

2nd ELD STAKEHOLDER CONFERENCE – BRUSSELS

'Evaluating the experience gained in the ELD Implementation'

Summary Report

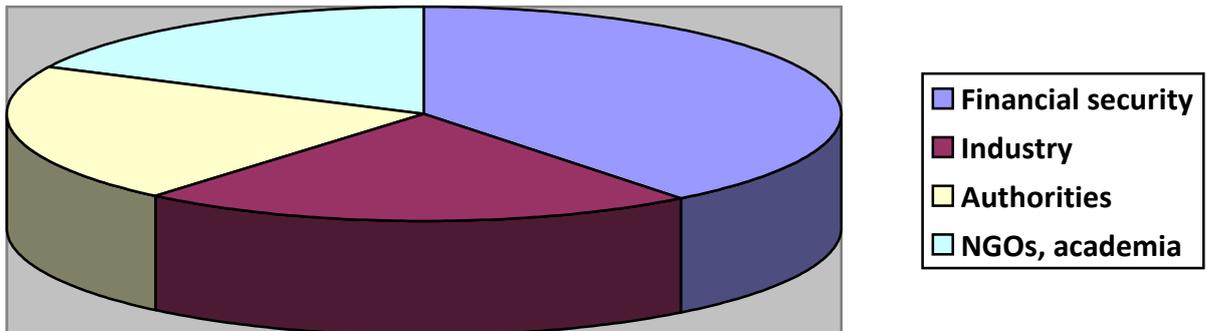
11th June 2013

Why did we have this workshop?

The purpose of the Conference was twofold: based on the experience gathered in the application of the Environmental Liability Directive, looking into (a) implementation and (b) review with the final aim of identifying strengths and weaknesses, in particular the areas needing to be improved. Such potential needs for improvements could call for practical measures to improve implementation (e.g. awareness raising measures, information exchange, enhancing capacities through trainings, developing guidance and supporting tools, establishment of registers of cases) or for legislative measures at national and/or EU level (e.g. following from ELD studies, review according to review points pursuant to Article 18(3) ELD, deriving from expert and stakeholder meetings such as this one etc.)

Who was present?

The largest contingent of the around 130 participants mainly came from financial security services and risk assessment experts, followed to nearly equal shares by operators or business representatives, authorities (national, regional and EU regulators) and NGOs/academia/independent lawyers:



Morning Sessions

Opening Words

The day was opened by Robert Konrad, Head of the Governance, Information & Reporting Unit of DG Environment/European Commission, who presented the background and way to the Commission ELD report and review of 2014.

Experience gained in the application of the ELD so far and what we can draw from it?

Do we have sufficient experience to be able to evaluate how the ELD works in practice?

Are we satisfied with how the ELD works or is room for improvement, considering that transposition, implementation and application is rather diverse?

Some key questions are:

Does the ELD contribute to higher remediation standards, for example in the field of biodiversity?

Has the ELD increased the level of precaution and prevention and improved risk prevention culture of operators?

Is there a case for legal improvements of ELD?

Is there a room for further progress concerning Commission support for ELD implementation, for example regarding raising awareness and training of practitioners and stakeholders, developing guidance at national and EU level, establishing an ELD register of cases, exchanging experience and networking and so on.

Followed the explanation of the process flow of the day by Ian Andersen who introduced himself as 'Maître de Cérémonie' of the Conference

Opening Presentations:

MS reports and COM study

Hans Lopatta, from Robert Konrad's unit, reported on the EU state of play regarding the obtained ELD application reports 2013 from the Member States and the ELD implementation study 2012/2013:

He referred to the 18 reports received by the Commission to date which differed significantly in terms of number of ELD cases between 85 annual cases over 10 and 3 annual cases to some MS which have no ELD cases. Based on a rough evaluation of 13 MS reports, 30% of the environmental damage concerned relates to biodiversity, 30% to land, and 40% to water. Duration of remediation takes between 5 days and more than 3 years and there are relatively few judicial review procedures (where enabled affected persons or NGOs or the operator concerned, appealed against the decision).

Costs of prevention and remediation ranged between 3,000 Euro and 2 million Euro so far, and administrative costs were addressed only in a few cases. On financial security quantitative data were not included, and some qualitative statements showed also a divergent situation: Mostly there is the possibility of insuring against ELD liabilities which includes in

some cases also cover for compensatory remediation, but other felt still difficulties in obtaining insurance cover (small markets, high costs, difficult calculation of financial guarantees). Several MS reported about activities to promote the application of the ELD.

He provided some key results on the implementation study 2012, mainly that due to many procedural and substantive variations, the implementation "*did not result in a level playing field but in a patchwork of liability systems*". Further with respect to the 'severity threshold', under the ELD that there is "*misperception that the ELD applies only to the most severe instances of damage*".

