

Study on the Polluter Pays Principle

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Workshop Report

July 2023

RPA
Europe

Study on the Polluter Pays Principle

July 2023

Workshop report

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1 Introduction

The online workshop on the ‘Implementation of the Polluter Pays Principle in the EU’ was organised in the context of the fitness check the European Commission is carrying out on how the ‘polluter pays’ principle (the ‘principle’) is applied in environmental policy. A Call for Evidence set out the mandate and process for this work¹.

The workshop is part of the ‘Study on the Polluter Pays Principle and Environmentally Harmful Subsidies’, which the European Commission (DG Environment) commissioned to RPA Europe, in collaboration with the Logika Group, Risk & Policy Analysts (RPA), Metroeconomica and the Centre for European Policy Studies (CEPS).

The aim of the study is to support the European Commission in gathering and analysing information for two interrelated work-streams:

- The fitness check of the implementation of the principle in the EU environmental legislation; and
- The development of a methodology for monitoring and reporting on non-energy environmentally harmful subsidies.

The fitness check is partly a response to the findings of the European Court of Auditors. In its special report on the polluter pays principle², the European Court of Auditors concluded that the principle is applied to varying degrees across environmental legislation and issued three recommendations to improve its application:

- Recommendation 1: Assess the scope for strengthening the integration of the principle into environmental legislation.
- Recommendation 2: Consider reinforcing the application of the Environmental Liability Directive.
- Recommendation 3: Protect EU funds from being used to finance projects that should be funded by the polluter.

In the Zero Pollution Action Plan³, the European Commission announced that it would respond in 2024 with recommendations based on the ongoing fitness check.

For additional information on the study supporting the fitness check, please consult the workshop background paper.⁴

The workshop focused on the fitness check of the implementation of the polluter pays principle, and on the first and third recommendations of the European Court of Auditors: the purpose was to investigate to which extent the principle has been integrated into EU environmental legislation, and to which extent EU funds may have financed projects that, according to the principle, should be funded by the polluter. The second recommendation of the European Court of Auditors focuses on the Environmental Liability Directive. This is the object of an ongoing evaluation, whose results are expected in the Autumn of 2023. The ongoing work supporting the development of a methodology

¹ https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/13546-Polluter-Pays-Principle-fitness-check-of-its-application-to-the-environment_en

² https://www.eca.europa.eu/Lists/ECADocuments/SR21_12/SR_polluter_pays_principle_EN.pdf

³ https://environment.ec.europa.eu/strategy/zero-pollution-action-plan_en

⁴ Available at: https://www.rpa-europe.eu/files/ugd/b48dda_5ecab0b7e99e40108c0cc061245723b0.pdf

for the identification and reporting of environmentally harmful subsidies will be discussed in a second workshop, also expected to be held in the Autumn of 2023.

This report provides the event proceedings, detailing stakeholder participation, and outlining the main topics of discussion (identified using thematic analysis, a qualitative method for distinguishing major patterns and themes in textual information).

The workshop was held online through Cisco Webex on 4 July 2023, starting at 9:30 CET and concluding at 12:30 CET. The objectives were to inform stakeholders of the ongoing study supporting the fitness check, and to provide a platform to exchange knowledge and ideas about the state of play of the implementation of the polluter pays principle in the EU legislation and the use of public funds in the EU.

