

IMPEL CAED WEBINAR on ENVIRONMENTAL LIABILITY DIRECTIVE (ELD) ENFORCEMENT

April 27th, 2022

*EU LIFE project on “Promoting financial instruments for liability on environment”
Stavroula Pouli*



ΕΝΩΣΗ
ΑΣΦΑΛΙΣΤΙΚΩΝ
ΕΤΑΙΡΩΝ
ΕΛΛΑΔΟΣ



Προώθηση Χρηματοοικονομικών Εργαλείων για την Περιβαλλοντική Ευθύνη

PROMOTE FINANCIAL INSTRUMENTS FOR LIABILITY ON ENVIRONMENT

LIFE19 GIE/GR/001127 LIFE PROFILE

EU LIFE project on “Promoting financial instruments for liability on environment”

Total amount: 1.086.000 euros EC Co-funding: 55 %

Duration: Start: 16/11/2020 - End: 15/11/2023

Coordinating Beneficiary:

Ministry for Environment & Energy (MEE) Coordination Office
For the Implementation of Environmental Liability (COIEL).

Associated Beneficiaries:

Green Fund, National Technical University of Athens , Panteio University (UEHR), National Observatory of Athens (NOA), Hellenic Association of Insurance Companies (HAIC), National and Kapodistrian University of Athens, Griffin Environmental Consulting LP.



ΕΝΩΣΗ
ΑΣΦΑΛΙΣΤΙΚΩΝ
ΕΤΑΙΡΙΩΝ
ΕΛΛΑΔΟΣ



Προώθηση Χρηματοοικονομικών Εργαλείων για την Περιβαλλοντική Ευθύνη
PROMOTE FINANCIAL INSTRUMENTS FOR LIABILITY ON ENVIRONMENT
LIFE19 GIE/GR/001127 LIFE PROFILE

OBJECTIVES & SCOPE

Main objectives of the project:

- Improvement of Environmental Liability Directive ELD (2004/35/EE) implementation for environmental damage mitigation
- Development of risk assessment for identifying & quantifying risk assessment scenarios for ELD Annex III activities
- Development & implementation of a national plan on ELD
- Enhancing of financial security for environmental damage remediation
- Support operators to fulfill their obligations regarding ELD and raise awareness of stakeholders and public on ELD
- Demonstration to other MS best practices



ΕΝΩΣΗ
ΑΣΦΑΛΙΣΤΙΚΩΝ
ΕΤΑΙΡΙΩΝ
ΕΛΛΑΔΟΣ



ΥΠΟΥΡΓΕΙΟ
ΠΕΡΙΒΑΛΛΟΝΤΟΣ
& ΕΝΕΡΓΕΙΑΣ

Προώθηση Χρηματοοικονομικών Εργαλείων για την Περιβαλλοντική Ευθύνη

PROMOTE FINANCIAL INSTRUMENTS FOR LIABILITY ON ENVIRONMENT

LIFE19 GIE/GR/001127 LIFE PROFILE

Environmental Liability in Greece

ELD was transposed in 2009 with P.D. 148/2009. It is applied

- at national level: competent is the Ministry for Environment and Energy- for cases of national significance or cases between regions.
- at regional level: competent are the Regional Committees for ELD: for cases within their territorial competency.

It is applied for:

- damage to protected species & natural habitats (not only for Annex III activities)
- water damage,
- land damage.

LIFE PROFILE key deliverables

- ✓ IT tool for environmental risk assessment
- ✓ Economic evaluation of damage
- ✓ Estimation of financial security needed



ΕΝΩΣΗ
ΑΣΦΑΛΙΣΤΙΚΩΝ
ΕΤΑΙΡΙΩΝ
ΕΛΛΑΔΟΣ



Πρωΐθηση Χρηματοοικονομικών Εργαλείων για την Περιβαλλοντική Ευθύνη

PROMOTE FINANCIAL INSTRUMENTS FOR LIABILITY ON ENVIRONMENT

LIFE19 GIE/GR/001127 LIFE PROFILE

A. Preparatory actions

- ✓ A1 Update of the current state of international and EU level regarding environmental risk analysis of Annex III activities of ELD
- ✓ A2 Examination of the current state of the national insurance market
- ✓ A3 SWOT Analysis on National level and identification of key stakeholders

B. Core actions

- ✓ B1 Environmental damage risk assessment for key-category activities as ranked in action A1
- ✓ B2 Economic evaluation of environmental damage and especially on biodiversity
- ✓ B3 Development of the IT- tool



