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BETTER  
REGULATION  
AIMED AT  
VALORISING EMAS

***Annex 1.6 Spain case study: Relationship between the EMAS certification and the Green Public Procurement***

## 1. Introduction to the Case Study

This report includes the results of the analysis of effectiveness of the Public Procurement process<sup>1</sup> in Spain in terms of *specifications of public contracts of environmental criteria being included in the scales*, specifically, the certification of the fulfilment of environmental management regulations (according to EMAS Regulation or ISO 14001 international standard) or of ecological criteria (according to the European Regulation on the EU Ecolabel).

The Law on Public Sector Contract clarifies the European legal framework established by the Directive 2004/18/EC<sup>2</sup> that regulates the introduction of environmental and social criteria in contract conditions.

Stripped from the inclusion of environmental criteria in the process of public procurement and after the integration of the environmental factor in several community public policies<sup>3</sup>, the *Plan on Green Public Procurement* of the Spanish General Administration, Public Bodies and Managing Body of Social Security was passed in Spain in 2008. It is aimed at articulating the connection between the public procurement and the implementation of environmentally-friendly practises.

*Green Public Procurement (GPP)* is defined as the purchasing or procurement of products and/or services that take into account not only economic or technical aspects, but also their environmental impact during their life-cycle<sup>4</sup>.

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<sup>1</sup> 30/2007 Act of 30 October on Contracts of the Public Sector.

<sup>2</sup> Directive 2004/18/EC of the European Parliament and of the Council of 31 March 2004 on the coordination of procedures for the award of public works contracts, public supply contracts and public service contracts.

<sup>3</sup> Among them are: European Union Strategy for Sustainable Development adopted in the Gothenburg European Council of 2001, Integrated Product Policy of the Commission of June 2003 and review of the Lisbon Strategy in 2004.

<sup>4</sup> This means that, as well as considering the environmental behaviour of used or acquired materials and products (including its use and manufacturing process), methods and procedures of the execution of contracts and the environmental behaviour of providers and manufactures should be also taken into account.

## 1.1. Objective

The Public Procurement Law that transposes the Spanish legal system for the Directive 18/2004/EC fixes the conditions in which contracting authorities can define environmental and social requirements in public tenders.

To prescribe environmental requirements, sustainability and environmental protection criteria will be considered such as:

- ❖ The certification of the fulfilment of *environmental management* regulations according to EMAS Regulation or ISO 14001 standard<sup>5</sup>.
- ❖ The prescription of environmental characteristics in terms of performance or functional requirements, as defined by European or (multi-) national *eco-labels*<sup>6</sup>.

The requirement of the fulfilment of environmental management regulations is more oriented to service contracts, whereas the requirement of the fulfilment of ecological criteria is more oriented to acquisition of materials and products.

Therefore, the objective of this study is to analyse environmental requirements included in the conditions of public contracts at national level as well as their efficiency.

## 1.2. Background

The beginning of Green Public Procurement and Purchasing harkens back to the eighties and it was firstly implemented in countries such as Germany, Austria, Sweden or Denmark.

From these early stages and over the years, the European Commission has developed a series of studies through which the significance of GPP has been acknowledged as an ideal instrument to promote and implement several environmental policies and strategies of the European Union. Thus, from **Europe** GPP is considered an essential tool to develop key policies such as:

- ❖ *Integrated Product Policy (IPP) and Environmental Technologies Action Plan (ETAP)* where Green Public Procurement and Purchasing is used as a tool to foster environmental products and technologies.
- ❖ *Review of the Lisbon Strategy*, on economic competitiveness and innovation in Europe, in which the establishment of Green Public Procurement and Purchasing Action Plan for 2006 is recommended.
- ❖ *Review of the European Union Strategy for sustainable development (EU SDS)*, in which quantitative objectives of Green Public Procurement and Purchasing for 2010 are established.

