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AK Position Paper

Towards a Circular Economy

About us

The Austrian Federal Chamber of Labour is by law representing the interests of about 3.4 million employees and consumers in Austria. It acts for the interests of its members in fields of social-, educational-, economical-, and consumer issues both on the national and on the EU-level in Brussels. Furthermore the Austrian Federal Chamber of Labour is a part of the Austrian social partnership.

The AK EUROPA office in Brussels was established in 1991 to bring forward the interests of all its members directly vis-à-vis the European Institutions.

Organisation and Tasks of the Austrian Federal Chamber of Labour

The Austrian Federal Chamber of Labour is the umbrella organisation of the nine regional Chambers of Labour in Austria, which have together the statutory mandate to represent the interests of their members.

The Chambers of Labour provide their members a broad range of services, including for instance advice on matters of labour law, consumer rights, social insurance and educational matters.

Rudi Kaske
President

More than three quarters of the 2 million member-consultations carried out each year concern labour-, social insurance- and insolvency law. Furthermore the Austrian Federal Chamber of Labour makes use of its vested right to state its opinion in the legislation process of the European Union and in Austria in order to shape the interests of the employees and consumers towards the legislator.

All Austrian employees are subject to compulsory membership. The member fee is determined by law and is amounting to 0.5% of the members' gross wages or salaries (up to the social security payroll tax cap maximum). 560.000 - amongst others unemployed, persons on maternity (paternity) leave, community and military service - of the 3.4 million members are exempt from subscription payment, but are entitled to all services provided by the Austrian Federal Chambers of Labour.

Werner Muhm
Director

The AK position in detail

1. Introduction

The Austrian Federal Chamber of Labour (BAK) welcomes the European Commission's aim of presenting an ambitious initiative to promote the circular economy by the end of 2015. The initiative is intended to comprise not only a revised version of proposals on **amendments to various waste management directives**, but also a mandatory and coordinated action plan that takes into account the whole value-added chain, rather than just a part of it.

An action plan, however, will only provide additional benefit compared to the **Zero Waste COM(2014) 398 final communication** if certain urgent projects such as a **reform of statutory warranties** in favour of long-lasting products (Directive 1999/44/EC) or a **broadening of the Ecodesign Directive 2009/125/EC** are actually tackled promptly. The **COM(2014) 397 final Proposal for a Directive concerning waste management** is also in need of improvement.

Having already made a critical assessment of the "Zero Waste Package" in October 2014¹, the BAK wishes to take the opportunity of the current public consultation on the circular economy² to reiterate some of those key points.

2. Where is there a need for action? Is a circular economy the answer? The environmental impact of production and consumption needs to be considered in its totality.

The term "circular economy" may sound like the promise of a better world, but if

we consider the various and contradictory proposals put forward in connection with it, we can see how fuzzy the term is and how easily it can be co-opted for specific interests. The European Commission rightly asks which products should be tackled using which goals and which measures should be taken in which phase of their life cycle of production, consumption and waste.

The term "circular economy" and consideration of material flows are of little aid. The circular flow of materials offers no guarantee that the **environmental impacts associated with certain products and their usage will actually and effectively be markedly reduced** along the respective value-added chain (from cradle to grave). The aim must be a substantial reduction in environmental impacts. **To that end, environmental impacts need to be considered in their totality in order that the relevant fields of action and instruments for the coming years can be reliably worked out.**

A survey of stakeholders using a "menu of options", as is the case with this consultation, cannot achieve that; it serves to highlight only the stakeholders' respective preferences and concerns.

The approach of the Swiss Federal Office for the Environment (FOEN) is exemplary in this respect, including in relation to efforts at European level. In order to **establish a better decision-making basis for its priority recommendations to policy-makers**, in 2011 it commissioned an assessment of **Switzerland's total environmental impact through consumption and production** for the first time.³

*Inclusion of the whole life cycle of products was important because many goods are imported into Switzerland, so consideration of only environmental impacts arising in Switzerland itself would not go far enough. In order to be aggregated as a total impact, the various environmental impacts were quantified using the **method of ecological scarcity**⁴ as so-called environmental impact points (EIPs). **Methodologically, that goes well beyond the conventional approach to defining environmental indicators.** EIPs assess various emissions into the soil, water and air, and the consumption of natural resources. Greenhouse gases, water pollution and land usage alike are taken into account.*

The most striking finding of the study is that imports account for around 60% of Switzerland's total environmental impact. The dependence of Switzerland on natural resources and production processes abroad is evident. It also highlights its shared responsibility for the state of the global environment. **The most relevant consumer sectors in environmental terms are food and housing**, accounting for 28% of the environmental impact each, as well as mobility, which makes up 12%.