The empirical part of the study showed as the strengths its effectiveness and its procedures; and the prevention and remediation of environmental damage as well as stakeholder involvement. As regards the challenges, some reported about the complexity of some requirements and conditions for application under the ELD. Mainly, lacking expertise and knowledge, limited resources, absent tools and guidance documents, as well as the co-existence with pre-existing liability regimes (possible overlaps, lack of coordination) would contribute to implementation problems.

Recommendations: organization of workshops and conferences, developing of supporting tools and actions to improve expertise and knowledge as well as promoting the development of databases. Addressed should be the following issues: widely varying liability system, clashes between self-executing provisions and determination of environmental damage, implementation of the correct threshold for biodiversity damage and ensuring greater coordination between the ELD and other related directives.

The overview of the application reports from the Member States was complemented by three presentations from the perspective of Member States:

UK experience gained in the application of the ELD

Edward Lockhart-Mummery from DEFRA provided the total number and characteristics of the 19 cases emerged from 2009 to 2012 in the United Kingdom: 12 cases of environmental damage (9 land, 2 biodiversity, 1 water) and 7 cases of imminent threat (5 biodiversity, 2 land).

The UK had experienced reduction in serious incidents with no known serious cases unaddressed. They felt that the framework is flexible enough to find right solution, and thresholds and methods would be workable. Reflections and lessons: He concluded that the focus should be on real outcomes, to analyse real problems and to understand their causes. The ELD is regarded as one part of the policy landscape; highlighted and shared should be best practices and policy stability be promoted. Cross cutting of innovation across the MS.

In the following debate questions raised by Juerg Busenhardt (Swiss RE), José Luis Heras Harraiz (Pool Español de Riesgos Medioambientales) and Anna Simpson (NFU) were discussed.

The French ELD methodological guide

Sylvain Pioch from University Montpellier explained that France had developed a guide by and for the final users. He described the elaboration of the guide and the tool (software visual Habitats Equivalence Analysis) in 2012 until it went online in October 2012. It included large consultation to understand the needs of local administrators and a national workshop in September 2012. The guide is divided in two parts: (1) the framework, legal and regulatory context and (2) a more operational part where the guide explores the determination of the remedial measures (equivalency methods and value approaches, process for determining remedial measures).

The developed software and training is provided for free to avoid repetitive calculus and strive for harmonization of the software (community of users, share experience). He also explained the principles of the software, the main interest from users (sensitivity analysis) and the current limits of the tool (visual HEA is complementary to Spanish MORA).

In the following discussion Barbara Goldsmith (Ad)-Hoc Industry Natural Resource Management Group) and Elisabeth Abrassart enquired further about the nature and intended purpose and use as well as about the validation and adaptation of the software.

Application of the ELD in Spain: tools for improving its implementation

Isaac Sanchez Navarro from the Spanish Ministry for Agriculture, Nutrition and Environment presented the Spanish activities to support the ELD implementation, the economic evaluation tool MORA and the reporting activities undertaken under Article 18(1) ELD in Spain. After explaining the principles and objectives of the ELD and the difference between the ELD transposing legislation and the national legislation he described the measures taken by Spain to support economic evaluation and risk analysis in the context of the establishment of mandatory financial security in Spain.

He explained the nature (ex-ante and ex-post methodology calculating remediation costs of damaged natural resources) and purposes (support for risk management measures and determination of financial security; establishment of remedial measures) of the economic evaluation tool MORA as well as its functioning. Finally, Isaac Sanchez Navarro presented the 18 instances of environmental damage in Spain so far (11 land, 11 water, 8 biodiversity – covering several multiple cases), 10 of which closed and 8 ongoing, with restoration of environmental damages to the baseline condition in all cases. He concluded by emphasizing the efforts undertaken by Spain in implementing the Directive (technical and economic valuation guidelines, procedures and manuals for risk assessment, legislative guidelines, financial security systems) and that ELD effectiveness cannot only be measures in terms of ELD cases

Coffee break

After the coffee break, the Conference continued with a presentation of the

Commission ELD training and information material

Ece Ozdemiroglu (eftec) provided an overview about the training material (handbooks and slides in three versions: ½-day, 1-day and 2-days trainings) and the development of the project. Due to the slow transposition quiet implementation of the ELD the purpose of the training material is to 'demystify' the ELD, i.e. to facilitate a wider and better understanding of the ELD. She presented the project methodology, the key questions answered by the training material and explained how to use the training material on the web. Training sessions can be tailor-made to individual groups using the material. MS specific information can be added and the interactive web page still needs to be activated on the Commission's Environmental Liability webpage (just training material can already be downloaded). The ELD information material (factsheets and brochure) complements the project (also available on the Environmental Liability website, and soon in all relevant languages).

