



Recommendations to the Bulgarian Presidency of the Council of the European Union

January - June 2018





Table of contents

| | |
|---|----|
| Message to the Bulgarian Presidency of the Council of the European Union | 2 |
| Agenda for Action 2014-2019 | 3 |
| Policy recommendations by Council configuration | |
| Agriculture and Fisheries | 4 |
| Competitiveness | 5 |
| Economic and Financial Affairs | 7 |
| Employment, Social Policy, Health and Consumer Affairs | 9 |
| Environment | 12 |
| General Affairs and Foreign Affairs | 15 |
| Justice and Home Affairs | 16 |
| Transport, Telecommunications and Energy | 17 |
| | |
| AmCham EU leadership | 23 |

Message to the Bulgarian Presidency of the Council of the European Union



Susan Danger
CEO,
American Chamber
of Commerce to
the European Union
(AmCham EU)

Bulgaria assumes the Presidency of the Council of the EU for the first time since joining in 2007. While Europe seems more united today than it did one year ago and the economy is regaining momentum, many challenges remain. Political leadership will be critical to steer the EU through the first half of 2018. The future relationship with the UK and the slow progress in the negotiations are issues that the Presidency must take strongly into consideration. We will need a robust and consensus-building Presidency to restore confidence in the EU's ability to deliver for its citizens and play a key role on the world stage.

Bulgaria is a great example of the positive impact of EU membership and access to the Single Market. The economic development that characterised the country since its accession in 2007 is a clear reminder that Europe matters. However, in the face of many critics of the European project, we cannot take the EU's achievements for granted. We need to speak out more loudly, tell the story of Europe and take a clear and unambiguous stance in favour of what it has brought to its citizens.

Bulgaria rightly identifies the development of the Single Market as a key priority. We are confident that the Presidency will embrace this opportunity to demonstrate its leadership and focus on a well-functioning Single Market which ultimately benefits European citizens and businesses of all sizes.

In an uncertain international environment, the case for strong transatlantic cooperation has never been as compelling. The EU and the US are the drivers of global growth. Our economic partnership is vibrant: it represents the largest and wealthiest market in the world. Aggregate US investment in Europe totalled more than €2 trillion in 2016 and directly supports more than 4.5 million jobs in Europe.

This relationship is indispensable in an environment of increasingly complex security challenges, with new threats emerging constantly. The Presidency's focus on security and stability on the continent is valued. US companies are invested in security and defence and need continued access to maintain their contribution to European stability in this sense. We hope that the Bulgarian Presidency will be a strong supporter of the EU-US partnership in every sector.

We are looking forward to working closely with Bulgaria during and after the Presidency to ensure we reach our common objectives of a stronger and more competitive Europe which creates jobs, meets consumers' needs and generates wealth for its citizens. This is why I am delighted to present these recommendations to the Bulgarian government on behalf of AmCham EU and our 157 member companies. We hope they will provide concrete input and direction to the Presidency's work programme. We believe that many of the issues raised by AmCham EU in this report are vital to creating sustainable economic growth.

AmCham EU has already met with a wide range of leading Bulgarian officials in October 2017 in Sofia and will continue to engage with them in the coming months. In our initial discussions, it was clear that we share a number of policy objectives. We are confident that Bulgaria will make progress and close several legislative files during its Presidency.

AmCham EU and its member companies stand ready to collaborate with the Bulgarian government and wish the Presidency every success.

Agenda for Action 2014-2019

The Agenda for Action offers ideas to enhance the competitiveness of Europe in the global economy.

AmCham EU calls for action in
five key action areas:



- 1 Build skills for the future**
- 2 Drive integration to create an attractive internal market**
- 3 Embrace revolutionary change for industrial leadership**
- 4 Develop new models of innovation and entrepreneurship**
- 5 Lead by example towards global integration**

Scorecard

AmCham EU uses these five key action areas to measure Europe's performance over time.

To learn more about AmCham EU's Agenda for Action Scorecard 2017, visit amchameu.eu/A4A17

Overall policy recommendations

- Uncertainty in Europe created by recent political events and by rising populism is a cause for real concern. EU leaders must act decisively to **bolster unity in Europe**, including by establishing a roadmap for more effective integration and placing greater emphasis on the **values and principles of the Single Market**.
- **Attracting the right talent and skills** remains a significant issue for businesses. This issue is likely to be compounded as the need for skills grows with increased digitalisation. The EU must place further emphasis on support for education and skills development, including early education, STEM skills, lifelong learning, and the portability of qualifications and professional standards.
- **Innovation** could be encouraged by a move towards greater technological neutrality, for example in public procurement. This would encourage competition and enhance efficiency.
- **Improving opportunities for entrepreneurship** and further encouraging innovation must be a priority. Currently, the outlook is mixed with new business ownership rates dropping in the past year. EU policy-makers should emphasise support for start-ups scaling up and in the event of bankruptcy. Greater access to finance for small businesses is also key.
- Europe retains a strong competitive advantage relative to much of the rest of the world. Nevertheless, concerns about insufficient **agility and flexibility in the economy remain**. Relaxing inflexible labour laws could be particularly helpful in addressing this issue.
- Europe's **commitment to free trade and open markets** is being openly challenged at home and abroad. A strong reaffirmation of the values and principles that underpin EU trade policy by EU leaders is critical to ensure the EU remains open for business to the rest of the world.

Policy recommendations by Council configuration

Agriculture and Fisheries

ISSUE

RECOMMENDATIONS

Agro-food supply chain

The Presidency should take a holistic and coherent approach to any policy-making that impacts the food and agricultural sectors. Policies in other sectors should always take food security issues into consideration.

Discriminatory taxation on food and non-alcoholic beverages

See the *Employment, Social Policy, Health and Consumer Affairs* section.

Revision of the legal framework for veterinary medicinal products

The veterinary medicines legislation should be based on sound risk-benefit assessments, not hazard-based approaches. It should modernise approaches to pharmacovigilance. Unnecessary, disproportionate and innovation-hampering regulation should be reduced to encourage and enable new developments and improve the functioning of the internal market. Investment in research is paramount to ensure that innovative treatments, new technologies and care options become available.

Risk assessment, management and communication in the agro-food sector

A proper balance between assessment, management and communication of risk is crucial for the integrity of the food chain. Risk management decisions must be communicated in a clear and transparent way to help foster 'technology acceptance' by EU citizens. At the same time, the scientific and technical basis of risk management decisions must be demonstrated.

