

Fitness check of the Polluter Pays Principle application to the environment

Fields marked with * are mandatory.

Introduction

The polluter pays principle (PPP) should be implemented in EU environmental policies, as set out in Article 191(2) of the Consolidated Version of the Treaty on the Functioning of the European Union [EUR-Lex - 12008E191 - EN \(europa.eu\)](#).

The PPP requires polluters to pay for the measures they take to stop pollution happening and for the pollution they cause. Implementing the principle provides an incentive to avoid damaging the environment at source and makes polluters responsible. For example, does an industrial operator pay for pollution abatement systems and risk management systems, and does that operator pay for remediation of any environmental damage that does occur, or for any costs to society of pollution? What is at stake therefore is environmental effectiveness, economic efficiency and a just transition that minimises social inequalities resulting from impacts on and policies for the environment and in which measures to protect the environment are implemented in a socially fair and inclusive way.

The European Court of Auditors has concluded that the PPP[1] is reflected and implemented to varying degrees in EU environmental policies and its coverage and implementation is therefore incomplete. Following up on the Court's recommendation, the Commission announced in its [Zero pollution action plan](#) that it would prepare a 'recommendation on how to better implement the polluter pays principle on the basis of a fitness check in 2024'.

The fitness check will consider whether EU and national policies ensure polluters bear the cost of measures to prevent, control and remedy pollution. It covers aspects such as the use of market-based instruments by the EU and the EU Member States, indirectly paying the polluter through environmentally harmful subsidies or possibly failing to implement the PPP in the context of EU funds, how environmental liabilities are dealt with and the use of pricing in policies.

The objective of this public consultation is to collect stakeholders' views — along with any evidence they might provide — on the implementation of the PPP in the EU, what is working well and not so well, and the EU added value of its implementation.

[1] [ECA \(2021\). Special Report 12/2021.](#)

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian
- Finnish
- French
- German
- Greek
- Hungarian
- Irish
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)

- Public authority
- Trade union
- Other

* First name

Arthur

* Surname

ten Wolde

* Email (this won't be published)

tenwolde@ecopreneur.eu

* Organisation name

255 character(s) maximum

Ecopreneur.eu

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

495144126378-48

* Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

- Afghanistan
- Djibouti
- Libya
- Saint Martin
- Åland Islands
- Dominica
- Liechtenstein
- Saint Pierre and Miquelon

- Albania
- Algeria
- American Samoa
- Andorra
- Angola
- Anguilla
- Antarctica
- Antigua and Barbuda
- Argentina
- Armenia
- Aruba
- Australia
- Austria
- Azerbaijan
- Bahamas
- Bahrain
- Bangladesh
- Barbados
- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Dominican Republic
- Ecuador
- Egypt
- El Salvador
- Equatorial Guinea
- Eritrea
- Estonia
- Eswatini
- Ethiopia
- Falkland Islands
- Faroe Islands
- Fiji
- Finland
- France
- French Guiana
- French Polynesia
- French Southern and Antarctic Lands
- Gabon
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Lithuania
- Luxembourg
- Macau
- Madagascar
- Malawi
- Malaysia
- Maldives
- Mali
- Malta
- Marshall Islands
- Martinique
- Mauritania
- Mauritius
- Mayotte
- Mexico
- Micronesia
- Moldova
- Monaco
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Saint Vincent and the Grenadines
- Samoa
- San Marino
- São Tomé and Príncipe
- Saudi Arabia
- Senegal
- Serbia
- Seychelles
- Sierra Leone
- Singapore
- Sint Maarten
- Slovakia
- Slovenia
- Solomon Islands
- Somalia
- South Africa
- South Georgia and the South Sandwich Islands
- South Korea
- South Sudan
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Sweden

- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
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- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Türkiye
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States

- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Curaçao
- Cyprus
- Czechia
- Democratic Republic of the Congo
- Denmark
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Laos
- Latvia
- Lebanon
- Lesotho
- Liberia
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Saint Barthélemy
- Saint Helena
Ascension and
Tristan da Cunha
- Saint Kitts and
Nevis
- Saint Lucia
- United States
Minor Outlying
Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and
Futuna
- Western Sahara
- Yemen
- Zambia
- Zimbabwe

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* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the [personal data protection provisions](#)