The insurance sector's experience of ELD application

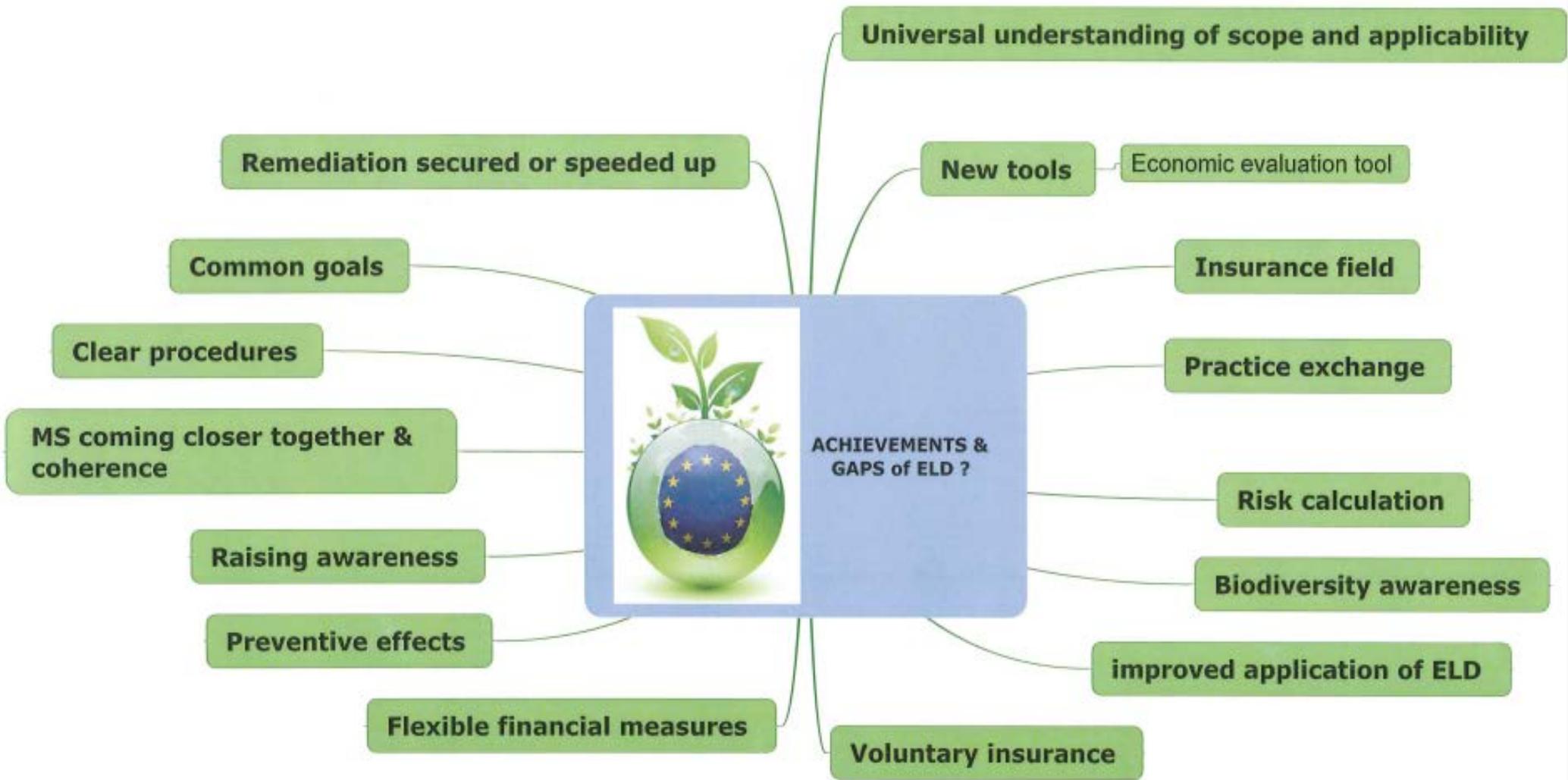
Carmen Bell and Olivia Fabry from Insurance Europe presented their organisation and operational coverage in Europe (34 national associations in 26 MS – 6 non EU markets, 2 associate members and 3 partners) to then describe the ELD cover and current situation in France (e.g. despite lack of use, the government would consider that the ELD does not work, increasing confusion between regimes, ELD specificity in terms of remediation not possible to apply). They then moved on to describe the German situation: ELD cover with optional add-ons, 100% of operators would have EIL and ELD cover, GDV's non-binding insurance model wordings and geographical information system ZÜRS for individual risk assessment, increasingly growing experience with ELD-claims. They concluded their presentation with the description as regards insurance cover in the Nordic and Baltic countries (Finland, Sweden, Latvia, Lithuania, Estonia).