Sanitary and phytosanitary elements in trade and innovation policy

The divergence between the EU measures on the assessment, management and communication of risk and those of its main trading partners leads to significant sanitary and phytosanitary questions in trade policy. It is crucial to make progress in these areas, in particular regarding plant protection products, maximum residue levels and agricultural biotechnology crops. A more effective and progressive regulatory framework is needed to address obstacles and promote innovative solutions.

Sustainability aspects of international trade in agricultural products

EU institutions are focusing on the sustainability of agricultural raw materials and the greening of supply chains. Therefore, environmental law-making is a potentially new non-tariff barrier to international trade. Addressing potential/current barriers through convergence and cooperation is necessary.

Competitiveness

ISSUE

Single Market

The EU Single Market is the basis of the economic success of Europe and a key determinate of US foreign direct investment in Europe. Completing the Single Market could help boost EU GDP by around four percent over the next ten years. It would increase productivity, investment, trade and job creation, ensuring Europe maintains its position as a global economic player.

Pressure on the Single Market has increased, particularly after the vote by the UK to leave the EU. Policy challenges such as migration and an increasingly nationalised and fragmented EU decision-making process also play a key role.

The will of EU policy-makers to complete the Single Market is clear – as demonstrated by the Commission’s 2015 Single Market Strategy. However, urgent action at Member State level is required. Strong Member State coordination and leadership, in partnership with the EU and stakeholders, including the business community, is ultimately necessary for Europe to face head on its challenges and move towards a more effective Union and Single Market.

Industrial policy

Europe faces increased global competition for investment. To tackle the downward trend in investment in manufacturing, Member States should focus on implementing structural reforms. We urgently need the right conditions to ensure solid infrastructure, great skills and talent, innovation, and labour flexibility at an affordable cost. The European Semester reports and recommendations should be fully leveraged at Member State level.

Better regulation

The better regulation agenda should remain a key priority of the Presidency, ensuring that crucial elements of the Interinstitutional Agreement on Better Law-Making are fully implemented. Particular attention should be devoted to the following areas:

- the introduction of transitional industry ‘lead-in’ periods following adoption of EU legislation;
- the need to increase transparency in the functioning of the Commission expert groups;
- the importance of consulting stakeholders when assessing if delegated or implementing acts should undergo an impact assessment and
- the inappropriate use of soft law to extend the scope of binding provisions.

In addition, AmCham EU encourages the Presidency to support the Commission’s REFIT efforts to avoid overlapping legislation.

Competitiveness (cont.)

ISSUE

RECOMMENDATIONS

Compatibility of EU and US security programmes for customs

Mutual recognition between the Authorised Economic Operator status (AEO) and the Customs Trade Partnership against Terrorism (C-TPAT) programme should be realised at the earliest opportunity. It will provide real benefits to business and can be used as the basis for all further mutual recognition agreements, giving business in the EU standardised and harmonised procedures worldwide.

Centralised clearance and one-stop shop

Importers should be able to handle all customs formalities through a single customs office in any EU Member State, rather than the current requirement to separately clear goods in all 28 countries.

Regulatory controls (eg veterinary, phytosanitary, agricultural) should also be managed through a single IT interface used and recognised by all Member States. This will eliminate red tape, saving time and money, as goods will only be stopped once for checks.

Customs infringements and sanctions

Penalties for infringements should only be applied in cases of proven gross negligence or intentional fraud. These penalties should be levied on the basis of unpaid or underpaid duties, not on the value of the goods.

Both customs officials and companies need rules that are easily applicable and understandable, which support and expedite trade rather than hamper it. They should serve as a tool, not an obstacle, particularly for SMEs, which are the growth engines of the European economy.

Defence industrial and procurement issues

European defence markets should be opened to allow the global defence industry to participate and support efforts fostering increased transatlantic defence industrial cooperation.

The focus of the two Directives, 2009/81/EC on Security and Defence Procurement and 2009/43/EC on intra-community transfers of defence goods and services, should remain on efficiency and transparency in the European market and not on protectionist measures or the creation of additional barriers.

Energy costs

Addressing the wide impact of Europe's high energy costs should remain a top priority. Special attention should be aimed at defining and rolling out concrete measures to support the competitiveness of the manufacturing industry - in particular energy-intensive industries.

European manufacturing is already the least energy-intensive sector, and therefore the most energy efficient in the world. However, the price gap is such that 'the reduction was not large enough to offset price increase', as recognised by the Commission in its Competitiveness Report 2014.

The discrepancy in energy costs among the world's great regions should be addressed. Furthermore, the difference between electricity wholesale and retail prices can only be explained by distorting schemes, public interventions and tax levies on energy. EU institutions and national governments need to address this discrepancy. Common understanding of energy costs and a clear breakdown of taxes and levies in their energy bill would be in the interest of both consumers and companies.

Competitiveness (cont.)

ISSUE

Promotion of intellectual property

RECOMMENDATIONS

The Presidency should support robust protection of intellectual property (IP) both online and offline. World-class IP protection for all technologies, including their market-based development and deployment is vital for maintaining European competitiveness. Protection of inventions, content (consistent with international agreements) and the fight against counterfeiting and piracy should be pursued in the EU and third countries.

Geo-blocking

Business-to-business must be excluded from the scope. Imposing such obligations undermines the established principle of contractual freedom between traders.

Clarity is needed on 'applicable law'. The current wording lacks legal certainty on liabilities in the case of a dispute with a consumer residing in a Member State where the trader is not operating.

Institutions should review the potential interactions with sector-specific legislation to clarify the liabilities arising from the obligation to sell.

Economic and Financial Affairs

ISSUE

A holistic approach to EU policy-making; facilitating long-term investment

RECOMMENDATIONS

We encourage the Presidency to ensure a holistic approach to EU policy-making. Legislation designed to restore market confidence should be consistent with EU goals to promote long-term investment. Initiatives aimed at facilitating access to finance should take existing financial services regulation into account and vice versa.

Transatlantic convergence in post-financial crisis financial services regulation

The global regulatory reform agenda in the wake of the financial crisis provides an unprecedented coordination opportunity between EU and US policy-makers in financial services. Four specific barriers to trade in this sector need to be addressed as a matter of priority:

- 1. Extra-territorial application of rules:** This can discourage third-country investors from undertaking transactions that risk bringing them into the scope of the legal regime of a jurisdiction that is not their own. This distorts economic decision making (eg. the choice of counterparty) and undermines market efficiency.

Economic and Financial Affairs (cont.)

ISSUE

Transatlantic convergence in post-financial crisis financial services regulation (cont.)

