

## **Feedback to the Call for Evidence “Polluter Pays Principle – fitness check of its application to the environment”**

**by the non-governmental organisation (NGO)  
Clean Air Action Group, Hungary ([www.levego.hu](http://www.levego.hu))**

The Commission’s Call for Evidence states: “The fitness check will consider whether EU and national policies ensure polluters bear the cost of measures to prevent, control and remedy pollution.” **There is already abundant literature on the fact that neither EU nor national policies ensure that polluters bear the cost of measures to prevent, control and remedy pollution. Just the opposite has been widely practiced: the polluters have been generously subsidised with EU and national money.**

Naturally, it is useful to constantly update and enlarge the knowledge about the implementation of the PPP. However, what we already know today is more than sufficient to act. Thus, **the main problem is not the lack of information but the lack of implementation.**

Unfortunately, **the Commission also bears significant responsibility for the deplorable situation. EU money has substantially contributed to environmental degradation.** The Commission has been warned about this many times and there have been many proposals to remedy the situation – but for many years to no avail (only lately there are signs that this situation might be changing).

Some examples:

- **The use of EU funding** in the 2014–2020 period has been **harmful to the climate and the environment to a large scale**, and was also inefficient, wasteful and there have been many cases of corruption and fraud. See e.g. *The Supplement to the Synthesis Report “Climate Change and the EU Budget 2021–2027*, <https://eeb.org/publications/183/eu-governance/100291/supplement-to-the-climate-change-and-the-eu-budget-report-by-clean-air-action-hungary.pdf>
- **EU funding plans** for the 2021–2027 financing period in the CEE region imply a **significant public financing of environmentally harmful activities** and are very unambitious for climate action. (See: *NGO Proposals for the Partnership Agreement on EU Funds in the 2021–2027 period and the National Recovery and Resilience Plan*, <https://www.levego.hu/egyeb/ngo-proposals-for-the-partnership-agreement-on-eu-funds-and-the-national-recovery-and-resilience-plan/>)
- Many publications appeared on **how to improve climate finance**, especially in terms of EU funding (e.g. here: <https://www.levego.hu/en/other/kiadvanyok-hatekony-unios-tamogatasokkal-a-klimasemleges-europaert/>).
- There are several **alternative solutions to fossil fuel tax cuts** in the context of Ukraine’s war (See: *Joint letter of NGOs to the European Commission*, <https://eeb.org/library/joint-letter-alternative-solutions-to-fossil-fuel-tax-cuts-and-price-caps-in-the-context-of-ukraines-war/>)

- Accelerating the deployment of **renewable energy** might come at the price of **damaging the environment** (See: *Renewable energy sources? Yes! At any price? No!* <https://www.euractiv.com/section/energy/opinion/renewable-energy-sources-yes-at-any-price-no/>)
- **EU funding has had tragic consequences on the environment** in Hungary (*The tragic consequences of EU funding on the environment in Hungary*, <https://eu.boell.org/en/2021/11/05/tragic-consequences-eu-funding-environment-hungary>)
- **Environmentally damaging investments have been incentivized** and accelerated by using the “priority investment” status and thus applying special permitting advantages in Hungary (*Growing protests against priority investments in Hungary*, <https://cz.boell.org/en/2021/12/29/growing-protests-against-priority-investments-hungary>)
- Large scale **investment projects** – often using public funds – **threaten the ecosystem** of Hungary’s Great Lakes, despite public outrage (*Wide protests unfolding against investments threatening Hungary’s great lakes*, <https://cz.boell.org/en/2022/03/11/wide-protests-unfolding-against-investments-threatening-hungarys-great-lakes> )
- A series of **harmful reforms and investments for biodiversity** set to be financed by the **recovery funds** (*Behind the ‘green recovery’: How the EU recovery fund is failing to protect nature and what can still be saved*, <https://bankwatch.org/publication/behind-the-green-recovery> )
- **ECB’s roadmap** of becoming “Europe’s Climate Bank” contains several loopholes, the **continuation of fossil fuel subsidies, and polluters financed** from public funds including the automotive industry and new road construction (*FLATTERING TO DECEIVE: A reality check for the ‘EU Climate Bank’*, <https://bankwatch.org/publication/flattering-to-deceive-a-reality-check-for-the-eu-climate-bank>)
- **EU and national funding for road constructions is based on flawed methodology** (*Contradictions in the evaluation of EU funding for road construction*, <https://www.levego.hu/sites/default/files/Contradictions-in-the-evaluation-of-EU%20funding-for-road-construction-final3.pdf>)
- The overwhelming majority of the **Hungarian independent media has been bought up by persons close to the government who got extremely rich mostly from EU money**, and now it is practically impossible to disseminate reliable environmental information (including on PPP issues) to the wider public (*The draft Hungarian Partnership Agreement seems to contradict EU rules*, [https://www.levego.hu/sites/default/files/The\\_draft\\_Hungarian\\_Partnership\\_Agreement\\_seems\\_to\\_contradict\\_EU\\_rules\\_220221.pdf](https://www.levego.hu/sites/default/files/The_draft_Hungarian_Partnership_Agreement_seems_to_contradict_EU_rules_220221.pdf))