Morning Discussions

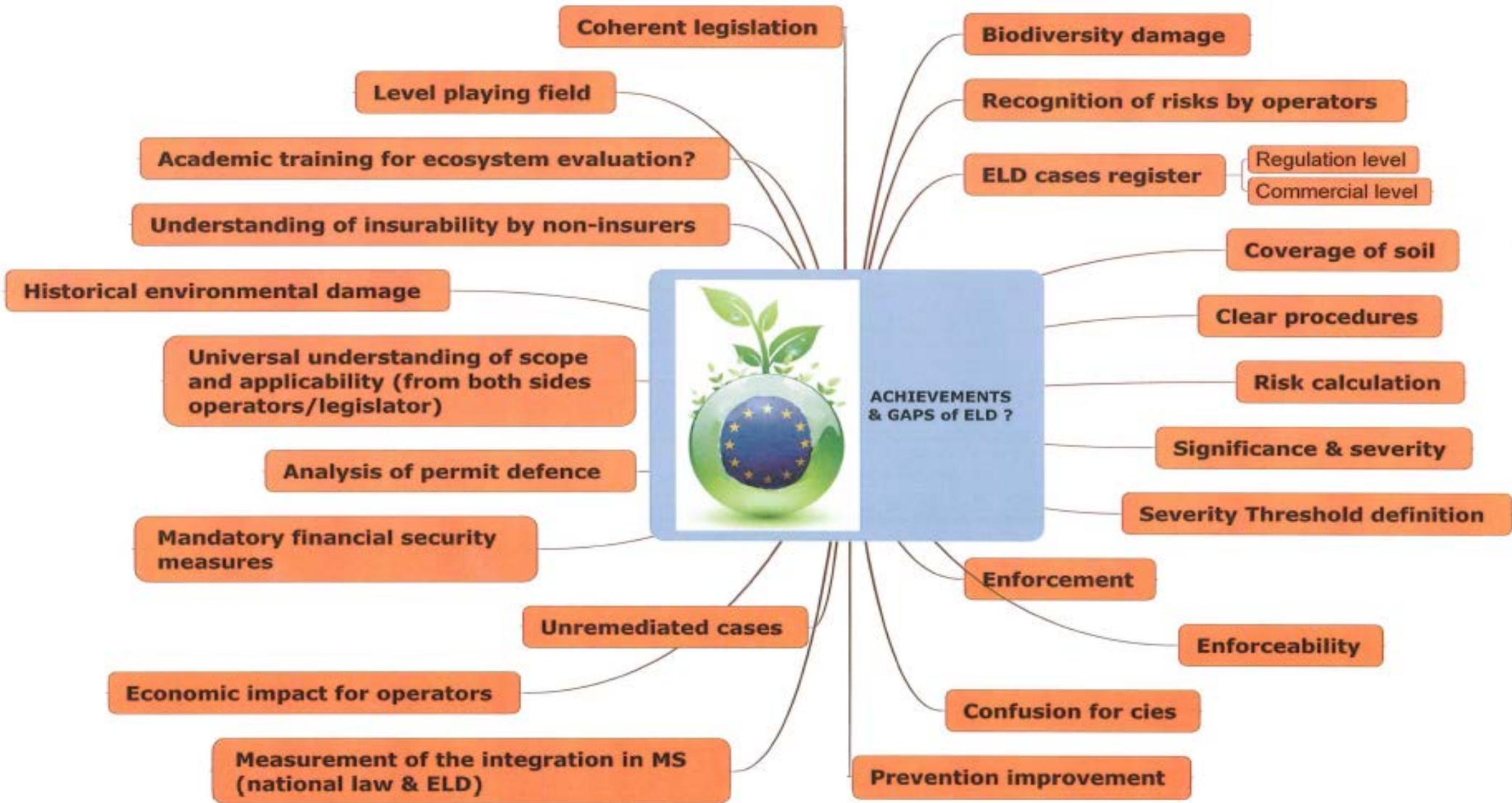
The participatory plenary discussion on the achievements in the application of the ELD and what has been missed out allowed all participants to have their say, and exchange the different perspectives, and inevitably very many points emerged.

Catherine Focant produced with the help of Daniela Terrile two great mind maps summarizing the first round of conversation focusing on the achievements and gaps in the application of the ELD:

Achievements



What has been missed out?



Afternoon Sessions

The Conference split into four parallel breakout groups in the first part of the afternoon:

Group One: Financial security

Group Two: ELD effectiveness

Group Three: Biodiversity damage

Group Four: ELD – national legislation and International Conventions

Summary of the four break-out sessions

Background note: Like at the 1st ELD Stakeholder Workshop of 8th November 2011, topic experts were selected in the preparation of the workshop and asked to provide kick-off presentations to facilitate the conversations and to contribute to the breakout reports. The topic experts have been informed about their role based on the participatory leadership method of the Commission upfront (teleconference and e-mail exchange). The topic experts provided kick-off presentations, harvested the results of the bistro-style discussions at the tables (which enabled the greatest possible participation for all stakeholders) and reported back the results to the plenary afterwards. We may choose to use again a participatory approach, as we knew this conference was about contributing to identify strengths and weaknesses of the ELD in implementation and legislation and finding ways forward to deal with the current situation.