1. Are you familiar with the polluter pays principle?

- I have never heard about the polluter pays principle before this survey
- I have only a general idea of what the polluter pays principle means
- I am familiar with the polluter pays principle

2. How familiar are you with the implementation of the polluter pays principle?

- I have no idea how the principle is implemented
- I am familiar with its implementation in national legislation only
- I am familiar with its implementation in at least one piece of the EU environmental legislation
- I am familiar with its implementation in various pieces of the EU environmental legislation

3. How important do you consider it is to ensure that the polluter pays principle is implemented?

- It is a major priority
- It is important
- It is important, but only to a limited degree
- It is not important

Part 1: effectiveness

4. In your opinion, to what extent do polluters in the following sectors bear the costs for the pollution they are directly responsible for? [Rank from 1 'not at all' to 5 'too large an extent', or select 'don't know']

	1 Not at all	2 Insufficient extent	3 To some extent	4 Sufficient extent	5 Too large an extent	Don't know
Agriculture, forestry and fishing	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mining and quarrying	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Manufacturing of food products and beverages	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Manufacturing of tobacco products	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Manufacture of textiles, wearing apparel, leather and related products	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Manufacture of wood, paper and related products	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Manufacture of coke and refined petroleum products	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Manufacture of chemicals and chemical products incl. pharmaceutical ingredients and products	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Manufacture of rubber and plastic products	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Manufacture of basic metals and metal products	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Manufacture of electronic and electrical equipment	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Manufacture of vehicles, transporting and storage	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Electricity, gas, steam and air conditioning supply	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water supply; sewerage; waste management and remediation activities	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Construction	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wholesale and retail	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-financial service activities	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Financial and insurance activities	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public administration and defence	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other, please specify:

Existing EU regulation is inadequate to realise a circular and sustainable economy. It is clearly unable to solve the huge waste problems for many products and materials in virtually all sectors, ranging from construction and plastics to food, textile and electronics. Sustainability over the whole life cycle needs to be considered. To achieve this, consistent and coherent application of the polluter pays principle in the EU, across policies that affect environmental protection and the improvement of environmental quality, is urgently needed.

The lack of integration of externalities in the price of products and services the main reason we are facing a climate and biodiversity catastrophe. Prices should be based on True Pricing.

In addition to full implementation of the polluter pays principle, substances of very high concern should be banned.

5. In your opinion, to what extent are the following polluter pays principle implementation instruments effective for **preventing/reducing** environmental pollution caused by human activities? [Rank each instrument from 1 'not effective at all' to 5 'fully effective', or select 'don't know']

	1 Not effective at all	2	3	4	5 Fully effective	Don' t know
Command and control measures (licensing procedures, bans, emission limit values, administrative orders and sanctions)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Market-based/economic instruments (subsidies /feed-in tariffs, taxes, charges, fees, tradable permits and quotas, Payment for Ecosystem Services, liability rules)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Voluntary approaches (voluntary agreements, environmental management systems (e.g. ISO 14001), labelling (e.g. eco-label)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
International agreements (i.e. international environmental agreements, and the inclusion of environmental provisions in trade agreements, cooperation agreements and partnerships with third countries)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

6. Not all pollution is reduced or stopped. In your opinion, to what extent are the following instruments of the polluter pays principle effective for **remedying** the remaining environmental pollution caused by human activities? [Rank each instrument from 1 'not effective at all' to 5 'fully effective', or select 'don't know']

	1 Not effective at all	2	3	4	5 Fully effective	Don' t know
Command and control law (licensing procedures, bans, emission limit values, administrative orders and sanctions)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Market-based/economic instruments (subsidies /feed-in tariffs, taxes, charges, fees, tradable permits and quotas, Payment for Ecosystem Services, liability rules)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Voluntary approaches (voluntary agreements, environmental management systems (e.g. ISO 14001), labelling (e.g. eco-label)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
International agreements (i.e. international environmental agreements, and the inclusion of environmental provisions in trade agreements, cooperation agreements and partnerships with third countries)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7. In your opinion, what are the most important obstacles to ensure that polluters pay for the pollution they are responsible for? [Rank from 1 'not important' to 5 'very important', or select 'don't know']