RECOMMENDATIONS

- 2. Divergent timelines for application:** Greater attention needs to be paid to the timetables for the introduction of new rules stemming from the G20 and initiatives such as Basel III. Policy-makers need to ensure that global markets are not disrupted by differentiated dates of application in different jurisdictions. Enough time should be allowed to draw up well thought rules and implementing measures.
- 3. Reciprocity provisions:** We strongly encourage a political declaration by EU and US policy-makers to avoid including provisions requiring 'reciprocal' action by the other regime before market access is granted in future legislation.

Capital Markets Union

A well-functioning and appropriately regulated transatlantic capital market is key to driving long-term economic growth and competitiveness in Europe and the US. The present fragmented state of markets represents an obstacle to cross-border investments and the efficient allocation of capital.

While building a Capital Markets Union (CMU), it is crucial to keep important transatlantic and global financial markets into account. The key roles played by non-EU investors into the EU, investment opportunities for EU investors and companies outside the EU and non-EU financial market participants in Europe are important as well. Moreover, in light of Brexit, the CMU will become an even greater priority for the EU.

Taxation policy

International tax coordination

A unilateral EU approach to the direct taxation of multinational companies, like in the case of the digital taxation proposals, could create double-taxation problems and provoke concerns about protectionism if it is not coordinated with the ongoing multilateral tax discussion at OECD level. The OECD is the best forum for a coordinated and coherent approach to the taxation of multinational companies. In addition, a consistent adoption of the OECD's Base Erosion and Profit Shifting (BEPS) recommendations across the EU is a key priority. Going beyond the recommendations would negatively impact the EU's attractiveness for investment.

Value added tax (VAT)

The Presidency should foster debate and provide political guidance on the future of VAT. The revamped EU VAT system must be efficient and neutral for business and as robust and fraud-proof as possible, provided it does not impose a burden on taxpayers. The VAT Action Plan should be promoted and implemented.

Financial Transaction Tax (FTT)

An FTT under enhanced cooperation should not be introduced. As proposed, an FTT will have serious implications, not just for financial institutions but for the 'real economy' - on businesses in every sector that legitimately use financial instruments in the normal course of their business, for example, to manage risk.

Employment, Social Policy, Health and Consumer Affairs

ISSUE

Challenges of work-life balance

RECOMMENDATIONS

To advance work-life balance, further EU-level policy guidance, strengthened monitoring, exchanges of good practices, and the development of meaningful benchmarks, monitored through the European Semester would be welcome. However, there is no need to improve the EU legislative framework in order to address these challenges.

On gender diversity, a strict 'compliance' approach to diversity is not enough for businesses to reap the benefits of greater female participation. Public and private sectors need to partner in order to promote a balanced representation of both genders throughout an organisation's hierarchy, as well as encourage work-life balance. Organisations need to engage their leaders, both men and women. Simply implementing programmes for women or working parents is not enough and may even slow down their trajectory in the absence of proactive management.

Labour market reform

The New Skills Agenda for Europe and the European Pillar of Social Rights provide the opportunity to implement labour reforms. These would ensure the long-term competitiveness of the European workforce through flexicurity measures and reforms promoting economic growth and agility in the labour markets. Policy frameworks must guarantee a quick and smooth reallocation of resources, including human capital, from declining activities to emerging ones.

REFIT of consumer law

The Presidency should focus on ensuring that existing consumer-related laws are transposed, implemented and properly enforced in national law before considering adopting new legislation.

Digital content

The proposal on digital content is a positive development. However, work is needed to ensure that the proposed rules effectively deliver the benefits promised to consumers and traders. Monetisation of data could impede rather than boost the data economy. There are also concerns on the disproportionate level of harmonisation. The relationship with other relevant existing rules should be further assessed.

Online contracts

The initiative to improve the quality and coherence of European online contract law is a step in the right direction. However, the directive lacks harmonisation with existing EU contract law, which will result in companies still relying on different rules for different distribution channels. The European institutions must ensure that the proposed directive is harmonised with the EU consumer acquis and wait for the conclusions of the REFIT, which should clearly identify the gaps in consumer protection. This will help ensure that the rules facilitate easier online cross-border consumer transactions, benefitting business, consumers and society as a whole.

Discriminatory taxation on food and non-alcoholic beverages

(Also relevant for Agriculture and Fisheries)

Special taxes on certain food and beverage products are not an effective approach to tackling complex diet and lifestyle-related problems and could be harmful to the competitiveness of the EU and national budgets. Given the discriminatory nature of food taxes on specific products, they must prove to be necessary, effective and proportional. As Member State taxes so far have not fulfilled these conditions from both socio-economic and public health perspectives, we encourage reevaluating these proposals.

Employment, Social Policy, Health and Consumer Affairs (cont.)

ISSUE

A strategic agenda for the life sciences industry

RECOMMENDATIONS

AmCham EU supports a strategic approach to life sciences – highly innovative industries such as pharmaceuticals, medical technology and eHealth – to support growth and overcome health inequalities in Europe. The Presidency should consult industry and relevant stakeholders to define sector-specific actions aiming to boost the competitiveness of the healthcare industry in Europe, within the framework of the Commission's industrial policy strategy.

In the face of demographic changes, constrained national budgets and increased international competition, AmCham EU proposes to establish a multi-stakeholder platform identifying inefficiencies in regulations and policies. The Commission should adopt a broad approach towards a comprehensive life sciences strategy that allows recent innovative developments such as personalised medicine, data analytics, eHealth/mHealth to flourish.

Investing in healthcare to build effective, accessible and sustainable health systems

The fundamental link between better access to healthcare services and the uptake of healthcare innovation in Europe risks being lost in the current economic climate. This means improving health outcomes and ensuring that health budgets are sustainable and contributing to growth, competitiveness and job creation in Europe.

In order to build safe, accessible and effective health systems and increase Europe's competitiveness, AmCham EU recommends to:

- safeguard innovation by implementing dynamic efficiency policies that balance short-term concerns (eg. cost containment) with long-term concerns (eg. R&D investment);
- strengthen the intellectual property incentive framework to boost innovative R&D;
- avoid seeking economies at any cost, eg through promotion of economic-driven, off-label use of medicines which can compromise patient safety;
- support innovative partnerships between the public and private sectors;
- take a consumer approach to empower citizens to be innovators in their own health and
- improve access to medicines through more flexible pricing policies such as differential pricing.

Access to medicines

The issue of access to medicines should be part of a wider strategic discussion, aimed at achieving more effective and sustainable healthcare systems in the long term. Investment should focus on medicines' value and meaningful patient outcomes, and enable healthcare systems to adapt to the evolution of digital technology and other healthcare innovations.