Coffee break

After the breakout group discussions and the coffee break, the rapporteurs of the groups informed the plenary about the main results harvested in the respective group:

Group One: *Financial security*: Experience with different arrangements for financial security (mandatory vs. voluntary instruments, insurance - other) and exploration of an industry motivated fund or risk pooling mechanism

Chairs: *Nils Hellberg, José Luis Heras Herráiz, Edward Lockhart-Mummery*
Report by *Edward Lockhart-Mummery*

The Break Out Group considered the following questions

- Would an EU harmonised mandatory financial security system for ELD liabilities be a more effective instrument for the prevention and remediation of environmental damage than the current arrangements? What would be the necessary conditions and what may be the possible results?

- Is an EU fund or risk pooling mechanism for ELD liabilities a desirable and feasible option and how could it fit in the existing landscape? What would be the necessary conditions and what may be the possible results?

The discussions resulted in the following:

Financial security (1)

- Any financial security only partial solution
- View that EU mandatory system is not needed and lots of practical problems
- Huge diversity across MSs and sectors
- MS should be able to decide
- Some attractions to mandatory elements in some MS contexts & for limited scope and allowing different options but takes time to develop.

Financial security (2) - funds

- Not appropriate within ELD liability system
- Not consistent with polluter pays principle
- Undermines market development of other financial security systems

Group Two: *ELD effectiveness*: Exploring the need and potential for further harmonisation (e.g. optional defences) and/or extension of scope (Annex III activities, environmental damage), revisiting the severity threshold

Chairs: Valerie Fogleman, Barbara Goldsmith, Matthias Sauer

Report by Matthias Sauer

On Leading Question 1

Do you see a need for further EU harmonization relative to the optional defenses (permit and state of the art defenses) and is the scope of environmental damage (biodiversity, water, land) about right?

The discussion did divide on the two sub-topics “optional defenses” (see a) and “the scope of environmental damage” (see b):

- **On (a) - “optional defenses”:**
 - The group took note of the surprising patchwork of national laws in the EU. It was informed that 15 Member States implemented the state of the art defense and these 15 and two more MS implemented the permit defense, while the other MS have not implemented them at all.

- It was clarified that from a legal point of view these defenses relate only to the costs of remediation but not to the application of the ELD as such – the scope of the ELD stays untouched.
 - Participants do not have sufficient data on how often these defenses really are used in practice.
 - It was pointed out that these defenses are important, especially for SMEs in the time of the economic crisis that companies need to defend themselves, that the defenses make sense and give legal certainty to operators.
 - An additional benefit of these defenses might be that operators are willing to obey the permits and constantly update installations, in order to be able to use these defenses, if needed.
 - But also the argument was raised, that a harmonization might be needed, because otherwise problems with competitiveness will occur.
- **On (b) - “the scope of environmental damage”:**
 - The group was skeptical to any changes in this regard, e.g. it was not considered possible to extend the scope to impacts on air, because these usually are caused by mixed pollution.
 - Nevertheless more information on Member States’ systems have been requested, if national legislation has led to extensions, including how they are applied in practice.

On Leading Question 2

Do you see a need for further EU harmonization of the significance threshold and is the scope of strict liability (Annex III activities) and fault-based liability (non-Annex III activities) and the ELD scope (as shaped by the many exceptions) about right?

Here again the discussion of the group made a distinction between the two sub-topics “Significance” (see c) and “strict versus fault-based liability” (see d):

- **On (c) - “Significance”:** On this point the group really has had very mixed views:
 - Some participants argued that significance is a major problem and clarification and/or a definition is needed, while others were of the opinion that a clarification is not possible and no further resources should be spent on this issue.
 - Some participants reported about positive experience with clarification of significance on a case-by-case approach, based on expert knowledge on habitat, water or soil legislation, while other participants reported that operators constantly ask for clarity by general abstract definitions.
 - A common conclusion was that it needs to be clarified, why in some Member States huge damage cases have not been treated as ELD-cases, and that in this regard enforcement is the key.
- **On (d) - “strict versus fault-based liability”:**
 - In this context the group unanimously was of the opinion that the current scope and the current system of strict liability based on Annex III of the ELD is OK.
 - If needed, a possible extension should be discussed only on a case by case basis, as e.g. pipelines in the French system.
 - Furthermore, again a need for enforcement was raised.

Group Three: Biodiversity damage: Experience in the application of the scope of biodiversity damage (EU protected/nationally protected species and natural habitats) and with concepts such as favourable conservation status, equivalency analysis, baseline condition etc.

