Legal 500
Country Comparative Guides 2025

United Kingdom
Environment

Contributor

Hausfeld & Co LLP

David Lawne

Partner | dlawne@hausfeld.com

Alex Cooper

Senior Associate | acooper@hausfeld.com

Giulia Trojano

Senior Associate | gtrojano@hausfeld.com

Ana Isabel Fernández Alonso

Associate | afernandezalonso@hausfeld.com

Abigail Thrasher

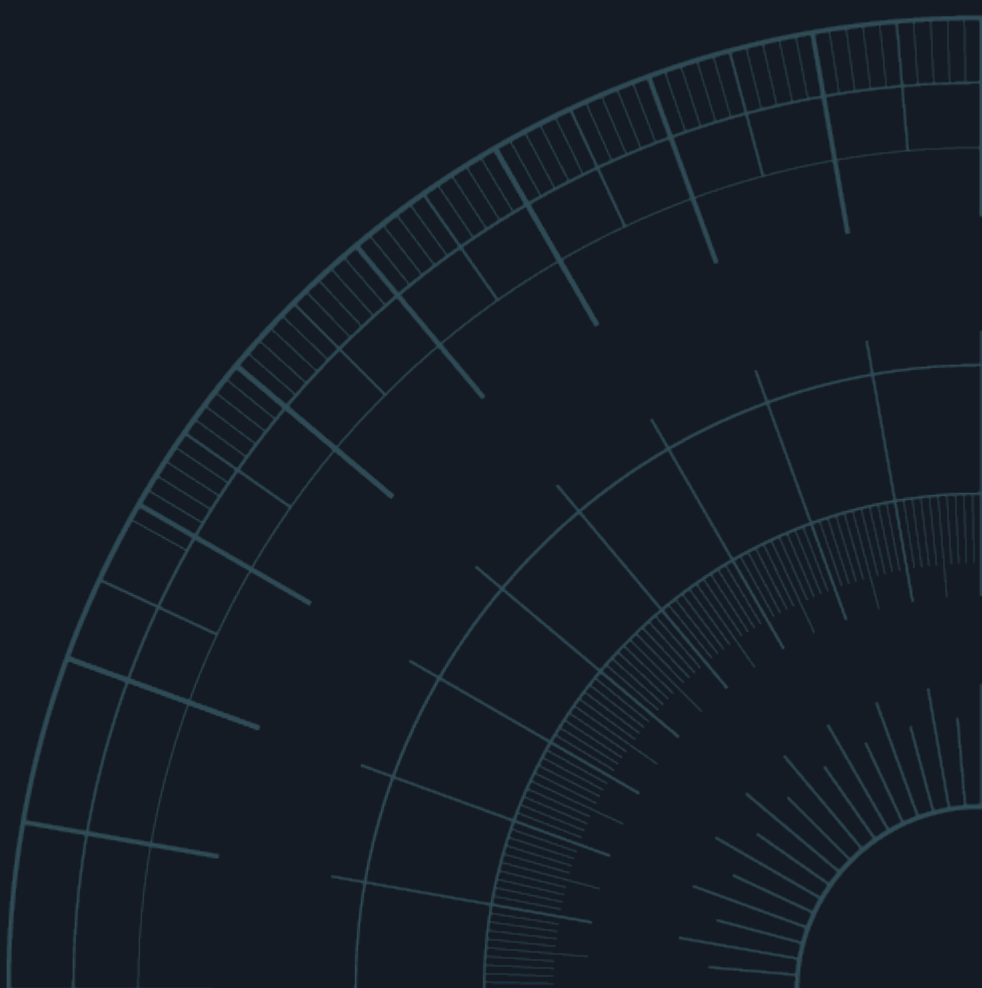
Associate | athrasher@hausfeld.com

The authors are grateful for the assistance of Ines Berizzo, Ariana Bourdillon Ruiz, Til Ewart, Philip Filou, Dylan Gordillo and Macha Phelan.

|

This country-specific Q&A provides an overview of environment laws and regulations applicable in United Kingdom.