	1 Not important	2 Slightly important	3 Moderately important	4 Important	5 Very important	Don' t know
The polluter pays principle is implemented by the most polluting industrial installations, but not by all	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public funds are used to support pollution prevention and control actions instead of the polluter paying for them	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public funds are used for pollution remediation activities even though the polluters are known, exist, and could be made liable	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National authorities fail to enforce environmental legislation and to make the polluters pay	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Industrial installations are not liable for environmental damage (because it is not captured by national liability rules or by the EU's Environmental Liability Directive)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The polluter pays principle is implemented only partially, as polluters are not required to meet the cost to society of the impact of residual pollution (i.e. pollution that stays within legal requirements)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The price of products and services does not fully reflect (internalise) the environmental damage (externalities) of the products and services' lifecycles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
It is difficult to identify the polluters and make them accountable when the pollution originates from diffuse sources (sources that are hard to trace)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU Member States supplement the income or lower the costs of consumers and producers in the form of subsidies which results in increasing negative environmental impacts (environmentally harmful subsidies)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Concerns about competitiveness of the EU versus non-EU countries implementing the principle differently, potentially leading to relocation of production (and associated pollution) outside the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Concerns about competitiveness between EU countries implementing the principle differently	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Concerns about the social impact (e.g., on vulnerable households) of implementing the principle more fully	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of political willingness to introduce and enforce implementation of the principle	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

8. In your opinion, are there other factors that may have hindered the effective implementation of the polluter pays principle and prevented it from fully meeting its objectives?

Yes, the major additional obstacles are

1. The persistent support for fossil fuels by EU Member States.
2. The unanimous voting procedure for deciding on tax matters in the EU Council. Ecopreneur.eu urges the next European Commission to move from consensus to majority voting for deciding on certain tax matters including the Value Added Tax (VAT).
3. The lack of harmonisation of Extended Producer Responsibility (EPR), see also below.

Part 2: efficiency

9. In your opinion, does the implementation of the polluter pays principle cause disproportionate costs to operators and consumers? Please rate your level of agreement or disagreement with the following statements (rate from 1 'completely disagree' to 5 'completely agree', or select 'don't know']

	1 Completely disagree	2 Mostly disagree	3 Neither agree nor disagree	4 Mostly agree	5 Completely agree	Don't know
The implementation of the polluter pays principle has led to disproportionate costs in the production of products and the provision of services by EU companies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The implementation of the polluter pays principle has led to disproportionately high prices of products and services for EU consumers	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The costs of the implementation of the polluter pays principle has negatively impacted the profitability and competitiveness of EU companies vs their competitors	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

10. In your opinion, has the polluter pays principle been implemented to the detriment of some social groups?

- Yes
- No
- In part
- Don't know

If you wish, please provide examples.

The polluter pays principle should be implemented as part of a tax shift from labour to resource use & pollution, as advocated by Ex'Tax and Ecopreneur.eu.

In that way governments can ensure:

(1) Sufficient spending power for all social groups: the additional costs for resource use & pollution are compensated by additional spending power from consumers: they have to pay less, or nom labour taxes

(2) Tax neutrality: additional tax revenues from resource use & pollution are compensated by lower tax revenues from labour

(3) Riots, as happend in France with the yellow jackets in response to increase fuel taxes. The government did not compensate for the additional costs for consumers by a corresponding tax measure to increase their spending power.

Part 3: relevance

11. In your opinion, to what extent does the implementation of the polluter pays principle contribute to the achievement of the following objectives of the European Green Deal? [Please rate from 1 'not at all' to 5 'full extent', or select 'don't know']

	1 Not at all	2	3	4	5 Full extent	Don't know
A zero-pollution ambition for a toxic-free environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Preserving and restoring ecosystems and biodiversity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
A fair, healthy and environmentally friendly food system	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Accelerating the shift to sustainable and smart mobility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Building and renovating in an energy and resource efficient way	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mobilising industry for a clean and circular economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supplying clean, affordable and secure energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increasing the EU's Climate ambition for 2030 and 2050	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Just transition and leaving no one behind	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

12. In your opinion, is the implementation of the polluter pays principle in the EU acquis adequate to tackle new or emerging environmental issues and changes in technology (i.e. issues that are not yet generally recognised but potentially having a major impact on human wellbeing and the environment, such as new materials and new production methods, or the increasing use of digital tools)?

