

Restoring the Past



Building the Future

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Dear Sir or Madam

Consultation on the White Paper on Environmental Responsibility (Com (2000)66 final)

The European Union of Developers and House Builders was very interested to learn about the *White Paper on Environmental Responsibility* and has carried out a detailed study of it.

The UEPC broadly follows the spirit and the letter of the paper and has the same objective as it of setting up a system of responsibility at Community level, in order to improve the implementation of the environmental principles laid down in the EC treaty and the implementation of Community law on the environment, and in order to acquire the means of ensuring appropriate restoration of the environment.

In particular, the part relating to the decontamination of sites caught the attention of the UEPC. In fact, the developers and house builders which it represents are particularly aware of the phenomenon of land pollution which they are often likely to be confronted with during construction projects with the following consequences:

- The calling into question of the equilibrium of the project as the remediation processes inevitably lead to extra costs and delays which can be prohibitive;
- Serious risks for workers on the building site.

The UEPC would like to restate its thoughts on the subject by expounding the main points of its draft statement on land condition:

- The affirmation of the “polluter pays” principle, with respect to building land, which lies fully within the objective of the *White Paper*;
- The institution of a land condition statement before the land is put up for sale (see attached draft).

UNION EUROPEENNE DES PROMOTEURS-CONSTRUCTEURS
EUROPEAN UNION OF DEVELOPERS AND HOUSE BUILDERS
EUROPÄISCHE UNION DER FREIEN WOHNUNGSUNTERNEHMEN

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The UEPC would like to draw attention to the fact that before any system of environmental responsibility is set up, thought must be given to risk insurance which should be based on the principle of its being voluntary rather than imposed by the state.

We hope that you will be happy to receive these comments and that you will be able to take our thoughts into account. We remain entirely at your disposal should you wish to discuss the matter in person.

Yours faithfully

A. SENOL
President