Budapest, 04 July 2023

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# Fitness check of the Polluter Pays Principle application to the environment

Fields marked with \* are mandatory.

## Introduction

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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

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\* 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

András

\* Surname

LUKÁCS

\* Email (this won't be published)

lukacs@levego.hu

\* Organisation name

*255 character(s) maximum*

Clean Air Action Group

\* 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.

351764810742-20

\* 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
- North Korea
- 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

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

### \* 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mining and quarrying	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Manufacturing of food products and beverages	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Manufacturing of tobacco products	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Manufacture of textiles, wearing apparel, leather and related products	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Manufacture of wood, paper and related products	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Manufacture of coke and refined petroleum products	<input checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Manufacture of rubber and plastic products	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Manufacture of basic metals and metal products	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Manufacture of electronic and electrical equipment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Manufacture of vehicles, transporting and storage	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Electricity, gas, steam and air conditioning supply	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water supply; sewerage; waste management and remediation activities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Construction	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Wholesale and retail	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-financial service activities	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

If other, please specify:

Transport
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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 type="radio"/>	<input type="radio"/>	<input checked="" 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 **remediating** 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 type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input type="radio"/>	<input checked="" 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 type="radio"/>	<input checked="" 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 checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Concerns about competitiveness between EU countries implementing the principle differently	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Concerns about the social impact (e.g., on vulnerable households) of implementing the principle more fully	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input 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?

Lack of proper information, lack of public awareness campaigns, weak civil society.

Concerns about the social impact (e.g., on vulnerable households) of implementing the principle more fully are unjustified. These households can be compensated and even overcompensated from the revenues stemming from the implementation of PPP. It is the current system which is utterly unjust, since it favours the rich much more than the poor.

**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 checked="" type="radio"/>	<input 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.

**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 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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input 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 checked="" type="radio"/>	<input 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 type="radio"/>	<input type="radio"/>	<input checked="" 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.

See <https://www.levego.hu/sites/default/files/Hungarian%20Partnership%20Agreement%20proposal%20Climate%202021apr21.pdf>  
<https://www.levego.hu/sites/default/files/kozlekedes-tamogatasdecilisek-en.pdf>  
[https://www.levego.hu/sites/default/files/internalisation\\_transport\\_costs\\_hungary\\_final\\_2020-1.pdf](https://www.levego.hu/sites/default/files/internalisation_transport_costs_hungary_final_2020-1.pdf)

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.

Please see the attached document.

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].

Please upload your file(s)

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

**ae8df782-c811-403d-b97b-067a76655536/PPP\_Commission\_call\_feedback\_CAAG\_2023.pdf**

## **Contact**

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