Not only is it remarkable that a remarkably **high ratio of Switzerland's environmental impact is caused abroad**, but it is notable that the environmental impact caused abroad is significantly higher than the impact in Switzerland itself in most consumer sectors. Only the consumer sector of mobility has a slightly higher environmental impact in Switzerland than abroad. **Analysis** of the environmental impact in Switzerland **broken down by economic sectors** (not including exports) show that **agriculture (30%), energy, waste management,**

hospitality and transport have the greatest environmental impact.

In 2014, FOEN used the same method to study how **Swiss environmental impacts changed over time between 1996 and 2011.**⁵ The key finding was that the domestic environment impact had significantly fallen, but that decrease was largely cancelled out by the increasing environmental impact abroad. The proportion of the environmental impact caused abroad increased from around 56% in 1996 to around 73% in 2011. The environmental impact needs to be halved in order to reach an environmentally sustainable level.

3. Effects on employment of an increased circular economy

The effects of a circular economy appear to hold great promise. The European Commission⁶, for example, anticipates net savings of up to EUR 600 billion for European companies through improved ecodesign, waste avoidance and recycling, together with a reduction in annual greenhouse gas emissions. Additional measures are predicted to increase resource productivity by 30% by 2030, and could generate a 1% increase in GDP yearly and create 2 million additional jobs.

However, it is difficult to avoid the impression that the economic effects of an "increased circular economy" may be greatly overestimated. It is clear at any rate that the current state of research does not allow for a detailed estimate of the employment and growth impacts of the circular economy. According to a recent study, the effects on employment of the sharing economy, digitalisation, recycling and the reprocessing of products have not been explored

sufficiently⁷. The impacts on European and international trade flows, the competitiveness of the European Economic Area, the demand for labour and qualifications etc.⁸ are also open questions. What is striking about the current estimates for individual states is how divergent they are – the framework study of the European Commission refers, for instance, to studies for the Netherlands and the UK from 2013; although the UK has approx. four times as many residents, around 50,000 jobs are estimated to be created in each of the countries by the transition to the circular economy.⁹

The BAK by all means supports both employer and employee organisations being systematically involved in all the sub-steps of the processes (for establishing facts, including with respect to the effects on welfare and the environment, and the development of policy proposals).

4. Circular economy through recycling rates and take-back systems?

The **debate on facilitation of the circular economy** is unduly dominated by the preferred instruments of recycling rates and the collection and recovery or take-back systems to be set up for that purpose. They are even wrongly equated with Extended Producer Responsibility (EPR). EPR, however, goes beyond that.

Nor are recycling rates an instrument with innovative potential. Instead, they resemble the familiar exhaust air filters from the early years of air pollution control policy, i.e. end-of-pipe measures that were and are certainly necessary as a starting point, but which do not go far enough. Recycling rates and the collection and recovery systems set up for their implementation are, if professionally managed, at best a **useful financing**

instrument for the handling of waste, but are prone to cartel formation and barely provide the obligated producers with **incentives for ecodesign**. The conflict of objectives here needs to be acknowledged.

In addition, recycling rates overshadow other, **more promising instruments that require a common EU-wide framework**.

- Demanding **technical specifications for the various recycling, recovery and disposal methods** remain essential. Loopholes need to be closed and the practical implementation of the specifications needs to be ensured.
- **Promotion of recycling by lowering those standards**, e.g. calls for exemptions from REACH for secondary raw materials together with premature end-of-waste status, or contemplation of relaxing the conditions concerning the waste licence for SMEs, **is the wrong approach**. Recycling needs to be of high quality to avoid diffuse dissipation of pollutants into the environment.
- The same ultimately applies to landfill. An **ambitious landfill ban** creates effective cost incentives that promote separate collection for the purpose of recycling or other forms of recovery. **Landfill levies** have the same effect.
- However, measures beyond waste management also have great potential, for instance the **reform of statutory warranties and the introduction of minimum guarantee obligations**, which would better protect consumers against defective products and early wear and tear.