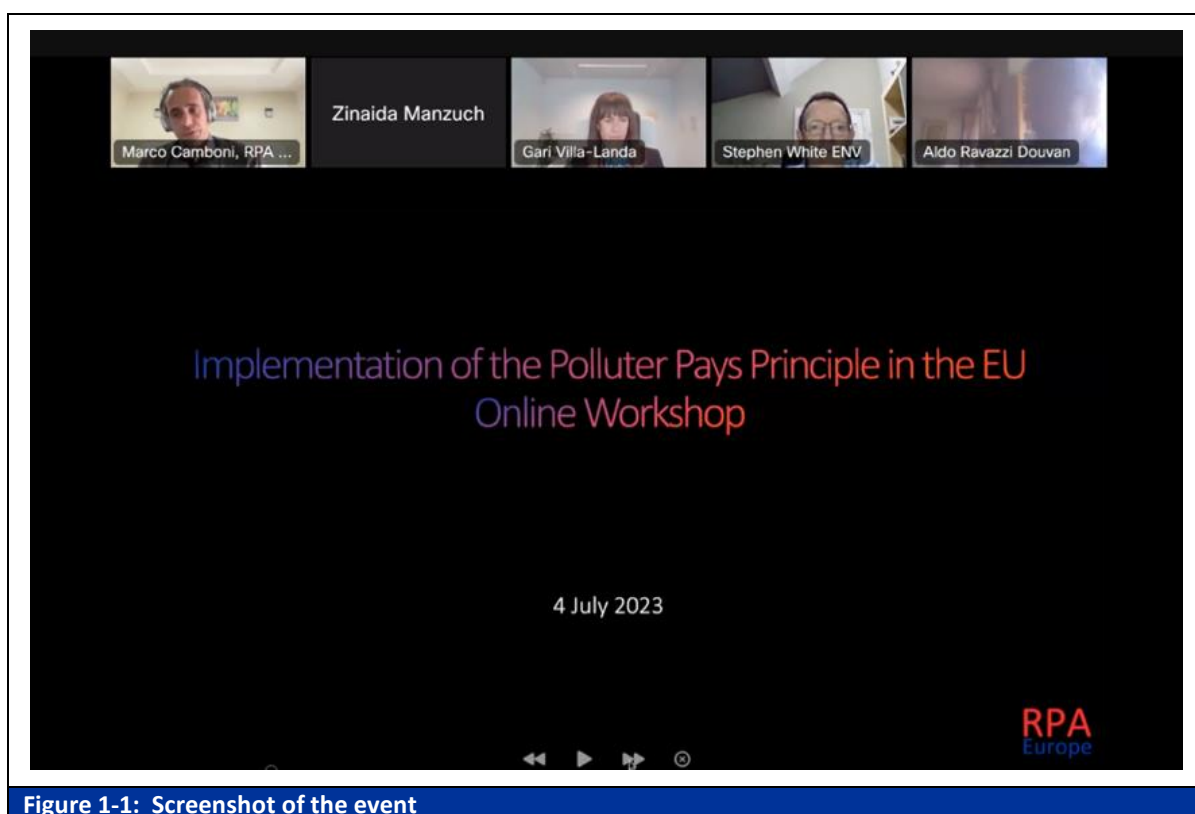


Figure 1-1: Screenshot of the event

Timing		Agenda item
09:00 – 09:30	30 mins	Registration
09:30 – 09:35	5 mins	Welcome and housekeeping rules (Marco Camboni, RPA Europe)
09:35 – 09:45	10 mins	Welcome message from the Commission and introduction to the aims of the study (Steven White, DG Environment)
09:45 – 09:55	10 mins	Study overview (Marco Camboni, RPA Europe)
09:55 – 10:05	10 mins	Q&A
10:05 – 10:15	10 mins	Overview of the scope of the PPP application in the EU legislation (Dave Tyrer, Logika Group)
10:15 – 10:25	10 mins	Overview of the PPP application in the EU funding programmes and mechanisms (Tamas Kiss-Galfalvi, CEPS)
10:25 – 10:35	10 mins	Q&A

Timing		Agenda item
10:35 – 10:45	10 mins	The implementation of the Polluter Pays Principle (Aldo Ravazzi Douvan, Chief Economist at DG Sustainable Development, EU & International Relations of the Italian Ministry of Environment)
10:45 – 10:55	10 mins	Break
10:55 – 11:05	10 mins	The Polluter Pays Principle and water services (Gari Villa-Landa Sokolova, Senior Policy Advisor – Water Services, EurEau)
11:05 – 11:15	10 mins	The implementation of the Polluter Pays Principle: the EEB’s perspective (Frederik Hafen, Senior Policy Officer for Environmental Democracy, European Environmental Bureau)
11:15 – 11:20	5 mins	Q&A
11:20 – 12:20	60 mins	Discussion
12:20 – 12:30	10 mins	Wrap up

After a brief introduction to the workshop by Marco Camboni (RPA Europe, project manager) and a welcome message from Steve White (European Commission DG Environment), Marco introduced purpose, scope, methodology and timeline of the study, including the forthcoming activities to be implemented by the team. He also informed the audience of the public consultation open until 4 August 2023⁵, inviting workshop attendees to participate. David Tyrer (Logika Group) followed by providing further details on the scope and methodology adopted in evaluating the implementation of the principle in the EU environmental legislation. Tamás Kiss-Gálfalvi (CEPS) then discussed the principle application in the EU funding programmes and mechanisms, and how the team is proceeding with the evaluation of these aspects.

Presentations were then delivered by three invited speakers with different backgrounds:

- Aldo Ravazzi Douvan, Chief Economist at DG Sustainable Development, EU & International Relations of the Italian Ministry of Environment;
- Gari Villa-Landa, Senior Policy Officer at EurEau; and
- Frederik Hafen, Environmental Democracy Policy Officer at the European Environmental Bureau (EEB).

Additional details on their presentations are provided in Section 3.

The floor was then opened to any intervention by the participants, to gather their views on which EU pieces of legislation best apply the PPP, what are the key issues that lead to non-implementation of the principle, how could compliance with the PPP be ensured in the application of EU funds, and how could awareness of the principle be increased.

The study team wrapped up the workshop by summarising key messages and informing the audience of a second workshop to be held in Autumn 2023.

⁵ https://environment.ec.europa.eu/news/zero-pollution-commission-consults-citizens-and-stakeholders-polluter-pays-principle-2023-05-12_en