Chairs: Juerg Busenhardt, Ece Ozdemiroglu, Sylvain Pioch

Report by Juerg Busenhardt

Biodiversity – Experience

- **Lack of harmonized approach** (methodology/tools /guidelines) at national and local level about how to remediate action. / Scope: varies in the different countries – national vs. EU level (protected species)
- **Strategy** needed: should aim for **BETTER** status than before: Net environmental benefit analysis not more harm than good
- Lack of experience (i.e. SMEs)
- Lack of enforcement (permits)
- Lack of data available to determine ‘significant damage’/standards **Baseline conditions: Lack of knowledge:** who is responsible to collect data? In advance by operators or by authorities? After incidents? Studies, **measurement** of effectiveness/monitoring = **long term process** (15 years): but **who finances?**
- Definitions in ELD vague Significant=?
- Increase knowledge and experience/Expertise of insurance companies
- **Academic figures:** lot of info in scientific world – need translation into **conclusions & policy making**
- **Tendency to traditional approach:** biodiversity not much looked at
- Legal aspect = clear; but practically – how to remediate?
- **Equivalency analysis** method: should take ecosystem function
- Technical issues not under ELD – lot of knowhow available
- Problem of administration: what to do if damage cannot be remediated? (e.g. *Lupus lupus*)

Biodiversity – Fit to apply?

- Who is **in charge?** MS/stakeholders? Data sets to evaluate ‘significant’ damage: Should every operator pay or the authority?
- Need for **practical guidelines:** based on case studies - real or virtual
- **ELD cases register** (coordinated at EU level)
- **Equivalency approach:** *wish* for one **centralized EU level** model / = negotiation tool, not research/academic
- Need to **communicate key concepts/ideal and framework concepts** of the ELD (eg. biodiversity) at EU level + definitions (‘significant’/‘compensatory’/ equivalency, remediation)

- How do operators/competent authorities organize to react on time (**using the available expertise within academic/scientific world for ELD**)
- **MS capability/capacity to assess best option?**
- Technical capacity building, e.g. conservation status = not a problem
- ELD should **empower** competent authorities, not burden => need **promoting**

Group Four: *ELD - national legislation and International Conventions*: Relation between ELD and national law and experience in application of both; Environmental damage treatment under IMO Conventions and Nuclear Conventions compared to ELD

Chairs: facilitated by *Lucas Bergkamp, Birgit Schmidhuber, James Walmsley*
Report by *Lucas Bergkamp*

ELD – International Conventions

- ELD exempts nuclear activities and oil pollution covered by international conventions
- There have been no nuclear accidents
- Oil pollution is covered by tiered regime pursuant to IMO conventions
- Regime works well and is effective
- Differences with ELD include:
 - Oil pollution regime covers financial losses, provides for financial security (fund) and is capped (but 3 tiers!)
 - Covers reasonable environmental restoration cost, but not interim losses, except where also financial loss
- Bringing oil pollution under ELD might help to expand environmental damage restoration, but at a cost and at risk of international regime unraveling

Is experience with remediation and prevention of environmental damage under IMO Conventions and Nuclear Conventions satisfactory, or should these exemptions to the ELD scope be revisited?

- Oil pollution regimes function properly; no need to change
- Oil regime covers large number of states, while ELD covers only EU-27

- What can ELD learn from oil pollution regime?
 - For example, fund, insurance?
- How should the difference in interim losses be addressed?
- What exactly is encompassed under ‘reinstatement of the environment’ under IMO conventions?
 - Reimbursement of cost incurred in restoration
- How can gaps in oil regime (EUR limits, no compensatory remediation) be addressed without unacceptable implications for limitation of liability?
 - ELD is probably not right tool!
 - IMO regime needs to be strengthened
 - Proposed changes could involve
 - Allocating additional funds to environmental cleanup
 - Ensure funds are spent on environmental remediation
 - Keep it simple: primary remediation only

ELD – national law

- Member States have discretion in ELD implementation
- ELD is minimum harmonization
- ELD law can be stand-alone or integrated
- Pre-existing national legislation on soil and water may be applied
- If pre-existing law is applied, ELD’s strengths may not be realized
 - Procedural effectiveness, prevention, stakeholder involvement
- ‘No level playing field’ for prevention and remediation of environmental damage

What would you consider the best way of legal integration of the ELD into the national legal frameworks in order to ensure an effective ELD implementation and to avoid widely disparate national ELD regimes?

- Better common understanding and better implementation of ELD is necessary
 - No need to amend ELD
 - Training & networking

- ELD should be applied in accordance with environmental policy principles
 - Prevention
 - Polluter pays
 - Remediation
- More uniformity on defenses
- Holistic, integrated approach needed to ELD implementation
 - ELD should not be viewed as stand-alone regime
 - Companies and regulators could benefit from collaborative approach and networking
 - Local regulators, which have multiple responsibilities, should talk more to other regulators