For a full list of jurisdictional Q&As visit **legal500.com/guides**



United Kingdom: Environment

1. What is the environmental framework and the key pieces of environmental legislation in your jurisdiction?

The UK's environmental framework is built on several key pieces of primary legislation:

- The Environmental Protection Act 1990 contains frameworks on waste management, pollution, litter, statutory nuisance, nature conservation and contaminated land (inserted by the Environment Act 1995).
- The Water Resources Act 1991 contains frameworks for the management of water resources and water pollution.
- The Pollution Prevention and Control Act 1999 grants wide powers to the government to enact secondary legislation, under which the Environmental Permitting (England and Wales) Regulations 2016 were enacted.
- The Climate Change Act 2008 contains the UK's statutory target for greenhouse gas emissions reductions, and a framework for setting budgets, reporting on performance against those budgets and implementing policies to reduce emissions.
- The Environment Act 2021, introduced, in part, to enshrine or refocus principles of UK environmental law following Brexit, requires the government to set environmental targets, including on air quality and biodiversity.

Most environmental legislation is contained in regulations, many implementing EU law. Environment policy is a devolved matter so regulations can vary between England, Scotland, Wales and Northern Ireland.

2. Who are the primary environmental regulatory authorities in your jurisdiction? To what extent do they enforce environmental requirements?

The Environment Act 1995 established regulatory authorities for England, Wales, Scotland, and Northern Ireland: respectively, the Environment Agency, Natural Resources Wales, Scottish Environment Protection Agency, and Northern Ireland Environment Agency.

Most breaches of environmental laws are criminal offences. Authorities have powers to investigate breaches and take enforcement action, including issuing penalty and enforcement notices and prosecuting offences.

Local authorities are generally responsible for the planning regime, the management of contaminated land, the regulation of statutory nuisances and the regulation of less polluting environmental activities.

The Office for Environmental Protection is responsible for holding government and public authorities accountable for their requirements under environmental law.

3. What is the framework for the environmental permitting regime in your jurisdiction?

The Environmental Permitting Regulations (England and Wales) 2016 (EPRs) specify activities for which an environmental permit is required and provide for certain low-risk activities to be undertaken without a permit, by registering an exemption. They apply to emissions for land, water, air, and waste-related activities. The Environmental Agency (for England), Natural Resources Wales (for Wales) and, in certain instances, local authorities act as regulators under the EPRs.

Discharges of trade sewage require a consent from the sewerage undertaker (i.e. the water company), under section 118 of the Water Industry Act 1995. Water abstraction or impoundment licences are issued under the Water Resources Act 1991 (WRA); the government has consulted on integrating this into the EPRs regime, although this has been delayed.

4. Can environmental permits be transferred between entities in your jurisdiction? If so, what is the process for transferring?

Under the EPRs, most environmental permits may be transferred, fully or partially, to a new operator. In most cases, the transferee and the operator (if they can be found) must apply to the regulator. An application is not required for the transfer of a permit that authorises a stand-alone water discharge activity, a stand-alone groundwater activity or a stand-alone flood risk activity, which can be transferred by notification to the regulator.

The regulator will only grant the transfer of a permit if it is satisfied that the transferor will be the operator of the

facility and will be able to operate it in accordance with the environmental permit.

Sewerage undertaker consents cannot be transferred. An incoming operator must apply for a new consent. Water abstraction licences can be transferred under the WRA.

5. What rights of appeal are there against regulators with regards to decisions to grant environmental permits?

The EPRs give an applicant the right to appeal against a decision by the regulator to refuse to grant an environmental permit. Generally, the Planning Inspectorate is the relevant appellate body; however, in exceptional or controversial cases it may be the Secretary of State or Welsh Minister. The Planning Inspectorate determines the appropriate procedure for the appeal as either by written representations, a hearing or an inquiry. The appeal decisions may be challenged on a point of law by way of judicial review. Third parties have no statutory right of appeal, but may challenge a decision through judicial review.

6. Are environmental impact assessments (EIAs) for certain projects required in your jurisdiction? If so, what are the main elements of EIAs (including any considerations in relation to biodiversity or GHG emissions) and to what extent can EIAs be challenged?

EIAs are required for specified projects under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations). These include large scale energy and infrastructure projects (specified under Schedule 1 of the EIA Regulations), and projects which are likely to have significant impacts on the environment including industrial, agricultural, infrastructural and tourism projects (pursuant to Schedule 2 of the EIA Regulations). Other projects may require EIAs under separate legislation, such as significant infrastructure projects under the Planning Act 2008.