2 Target audience

2.1 Event dissemination activities

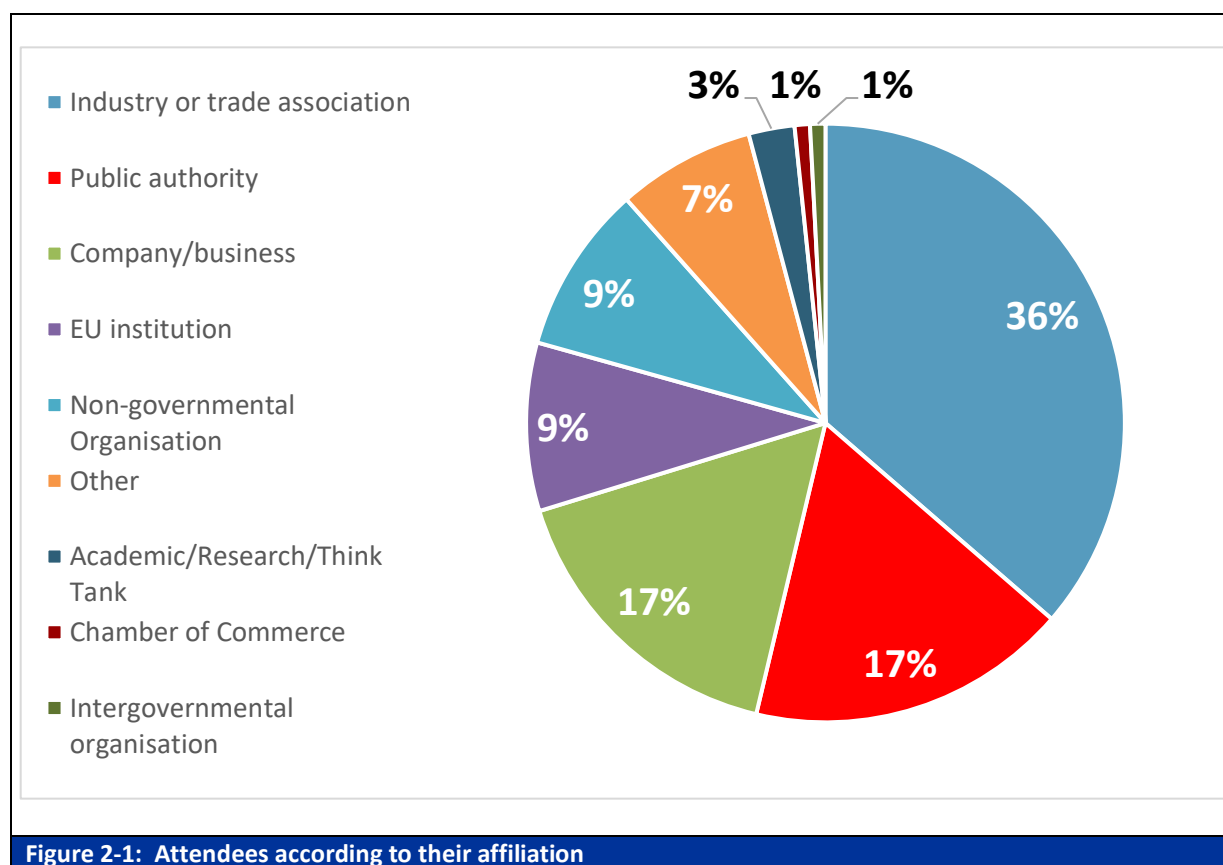
Invitations to participate in the workshop were sent by email to 894 contacts from Member State competent authorities, trade and industry associations, companies, non-governmental organisations and research institutions with knowledge and practical experience on the polluter pays principle implementation.

In addition, the workshop was promoted through posts on the consortium members LinkedIn webpages three weeks prior to the event and reposted by members of the study team and by attendees.

2.2 Participation in the event

A total of 194 people registered for the event, with 121 participants (over 60%) joining on the day. Attendees were from competent authorities, EU institutions, industry and trade associations, private companies, non-governmental organisations, researchers and members of the study team. The list of participants' affiliations is provided in Annex 1.

Representatives of all target audience groups attended the event (see Figure 2-1).



Companies in attendance included energy and water suppliers, oil and gas producers, waste management enterprises, law firms, consultancies, and insurance companies.

A total of 22 countries were represented during the workshop. This number included nineteen EU Member States, and 3 non-EU countries: UK, Norway and Iraq. Figure 2-2 shows the number of participants attending the event based in Europe, excluding the 39 attendees based in Brussels and operating at EU level (representatives of EU institutions, European industry associations and pan-European NGOs).