In **Spain**, both *Integrated National Plan for Waste 2007-2015 (PNIR)* and *Spanish Strategy for Climate Change and Clean Energies (Horizonte 2012)* consider Green Purchasing policies as one of the ways to meet their respective objectives at local level. In terms of Spanish General Administration, the Ministry of Environment Affairs has included environmental criteria in its tenders (electricity, cleaning, paper, office supplies, and works). Back in 2006, the Interministerial

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<sup>5</sup> Article 70 of 30/2007 Act.

<sup>6</sup> Article 101 of 30/2007 Act.

Commission was created for the incorporation of environmental criteria in Green Public Procurement and the Spanish Cabinet passed the *Plan for Green Public Procurement* of the Spanish General Administration and its Public Bodies and Managing Body of Social Security which establish environmental quantitative objectives for products and services of centralised procurement.

Much of the **Autonomous Communities** are also working in this line:

- ❖ In Catalonia, the Regional Government passed a Governance Agreement in 2005 to "Fostering the environmental aspects of Procurement of the Administration of the Regional Government of Catalonia and of public ascribed or linked entities and companies".
- ❖ In the Autonomous Community of Navarre, the "Guide for Sustainable Public Procurement" was established together with the participant municipalities of NELS network and the Regional Department of Navarre for Environment, Territory Planning and Housing.
- ❖ «Program for Public, Ethical and Sustainable Procurement» in Andalusia.
- ❖ Other Autonomous Communities have started as well to establish initiatives or programs for Green Public Procurement, such as the Regional Government of Aragon or the Community of Valencia.

Within the **Local Government**, the first mover in the implementation of GPP was Barcelona City Council that in 2001 it institutionalised the «Program of Green Office» for the local government. Other City Councils and Regional Councils that are proactive with actions in terms of GPP along with those of the Autonomous Community of the Basque Country, which will be explained below, are the City Councils of Madrid, Pamplona, Saragossa, Palma de Mallorca or Badalone and the Barcelona and Gerona Provincial Councils.

Furthermore, **other public entities** such as Spanish universities, colleges or hospitals have also implemented environmental procedures in their daily operation, especially motivated by its exemplary and educative function.

### 1.3. Methodology

The methodology followed for gathering data of the two first sections has been *searching in the main available sources of information* at European, national and regional level in terms of Public Procurement and EMAS among them:

#### ❖ EMAS regulation:

- Environment European Commission<sup>7</sup>.
- Spanish Ministry of the Environment, Rural and Marine Affairs<sup>8</sup>:

#### ❖ Public Procurement:

- Ministry of Finance and Public Administrations<sup>9</sup>.
- Government Platform for Procurement<sup>10</sup> and Autonomous Communities Platform, such as Andalusia<sup>11</sup>, Basque Country<sup>12</sup>, Community of Madrid<sup>13</sup>, Community of Valencia<sup>14</sup> and Regional Government of Catalonia<sup>15</sup>.
- Spanish Ministry of the Environment, Rural and Marine Affairs<sup>16</sup>.

Through this literature research, the main existing references in terms of standards; practical handbooks, papers and results of courses of training and information about the matter, as well as other type of support documents have been analysed such as:

#### ❖ Regulation:

- Directive 2004/18/EC of the European Parliament and of the Council of 31 March 2004 on the coordination of procedures for the award of public works contracts, public supply contracts and public service contracts.
- 30/2007 Act of 30 October on Contracts of the Public Sector.
- PRE/116/2008 Order of 21 January for which the Spanish Cabinet Agreement is published and the Plan for Green Public Procurement of the Spanish General Administration and its Public Bodies and Managing Body of Social Security is passed.
- MAM/2116/2007 Order of 10 July on environmental requirements and criteria to be introduced in the requirements of administrative clauses ruling in the contracts of the Ministry of Environment and Public Bodies dependent on it.
- 39/2011 Spanish Decree of 22 February for which the administrative organisation is established for managing the procurement of the Administration of the Andalusian

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<sup>7</sup> [http://ec.europa.eu/environment/emas/index\\_en.htm](http://ec.europa.eu/environment/emas/index_en.htm)