- Significant impetus could be generated by a **more comprehensive application of the EU Ecodesign Directive** by placing greater emphasis on the lifetime and reparability of products.
- Major incentives can also result from **environmentally focused public procurement** if effective use is made of the buying power concentrated there. The BAK advocates that approach¹⁰.
- **Transparent environmental information about products** to make it easier for consumers to make sustainable purchase decisions is also essential.

5. Implement a landfill ban across Europe as swiftly as possible and ...

In terms of waste management specifically, it is essential, as mentioned above, that conventional means of depositing waste, which should actually be pre-treated, are as swiftly as possible prohibited by an **up-to-date landfill ban** or at least the cost benefit associated with those forms of disposal is cancelled out by landfill levies.

The **specifications set out in the EU Landfill Directive 1999/31/EU contain far too low requirements concerning the quality of the waste to be landfilled and allow for excessively long transitional periods.** However, the approach taken in Article 3(2) of the COM(2014) 397 final Proposal for a Directive would not have been expedient either. It would also have led to the problem of how such requirements could be implemented on a competitive waste management market.

It is better – **for instance, following the model of Sections 6ff. of the Austrian Landfill Ordinance** – to make clear (to put it briefly) that waste needs to be pre-treated and only inert waste may be landfilled. The advantage is that such requirements, unlike rates, are justifiable on scientific grounds. They are designed, above all, to prevent landfills from becoming the contaminated sites of tomorrow. **The high costs of the necessary thermal pre-treatment in themselves lead to recyclable waste being voluntarily sorted by waste holders in advance.** In other words, use is made of market forces.

As an example, the recovery of plastic waste in Austria was increased from 20% (1994) to 98% (2010), which the authors of the study attribute solely to the landfill ban set out in the Landfill Ordinance.¹¹

6. ... subsidise it by means of landfill levies to enable investments in facilities

It is clear that a landfill ban is only effective if compliance can be monitored and non-compliance is penalised. To ensure the ban can be implemented, sufficient plant capacity for the pre-treatment of waste is required. In Austria, that predominantly meant facilities for thermal treatment. Creation of sufficient capacity requires transitional periods. However, the **introduction of a landfill ban in itself will not ensure the creation of the necessary capacity**, since the obligated companies are inclined to wait during the transitional period, as is the case currently with the long transitional periods set out in the EU Landfill Directive.

In order for companies in the industrial or energy supply sector to make the necessary investments in facilities in time, it needs to be ensured that the cost benefits of conventional cheap landfill are cancelled out by a landfill levy even during the transitional phase. That creates investment protection.

*The **contaminated site fee** – a waste steering tax which was and is payable by the landfill operator – has had precisely that effect in Austria.¹² The contaminated site fee was **staggered according to the quality of the waste to be landfilled from 2004** and obliged landfill operators wanting to stick to the old landfill standards to pay a correspondingly higher fee. That meant cheap landfill lost its cost benefits from the perspective of the waste holder. **Conventional landfill was just as expensive from 2004 as compliance with the requirements of the Landfill Ordinance, which became mandatory by no later than 2008.** Many waste holders therefore strived to comply immediately with the new landfill standards.*

7. Does the “risk of incineration overcapacity” argument hold?

With respect to the argument that a strict landfill ban poses the risk of excess incineration capacity being created, it is true that it is not at all easy to reach conclusions about the necessary annual incineration capacity from the annual landfill quantities.

The Austrian example shows that **it comes down to the right mix of instruments**. Waste holders and disposers in Austria, from 2004 at the latest, if only for cost reasons, looked closely at what waste can be separated and recycled to spare the high costs of land-

fill. Investors and operators of thermal facilities also had to take that into account when drawing up their plans.

There is no evidence of overcapacity having been created in Austria. Nor is there any evidence that the stringent requirements of the Landfill Ordinance exerted a “pull” towards incineration.

8. National landfill levies need to be introduced

The challenge on the European level undoubtedly lies in the **large differences in development** that can be observed among the Member States. Transitional periods for a landfill ban will have to take that into account.