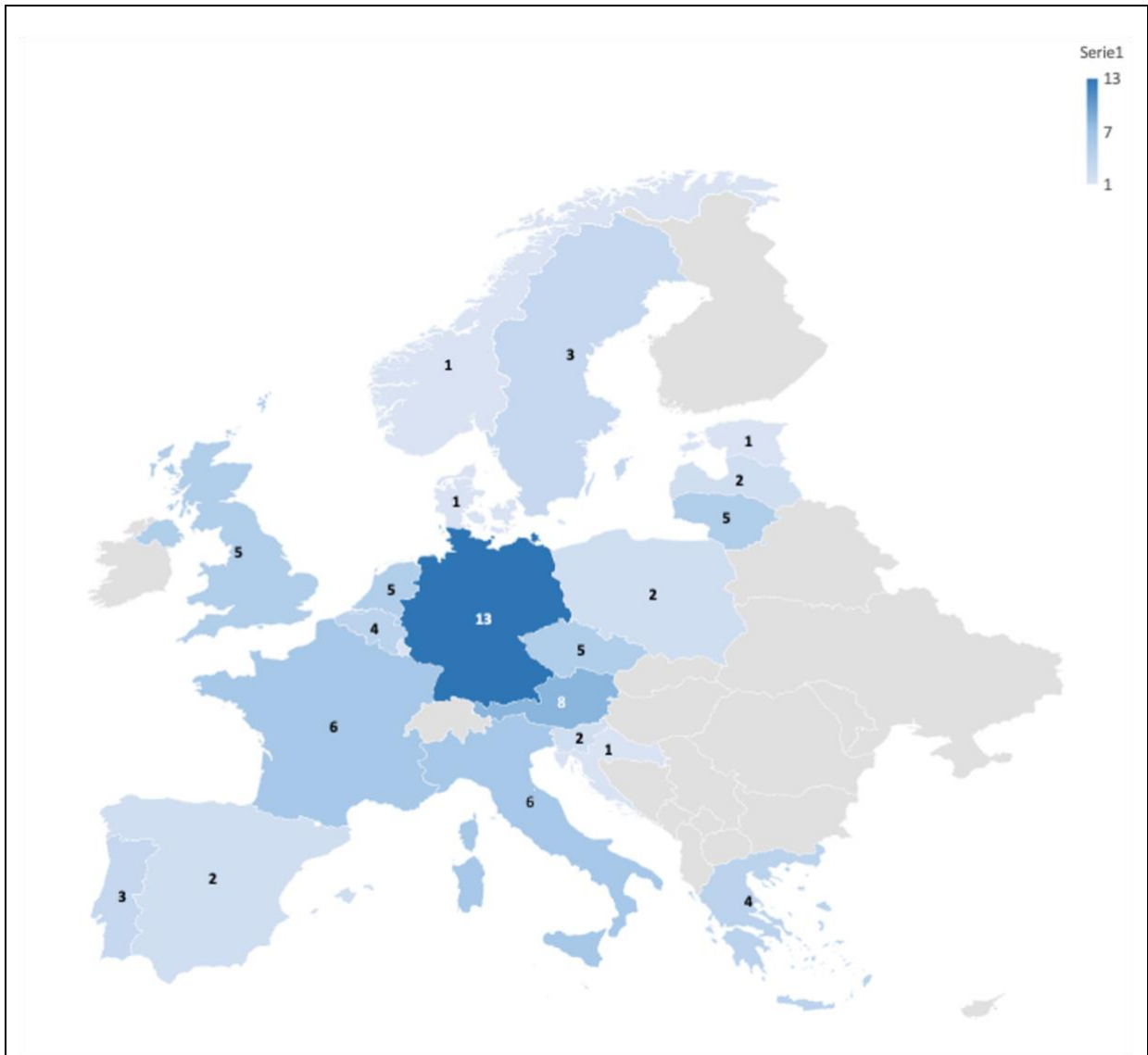


Figure 2-2: Attendees according to their countries of residence (operation)

3 Workshop discussion

Aldo Ravazzi Douvan framed his presentation around 12 key messages:

1. Economists who deal with environment and sustainable development tend to think that the **PPP is still a key principle for improving environment and economy performances**.
2. The project may benefit from the consideration of the **historical perspective**: the principle was introduced by Michel Potier and OECD economists through an OECD Council Recommendation in the 1970s, with the introduction of the principle in the EU Treaties in the 1990s.
3. The fitness check of the principle implementation is a **welcomed initiative**, in particular following the 2021 Court of Auditors report.
4. There are at least **two major problems**:
 - a) There is a general tendency to distribute **aid and subsidies**: in the short-run they create consensus for politicians, quiet life for administrators and bureaucrats, a better-off situation for producers and consumers; in the medium and long-term results are not necessarily positive (bad price signal influences today's and tomorrow's consumption, production and investment).
 - b) There is insufficient consideration of where the money comes from: **too often from the public budget and public debt** (which impacts future generations) and not from the polluters.
5. The **fiscal dimension** should not be ignored: the implementation of the principle through taxes and pricing is essential. There is a problem with the **EU fiscal unanimity rule**, and this should be raised and tackled.
6. It would be helpful to analyse the principle (and subsidies) **in the frame of the Environmental Fiscal Reform** (i.e. fiscal shift from citizens' and firms' income to pollution and use of natural resources) as suggested by Jacques Delors and European economists back in 1992-94.
7. There is a strong argument in favour of the principle implementation: if we wish (and we should) help the poor and the vulnerable (citizens, some industrial and agricultural sectors, specific areas), it seems wiser (more efficient and effective) to not do it by **under-pricing the environment** (non-full implementation of PPP), but through direct and transparent aid.
8. In Italy, we have produced five editions of the Catalogue of EHS-EFS (Environmentally Harmful and Environmentally Friendly Subsidies), with the last edition with 2021 estimates published in recent weeks. It seems important to **treat together the different dimensions of EHS**, including BHS-FFS-CEHS (Biodiversity, Fossil Fuels, Circular Economy, and probably the connection to the Do not Significant Harm principle (DNSH)).
9. We are facing **three concurrent crises** (post-COVID 19 recovery, Russian aggression to Ukraine, and subsequent energy prices increases and energy-driven inflation): we have obviously to intervene with subsidies in emergency (and possibly for the minimum transition and short-term), but we should strive to avoid giving wrong price signals (e.g. on fuels and energy sources) and use direct measures.
10. The analysis should have a **European but also a national level**. The National Recovery and Resilience Plans, the derived measures from the European Green Deal, and the use of European Funds by Member States is where the principle should be fully implemented.
11. It is important not to forget that EU funds/budget are just above 1% of European GDP. **The European Commission should show how the principle can be fully implemented at EU level** but the implementation of the principle seems to have a much larger national scope and dimension.

12. **Communication:** there is strong resistance of **vested interests**, privileged interests, incumbent positions. The presentation of these aspects would contribute to **Environmental Justice**. It is important to give voice and visibility to nature and ecosystems, i.e. the Natural Capital, the 4th forgotten capital of Herman Daly. Compensations should be visible and well-communicated.