To this end, a broader view is needed towards outcomes-based healthcare that provides:

- a holistic approach covering the whole spectrum of provisions in relation to health outcomes;
- resources and infrastructure to measure value and outcomes;

Employment, Social Policy, Health and Consumer Affairs (cont.)

ISSUE

Access to medicines

(cont.)

- flexible frameworks to ensure fast access to medicines through innovative and alternative pricing schemes, such as differential pricing combined with the increased use of value-based pricing methods and
- strong intellectual property protection to increase access to medicines and incentivise their development.

Fighting Antimicrobial Resistance (AMR)

Industry is a key partner in the fight against AMR. Working together with business, policy-makers should put in place policies that incentivise research into new antibiotics, vaccines and diagnostics, as well as create a sustainable marketplace. This includes:

- encouraging the development of novel mechanisms to research and develop new antibiotics, vaccines and diagnostics and
- advocating for the prevention of infections through expanded use of diagnostic tools and vaccination methods.

Public procurement of healthcare products (Implementation of Directive 2014/24/EU)

Public procurement can contribute to increasing the efficiency of national health systems by supporting the market uptake of innovative healthcare products and addressing major societal challenges including ageing.

The 2014 revision of public procurement rules, including the new criterion of the 'most economically advantageous tender' (MEAT) in the award procedure, was expected to make it easier for public authorities to put more weight on 'quality' or 'innovation' criteria relative to 'price'. However, evidence suggests that in many countries award criteria are still heavily price-biased, even for complex medical devices or for pharmaceuticals for which interchangeability has not been established. In addition, processes and the lack of dialogue with bidding companies remain a challenge.

AmCham EU recommends collecting best practices and exploring the opportunity to develop EU-wide guidance on the implementation of Directive 2014/24/EU and the procurement of healthcare products.

Pharmaceutical products and the Single Market

The Single Market should allow equal opportunities for patients to access appropriate treatments. The governance of pharmaceutical products must therefore be adapted to allow the Single Market to achieve its full potential.

The inequalities in access to treatment need addressing. Policies such as price referencing, ie. External Reference Pricing, are preventing the full implantation of equity-based pricing between markets in Europe and causing inadequate management of drug shortages. Using cost containment as a guiding principle without considering the health impacts exacerbates this problem. One way to create a practical pricing framework is through the principle of non-extraterritoriality of medicine prices set by governments.

There should be a centralised authorisation procedure to switch appropriate medicines from prescription to non-prescription status. Legislation should be clarified to ensure that prior central authorisation does not prevent non-prescription status by national health boards.

Employment, Social Policy, Health and Consumer Affairs (cont.)

ISSUE

Medical devices and in-vitro diagnostics: making them safer and future proof

RECOMMENDATIONS

A modern and effective regulatory system for medical devices which ensures a high-level of patient safety while providing timely and continued access to the latest medical technologies is crucial. To do this the following is required:

- maintain a decentralised authorisation system;
- regulate the reprocessing of single-use devices;
- increase harmonisation and coordination across Member States and
- increase transparency and better coordinate market surveillance across Member States.

eHealth

Both eHealth and mHealth are key enablers of more sustainable healthcare systems in Europe. They are based on the exchange of electronic health information that will be highly personalised and focused on patient empowerment. In light of the transatlantic eHealth/health IT cooperation roadmap, efforts should be directed towards expanding the adoption of interoperable electronic health records. Citizens should be allowed to access their medical information and related services online, including on mobile devices.

The steps undertaken as a result of the Commission's consultation on Transformation of Health and Care in the DSM should lead to policies that engage citizens, healthcare providers and productivity vendors to enhance care outcomes, promote self-management, improve safety and lower health costs.

Environment

ISSUE

2030 climate and energy policies

(Also relevant for the Energy and Competitiveness Councils)

RECOMMENDATIONS

EU energy and climate policies must promote a balanced approach between the objectives of security of supply, sustainability and competitiveness to transition to a low-carbon economy at the lowest possible cost. In order to relaunch investments and drive the move towards a low-carbon economy, the EU must improve governance, clarity and predictability in both the ETS reform and the Clean Energy for All Europeans Package.

Therefore, the Presidency should focus on:

- completing the internal energy market;
- ensuring a diverse mix of energy sources, including renewables, nuclear, coal as well as conventional and unconventional oil and gas;
- leveraging the potential of energy efficiency, particularly in the building sector;
- investing in infrastructure and
- integrating the external dimension of energy and climate policies.

Environment (cont.)

ISSUE

Emissions Trading Scheme (ETS) reform proposal

RECOMMENDATIONS

The ETS is the cornerstone of EU climate policy. The current proposal for revision has been discussed for more than two years already. As the negotiations are coming to an end, there is still room for improvement to support competitiveness and investment in Europe. We encourage policy-makers to ensure a stable regulatory framework and prevent any intervention which distorts market mechanisms.

AmCham EU also recommends :

- adequate protection for exposed sectors against the risk of carbon leakage, by a fair split between free and auctioned allowances;
- enhanced compensation of indirect costs for the industry and
- consistency between funds and clarity on the eligibility of industry projects in terms of funding.

REFIT of the Registration, Evaluation, Authorisation and Restriction of Chemicals Regulation (REACH)

Over the past few years, the implementation of REACH has improved and to some extent has become more predictable. The adoption of the Risk Management Option Analysis (RMOA) and of the Substances of Very High Concern Roadmaps are the most visible signs in this sense. Nonetheless, more could be done to guarantee REACH delivers on safety without jeopardising competitiveness and innovation in Europe.

Competitiveness is about much more than compliance costs. Too often the impact of REACH on industry is minimised to costs only. A closer look should be taken at the impact of REACH on predictability and long-term investment in Europe, global competitiveness of Europe versus the rest of the world, as well as innovation.

Endocrine disruptors (ED)

The absence of potency and other aspects of hazard characterisation in the Commission's proposal is a major omission. This will lead to the inappropriate identification of certain substances as EDs and ban many everyday substances such as vitamins, broccoli and soy protein, for example. However, given the lengthy period of legal uncertainty that industry has had to face regarding this issue, the proposal should be enforced without any further changes or delays.

Resource efficiency and the EU circular economy action plan

These five key principles should be the cornerstone of circular economy legislation as it moves forward:

1. More efforts need to be placed on consistent implementation across Member States and on developments of necessary infrastructure.
2. A single market for secondary raw materials is critical to provide sufficient scale for the development of new business models.
3. It is crucial to factor in the international dimension: EU circular economy strategy should create global loops rather than close borders.
4. A proportionate sharing of costs and responsibility along the value chain and waste management chain is essential.
5. There is no one-size-fits all solution and we support a sectoral approach to further promote the circular economy.