- Adequate
- Neither adequate nor inadequate
- Inadequate
- Don't know

Part 4: coherence

13. In your opinion, is the polluter pays principle coherently and consistently implemented in the following areas? [Please rate your answer from 1 'completely disagree' to 5 'completely agree', or select 'don't know']

	1 Completely disagree	2 Mostly disagree	3 Neither agree nor disagree	4 Mostly agree	5 Completely agree	Don't know
Across environmental policies and mechanisms at the EU level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Across environmental policies and mechanisms at the Member State level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Across relevant policies (e.g., agriculture, transport, trade) and strategies at the EU level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Across relevant policies (e. g., agriculture, transport, trade) and strategies at the Member State level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Across trade agreements	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

14. In your opinion, what is the impact of the EU implementation of the polluter pays principle outside the EU? [Please rate your answer from 1 'very negative' to 5 'very positive', or select 'don't know']

	1 Very negative	2 Negative	3 Neither positive nor negative	4 Positive	5 Very positive	Don't know
Impact on the competitiveness of EU industries vs non-EU industries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impact on environmental legislation in other developed world regions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impact on environmental legislation in least-developed countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Part 5: EU added value

15. In your opinion, to what extent have EU requirements led to your Member State implementing the polluter pays principle in its policies?

- To a large extent
- To a limited extent
- Not at all
- Don't know

16. Market based instruments on Member State level are one approach to implement the polluter pays principle to pollution. Are there cases where you consider the polluter pays principle would have better been implemented through an EU level market based instrument (such as taxes, charges, fees, tradable permits and quotas, Payment for Ecosystem Services)? Please explain your answer below, possibly pointing to specific examples.

Yes, absolutely:

1. We advocate EU-wide implementation of mandatory, harmonised eco-modulated Extended Producer Responsibility (EPR) schemes for all waste-intensive product groups, with the fee structure based on the waste hierarchy (e.g., a higher fee for recycling than for reuse) and taking GHG emissions into account.
2. Ecopreneur.eu also advocates rapid implementation of Green and Circular Public Procurement in all EU member states.
3. The tax shift from labour to resource use & pollution should be implemented by at least 9 Member States at the same time, including France and Germany, and preferably at EU level by all 27. Ecopreneur.eu considers taxation reform crucial to foster delivering sustainable products and services based on True Pricing. The economic framework should foster delivering circular products and services.
4. Ecopreneur.eu advocates the EU to further open up the EU VAT Directive to allow member states to differentiate the rates on the basis of circularity and sustainability, and by regulating low VAT on transnational sustainable services such as international trains within the EU powered by renewable energy.
5. Carbon pricing needs to reflect the true cost of climate impacts. To this end, our Federation strongly advocates the following rules and measures:
 - Immediate ending of all EU and member state aid and support schemes for fossil fuels, including cancellation of free CO₂ credits or allowances for specific industries or product groups
 - Extension of the EU ETS to all products facing international competition
 - Rapid implementation of a Carbon Border Adjustment Mechanism (CBAM) with expansion to all sectors involved
 - Additional taxation of greenhouse gas (GHG) emissions at the national level until the EU ETS carbon price has reached its True Cost value.

Please provide any other comment or suggestion you would like to share regarding the evaluation of the implementation of the polluter pays principle in the EU legislation.

The EU and some member states have implemented a range of measures based on the polluter pays principle, as well as adopted and proposed a range of recent improvements, including ETS reforms and new policies. But they still fall short. The polluter pays principle has not been coherently and consistently implemented at the EU level, let alone at the Member State level. This is the major obstacle for meeting the EU climate, circularity & biodiversity goals in 2030.

Effective pricing measures based on the polluter pays principle and True Pricing should therefore become a priority for the next European Commission and Parliament (2024-2029). Time is running out. This is our last chance. Implementing all the measures advocated above is therefore extremely urgent and important. Failure to implement them in time will cause increasing damages to the EU economy.

In addition to the tax shift, alternative constructions such as the Social Climate Fund can be used to prevent disproportionate costs to citizens and companies. E.g., the aim of the EU Social Climate Fund is to help vulnerable households, micro-businesses and transport users meet the costs of the green energy transition in the buildings and road transport sector.

Please upload a document if you wish to share a more extensive contribution or any background materials that will help us to understand your answers. [Please note the maximum file size is 1 MB, however, multiple files may be uploaded].

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