EIAs must assess the development's direct and indirect significant effects on several factors: population and human health, biodiversity, land, soil, water, air and climate (including downstream greenhouse gas emissions), material assets, cultural heritage and the landscape. The process begins with 'screening' to identify whether an EIA is required; followed by 'scoping' to determine which factors need assessment. Developers can request screening and/or scoping opinions from the planning authority.

EIA decisions can be challenged through statutory appeals under the EIA Regulations or by judicial review.

The Levelling-up and Regeneration Act 2023 (LURA) will replace the EIA regime with Environmental Outcomes Reports (EORs). The LURA provides powers to make regulations which specify environmental protection outcomes, including the protection of the natural environment, cultural heritage and the landscape from the effects of human activity. Following consultation in March 2023, the government's Clean Power 2030 Action Plan commits to publishing a roadmap setting how and when this transition will take place.

7. What is the framework for determining and allocating liability for contamination of soil and groundwater in your jurisdiction, and what are the applicable regulatory regimes?

The National Policy Planning Framework requires that planning policies and decisions should aim to remediate land and ensure that it is safe for the intended use. Local authorities may impose planning conditions requiring the developer to carry out remediation.

Under the Environmental Protection Act 1990 (EPA), local authorities are required to identify contaminated land, and serve a remediation notice on the "appropriate person". In the first case, this will be a person who "caused or knowingly permitted" substances to contaminate the land in question ('Class A persons'). Failing that, for example where the polluter cannot be identified following reasonable enquiry, the appropriate person will be the owner or occupier of that land ('Class B persons'). There are a series of complex tests which determine when Class A persons can be excluded from liability, such as when the land is sold with sufficient information to make the new owner aware of the contamination.

8. Under what circumstances is there a positive obligation to investigate land for potential soil and groundwater contamination? Is there a positive obligation to provide any investigative reports to regulatory authorities?

There is no general obligation for private entities to investigate land for potential soil or groundwater contamination. Where planning permission is sought, a

local authority may impose a condition that a site is investigated and contaminated land is remediated. The developer may be required to provide a remediation strategy and, after remediation, a report showing that this has been successful to the local authority.

Under the permitting regime, operators must carry out a survey of the site when applying for and surrendering the permit, to satisfy the regulator that necessary measures have been taken to avoid pollution risk and to return the site to a satisfactory state.

9. If land is found to be contaminated, or pollutants are discovered to be migrating to neighbouring land, is there a duty to report this contamination to relevant authorities?

There is generally no positive obligation to report existing contaminated land or migrating pollutants, although environmental permits or planning conditions (through requiring site inspection reports to be provided to a local authority) may require such issues to be reported. Regulatory authorities may require disclosure of site investigation reports during prosecution.

In serious cases, where there is an imminent threat of, or reasonable grounds to believe that there is, a deterioration of the environment, the operator of a site must take steps to limit or prevent further damage and notify the relevant environmental authority. This is limited to significant adverse effects to water, contamination to land posing a significant risk of adverse effects on human health, and damage to a protected species or natural habitat.

10. Does the owner of land that is affected by historical contamination have a private right of action against a previous owner of the land when that previous owner caused the contamination?

There is no general private right of action against a previous landowner who caused contamination. A purchaser may have a claim for breach of contract or misrepresentation of the condition of the land. It is common practice to address contamination risk through specific contractual mechanisms. Sellers often include provisions in a sale contract which either transfer liabilities from the seller to the purchaser or require the purchaser to rely on their own investigations. Alternatively, buyers may negotiate environmental indemnities from sellers (which may be time limited and subject to caps).

11. What are the key laws and controls governing the regulatory regime for waste in your jurisdiction?

The retained EU Waste Framework Directive 2008 (2008/98/EC) forms the basis for UK waste law.