Environment (cont.)

ISSUE

Waste Package

(including Waste Framework Directive, Packaging and Packaging Waste Directive, ELV and WEEE)

RECOMMENDATIONS

When reviewing or adopting new legislation related to the circular economy, EU policy-makers should ensure that the smooth functioning of already successful industrial processes is not compromised. The Single Market is a strong asset in enabling the development of new, circular business models and it should be preserved.

Key recommendations:

Definitions

The waste package should set out clear definitions, particularly when it comes to municipal waste, recycling, re-use/preparation for reuse and backfilling.

Targets

A sound, common methodology for calculating targets should be established. A focus on overall (recycling) targets for the circular economy without being too prescriptive – eg no additional targets for the type of materials to be used like bio-based materials – would be useful. Overly detailed and prescriptive targets could harm the market principle, as well as existing circular economy solutions and innovations.

Packaging and Packaging Waste Directive (PPWD) legal basis

AmCham EU is concerned by the discussions around a potential change of legal base for the Packaging and Packaging Waste Amending Directive and the potential impact on the ability for packaged goods to move across the EU. Therefore we recommend maintaining a single market legal base.

Extended Producer Responsibility (EPR)

The general requirements for the EPR should guarantee a level playing field and fair competition between the EPR schemes in all European countries, with a clear cost demarcation for producers.

End-of-waste

The Commission should without delay set unambiguous definitions and adopt necessary secondary legislation to specify the end-of-waste criteria for different products, especially for those in strong demand. Existing end-of-waste criteria must be implemented consistently across Member States. National end-of-waste criteria are not meaningful enablers of the circular economy, as they fragment the EU's market for secondary raw materials.

Waste and chemicals

Caution should be maintained against addressing such a complex matter in the WFD, as existing chemicals legislation already addresses the concerns raised by the safe handling of chemicals. This is the case with product specific legislation, the Restriction of Hazardous Substances (RoHS) Directive for EEE, as well as with information obligations under the REACH Regulation.

General Affairs and Foreign Affairs

ISSUE

Brexit and EU-UK trade and investment relationship

RECOMMENDATIONS

The UK's impending withdrawal from the EU is raising important questions for the US business community in Europe. US companies – who are heavily invested in both the EU and the UK – require certainty about the path forward for the new EU-UK relationship. Significant disruption or changes to this relationship, or to the EU Single Market, could have profound effects on the ability of US companies to operate in these markets.

It is essential that the two sides deliver a new relationship that builds on the deep and comprehensive links that underpin EU-UK ties while limiting disruption and uncertainty in the interim. Any agreement should preserve the integrity of the Single Market – the key driver for US investment. The American business community stands ready to provide constructive input throughout the process.

EU bilateral trade relations

The Presidency should support the early conclusion of free trade agreements that are:

- WTO-compatible;
- ambitious in coverage;
- balanced;
- capable of strengthening and complementing the multilateral trading system;
- contributing to the development of friendly trade and investment standards, rules and principles and
- promoting better protection of intellectual property rights.

The development of constructive dialogue with major trading partners at all levels is key to enhance mutual understanding, economic growth and prosperity.

Role of the World Trade Organization (WTO)

The renewed agenda at WTO level is a step in the right direction. AmCham EU values a strong WTO that acts as an important guarantor of legal rights in international trade and investment for business and society. Further market liberalisation and development of multilateral rules would boost global economic recovery for developing and developed countries alike.

The Presidency should support the ratification and implementation of multilateral and plurilateral agreements including the Trade Facilitation Agreement (TFA), Trade in Services Agreement (TISA); and Environmental Goods Agreement (EGA), which could boost global trade and development.

Trade and investment

AmCham EU supports the Joint Statement of Shared Principles for International Investment agreed by the EU and US governments. The Presidency should promote these principles, both within the EU and with third countries. Countries that apply these principles would significantly increase their chances of (re) building business confidence and attracting the investment needed to maintain and create sustainable jobs and prosperity.

General Affairs and Foreign Affairs (cont.)

ISSUE

Export Control of dual-use goods

RECOMMENDATIONS

As cyber threats constantly evolve, heavy-handed regulation stifles innovative responses. Labelling cyber surveillance technology as dual-use could undermine the ability of legitimate EU and foreign users to protect themselves, without effectively deterring malicious parties from accessing truly harmful technological capabilities.

Some of the proposed requirements could put a disproportionate burden on companies. A better balance of responsibilities should be struck between industry and national authorities, who are better equipped to gather intelligence on matters such as risks of human rights violations and terrorism.

As goods are traded at global level, export controls should be regulated at global level through multilateral forums (eg. Wassenaar Arrangement). Going beyond these agreements will undermine EU competitiveness at an international level.

Enforcement of intellectual property rights (IPRs) in third countries

Improved protection of IPRs is crucial to encouraging innovation and building a European knowledge-based economy. Continued efforts to enforce IPRs in non-EU countries are essential for the EU and its Member States to compete in the global economy.

Justice and Home Affairs

ISSUE

Data protection

RECOMMENDATIONS

The General Data Protection Regulation (GDPR) does not take EU-wide harmonisation far enough. Harmonisation is crucial when taking into account situations such as the recently raised uncertainty on EU-US data transfer tools. A key concern is that different Member States may take divergent views on particular aspects of the Regulation which could result in a patchwork of rules that GDPR aimed to prevent.

AmCham EU members take GDPR compliance seriously and are currently working to implement the upcoming rules. When formulating guidance and rules, we encourage regulators to consult and work closely with stakeholders, including industry. AmCham EU has identified seven priority aspects where further guidance is needed: (i) the one-stop shop; (ii) high-risk processing / data protection impact assessments (DPIAs); (iii) personal data breaches and notification; (iv) approved codes of conduct and certification; (v) data portability; (vi) sanctions and (vii) data protection officers (DPOs).

Integrated border management

It is key to strike the right balance between border security, the need for more efficient movement of travellers and individuals' rights and privacy. A clear EU legal framework for sharing, retaining and storing data related to border protection needs to be created. This will help companies develop innovative technical solutions to meet security and data protection requirements.

Transport, Telecommunications and Energy

ISSUE

Energy Union Framework Strategy

2030 Framework for Climate and Energy

RECOMMENDATIONS

Competitiveness

Energy and climate policies will remain highly interlinked with competitiveness and industrial policies. All industries operating in Europe should be allowed to compete, develop and innovate on a level playing field to ensure Europe's continued competitiveness while transitioning to a stable low-carbon global economy. Both opportunities and risks for European business arise from this transition and they should be carefully calibrated. In this context, technological and tax neutrality should be the rule.