ΕΝΩΣΗ
ΑΣΦΑΛΙΣΤΙΚΩΝ
ΕΤΑΙΡΙΩΝ
ΕΛΛΑΔΟΣ



Προώθηση Χρηματοοικονομικών Εργαλείων για την Περιβαλλοντική Ευθύνη

PROMOTE FINANCIAL INSTRUMENTS FOR LIABILITY ON ENVIRONMENT

LIFE19 GIE/GR/001127 LIFE PROFILE

- ✓ B4 Pilot testing of the risk assessment methodology and IT tool on ELD Annex III activities
- ✓ B5 Socio-Economic impact assessment of the application of financial provisions based on the risk assessment tool, on the relevant market and on the national economy
- ✓ B6 Adoption of the IT tool that will be available at Ministry's website
- ✓ B7 Consultation Forum establishment
- ✓ B8 Development of the National Plan
- ✓ B9 Creation and operation of a web-based platform for environmental liability cases
- ✓ B10 A series of 7 one-day seminars, one at the site of each Decentralized Authority addressing the need to inform and raise awareness of stakeholders on the importance of Financial Provisions



ΕΝΩΣΗ
ΑΣΦΑΛΙΣΤΙΚΩΝ
ΕΤΑΙΡΙΩΝ
ΕΛΛΑΔΟΣ



Πρωώθηση Χρηματοοικονομικών Εργαλείων για την Περιβαλλοντική Ευθύνη
 PROMOTE FINANCIAL INSTRUMENTS FOR LIABILITY ON ENVIRONMENT
 LIFE19 GIE/GR/001127 LIFE PROFILE

- ✓ B11 A series of 7 one-day seminars, aimed to demonstrate the tool and the web-based under ELD platform addressed to administrators
- ✓ B12 An event on the implementation of the project, targeting specific stakeholders (Insurers, operators, bankers)
- ✓ B13 Produce recommendations including best practice guidelines for operators
- ✓ B14 Organization of 3 workshops to promote replicability of financial provision under ELD in EU member states, including tool demonstration



ΕΝΩΣΗ
ΑΣΦΑΛΙΣΤΙΚΩΝ
ΕΤΑΙΡΕΙΩΝ
ΕΛΛΑΔΟΣ



Πρώθηση Χρηματοοικονομικών Εργαλείων για την Περιβαλλοντική Ευθύνη
PROMOTE FINANCIAL INSTRUMENTS FOR LIABILITY ON ENVIRONMENT

LIFE19 GIE/GR/001127 LIFE PROFILE

Risk Assessment

- ✓ The IRAM (Integrated Risk Assessment) methodology of IMPEL
- ✓ The National Plan of Environmental Inspections of the Ministry of Environment
- ✓ Methodologies applied in other EU countries and aimed at calculating the cost of financial security under the ELD Directive (Spain, Portugal, Ireland, the Netherlands, France)
- ✓ Environmental risk assessment methodologies applied by financial security providers such as the Risk Categorization Framework of the European Bank for Reconstruction and Development (EBRD), as well as environmental risk assessment methodologies applied by the insurance industry in Greece.

The scenario selected for estimating the cost of financial provision is a critical step that needs to be thoroughly considered, as worst-case scenario is likely to lead to an overestimation of financial security.



ΕΝΩΣΗ
ΑΣΦΑΛΙΣΤΙΚΩΝ
ΕΤΑΙΡΙΩΝ
ΕΛΛΑΔΟΣ



Πρώθηση Χρηματοοικονομικών Εργαλείων για την Περιβαλλοντική Ευθύνη

PROMOTE FINANCIAL INSTRUMENTS FOR LIABILITY ON ENVIRONMENT

LIFE19 GIE/GR/001127 LIFE PROFILE

Criteria used for the selection of Annex III activities for testing

1. Number of licensed companies by category of activity in Greece
2. Number of licensed companies by category of activity in Europe
3. Availability of existing insurance products in the market by activity category
4. The range of environmental risk by activity category (EBRD)
5. Activities under special legislation such as REACH, IED / IPPC, SEVESO
6. Location
7. Activities of high importance for the national economy
8. Environmental risk categorization of an activity
9. Installation size
10. Complexity of the installation process
11. Type and number of substances emitted
12. Hazardous Substances & Waste Management
13. Off-site waste transportation
14. Environmental performance of activities (empirical criteria)
15. History of activities that caused an environmental accident (last 5 years)
16. Seasonal character of an activity
17. Industry branches