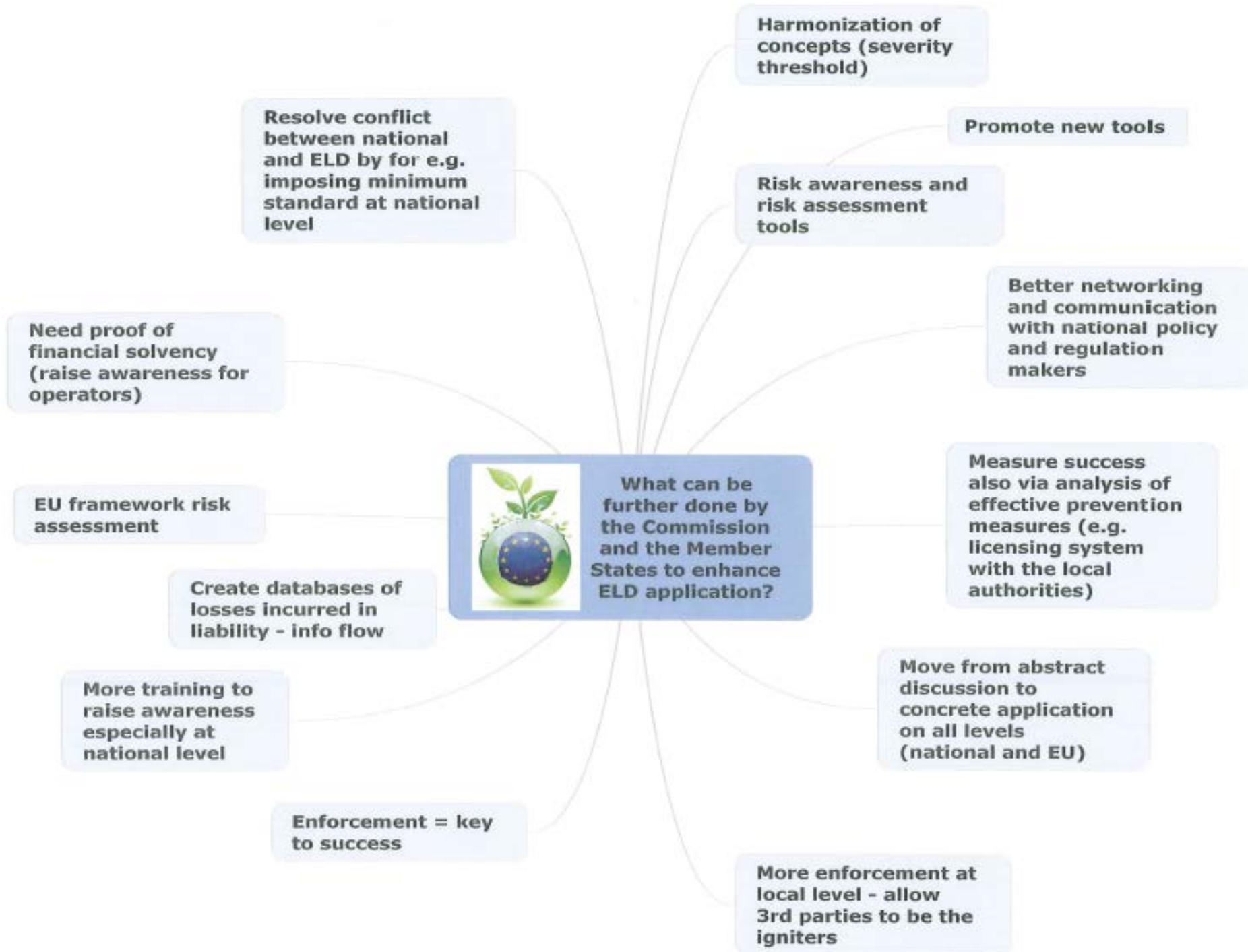
Following the breakout group reports the participants engaged again in a participatory plenary discussion to deepen and enrich the considerations of the morning plenary with the gained experience at the breakout groups.

The key questions debated were:

- *Are we satisfied with the experience gained in the application of the ELD?*
- *Can we identify a need for improvement of either practical or legal matters?*
- *What can be further done by the Commission and the Member States to enhance ELD application?*

All stakeholders were then asked to present their common findings with regard to the last question.

The result of the participatory plenary discussion on “What can be further done by the Commission and the Member States to enhance the ELD application?” are captured in the Mind Map by Catherine Focant on the following page:



Closing of the day

Hans Lopatta at the end of the day thanked all participants for their valuable contributions and described briefly the plans of the Commission for the period to come: Analysing the Member State reports 2013 and the additional studies launched in 2013, evaluating the application of the Environmental Liability Directive and the review points, submitting the Commission report to the European Parliament and the Council by April 2014, based on the outcome considering whether the ELD should be subjected to a future revision in 2015 and/or considering further measures to enhance the implementation of the ELD (raising awareness, exchanging stakeholder information, providing trainings, consulting experts and stakeholders etc.)

Fostering of the ELD Stakeholder community

There had been many opportunities during the day to meet with new people in the different rounds of conversation, both in the plenaries and in the afternoon break out groups; one purpose of this meeting was also fostering the community of stakeholders. One stakeholder in particular appreciated this momentum and suggested to build awareness between stakeholders and administrators in MS to connect more each other and to share best practices and to create knowledge with a broader methodology.