<sup>8</sup> <http://www.magrama.gob.es/es/calidad-y-evaluacion-ambiental/temas/sistema-comunitario-de-ecogestion-y-ecoauditoria-emas/>

<sup>9</sup> <http://www.minhap.gob.es/es-ES/Servicios/Contratacion/Paginas/default.aspx>

<sup>10</sup> [http://contrataciondelestado.es/wps/portal/!ut/p/b1/04\\_SjzQ0MzQ1sTA3MNWP0I\\_KSyzLTE8syczPS8wB8aPM4k2NnU3CvMICzII93Q0MPD3cXHxCDU0N3I3M9HOjHBUB0w8ACw!!/](http://contrataciondelestado.es/wps/portal/!ut/p/b1/04_SjzQ0MzQ1sTA3MNWP0I_KSyzLTE8syczPS8wB8aPM4k2NnU3CvMICzII93Q0MPD3cXHxCDU0N3I3M9HOjHBUB0w8ACw!!/)

<sup>11</sup> <http://www.juntadeandalucia.es/contratacion/MainMenuProfile.action>

<sup>12</sup> <http://www.contratacion.euskadi.net/w32-home/es/>

<sup>13</sup> [http://www.madrid.org/cs/Satellite?pagename=PortalContratacion/Page/PCON\\_home](http://www.madrid.org/cs/Satellite?pagename=PortalContratacion/Page/PCON_home)

<sup>14</sup> [http://www.gva.es/va/inicio/empresas/emp\\_quiero\\_contratar\\_con\\_la\\_administracion/emp\\_qca\\_contratacion\\_electronica](http://www.gva.es/va/inicio/empresas/emp_quiero_contratar_con_la_administracion/emp_qca_contratacion_electronica)

<sup>15</sup> [https://contractaciopublica.gencat.cat/ecofin\\_pscp/AppJava/search.pscp?reqCode=start&set-locale=es\\_ES](https://contractaciopublica.gencat.cat/ecofin_pscp/AppJava/search.pscp?reqCode=start&set-locale=es_ES)

<sup>16</sup> <http://www.magrama.gob.es/es/ministerio/planes-y-estrategias/plan-de-contratacion-publica-verde/default.aspx>

Regional government and base entities and the regime of approved goods and services is regulated.

- Governance Agreement of 11 October 2005 on measures to fostering the environmental aspects of public procurement of the Administration of the Regional Government of Catalonia and of public or linked entities and companies.
- Governance Agreement of 9 December 2009 on measures in terms of public procurement.
- 25/2003 Spanish Decree of 27 February for which the procedure for the application in the Community of Madrid of Regulation (EC) No 761/2001 of the European Parliament and of the Council allowing voluntary participation by organisations in a Community eco-management and audit scheme (EMAS).
- 6/2006 Law on the Cortes of Navarre of 9 June of public procurements.
- Order of 18 January 2007 of the Regional Department for Environment, Territory Planning, for which environmental requirements and criteria to be introduced will be established in the requirements of administrative clauses ruling in the contracts of this Department and linked or dependent entities.
- 6/2008 Decision of 2 June of the Head of the Government Secretariat and of the Relations with the Parliament, for which the Agreement contracted by the Governing Council is issued «on integration of social and environmental criteria and other public policies on the procurement of the Administration of the Autonomous Community and its public sector.
- Regulation (EC) No 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation by organizations in a Community eco-management and audit scheme (EMAS).
- International Standard ISO 14001 Environmental Management System.

#### ❖ **Handbooks:**

- Practical handbooks on Public Purchasing and Procurement (INHOBE, 2010).
- Practical guide on Public Procurement for SMEs (Spanish Ministry of Industry, Tourism and Commerce, 2010).
- Code of good environmental practice for contracts of maintenance of finishing (Spanish Ministry of the Environment, Rural and Marine Affairs).
- Code of good use of papers and publications (Spanish Ministry of the Environment, Rural and Marine Affairs).
  