Gari Villa-Landa highlighted the deficiencies in the implementation of the principle within EU water policies, outlining five major issues:

- Insufficient adherence to existing emission limit values.
- Inadequate accountability of polluters once pollution has occurred.
- Lack of polluter pays principle initiatives to address the additional costs associated with the removal of pollutants such as PFAS, pesticides, and nitrates.
- The necessity for consistent application of PPP to tackle diffuse pollution.
- EU fundings should not be granted if there is no specific obligation of protecting water resources and preventing their pollution through specific targets and measures.

Frederik Hafen pointed to the scope and purpose of the polluter pays principle, which should aim at fully internalize all negative environmental externalities, reduce and prevent pollution and provide legal recourses. He discussed opportunities and limitations of the current implementation, and recommended a number of actions for implementation:

- Attaching green conditionalities to all EU funds, ensuring that public money is used in environmentally friendly initiatives.
- Halting and redirecting harmful subsidies at the national level, and prioritising the assessment of liability options before allocating public funds.
- Improving and elaborating environmental taxes.
- Eliminating derogation exemptions that contribute to degradation.
- Including directly enforceable provisions, specifically focusing on limits rather than targets.
- Ensuring public access to information and justice is crucial in safeguarding the interests of the general population.

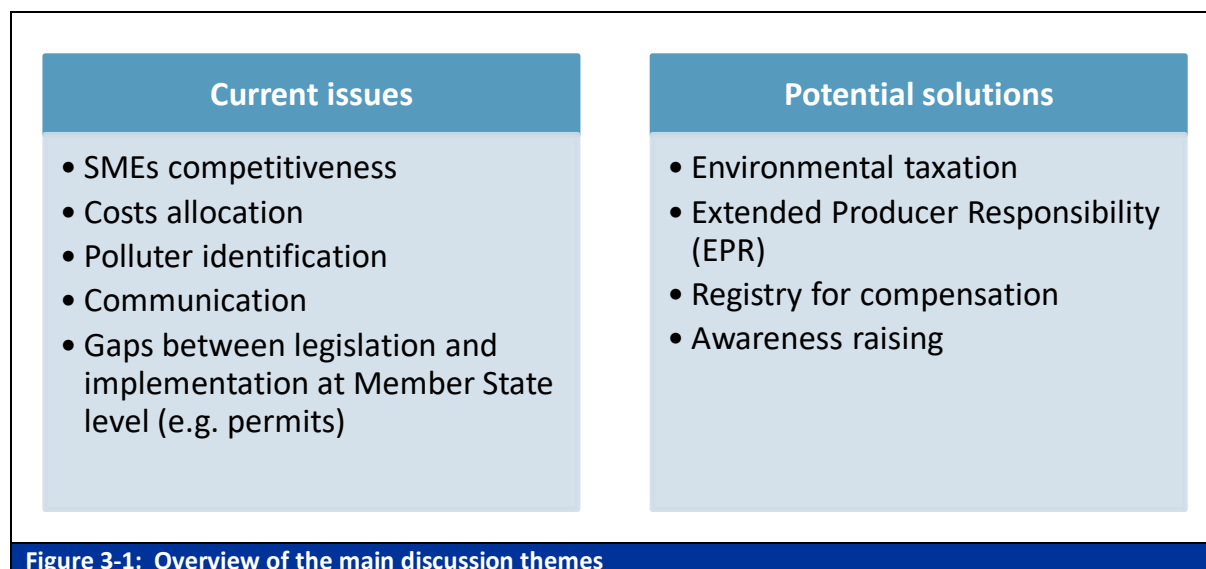
The open discussion focused on the two main themes of the workshop: the polluter pays principle implementation in the EU legislation and the use of public funds in the EU. Attendees participated in the discussion, both by intervening in the chat and by taking the floor. The following subsection describes the main themes that emerged.

3.1 The implementation of the polluter pays principle

In order to frame the discussion, the study team proposed a set of questions:

- What are the **pieces of legislation that best apply the Polluter Pays Principle**? Is there a gap between legislative requirements and actual implementation? If yes, what are the issues?
- What are the economic sectors where legislation would benefit from a stronger application of the principle?
- The principle is not fully applied in all occasions and, therefore, **polluters do not always pay (in full) and the wider society endure the negative impacts of pollution** and may have to incur the costs of remediation. What are the key issues that lead to this non-desirable result?

During the discussion, participants identified several existing issues that hinder the proper application and implementation of the Polluter Pays Principle and outlined potential solutions that could be applied to improve the situation. Figure 3-1 summarises the main topics that emerged.