Rather than fragmented national policies, a more coordinated and regional approach to European energy policy is crucial. The proposed stronger governance process on energy policy as well as the upcoming 'Winter Package' are an opportunity to strengthen harmonised implementation of EU regulation.

Infrastructure investment

Further developing energy grids, updating networks, addressing bottlenecks, deploying cross-border links, exchanging information on major national decisions and building new connections are crucial to delivering Europe's Energy Security Strategy and energy and climate objectives for 2030.

A well-functioning internal market

To complete a functioning, transparent and liberalised single energy market, a balanced approach should be promoted between the objectives of security of supply, sustainability and competitiveness to transition to a low-carbon economy at the lowest possible cost. Therefore, affordability of energy prices, supporting industrial competitiveness as well as the moderation of energy demand should be a key dimension of the Energy Union.

Please see Environment section.

Transport, Telecommunications and Energy (cont.)

ISSUE

Clean Energy for All Europeans Package

RECOMMENDATIONS

The Commission's proposal to restore market signals for the energy markets in Europe is a positive development. A liberalised electricity market requires price signals coming from the free flow of energy across borders. This entails enhanced European coordination and enlargement of cross-border grid capacities to further reduce the need for (national) capacities, increased transmission and strategic interconnector capacity to optimise allocation and congestion mechanisms, etc.

The coherence of the entire package needs to be maintained and long-term investment visibility enhanced. Therefore:

- proper implementation of existing (and upcoming) legislation is a prerequisite;
- the draft Governance Regulation will be instrumental in providing clarity for investment planning. An orderly and predictable implementation of 10-year national plans will help build investors' trust and
- markets should create the conditions for investors to limit the risks of a project, through, for instance, long-term contracts (similar to Power Purchase Agreements in the US).

The immediate political focus should lie with supporting the investments needed in infrastructure projects to integrate renewables such as energy storage. To facilitate the digitalisation of distribution systems, data collection and distribution must be given a greater role and data protection must be secured.

Electricity Market Design

The new EU electricity market design should focus more on markets and less on regulation. Adequacy assessment should be made at a regional level (ideally European) and look beyond generational capacity, also considering auxiliary grid services and availability of short-term flexibility.

A market-driven energy policy where all technologies can compete on a level playing field is needed. Therefore we call for:

- the end of support schemes for mature technologies;
- non-discriminatory grid network charges be included in the legislation to allow a large-scale deployment of storage technologies;
- scarcity pricing, which should help identify market mismatches;
- if required, capacity mechanisms be temporary, regional, and focused on safeguarding the security of supply at minimal cost to the consumer and
- flexibility should be rewarded.

Transport, Telecommunications and Energy (cont.)

ISSUE

Renewable Energy Directive (RED)

RECOMMENDATIONS

The revision of the Renewable Energy Directive must not be seen in isolation from the 'Clean Energy for all Europeans' package'. It should respect the principles of technology neutrality and cost-effectiveness and remain consistent with the European Energy Union objectives to secure both affordable and climate-friendly energy.

Competition and cost efficiency are paramount when renewables are promoted. This requires the phase-out of subsidies and a shift towards research and innovation for low carbon technologies and storage.

The directive should also offer ways to mitigate risks for new projects. A good example is the one of Power Purchase Agreements (PPAs) in the US. This business model has the potential to deliver the clean energy needed to meet Europe's decarbonisation objectives. However, so far, PPAs are not readily and easily available to corporates across Member States. The reference to PPAs in the RED 2 proposal should be linked to reporting requirements in the Governance regulation, encouraging Member States to report on removing hurdles to PPAs. We also recommend ensuring greater transparency and harmonisation in how Guarantees of origin (GOs) are issued throughout Europe to prevent double counting.

Energy Performance of Buildings and Energy Efficiency directives

The building sector offers significant energy-saving opportunities. Energy efficient renovation of existing buildings can generate cost savings for both public and private actors, increase energy security, create a significant number of local jobs and bring about a range of environmental benefits.

There is significant scope for improvement in several directives reviewed as part of the Clean Energy for All Europeans Package: Energy Efficiency Directive (EED), Energy Performance of Buildings Directive (EPBD) and Renewable Energy Directive (RED). Particular attention should be paid to the implementation and enforcement dimensions. In addition, AmCham EU recommends setting an ambitious and clear vision for the EU building stock by 2050, with 2030 and 2040 milestones.

The EU should support a more holistic, systems-based approach that considers buildings as part of the energy system – balancing energy supply and demand, where thermal networks and decentralised systems complement each other, providing more flexibility for an increased use of renewable energies. Equally important are efforts to promote financing and investment into energy efficiency in this sector.

Transport, Telecommunications and Energy (cont.)

ISSUE

Low-emission mobility strategy

Infrastructure: President Juncker's investment plan and EU project bonds

RECOMMENDATIONS

AmCham EU promotes five key principles to transition to a low-emission transport sector:

- 1. Support economic activity:** Sustainability in transport can only be ensured if the social, economic and environmental dimensions are considered equally important. The potential of further completing the EU internal market for transport is enormous.
- 2. Address risks of climate change in an integrated and balanced manner:** Policies should avoid market distortions and take a technology/fuel neutral approach.
- 3. Invest in infrastructure:** Transport largely depends on further and accelerated investments in infrastructure, including Intelligent Transport Systems.
- 4. Maintain a level playing field between transport modes:** All modes of transport will be needed to move the growing transport volumes of the future.
- 5. Factor in the international dimension of transport:** Maintaining an international level playing field goes hand in hand with finding global solutions for global challenges.

AmCham EU welcomes President Juncker's plan for investment and the set-up of a new European Fund for Strategic Investments (EFSI). We equally support the European project bonds and public-private partnerships. Well-managed pilot programmes could significantly contribute to reversing the net decline in European investment over the last 30 years.

EFSI and EU project bonds cannot replace Member States' additional commitments and responsibilities for public investment and structural reform. They should be supplementary to a strong European commitment to the completion of TEN-Ts/TEN-Es, a strong regional policy, an ambitious lending policy from the European Investment Bank and the earmarking of revenues.

None of these instruments should lead to financial market distortion or market access restrictions; they should support the EU's objectives while protecting the principles of technology neutrality.

Transport, Telecommunications and Energy (cont.)

ISSUE

RECOMMENDATIONS

Digital Single Market

It is critical to build a Digital Single Market where connected machines and objects enable huge benefits for the economy and society. As we connect more and more objects, policy-makers must evaluate all existing tools and new market realities before deciding on policies, legislation or regulation. Security and privacy policies will need to be optimised across borders to upscale technologies. Cross-border data flows are essential for businesses to grow across Europe as well as globally, be they SMEs or large industries. Technology neutrality should be the cornerstone of policy-making.