The Environmental Protection Act 1990 (EPA) establishes a duty of care for persons who produce or handle waste to (among other things): prevent unauthorised or harmful deposit, treatment or disposal of waste; prevent the escape of waste; prevent a breach of an environmental permit by another person; and ensure that waste is transferred to an authorised person. This duty extends throughout the complete journey of the waste to its disposal or recovery. Domestic households are only required to ensure that waste is transferred to an authorised person. The EPA regime is supported by The Waste Duty of Care Code of Practice, which provides guidance on compliance with this duty.

The Environmental Permitting (England and Wales) Regulations 2016 govern the permit regime for waste operations and require those carrying out such operations to obtain a permit or register an exemption (if the operation is low-risk).

12. Do producers of waste retain any liabilities in respect of the waste after having transferred it to another person for treatment or disposal off-site (e.g. if the other person goes bankrupt or does not properly handle or dispose of the waste)?

Under section 34 EPA, producers have a duty to take all reasonable steps to ensure that any person to which they transfer waste is authorised to handle it, and to provide an accurate description of such waste. The Code of Practice recommends that the transferor should examine evidence of the transferee's authorisation (such as the environmental permit or exemption), check that the transferor is listed in the Environment Agency's public register, and ask where the intended destination of the waste is. More detailed checks should be carried out if the transferor suspects that the waste is not being handled in line with the duty.

Any person who fails to comply with the duty of care shall be liable for a fine on conviction.

13. To what extent do producers of certain products (e.g. packaging/electronic devices)

have obligations regarding the take-back of waste?

Under the Producer Responsibility Obligations (Packaging and Packaging Waste) Regulations 2024, large producers of packaging (which includes among other things brand owners, manufacturers, importers and sellers) are required to recycle or recover a proportion of packaging waste. Producers may comply through a registered scheme which meets their obligations on their behalf. Producers are required to register with the appropriate regulator, and provide records showing that they have met these obligations.

Producers of Electrical and Electronic Equipment (EEE) must finance the costs of the collection, treatment, recovery and disposal of waste EEE (WEEE) from private households. Such producers are also required to ensure that WEEE can be returned by private households, or pay to join a distributor take-back scheme. The government has consulted on increasing retailer obligations to provide a collection service for small household WEEE, and designating online marketplaces as producers. A response to these proposals is expected in 2025.

The End-of-Life Vehicles Regulations 2003 and the End-of-Life Vehicles (Producer Responsibility) Regulations 2005 regulate the disposal of vehicles, including electric vehicles, and require producers to provide a convenient network of authorised treatment facilities to deal with end-of-life vehicles, which must meet requirements in relation to disposal and recycling of the components.

The Waste Batteries and Accumulators Regulations 2009 oblige battery producers to finance the costs of collecting, treating and recycling batteries, and to take back and recycle batteries and accumulators. Producers of portable batteries may join a compliance scheme which will deal with this obligation.

14. What are the duties of owners/occupiers of premises in relation to asbestos, or other deleterious materials, found on their land and in their buildings?

Under the Control of Asbestos Regulations 2012 (CAR 2012) there is a duty to manage asbestos in non-domestic premises. The “dutyholder”, which includes every person who has an obligation for the maintenance or repair of the premises, must ensure suitable and sufficient risk assessments are carried out as to whether asbestos is or is liable to be present in the premises. This requires a suitable assessment of the building, determining the risk which any asbestos poses, and preparing and implementing a written management plan. This plan could include monitoring, and if necessary, the removal of asbestos. Additionally, employers are required to prevent or reduce the spread of asbestos.

Failure to comply with CAR 2012 is a criminal offence and carries risk of a fine and/or imprisonment.

15. To what extent are product regulations (e.g. REACH, CLP, TSCA and equivalent regimes) applicable in your jurisdiction? Provide a short, high-level summary of the relevant provisions.

The UK has adopted regulations which largely implement previous EU regulations, although care should be taken to meet both EU and UK requirements where relevant. These are the Registration, Evaluation, Authorisation and Restriction of Chemicals Regulations (REACH) and the Classification, Labelling and Packaging Regulations (CLP).

REACH is designed to protect consumers against harmful substances. It applies to the manufacture, import and supply of chemical substances or products containing chemicals in the UK. These chemicals must be registered with the UK's Health and Safety Executive and may be subject to restrictions.

CLP establishes requirements for the classification, labelling and packaging of chemical substances and mixtures. It aims to ensure a high level of protection of human health and the environment, as well as the free movement of substances, mixtures, and articles.