- **Competitiveness:** one of the reasons the principle may not be applied is due to concerns about the impact on small and medium-sized enterprises (SMEs). Implementing certain environmental regulations or sustainability practices can increase costs for businesses, particularly smaller ones that may have limited resources or economies of scale.
- **Fairness and costs allocation:** some stakeholders may argue that imposing environmental taxes disproportionately affects certain groups or industries, placing an unfair burden on them. There may be debates and disagreements about how these costs should be distributed across different sectors of society.
- **Identification of the polluter** and differentiation from the users: determining who should be held accountable can be complex. It is not always straightforward to identify who is the polluter: for example, is it always the manufacturer of a particular chemical substance, or could it be the user? Should this be decided on a sector by sector, case by case basis? This is particularly difficult in the case of **diffuse pollution**. Diffuse pollution refers to the release of pollutants from multiple, often dispersed, sources, making it challenging to clearly identify and regulate these polluters. Implementing the principle may face difficulties in ensuring that all polluters responsible for diffuse pollution are identified and made to bear the costs.
- **Communication:** effective communication and awareness about the polluter pays principle are crucial for its successful implementation. Lack of proper communication about the rationale, objectives, and benefits of the principle can lead to misunderstandings or resistance from various stakeholders. Disseminating information, engaging in dialogue, and fostering understanding among policymakers, businesses, and the public are essential for creating a supportive environment for the application of the principle.
- **Outdated permits** granted by national authorities: another obstacle to the application of the principle could arise from permits granted by national authorities that may no longer align with current environmental standards or regulations. One example mentioned during the workshop is the case of the hydro power project in Romania, where the project was issued a permit twenty years before the actual start of the work, and therefore did not consider any of the updated environmental legislation⁶.

⁶ <https://meta.eeb.org/2017/10/17/old-permit-for-hydropower-project-threatens-romanian-wild-river/>

In this contest, participants highlighted the significant improvements brought forth by the revised Industrial Emissions Directive (IED 2.0). The latest version of the IED now incorporates several new provisions aimed at enhancing the permitting process and ensuring a fair and level playing field among Member States.

Some participants provided ideas and suggestions on how some of the major issues related to the principle implementation could be tackled and gave examples where these solutions have already been proposed or implemented.

Environmental taxation: one potential solution to improve the application of the polluter pays principle is through the implementation of an ecological fiscal reform. This involves restructuring the tax system to incorporate environmental considerations. By introducing environmental taxes or levies on polluting activities, the costs associated with pollution can be internalised, making polluters bear the financial burden of their actions. The revenue generated from these taxes can then be used to fund environmental initiatives, promote sustainable practices, and support the transition to a greener economy.

Extended Producer Responsibility (EPR): implementing more extensively the extended producer responsibility could be an approach to clearly define and assign responsibility to the polluter. This concept holds manufacturers accountable for the entire lifecycle of their products, including their disposal and environmental impact.

Example

The Urban Waste Water Treatment Directive (UWWTD) is currently under revision and one of the most sensitive issues in the revision concerns the [European Commission's proposal](#) to introduce a new Article 9, under which extended producer responsibility (EPR) schemes would be set up to cover the costs for the removal of micro-pollutants deriving from pharmaceutical and cosmetic products from urban waste water. Many actors of this industrial sector are not in favour of the proposal, stating that 'the financial responsibility should be either shared by all actors involved in the chain (from industry to consumers) or taken by the public authorities.'

Example

The EPR solution was also proposed by the European Parliament Committee on the Environment, Public Health and Food Safety [Draft Report](#) on the proposal for a regulation on the sustainable use of plant protection products. Under the proposed new Article 19a, Member States would 'take measures to ensure that producers who place any plant protection product on the market have extended producer responsibility' and 'ensure that the producers of plant protection products cover the costs pursuant to the extended producer responsibility'.

Example

In the context of the revision of the Groundwater Directive (GWD) and the Environmental Quality Standards Directive (EQSD) the European Parliament has [proposed](#) EPR schemes to cover not the pollution itself but the costs related to the monitoring of pollutants (in particular emerging pollutants).

EU-wide registry for compensation claims: establishing an EU-wide registry where stakeholders can submit claims for compensation could improve the implementation of the principle. This registry

would serve as a centralised platform for individuals, communities, or organisations affected by pollution to seek compensation from the responsible parties. Once claims have been verified, they can be categorised according to sectors and/or polluters. Subsequently, the responsible polluter(s) can assess whether it is more cost-effective to invest in measures aimed at addressing pollution at its source or to provide compensation to the affected stakeholders/sectors.

Awareness raising: to enhance implementation, prioritizing awareness and understanding of the principle among stakeholders is crucial. Participants emphasised that such awareness-raising efforts should begin even before the implementation phase, during the law-making process. This means raising awareness before the European Commission makes a proposal, for instance when it carries out impact assessments and studies.

3.2 EU funding programmes and mechanisms

To frame the discussion on how to better protect the EU funds from financing projects that should be paid for by the polluter, the study team proposed a set of questions:

- How could **compliance with the PPP be ensured in the application of EU funds**, especially those under shared management?
- What is the best way to address (potential) **contradictions with the PPP in Just Transition Plans**?
- What would be the best way to **improve awareness** of the principle (e.g. inclusion in fund regulation recitals, guidance documents, etc.)?

Participants underlined existing issues that are faced when implementing EU funds and suggested several instruments and actions that could improve the situation. Figure 3-2 summarises the main topics that emerged in the discussion.