It is crucial that a **revised proposal for a directive concerning waste management obliges the Member States to swiftly introduce national landfill levies**, since these, depending on the level of the levies, in themselves promote recycling and other forms of recovery accordingly and help to prepare the national waste disposal industry for the implementation of a strict landfill ban.

9. Evaluate and improve the practice of EPR in Member States

A future proposal for a directive concerning waste management will naturally also have to address the question of what **minimum requirements** should be made with respect to **Extended Producer Responsibility (EPR)** systems.

The Commission had prepared a broad-based study titled **“Development of Guidance on Extended Producer Responsibility”¹³** on that subject. The BAK gave a detailed critical assessment in December 2013 during preparation of the study¹⁴ and in October 2014 on the

COM(2014) 397 final Proposal for a Directive concerning waste management¹⁵. The study did not succeed in identifying a best practice model applicable to all situations. It does, however, provide a number of insights and shows, above all, how differently national implementation is designed and carried out, and what key aspects need to be observed.

Drawing on those findings, a revised proposal for a directive concerning waste management should **first oblige the Member States to debate the results of the study, and to self-critically assess the environmental contribution and weak points of the existing national systems and report on those.**

To support those processes, some aspects should be given greater emphasis in a future proposal for a directive concerning waste management. Unfortunately the suggestions in the **COM(2014) 397 final Proposal for a Directive concerning waste management** fall far short of the proposals set out in the study and are not hard-hitting enough.

Proposal for Article 8 of the Waste Framework Directive 2008/98/EC:

“By no later than a year following the coming into force of [the new provisions on EPR] the Member States shall apply the provisions [the old and new provisions on the EPR] to existing EPR systems and shall also investigate their potential for improvement in respect of assignment of responsibility, bearing of costs, true-cost pricing, competition, transparency and control⁶ and shall report to the European Commission on the measures taken by”

9.1. EPR is only justified if it enables environmental targets to be achieved effectively and efficiently

The OECD issues papers on EPR¹⁷ show that EPR is only justified if the shift of responsibility to the producer is better suited to internalising environmental costs, aiding the ecodesign of products and advancing implementation of the goals of waste legislation than conventional environmental policy instruments and forms of assignment of responsibility are.¹⁸ That therefore also needs to be reflected in the legal requirements. It should by no means be assumed – as proposed in the COM(2014) 397 final Proposal for a Directive concerning waste management¹⁹ that the **shift of financial responsibility** will in itself lead to improved attainment of environmental targets.

A current negative example from Austria's perspective is the planned compensation ordinance, according to which collection and recovery systems are to compensate municipalities for the costs of packaging waste that continues to land in the residual waste. The ordinance cannot be justified on environmental grounds and does not strive for environmental improvements. Instead, it is only driven by the aim of effecting transfers of funds to municipalities.²⁰

9.2. EPR does not automatically mean that the producer is responsible for the “full costs”

Nor, specifically, should the full bearing of costs by the producer be adopted as a minimum criterion.²¹ Instead, it should be made clear **that the question of bearing costs (by whom and in what ratio) must follow from the specific environmental goals being pursued.** Systems such as Fost Plus in Belgium, which are seen as exemplary, do not envisage the full bearing of costs by producers, and are instead based on **“shared responsibility”**.

The BAK also favours models such as Fost Plus because they avoid the kind of overlap problems between packaging waste collection and other forms of municipal collection that could be observed in Austria until recently.²² Instead optimal use is made of the synergies between the local government utility systems and the EPR systems; private end consumers get a solution from a single source.

Proposal for a minimum standard for EPR:

“Manufacturers shall bear the necessary and expedient costs for attaining the environmental policy targets.”

9.3. Prevention of self-dealing in EPR systems

The mere specification of a “clear” assignment of responsibility as required by Annex VI of the COM(2014) 397 final Proposal for Directive concerning waste

management is of little benefit. It does not prevent **environmentally and economically counter-productive conflicts of interest or distortions of competition in EPR systems.** Such circumstances, which are neither coincidental nor uncommon, **simply reflect the economic interests of powerful market players,** and lead to excessive costs for producers, damage competition on the waste markets and even have a negative impact on recycling.