16. What provisions are there in your jurisdiction concerning energy efficiency (e.g. energy efficiency auditing requirements) in your jurisdiction?

Under the Energy Savings Opportunity Scheme (ESOS), large undertakings and companies within their corporate groups must carry out energy audits of at least 90% of their total energy consumption, identify measures to improve energy efficiency, and recommend any such measures which are reasonably practicable and cost effective. These must be carried out every four years, and the appropriate regulator must be notified of compliance. The Environment Agency can issue financial penalties for failure to comply.

Energy Performance Certificates (EPCs) are required for domestic and commercial properties. New or continuing

tenancies of privately rented properties with an EPC below 'E' may not be granted unless all cost-effective energy efficiency improvements have been made to the property (subject to a limited number of exemptions). The government is currently consulting on reforms to the EPC regime, including providing more specific data, and will increase the minimum EPC rating required by 2030.

17. What are the key policies, principles, targets, and laws relating to the reduction of greenhouse gas emissions (e.g. emissions trading schemes) and the increase of the use of renewable energy (such as wind power) in your jurisdiction?

The Climate Change Act 2008 (CCA) establishes the UK's framework for addressing climate change, requiring a 100% reduction in greenhouse gas (GHG) emissions by 2050 compared to 1990 levels. This target can be met through direct emissions reduction or offsetting. The CCA requires the government to set five-yearly carbon budgets setting caps on emissions, progressively reducing towards the 2050 target.

The government can implement this framework through various policy measures. These include the 'Clean Power 2030 Action Plan' which aims to decarbonise energy production, and the 'Electrifying Britain' policy, which aims to decarbonise all electricity by 2030.

The UK Emissions Trading Scheme will implement a Carbon Border Adjustment Mechanism from 2027, requiring importers of carbon-intensive goods from countries with lower carbon prices to pay a levy aimed at creating parity between foreign and domestic manufacturers.

18. Does your jurisdiction have an overarching "net zero" or low-carbon target and, if so, what legal measures have been implemented in order to achieve this target.

The CCA requires a 100% reduction in GHG emissions by 2050 as against a 1990 baseline. The UK has set interim carbon budgets towards this goal; the fourth carbon budget requires a 52% reduction in emissions by 2027, and the sixth requires a 78% reduction by 2037.

As part of its Nationally Determined Contribution under the Paris Agreement, the UK has committed to a 68% reduction in emissions by 2030.

Following a series of judicial review challenges, the government must publish an updated Carbon Budget Delivery Plan by Spring 2025, since the policies previously relied on did not adequately account for delivery risk.

19. Are companies under any obligations in your jurisdiction to have in place and/or publish a climate transition plan? If so, what are the requirements for such plans?

Currently, listed companies must disclose in their annual financial reports whether they have a climate transition plan, as part of their obligations under the Financial Conduct Authority (FCA) Listing Rules. Where such plans exist, companies must describe them in line with the FCA climate-related Disclosure Rules (aligned with the Task Force on Climate-Related Financial Disclosures guidance). These disclosures should include the company's targets and transition strategies.

While having a formal plan is not yet universally mandatory, there is growing regulatory momentum towards requiring companies to publish standardised plans for achieving climate goals.

20. To what extent does your jurisdiction regulate the ability for products or companies to be referred to as "green", "sustainable" or similar terms? Who are the regulators in relation to greenwashing allegations?

The regulatory framework regarding such claims is spread across various agencies and regulators. The Consumer Protection from Unfair Trading Regulations 2008 and Business Protection from Misleading Marketing Regulations 2008 regulate claims regarding consumer products and business-to-business marketing respectively. The Competition and Markets Authority (CMA) guidance on environmental claims on goods and services, which covers the use of the terms "green" and "sustainable", and the Advertising Standards Authority's codes provide guidance on this legislation. In September 2024, the CMA published guidance for fashion brands, following its investigation into greenwashing in this industry.

Under the Digital Markets, Competition and Consumers Act 2024 (DMCCA), the CMA may impose fines of up to 10% of a company's global turnover for breaches of consumer protection law (which include greenwashing). The consumer regime powers under the DMCCA are expected to come into force in April 2025.