What they said about the day

"Congratulations also for the ELD Workshop this week that I found interesting and well organised."

"That was fun."

"The discussions were lively, and the breakout groups went well. Thank you for organising this."

"It was my pleasure to contribute to the stakeholder conference yesterday!"

"It was very important for us to participate in the 2nd ELD Stakeholder Conference. The results of the ELD application reports 2013 were very interesting and the tools presented by Spain and France were particularly useful for us. ... We did appreciate all the efforts done to involve the stakeholders in this matter, which is not so easy."

Credits

Organisers:	Hans Lopatta, Alexandra Vakrou
Facilitation team:	Ian Andersen (Maître de cérémonie), Catherine Focant, Daniela Terrile
Report /Pictures and mind maps:	Daniela Terrile / Catherine Focant
Logistics:	Miriam Crawley

Results of the answers provided by participants (based on 42 questionnaires, but not all fields always filled in). Individual opinions/qualitative statements in italics:

Content:

- This conference was relevant to my work/my mission/my tasks YES/PARTLY/ NO
36 / 4 / 0

Facilitators had/were:

- a good knowledge of the topic: YES / PARTLY / NO: 40 / 0 / 0
- good communicators: YES / PARTLY / NO: 25 / 15 / 0
- attentive to the needs of participants: YES / PARTLY / NO: 27 / 11 / 0
- good language skills: YES / PARTLY / NO: 34 / 6 / 0
- well prepared: YES / PARTLY / NO: 34 / 5 / 1

Methodology:

- The level of the conference was appropriate: YES / PARTLY / NO: 39 / 2 / 0
- The pace of the conference was appropriate: YES / PARTLY / NO: 29 / 9 / 2
- The length of the conference was appropriate: YES / PARTLY / NO: 30 / 7 / 4
- The conference offered sufficient examples / exercises: YES / PARTLY / NO: 16 / 15 / 7

"Depending on sessions, some too long, some too short."; "Not enough examples but too many exercises."

Resources: (Conference folder, Presentation material, Papers, etc.)

Was the conference documentation (folder, slides, websites, information material, stakeholder communities of practice etc.) useful?

"List of participants was missing."; "List of participants would have been useful."; "Handouts of all presentations in advance would have been appreciated."

Organisation and logistics:

- The equipment was appropriate: YES / PARTLY / NO: 35 / 5 / 1
- The conference environment was appropriate: YES / PARTLY / NO: 41 / 0 / 0
- I was satisfied with the administrative organization: YES / PARTLY / NO: 38 / 3 / 0
- In the interest of continuous improvement, please feel free to make any additional comment:

"More time should be dedicated to breakout group discussions"; "Please send confirmation e-mail"; Collect presentations in advance, test presentation of equipment prior to and have back-up equipment in the event of unforeseen issues"; "Not in the centre of Brussels please (traffic jam is horrible)"; "List of attendees", "Handouts in advance"; "Excellent organization. Incredible human and technically. Thanks again. It's always a pleasure participating in these workshops. Well done."

General comments:

Do you feel that:

- You have learnt relevant information and facts today? YES / PARTLY / NO: 24 / 17 / 0
- You had sufficient opportunity to express your views? YES / PARTLY / NO: 35 / 5 / 1
- You had a chance to contribute to the overall outcome? YES / PARTLY / NO: 29 / 10 / 0
- The Conference met your expectations? YES / PARTLY / NO: 24 / 17 / 0
- The event was useful in meeting your objectives? YES / PARTLY / NO: 33 / 8 / 0

Is there anything else you would like to let us know in terms of overall evaluation of the Conference?

"Reports from breakout groups were rather not dynamic and uninterested. It lost full attention. Don't know if this was best set-up."; "I would like to see more attention to the actual goal of the Directive and how this impact several businesses. The conference had a highly abstract legal and policy character whereas opinions and impact assessments of operators could have given valuable insights."; "It seems that not much has changed since the 1st Conference. I had the

impression that a lot of the issues with the ELD were already mentioned in 2011."; "Would like to have participants list together with documents delivered on the day of the meeting."; "Operators not enough represented. Should be more involved."; "To avoid more than 1-2 discussions in small groups because is not constructive"; Similar to BIOIS workshop but more structured and interactive. Listen to what was said. Is this just about ELD or how ELD contributes?"; "I would have liked to know more from the Commission and less of stakeholders views"; "Speak about real damages and how to quantify them. How do that?"; "I was pleased with the openness of the participants and the collaborative, positive and proactive attitude from the stakeholder group to find solutions and find positive aspects."; "I would encourage the engagement of SMEs and corporate operators in future conferences. Nice to have insurance and lawyers, but these issues will have greatest impact on actual operators. Redouble efforts to engage operators."