Electronic Communications Code

The European Electronic Communications Code is an opportunity to enhance legal certainty for investments in high-speed broadband networks, enable the digitalisation of the wider economy by accelerating 5G deployment and reducing costs for consumers and providers by tackling regulatory fragmentation and the deterrent effect it can have on investment.

Co-legislators should build a truly single market for electronic communication services. Cross-border providers should be able to rely on a single notification ('one-stop-shop') and the principle of main establishment (one main supervisory authority in the EU). In the same spirit, a full harmonisation approach should apply to end-user contractual obligations together with a layered approach where rules only apply to relevant services. Finally, the definition of electronic communication services should be clarified to explicitly mention that only the transmission and not machine-to-machine (M2M) services and applications themselves are covered by the Code. At the minimum, M2M conveyance services should be excluded from end-user contractual obligations, as voted by the ITRE committee.

e-Privacy

Privacy and security must be implemented in a way that would not unnecessarily hamper innovation and growth.

The scope of the e-Privacy Regulation is unnecessarily broad. It should be aligned with the Electronic Communications Code. Machine-to-machine (M2M) communication services in general and M2M not related to end-users, in particular, should be excluded from the scope of the EPR but also from the Code. Furthermore, the current EPR approach to 'minor-ancillary services' further extends the scope beyond that of the Code and potentially all services, without a clear justification.

We call on Member States to fully align all the data protection-related provisions with the GDPR. To the extent the communications data makes it possible to identify end-users, it is already covered by the GDPR. For other types of processing, the same degree of flexibility allowed under the GDPR should be allowed under the EPR.

Transport, Telecommunications and Energy (cont.)

ISSUE

RECOMMENDATIONS

Data Economy

The Commission put forward a strong proposal on the free flow of non-personal data. By banning data localisation requirements and increasing transparency around Member State practices, it removes one of the key barriers to building a European data economy. As the proposal moves through the legislative process, a swift adoption by the Council and the European Parliament is necessary. Ensuring strong monitoring and enforcement mechanisms will be particularly critical to the success of the proposal. In contrast, extending the scope of exceptions beyond the grounds of justified public security would strongly limit the framework's effectiveness.

EU Cybersecurity package, including Network and Information Security (NIS)

Since cyber threats are global in nature, maintaining and improving international cooperation with public and private partners will remain essential to keep Europe safe, secure and resilient.

We are particularly pleased to see the EU standing up against cybersecurity being used as an excuse to raise trade barriers.

We agree with the Commission that the transposition and implementation of the NIS Directive should be as harmonious as possible. At the same time, in proposing implementing acts, care must be taken not to undermine the light touch approach agreed by the legislators.

On the EU Cybersecurity Act, we believe that using a voluntary approach to ICT certification is the right thing to do. We hope that this approach will be preserved, and certifications will not be made indirectly mandatory at later stages. We would like to see more private sector involvement in the design of the certification framework and of the particular schemes to be developed under it.

E-evidence

The Commission worked to promote the free flow of data within the EU, and eliminate data localization laws that prohibit free flows of data in the cloud. However, the lack of certainty and safeguards relating to law enforcement access to data in the cloud also needs to be addressed. The current situation inhibits the flow of data and encourages data localization among European technology users, in the private as well as public sectors, when they believe that their data is safer within their own countries. Moreover, the difficulties for law enforcement to obtain digital evidence across borders causes some to seek data localization laws so that evidence is within their reach. A modern EU legal framework that ensures consistent protection of technology users while providing clearer and efficient law enforcement procedures would benefit the Digital Single Market and also pave the way towards a better transatlantic approach.

AmCham EU leadership

BOARD OF DIRECTORS



Maxime Bureau
Chairman
3M



Pastora Valero
Vice-Chair
Cisco



Meglena Mihova
Vice-Chair
EPPA



Liam Benham
Chair, Policy Group
IBM



Melanie Faithfull Kent
Chair, Communications
and Marketing Group
Hill+Knowlton Strategies



Patrick Xhonneux
Chair, Operations Group
SAS



Louise Harvey
Member-at-Large
FTI Consulting



Zeger Vercouteren
Member-at-Large
Johnson & Johnson



Susan Danger
CEO
AmCham EU

COMMITTEE CHAIRS



AGRICULTURE & FOOD
**Marta Zuluaga
Zilbermann**
Cargill Europe



COMPETITION
**Bertold
Bar-Bouysiere**
DLA Piper UK LLP



COMPETITION
Jay Modrall
Norton Rose
Fulbright LLP



CONSUMER AFFAIRS
**Noelia Souque
Caldato**
Avon Products



**CUSTOMS &
TRADE FACILITATION**
**Walter
Van der Meiren**
UPS



DIGITAL ECONOMY
Claudia Selli
AT&T INC.



**EMPLOYMENT AND
SOCIAL AFFAIRS**
Elke Duden
Linklaters LLP
(until June 2017)



ENVIRONMENT
Leah Charpentier
First Solar



**FINANCIAL
SERVICES**
Richard Kaye
J.P. Morgan
Chase & CO



HEALTHCARE
Alexander Roediger
MSD



INSTITUTIONAL AFFAIRS
Renato Addis
EPPA



**INTELLECTUAL
PROPERTY**
Vincent Jamois
Time Warner
Europe



SECURITY & DEFENCE
Rudy Priem
United
Technologies
Corporation



TAX
William Morris
PwC



**TRADE & EXTERNAL
AFFAIRS**
Carsten Dannöhl
Caterpillar



**TRANSPORT,
ENERGY & CLIMATE**
Jérôme Bandry
Caterpillar

TASK FORCE CHAIRS



BREXIT
**Zeger
Vercouteren**
Johnson &
Johnson



**GENDER INITIATIVES
TASK FORCE**
**Beatrice
Flammini**
Liberty Global
Europe



SINGLE MARKET
Barbara Wynne
Accenture



**TRANSATLANTIC
TASK FORCE**
Nicholas Hodac
IBM



**EUROPEAN
PARLIAMENT
OUTREACH**
Alberto Zilio
AT&T INC.



**EXECUTIVE
COUNCIL**
Aongus Hegarty
DELL EMC



**EXECUTIVE
COUNCIL**
William Parker
Chief Sherpa
DELL

EXECUTIVE COUNCIL

AmCham EU speaks for

American companies **committed to Europe** on trade, investment and competitiveness issues. It aims to ensure a **growth-orientated business** and **investment climate** in Europe. AmCham EU facilitates the **resolution of transatlantic issues** that impact business and plays a role in creating **better understanding** of EU and US positions on business matters. Aggregate US investment in Europe totalled more than **€2 trillion in 2016**, directly supports more than **4.5 million jobs** in Europe, and **generates billions of euros** annually in income, trade and research and development.