A negative example from Austria’s perspective is the ARA packaging collection scheme, which the European Commission is investigating on the grounds of abuse of dominant market position.²³ Large contractors of ARA that are involved both in the collection (large supermarket chains) and in the recovery of packaging waste (industries recovering waste materials) are represented on the ARA supervisory board, which is the central decision-making body.²⁴

Proposal for a minimum standard for EPR:

“If schemes are set up for the collective implementation of Extended Producer Responsibility, the Member States shall ensure that current or future contractors of those schemes may neither directly or indirectly be members or owners of those schemes.”

10. Reform of statutory warranties and introduction of a minimum guarantee obligation

Under warranty law as it currently stands, it is difficult for consumers to enforce their rights because after six months they have to prove that product defects already existed at the time of taking receipt of the product. For that reason, in addition to a general extension of the warranty period, the reversal of the burden of proof should also be extended. Studies²⁵ further show that products wear out early and have to be replaced by consumers. The introduction of mandatory minimum guarantees on devices or certain wear parts would therefore be an important step to reduce waste and protect consumers from additional costs.

11. Broadening of the EU Ecodesign Directive

The Ecodesign Directive is an important instrument for bringing environmentally sustainable products to market. Annex I of the Directive lists parameters for taking environmental aspects into account throughout the product life-cycle (from production through to disposal), in particular

“extension of lifetime as expressed through: minimum guaranteed lifetime, minimum time for availability of spare parts, modularity, upgradeability, reparability”²⁶

The regulations hitherto focused on energy-efficient measures, but aspects of the extension of product lifetime and

improved reparability should receive greater emphasis in future. Further, the environmental consequences of the whole product life cycle should be assessed and relevant measures developed.

Broader involvement of environmental, consumer and employee organisations in the development of the regulations is required.

12. Transparent environmental information about products

Consumer information should not be limited to eco-labelling. To make environmentally friendly decisions, consumers need well-founded, relevant and complete environmental information about products.²⁷ That requires consumer information that is independent of producers’ interests, for instance concerning minimum durability, costs per year, reparability and recyclability.

Footnotes and Literature

¹ See the position paper at http://www.akeuropa.eu/en/publication-full.html?doc_id=351&vID=77

² http://ec.europa.eu/environment/consultations/closing_the_loop_en.htm

³ <http://www.bafu.admin.ch/publikationen/publikation/01611/index.html?lang=de>

⁴ <http://www.esu-services.ch/de/projekte/ubp06/>

⁵ <https://www.news.admin.ch/message/index.html?lang=de&msg-id=53860>

⁶ See http://ec.europa.eu/environment/circular-economy/index_en.htm; cf. also the brief article at <http://blog.arbeit-wirtschaft.at/wir-exportieren-umweltbelastungen-tendenz-steigend/> and in detail: Hochreiter, Wir exportieren Umweltbelastungen – Tendenz steigend! [Our exports of environmental impacts are on the rise] Zeitschrift Wirtschaft & Umwelt 1/2015 p.10 – download <http://www.ak-umwelt.at/schwerpunkt/?issue=2015-01>

⁷ Horbach, Jens, Rennings, Klaus, Sommerfeld, Katrin (2015): Circular Economy and Employment. May 2015, Lichtenfels/Mannheim, p. 29.

⁸ See Ellen MacArthur Foundation/ SUN/ McKinsey Center for Business and Environment (2015): Growth Within: A Circular Economy Vision for a Competitive Europe, p. 42 (Figure 22)

⁹ European Commission (2014): Scoping study to identify potential circular economy actions, priority sectors, material flows and value chains. Funded under DG Environment's Framework contract for economic analysis ENV.F.1/FRA/2010/0044, August 2014. Luxembourg: Publications Office of the European Union, p. 3.

¹⁰ Grünbuch über die Modernisierung der europäischen Politik im Bereich des öffentlichen Auftragswesens – Kurzbewertung der AK [Green book on modernisation of European policy in the field of public procurement – brief analysis by the BAK] http://www.akeuropa.eu/de/publication-full.html?doc_id=175&vID=16

¹¹ Feketitsch – Laner, Kunststoffe in Österreich - Analyse der letzten 15 Jahre [Synthetic materials in Austria – analysis of the past 15 years], ÖWAW 2015/67, p 35.