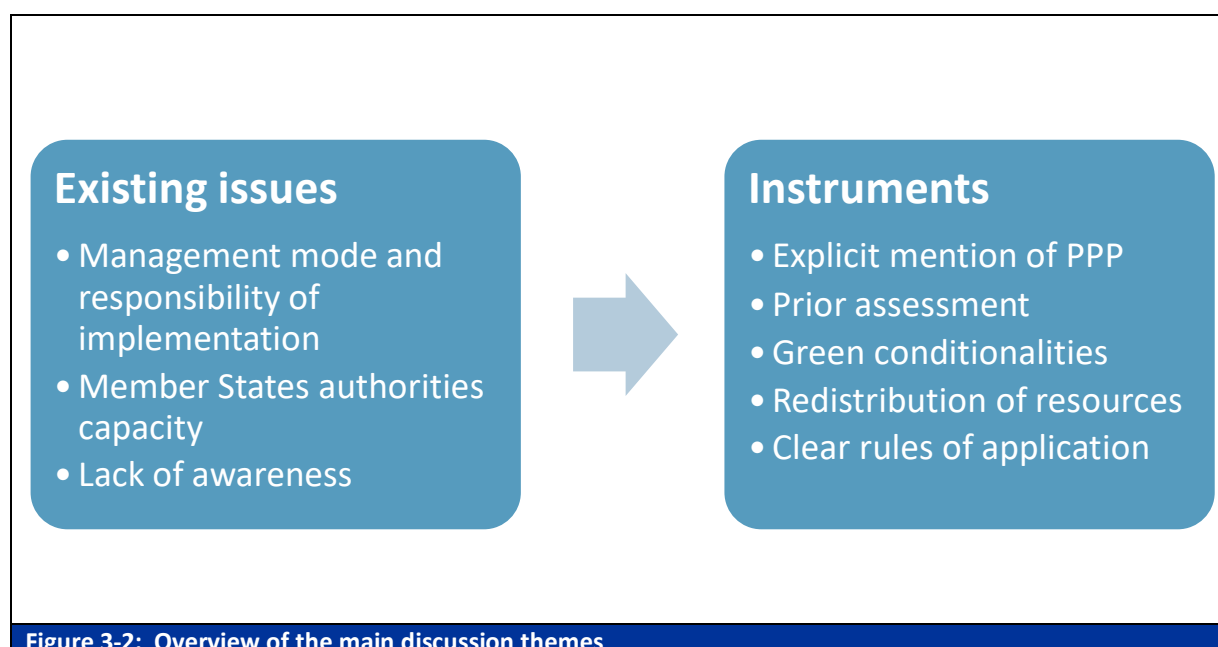


Figure 3-2: Overview of the main discussion themes

Management mode and responsibility of implementation: in some instances, certain programmes fall under the direct management of the European Commission, making it responsible for selecting operations and launching calls. Consequently, the enforcement of the principle lies with the Commission in such cases. However, in other programs, the **responsibility is shared between the**

Commission and the Member States, though ultimately, it is the Member States who are responsible for selecting the operations. Thus, the practical application of the principle is vested in the Member States, and they are accountable for its implementation. Most of the cases identified by the Court of Auditors where the principle was not respected related to the shared management, so where the responsibility was with the Member States.

Capacity problems for national authorities when implementing EU funds arise due to the multitude of rules and criteria associated with these funds. The complex nature of the EU funding framework poses significant challenges and burdens on national authorities responsible for managing and distributing these funds effectively.

During discussions, participants put forward several actions and instruments that could enhance the implementation of EU and national funds in the context of the polluter pays principle. These proposed actions aim to strengthen environmental accountability, improve fund utilisation, and ensure fair distribution of resources.

Explicit mention of the principle in the EU funds: participants recommended including explicit references to the principle within the legal frameworks and guidelines of various EU funds. By explicitly acknowledging the principle, these funds would reinforce its importance and promote its integration into project selection, evaluation, and financing processes. A number of participants stressed that the principle should be integrated in specific provisions in the articles of the relevant pieces of legislation, rather than in the recitals, which are not mandatory. Participants highlighted that within the EU funds related regulations there are instances of indirect mention of the principle.

Example

Indirect mentions of the principle can be found in various contexts, such as the guidelines on state aid for climate, environmental protection, and energy¹ (which also contain explicit mention of the principle). These guidelines demand that the aid provided should surpass the EU standards for environmental protection, not merely reinforce the status quo. The aim is to promote and ensure enhanced protection, which aligns with the essence of the principle. Although not a direct reference, this requirement demonstrates a connection.

Example

Within the framework of the Just Transition Fund, a Commission working document¹ clarifies that, for the analysis of specific projects, Member States are required to diligently assess whether the activities can be fully or partially funded by the polluter, taking into account existing legal obligations like the Environmental Liability Directive and relevant national rules.

- **Prior assessment:** before using public funds to remediate pollution and address environmental damages, a thorough assessment should determine if it is the most suitable approach. Using public funds and awarding contracts to industry players for remediation could complicate the process of recovering the costs from the polluters later on. However, it is also crucial to ensure that environmental remediation efforts are not delayed despite this consideration.
- **Clear rules on implementation:** participants emphasised the need for clear and standardised rules regarding the implementation of the principle in EU funds. Establishing transparent guidelines would provide clarity on how the principle should be applied, thereby reducing ambiguity and enabling consistent enforcement across different projects and Member States.

- **Green conditionalities** in the funds: to reinforce environmental considerations, participants suggested incorporating green conditionalities into the implementation of EU funds. These conditionalities would require project beneficiaries to meet specific environmental performance criteria, such as reducing greenhouse gas emissions, promoting sustainable practices, or adopting eco-friendly technologies.
- **Redistribution of resources** among citizens: recognising the social dimension of the principle, participants proposed the redistribution of resources generated through the principle's implementation. This would involve directing a portion of the financial contributions received from polluters towards initiatives aimed at benefiting affected communities or financing environmental protection and restoration projects.