From 31 May 2024, all FCA-authorised firms must comply

with the regulator's anti-greenwashing rule. FCA-authorised firms communicating sustainability characteristics of a product or service must ensure that any such references are clear, fair, capable of being evidenced, not misleading, and proportionate to the sustainability profile of the product and service. The FCA has published guidance to provide firms with clarity over the rule's application.

21. Are there any specific arrangements in relation to anti-trust matters and climate change issues?

In October 2023, the CMA published guidance on the application of the Competition Act 1998 to sustainability agreements between horizontal competitors. The CMA's guidance explains the type of environmental sustainability agreements which may be exempt from the prohibition on collusive agreements because the benefits outweigh the competitive harm. Businesses considering entering into an environmental sustainability agreement can approach the CMA for informal guidance.

22. Have there been any notable court judgments in relation to climate change litigation over the past three years?

Notable court judgments in recent years in relation to climate change litigation include:

- On 3 May 2024, in *Friends of the Earth & Ors v SoS for Energy Security and Net Zero*, the High Court deemed the government's Carbon Budget Delivery Plan to be unlawful. This supports the principle that policies must be based on supported assumptions and on sufficient information to determine whether they can be fully met.
- On 20 June 2024, the Supreme Court handed down judgment in *R (Finch) v Surrey County Council & others*, holding that downstream GHG emissions must be included in an Environmental Impact Assessment where there is a causative link with the development. This decision was applied in further cases regarding West Cumbria coal mine (*Friends of the Earth v SoS for Levelling Up, Housing & Communities & others*) and the grant of offshore oilfield drilling consents (*[2025] CSOH 10 P560/22, P967/23, P1158/23 Opinion of Lord Ericht*).

23. In light of the commitments of your jurisdiction that have been made (whether at international treaty meetings or more generally), do you expect there to be substantial legislative change or reform in the relation to climate change in the near future?

There are no substantial legislative changes expected in the near future.

24. To what extent can the following persons be held liable for breaches of environmental law and/or pollution caused by a company: (a) the company itself; (b) the shareholders of the company; (c) the directors of the company; (d) a parent company; (e) entities (e.g. banks) that have lent money to the company; and (f) any other entities? Transactions

Environmental liability in the UK operates through multiple layers. Primary liability lies with the entity that committed the breach, typically as a criminal offence, for example for breaches of the Environmental Protection Act 1990 (EPA) or the Environmental Protection Regulations (England and Wales) 2016 (EPRs).

Liability can also extend to a company's officers (including its directors, managers and executives) or its shareholders (if its affairs are managed by its shareholders) if the breach occurs with their consent or connivance, or through their neglect (section 157 of the EPA and section 41 of the EPRs). In addition, the corporate veil can be pierced to make shareholders, directors and parent companies liable where the company is acting as an alter ego to another party. Parent companies can be held directly or jointly liable for environmental damage under theories of vicarious liability or corporate structure abuse.

Third parties may be liable for conspiracy under criminal law principles or imposed through specific statutory provisions; for example, the EPRs extend liability to third parties who caused or knowingly permitted the offence.

Recent cases have considered novel routes to establish private civil liability against a variety of stakeholders, including through financial regulation, competition law, and tort claims.

25. To what extent can: (a) a buyer assume any pre-acquisition environmental liabilities in an asset sale/share sale; and (b) a seller retain any

environmental liabilities after an asset sale/share sale in your jurisdiction?

In an asset sale, environmental liabilities generally remain with the seller. However, a buyer may be liable under the contaminated land regime, as a regulator can enforce against the occupier of the land where the original polluter cannot be found. Such liability can also be transferred by contract.

In a share sale, the buyer typically inherits environmental liabilities which attach to the company. Purchasers generally seek alternative protection, for instance through environmental insurance. Contractual mechanisms such as indemnities and escrow accounts can be used, but it should be noted that UK courts will generally not enforce indemnities against criminal fines.

26. What duties to disclose environmental information does a seller have in a transaction? Is environmental due diligence commonplace in your jurisdiction?