ΕΝΩΣΗ
ΑΣΦΑΛΙΣΤΙΚΩΝ
ΕΤΑΙΡΕΙΩΝ
ΕΛΛΑΔΟΣ



Πρώθηση Χρηματοοικονομικών Εργαλείων για την Περιβαλλοντική Ευθύνη
PROMOTE FINANCIAL INSTRUMENTS FOR LIABILITY ON ENVIRONMENT
LIFE19 GIE/GR/001127 LIFE PROFILE

Selected Annex III Activities (for developing and testing IT -tool)

1. Recycling installations for non-hazardous mixed recyclable waste
2. Extractive waste management facilities
3. Hotel industry
4. Poultry industry
5. Dairy production (cheese)
6. Polyurethane production
7. Paints, varnishes and similar coatings & printing inks production
8. Soap, detergents, cleaning and disinfecting production,
9. Aluminum industry (profiles, tubes, etc.)
10. Wind power generation



ΕΝΩΣΗ
ΑΣΦΑΛΙΣΤΙΚΩΝ
ΕΤΑΙΡΙΩΝ
ΕΛΛΑΔΟΣ



Πρώθηση Χρηματοοικονομικών Εργαλείων για την Περιβαλλοντική Ευθύνη
PROMOTE FINANCIAL INSTRUMENTS FOR LIABILITY ON ENVIRONMENT
LIFE19 GIE/GR/001127 LIFE PROFILE

Approach of economic evaluation of environmental damage focusing on biodiversity

- Natural resource services that are damaged in each case,
- Amount of damaged resource services (in Ha/Year),
- Special characteristics of the areas where the damages occurred (e.g. protected areas),
- Key species of the Greek ecosystem valued anew - in collaboration with biodiversity experts to compile a short list of key species and habitats,
- The most important of them will be monetarily evaluated using Non-market valuation techniques (such as questionnaire),
- Monetary evaluation of the risks for the key - category activities.



ΕΝΩΣΗ
ΑΣΦΑΛΙΣΤΙΚΩΝ
ΕΤΑΙΡΙΩΝ
ΕΛΛΑΔΟΣ



Προώθηση Χρηματοοικονομικών Εργαλείων για την Περιβαλλοντική Ευθύνη
PROMOTE FINANCIAL INSTRUMENTS FOR LIABILITY ON ENVIRONMENT
LIFE19 GIE/GR/001127 LIFE PROFILE

Expected Policy Outcomes:

- ✓ Issuing and implementation of ministerial decision on financial security for environmental damage remediation (according to ELD and national legislation).
- ✓ Development of the IT- tool for environmental risk assessment: available to operators and the general public.
- ✓ Consultation Forum establishment: that will provide the “environment” for an open dialogue among stakeholders for the improvement of environmental liability application.
- ✓ Development of the National Plan for the improvement of environmental liability implementation.
- ✓ Creation and operation of a web-based platform that will provide information on ELD cases to authorities and public.



ΕΝΩΣΗ
ΑΣΦΑΛΙΣΤΙΚΩΝ
ΕΤΑΙΡΕΙΩΝ
ΕΛΛΑΔΟΣ



Πρώθηση Χρηματοοικονομικών Εργαλείων για την Περιβαλλοντική Ευθύνη

PROMOTE FINANCIAL INSTRUMENTS FOR LIABILITY ON ENVIRONMENT

LIFE19 GIE/GR/001127 LIFE PROFILE

EXPECTED IMPACTS

- Compliance and Enforcement: ELD cases recorded on web-based platform & register, potential ELD cases detected through Environmental Inspectorate, operators using the IT tool;
- Training: targeted to public authorities and operators with seminars/ webinars/ training tool & platform;
- Citizen and NGO involvement: Public and NGOs involved in project activities, users of the web-based platform developed by the project;



ΕΝΩΣΗ
ΑΣΦΑΛΙΣΤΙΚΩΝ
ΕΤΑΙΡΕΙΩΝ
ΕΛΛΑΔΟΣ



Προώθηση Χρηματοοικονομικών Εργαλείων για την Περιβαλλοντική Ευθύνη
PROMOTE FINANCIAL INSTRUMENTS FOR LIABILITY ON ENVIRONMENT

LIFE19 GIE/GR/001127 LIFE PROFILE

Thank you!



ΕΝΩΣΗ
ΑΣΦΑΛΙΣΤΙΚΩΝ
ΕΤΑΙΡΙΩΝ
ΕΛΛΑΔΟΣ



Πρώθηση Χρηματοοικονομικών Εργαλείων για την Περιβαλλοντική Ευθύνη
PROMOTE FINANCIAL INSTRUMENTS FOR LIABILITY ON ENVIRONMENT
LIFE19 GIE/GR/001127 LIFE PROFILE