4 Conclusions and next steps

The workshop generated substantial interest among stakeholders. Over sixty percent of registered stakeholders attended the event resulting in more than 120 participants from twenty-two EU Member States and three non-EU countries. The participants represented all nine stakeholder groups identified by the study team as concerned with the implementation of the polluter pays principle in the EU.

Several themes were prominent in the discussion:

- **Identification of the polluter and clear definition of their responsibilities.** Participants agreed that determining who should be held accountable as the polluter can be complex, in particular when considering diffuse pollution.
- **Management of funds and Member States capacity.** Attendees highlighted the capacity issues that many Member States may face when implementing the principle in the context of the various funds applications.
- **Awareness and communication.** Participants underlined the lack of awareness regarding the polluter pays principle among both stakeholders and citizens. Issues related to how decisions that deal with environmental taxation and similar subjects are communicated to the public were also highlighted.

Based on the workshop discussions, the study team collected information and examples to complement the literature review and legislation analysis.

Annex 1

List of participants

Table 1-2: List of participants	
Organisation name	Country of residence (operation)
A2A	Italy
Ad-Hoc Industry Natural Resource Management Group	Belgium
Administration de l'Environnement	Luxembourg
Airclim - Air Pollution & Climate Secretariat	Sweden
ARC	Denmark
Association of public services and enterprises Austria (VÖWG)	Austria
Association of River water companies (RIWA-Rijn)	Netherlands
Association of the Waterworks and Sewerage Industry of the Czech Republic, zs. (SOVAK ČR)	Czech Republic
Association of the Waterworks and Sewerage Industry of the Czech Republic, zs. (SOVAK ČR)	Czech Republic
Austrian Association for Building Materials and Ceramic Industries	Austria
Biotek, S.A.	Portugal
Bundesministerium für Klimaschutz, Umwelt, Energie, Mobilität, Innovation und Technologie (BMK)	Austria
BV Glas (Federal Glass Industry Association)	Germany
CEFIC	EU level
CEFIC	EU level
CEFIC	EU level
Centre for European Policy Studies (CEPS)	EU level
Chamber of Commerce "Polish Waterworks"	Poland
Citizens Climate Europe	Portugal
Coalition Clean Baltic (CCB)	Sweden
Comité National de la Conchyliculture (CNC)	France
Comité National Des Pêches Maritimes et des Élevages Marins (CNPMEM)	France
Community of European Railway and Infrastructure Companies (CER)	EU level
Compost and Biogas Association	Austria
Confederation of european paper industries (Cepi)	EU level
Copa-Cogeca	EU level
Copa-Cogeca	EU level
Croatian Customs Administration	Croatia
Czech Environmental Information Agency (CENIA)	Czech Republic

FuelsEurope	EU level
Fundación Española para la Ciencia y la Tecnología (FECYT)	Spain
General Association of the German Insurance Industry (GDV)	Germany
German Association of Local Public Utilities (VKU)	Germany
Greek LIFE Task Force	Greece
Greek LIFE Task Force	Greece
Holding Slovenske Elektrarne (HSE)	Slovenia
Holding Slovenske Elektrarne (HSE)	Slovenia
Howden Group Holdings	Germany
Howden Group Holdings	United Kingdom
International Association of Oil & Gas Producers	EU level
International Commission for the Protection of the Rhine (ICPR)	Germany
International Working Group of Waterworks in the Rhine catchment area (IAWR)	Germany
Krakowski Holding Komunalny S.A. w Krakowie	Poland
Lenzing Group	Austria
Logika Group	United Kingdom
Logika Group	United Kingdom
Maastricht University	Netherlands
Ministry of Environment	Italy
Ministry of Environment	Estonia
Ministry of Environment	Czech Republic
Ministry of Environment	Czech Republic
MKP (Mārupes communal services)	Latvia
MKP (Mārupes communal services)	Latvia
Natural Environment and Climate Change Organization (OFYPEKA)	Greece
Natural Environment and Climate Change Organization (OFYPEKA)	Greece
Ökopol – Institute for Ecology and Politics GmbH	Germany
OMV Aktiengesellschaft	Austria
Pool Ambiente	Italy
Proman Management GmbH	Austria
RPA Europe	Italy
RPA Europe	Lithuania
RPA Europe	Lithuania
RPA Europe	Lithuania
RPA Europe	Lithuania
RREUSE	EU level
Seeds Consulting	Italy

Service public de Wallonie	Belgium
Šiauliai Region Waste Management Center (ŠRATC)	Lithuania
Siemens Energy	Germany
Stevens & Bolton LLP	United Kingdom
Together to Protect Human & the Environment Association	Iraq
University of Turin	Italy
Unknown	Unknown
VCI (Association of the Chemical Industry)	Germany
Veolia	France
Vewin - association of water companies	Netherlands
Vewin - association of water companies	Netherlands
Vitis Regulatory	Belgium
Vitis Regulatory	Belgium
Water District Authority	Sweden
WEEE Forum - International Association of Electronic Waste Producer Responsibility Organisations	EU level
WEEE Forum - International Association of Electronic Waste Producer Responsibility Organisations	Spain
WEEE Forum - International Association of Electronic Waste Producer Responsibility Organisations	EU level
WWF Germany	Germany



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