There is no general duty on a seller to disclose environmental information about an asset or company in a transaction. However, misrepresentations could give rise to potential tortious civil liability or a claim for breach of contractual warranties. Therefore, sellers should consider their responses to specific queries regarding environmental issues.

It is common for some degree of environmental due diligence to be carried out. This will depend on several factors such as the size of the transaction, the nature of the business activity, the type of asset sold (in particular where the transaction involves land), and industry sector. In corporate transactions, buyers commonly use warranties and representations to obtain information from the seller on compliance with environmental laws.

27. What environmental risks can be covered by insurance in your jurisdiction, and what types of environmental insurance policy are commonly available? Is environmental insurance regularly obtained in practice?

Environmental impairment insurance is commonly available in the UK, and can cover liabilities arising from pollution, statutory clean-up costs, damages payable to third parties, contractual liabilities, and liabilities for contamination (among others). Insurance is not required, but is regularly obtained, and may be a contractual requirement on an asset or share sale which is likely to involve potential environmental liabilities. Insurance putting a cap on remediation costs is also available.

28. To what extent are there public registers of environmental information kept by public authorities in your jurisdiction? If so, what is the process by which parties can access this information?

Under the Environmental Information Regulations 2004, public authorities are required to make environmental information electronically available; such information is therefore generally available online. Environmental information includes planning records, consultation information on environmental matters, and information on environmental permits, including breaches and enforcement actions.

29. To what extent is there a requirement on public bodies in your jurisdiction to disclose environmental information to parties that request it?

Public authorities are required to provide environmental information requested within 20 working days (which may be extended to 40 working days where a large volume of information, or complex information, is requested). Requests may be written or verbal, and reasons for the request are not required. Public authorities may charge a reasonable fee for this service.

There is a general presumption in favour of disclosure, although there are a number of exemptions to this requirement, such as the protection of personal data, where disclosure could threaten international relations or national defence, or for commercially confidential information (although such information must still be disclosed if it is deemed to be in the public interest).

30. Are entities in your jurisdictions subject to mandatory greenhouse gas public reporting requirements?

Large and medium companies and limited liability partnerships (LLPs) are required to report greenhouse gas emissions resulting from their activities, including the combustion of fuel and the operation of any facility. This includes emissions within the UK and offshore, and the reporting must delineate between the two. These entities are also required to report on climate-related risks in their

non-financial reporting.

Listed companies are subject, on a 'comply or explain' basis, to listing rules reporting requirements, which includes disclosures in line with the Taskforce on Climate-Related Financial Disclosures. These include disclosures of direct emissions (scope 1) and indirect emissions from consumption of purchased energy (scope 2) and other indirect emissions (scope 3) where material.

31. Have there been any significant updates in environmental law in your jurisdiction in the past three years? Are there any material proposals for significant updates or reforms in the near future?

The implications of the decision in *Finch* (see question 22) may continue to have significant effects on the planning regime in the UK, and are likely to be tested in the planning regime and in the courts.

Provisions in the Environment Act 2021 continue to enter into force. Most significantly, the requirement for developers to produce a plan showing how they will deliver a minimum of 10% biodiversity net gain entered into force in 2024 (from January for large sites; from April for small sites).

The water sector has been an area of much public focus recently, and the government has announced an independent commission to report on the sector in mid-2025. In 2024, the Supreme Court judgment in *Manchester Ship Canal Company Ltd v United Utilities Water Ltd* opened a potential route for private law claims to be brought against water providers for unauthorised discharges of sewage. A competition law claim alleging that water companies have overcharged customers (*Roberts v Thames Water Utilities Limited*), was filed in March 2024, and is expected to develop over 2025.

Increased regulatory powers to enforce breaches of consumer law may have a substantial effect on green and sustainability claims.

Contributors

David Lawne
Partner
dlawne@hausfeld.com

Alex Cooper
Senior Associate
acooper@hausfeld.com

Giulia Trojano
Senior Associate
gtrojano@hausfeld.com

Ana Isabel Fernández Alonso
Associate
afernandezalonso@hausfeld.com

Abigail Thrasher
Associate
athrasher@hausfeld.com

The authors are grateful for the assistance of Ines Berizzo, Ariana Bourdillon Ruiz, Til Ewart, Philip Filou, Dylan Gordillo and Macha Phelan.