amchameu.eu





3M ★ ABBOTT ★ ABBVIE ★ ACCENTURE ★ ADM ★ AFORE CONSULTING SPRL ★ ALBEMARLE EUROPE SPRL
★ AMERICAN EXPRESS ★ AMGEN ★ AMWAY ★ APCO WORLDWIDE ★ APPLE ★ ARCONIC ★ ARNOLD &
PORTER KAYE SCHOLER LLP ★ ASTRAZENECA ★ AT&T INC. ★ AVON PRODUCTS ★ BAKER BOTTS LLP ★
BANK OF AMERICA/MERRILL LYNCH ★ BARCLAYS ★ BAXTER WORLD TRADE CORPORATION ★
BDO INTERNATIONAL ★ BORGWARNER ★ BRISTOL-MYERS SQUIBB COMPANY ★ BRITISH AMERICAN
TOBACCO ★ BRUNSWICK GROUP LLP ★ BURSON-MARSTELLER ★ CA TECHNOLOGIES ★ CABINET DN ★
CARGILL EUROPE ★ CATERPILLAR ★ CELGENE ★ CHARLES SCHWAB & CO., INC. ★ CHEVRON ★ CICERO
CONSULTING ★ CISCO ★ CITI ★ CLEARY GOTTLIEB STEEN & HAMILTON LLP ★ CNH INDUSTRIAL ★
COGNIZANT ★ COVINGTON ★ CROWELL & MORING LLP ★ DAIMLER ★ DELL ★ DIAGEO ★ DLA PIPER UK LLP
★ DOW CHEMICAL ★ DUPONT DE NEMOURS INTERNATIONAL S.A. ★ ECOLAB ★ ELI LILLY & COMPANY ★
EPPA SA/NV ★ ESTEE LAUDER ★ EXPEDIA ★ EXXONMOBIL PETROLEUM & CHEMICAL ★ EY ★ FACEBOOK ★
FEDEX EXPRESS ★ FIRST DATA ★ FIRST SOLAR ★ FLEISHMANHILLARD ★ FOLEY & LARDNER LLP ★ FORD
MOTOR COMPANY ★ FRESHFIELDS BRUCKHAUS DERINGER LLP ★ FTI CONSULTING ★ GE ★ GENERAL
MOTORS EUROPE ★ GILEAD SCIENCES ★ GLAXOSMITHKLINE ★ GOLDMAN SACHS INTERNATIONAL ★
GOODYEAR DUNLOP ★ GOOGLE ★ GOWAN GROUP ★ GOWLING WLG (UK) LLP ★ HASBRO EUROPEAN
SERVICES ★ HERBALIFE INTERNATIONAL INC. ★ HILL+KNOWLTON STRATEGIES ★ HOGAN LOVELLS ★
HONEYWELL EUROPE N.V. ★ HP ENTERPRISE ★ HP INC. ★ IBM ★ INTEL CORPORATION ★ INTELLECTUAL
VENTURES ★ INTEREL ★ INTERNATIONAL PAPER ★ J.P. MORGAN CHASE & CO ★ JOHN DEERE GMBH & CO.
KG. ★ JOHN WILEY & SONS ★ JOHNSON & JOHNSON ★ JOHNSON CONTROLS ★ KELLER AND HECKMAN
LLP ★ KREAB ★ LATHAM & WATKINS LLP ★ LIBERTY GLOBAL EUROPE ★ LINKLATERS LLP ★ LOCKHEED
MARTIN ★ LVMH ★ LYONDELLBASELL ★ MARS ★ MARSH & MCLENNAN COMPANIES, INC. ★ MASTERCARD
EUROPE ★ MATTEL EUROPE ★ MAYER BROWN EUROPE-BRUSSELS LLP ★ MCDONALD'S EUROPE ★
MCGUIREWOODS LLP ★ METLIFE ★ MICHELIN NORTH AMERICA INC. ★ MICROSOFT ★ MONSANTO ★
MORGAN STANLEY INT. ★ MORGAN, LEWIS & BOCKIUS, LLP ★ MSD (EUROPE) INC. ★ NIKE EMEA ★ NORTON
ROSE FULBRIGHT LLP ★ ORACLE ★ PFIZER ★ PHILIP MORRIS INTERNATIONAL ★ PITNEY BOWES LTD. ★
PRICEWATERHOUSECOOPERS ★ PROCTER & GAMBLE ★ QUALCOMM ★ QUINN EMANUEL URQUHART &
SULLIVAN LLP ★ RELX GROUP ★ S.W.I.F.T. SCRL ★ SAS ★ SHIRE ★ SIDLEY AUSTIN LLP ★ SKADDEN, ARPS,
SLATE, MEAGHER & FLOM ★ SQUIRE PATTON BOGGS (UK) LLP ★ STANDARD & POOR'S ★ STANLEY BLACK
& DECKER ★ STEPTOE & JOHNSON LLP ★ SYMANTEC ★ SYNGENTA ★ SYNOPSIS ★ TE CONNECTIVITY ★
TENNECO ★ TEXAS INSTRUMENTS ★ THE AES CORPORATION ★ THE BOEING COMPANY ★ THE CARLYLE
GROUP ★ THE COCA-COLA COMPANY ★ THE NIELSEN COMPANY ★ THE WALT DISNEY COMPANY ★
THOMSON REUTERS ★ TIME WARNER EUROPE ★ UBER ★ UNITED TECHNOLOGIES CORPORATION ★ UPS
★ VAN BAELE & BELLIS ★ VERIZON ★ W.L. GORE & ASSOCIATES ★ WHITE & CASE LLP ★ WILLKIE FARR &
GALLAGHER LLP ★ WILMER CUTLER PICKERING HALE & DORR LLP ★

List accurate as of November 2017

amchameu.eu

American Chamber of Commerce to the European Union (AmCham EU)

Avenue des Arts/Kunstlaan 53, B-1000 Brussels, Belgium • amchameu.eu

T +32 (0)2 513 68 92 • F +32 (0)2 513 79 28 • info@amchameu.eu



American Chamber of Commerce to the European Union (AmCham EU)
Avenue des Arts/Kunstlaan 53, B-1000 Brussels, Belgium • amchameu.eu
T +32 (0)2 513 68 92 • F +32 (0)2 513 79 28 • info@amchameu.eu

