from the political agenda and accelerate the efforts to instil a smart regulation mind-set across the EU institutions. In addition, EU impact assessments must be prepared in accordance with the "Think Small First" principle to ensure that legislation and administrative procedures are proportionate and easy to apply. The SME test must also be a mandatory part of impact assessments in all Member States.

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

Business wants an EU growth strategy that revolves around a vibrant business community, which is essentially made up of small and medium-sized enterprises (SMEs). To unlock the growth and jobs potential of SMEs and make full use of their innovative capacities, a stronger connection should be made between the broad EU growth action plan and SME policy by integrating the Small Business Act (SBA) into the Europe 2020 strategy.

National Reform Programmes should contain a separate chapter, which would assess specifically the SBA measures implemented. Furthermore, the Commission should use its country-specific recommendations as part of the European Semester to assist the member states to further drive their SME policy using the results of the SBA fact-sheets.

As past experience has already indicated, it would be advisable to strengthen the interaction and cooperation between the EC services and to ensure that policies proposed by the EU and undertaken by the member states are coherent. The new EC structure with vice-presidents coordinating and steering the work of a number of Commissioners is welcomed, but it remains to be seen whether this new way of working will change old habits.

- 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?

There is a lot to be done on the EU institutions' side to regain citizens' confidence in the EU project. Better and more efficient communication would allow as well limiting the level of miscommunication and misuse when it comes to implemented legislation.

Governance and monitoring of national measures must be ensured in close collaboration with expert practitioners and support providers such as Chambers. EUROCHAMBRES specifically recommends that this element is made explicit in the next set of National Reform Programmes.

### **Tools**

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

In order to succeed in the balancing act of further reducing greenhouse gas emissions and promoting growth and jobs, the EU Emissions Trading System (ETS) has to maintain its status as main instrument for fighting global warming. In order to meet our climate and energy targets at least costs, the market-based characteristics of the ETS must fully remain in place along with sufficient, robust and long-term protective measures against carbon leakage. Under these conditions, the two equally important objectives of increasing the industrial production while decreasing CO<sub>2</sub> emissions are not mutually exclusive. A price regulation mechanism (e.g. though a market stability reserve as proposed by the Commission) would just cause further trade-offs between energy/climate and general growth/jobs targets.

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

Europe 2020 is above all a long term strategy that must be implemented rigorously and sustainably if it is to have the desired effect. In this respect, the role of the Competitiveness Council in the governance process is crucial and improvements should be made to strengthen its effectiveness given its broad mandate. EUROCHAMBRES believes that the mandate and functioning of the Council's High Level Group on Competitiveness and Growth (HLG) should be reviewed in order to act as a "think tank" for the Competitiveness Council, helping to define priorities, shape and propel the agenda. In its paper on March 2014<sup>5</sup>, EUROCHAMBRES put forward a series of specific recommendations to reinforce the work and impact of the HLG.

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<sup>5</sup> EUROCHAMBRES' paper is available upon request

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

Europe 2020 Strategy is a major instrument in striving for more economic and social growth in the European Union. While the targets are set at European level, the implementation happens at national, regional and local level.

Through closer cooperation between public authorities and Chambers, the information flow can be enhanced, thus leading to better targeted programmes and greater efficiency in their execution.

This additional channel would allow for better targeting and influence over national and regional governments' policies to deliver growth.

Introduction of additional enforcement mechanisms could pose a threat of undermining a responsibility of individual member states.

- Are targets useful? Please explain.

Yes – what can be measured can be assessed and improved.

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

No. As alluded to earlier in this consultation response, EUROCHAMBRES believes that a lengthy reflection on possible target additions or deletions would prove a distraction from the main challenge of improving delivery and would undermine policy continuity.

Rigid compulsory targets do not make sense in every area and should be more flexible. (E.g. defining a rigid compulsory ceiling regarding the overall energy consumption seems problematic, not least because weather conditions and economic trends can lead to ups and downs in consumption.) Moreover, different economic characteristics and the types of available resources in different Member States require a flexible European approach.

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

The most prominent example of joint EU-Member State action is the single market, which should be completed and preserved to bring further benefits. In theory the EU's single market allows people and businesses to trade freely across the EU-28, however, there are still obstacles in place.

Various EC figures indicate that: between 1992 and 2006, the single market boosted EU GDP by 2.15%. Over the same period, it helped to create 2.75 million jobs, a 1.4% increase in total employment. These benefits could have been doubled with the removal of most of the remaining barriers to trade – notably in services and the digital single market. These advantages were immensely reduced during the time of financial crisis and recession that severely hit the economies of some EU member states. Now it is the time to revive the concept, making sure at the same time that the member states and their citizens are aware of socio-economic cost-benefit analysis of the introduced changes.

The internal energy market still bears a huge potential for joint action and must be completed as swiftly as possible. It is important to remove barriers to competition (such as regulated prices), couple markets and connect “energy islands” to the rest of Europe.

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

No answer

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

**National Chambers that responded to EUROCHAMBRES’ internal survey on involvement in NRPs and CSRs at member state level:**

[AUSTRIAN Federal Economic Chamber](#)

[Federation of BELGIAN Chambers of Commerce](#)

[CYPRUS Chamber of Commerce and Industry](#)

[CZECH Chamber of Commerce](#)

[Association of GERMAN Chambers of Industry and Commerce](#)

[ESTONIAN Chamber of Commerce and Industry](#)

[Chamber of Commerce of SPAIN](#)

[The Central Chamber of Commerce of FINLAND](#)

[Union of HELLENIC Chambers of Commerce](#)

[Association of ITALIAN Chambers of Commerce, Industry, Craft and Agriculture](#)

[LATVIAN Chamber of Commerce and Industry](#)

[Chamber of Commerce of the GRAND-DUCHY of LUXEMBOURG](#)

[NETHERLANDS Chamber of Commerce](#)

[POLISH Chamber of Commerce](#)