¹² Federal Act of 7 June 1989 on the Financing and Execution of the Remediation of Contaminated Sites – <http://www.ris.bka.gv.at/GeltendeFassung.wxe?Abfrage=Bundesnormen&Gesetzesnummer=10010583>

¹³ See http://ec.europa.eu/environment/waste/target_review.htm and http://ec.europa.eu/environment/waste/pdf/target_review/Guidance%20on%20EPR%20-%20Final%20Report.pdf

¹⁴ Responses of the BAK as part of the written stakeholder consultation on possible golden principles and guidelines http://www.akeuropa.eu/de/publication-full.html?doc_id=348&vID=43

¹⁵ See the position paper at http://www.akeuropa.eu/en/publication-full.html?doc_id=351&vID=77

¹⁶ These aspects correspond to guiding principles nos. 1 to 8 of the aforementioned “Development of Guidance on Extended Producer Responsibility” study.

¹⁷ Issues Paper – The State of Play on Extended Producer Responsibility (EPR): Opportunities and Challenges – Global Forum on Environment: Promoting Sustainable Materials Management through Extended Producer Responsibility (EPR) 17-19 June 2014, Tokyo, Japan – <http://www.oecd.org/environment/waste/Global%20Forum%20Tokyo%20Issues%20Paper%2030-5-2014.pdf> (Global Forum on Environment: Promoting Sustainable Materials Management through Extended Producer Responsibility (EPR) – OECD – <http://www.oecd.org/env/waste/gfenv-extended-producerresponsibility-june2014.htm>); <http://www.oecd.org/fr/env/dechets/factsheetextendedproducerresponsibility.htm> and <http://www.oecd.org/env/tools-evaluation/extendedproducerresponsibility.htm>

¹⁸ Cf. the detailed responses of the BAK as part of the stakeholder survey in the context of the above study.

¹⁹ Cf. Article 1 (6) a of COM(2014) 397final.

²⁰ See the unfavourable opinion of the BAK <http://wien.arbeiterkammer.at/interessenvertretung/umweltundverkehr/umwelt/abfall/Abgeltungsverordnung.html>

²¹ See Annex vii, 6.1. COM(2014) 397 final ANNEX 1.

²² Dispensation schemes such as Fost Plus (unlike ARA in Austria or DSD in Germany) are not themselves purchasers of collection and recovery services, i.e. the municipalities continue to commission collection and sorting of waste, but receive financial support from the producers.

²³ European Commission press statement of 18.07.2013: http://europa.eu/rapid/press-release_IP-13-711_de.htm ; cf. also the Commission decision of 16 October 2003 against ARA, OJ L 75/59 of 12 March 2004; see <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2004:075:0059:0097:DE:PDF> and the Judgment of the General Court of 22 March 2011 – Altstoff Recycling Austria v Commission (case T-419/03) OJ C 139/15 of 7 May 2011 – <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:C:2011:139:0015:0015:DE:PDF>

²⁴ On such self-dealing arrangements and the impact on the environment, consumers and competition, cf. the articles in the BAK competition reports from 2002/ Part I p. 67 , 2008/p.134, 2010/p.136, 2012/p.63, 2013/p.70 and 2014/p. 82; Hochreiter, ARA-System – Marktöffnung in Sicht? [ARA system – market opening in sight?], Wirtschaftspolitik-Standpunkte 03/2013, 9 and most recently ARA-System – Marktöffnung in statu nascendi [ARA system – market opening in statu nascendi], Wirtschaftspolitik-Standpunkte 02/2015, 19 <http://wien.arbeiterkammer.at/service/zeitschriften/WirtschaftspolitikStandpunkte/index.html>

²⁵ Cf. inter alia the study by the BAK (2015): Die Nutzungsdauer und Obsoleszenz von Gebrauchsgütern im Zeitalter der Beschleunigung [The useful life and obsolescence of consumer durables in the age of acceleration]; study on behalf of the German Alliance ,90/The Greens (2014): Geplante Obsoleszenz [Planned obsolescence].

²⁶ See Directive 2009/125/EC, LB 285/24, 1.3 i) <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:285:0010:0035:en:PDF>

²⁷ Cf. FOEN http://www.bafu.admin.ch/produkte/10446/index.html?lang=de#sprungmarke0_32

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