- Code of good environmental practice for procurements of building cleaning services (Spanish Ministry of the Environment, Rural and Marine Affairs).
- EMAS - Dynamic tool for environmental protection for sustainable development. Business benefits and environmental management (INEM).

#### ❖ **Reports:**

- General Report on the state of Green Public Procurement (Spanish Ministry of the Environment, Rural and Marine Affairs, 2008-2010 period).

## ❖ Events:

- Technical seminar of Awareness for Eco-Purchasing. April 2010<sup>17</sup>.
- Seminar of Awareness for Eco-Purchasing. November 2010<sup>18</sup>.
- Public mechanisms of promotion of EMAS.
- Etc.

## 2. Simplification measures

### 2.1. Measure description

Procurement procedures are strongly regulated by the Public Procurement Laws, whose objectives are to protect both the buyer and the contractor.

Within the European Union, the procurement framework of the Member States is defined by the above mentioned Directive 2004/18/EC and 2004/17/EC for procurements and contracts above a specific threshold and National Laws for contracts below this threshold. Nevertheless, all Public Administrations have the obligation to respecting the principles of the European Union Treaty during the procedures of procurement, regardless of the size of these or the legal system under which they are ruled (regional, state or European). The most significant principles of the Treaty are as follows:

- ❖ Principle of freedom for transporting goods.
- ❖ Principle of freedom for providing services.
- ❖ Non-discrimination principle.
- ❖ Principle of fair treatment.
- ❖ Principle of proportionality.
- ❖ Principle of transparency.

The introduction of environmental criteria in requirements without breaking national and European regulation is possible as long as they are observed and the critical principles of free trade set in the agreements of the Organisation for Economic Co-operation and Development (OECD) and the European Union Treaty are followed.

New Directives clearly define where and how environmental considerations can be introduced in the requirements for procurement. These sections are:

1. Object of the contract.
2. Mandatory and measurable technical specifications.
3. Selection criteria of tenders.
4. Criteria of award of contract.
5. Clauses of execution of the contract.

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<sup>17</sup> <http://www.magrama.gob.es/es/ministerio/planes-y-estrategias/plan-de-contratacion-publica-verde/ponencias.aspx>

<sup>18</sup> [http://www.magrama.gob.es/es/ministerio/planes-y-estrategias/plan-de-contratacion-publica-verde/Programa\\_jornada\\_compra\\_verde\\_10\\_11\\_M\\_Presidencia\\_tcm7-156050.pdf](http://www.magrama.gob.es/es/ministerio/planes-y-estrategias/plan-de-contratacion-publica-verde/Programa_jornada_compra_verde_10_11_M_Presidencia_tcm7-156050.pdf)

Therefore, environmental criteria can be referred to the product or service or to the provider himself, as showed in the following table:

Requirements concerning the <b>product and/or service</b>	Subject of the contract
	Technical specifications
	Award criteria
	Performance criteria of contract
Requirements concerning the <b>provider</b>	Selection criteria of provider

Furthermore, the requirement of the fulfilment of environmental management is referred to the provision of services, whereas the criteria of green label are usually referred to the provision of goods or purchase of materials and products.

Therefore, the requirement of environmental criteria in the specifications of the public tenders is about *EMAS promotion measure (public procurement)* aimed at supporting financially those installations which guarantee the fulfilment of the environmental law, the environmental behaviour improvement and the pollution prevention through its Environmental Management System reviewed by an authorised and independent institution.

## **2.2. Description of the sector characteristics in each region**

In 2005 the European Commission Directorate General for Environment published a study about the Green Public Purchasing in Europe (Green Public Procurement: Best Practice and ahead), whose results are listed below:

COUNTRY	% GDP PUBLIC PROCUREMENT	BIDS WITH ENVIRONMENTAL CRITERIA	GOALS AND PRODUCTS/PRIORITY ASPECTS
GERMANY	17%	70%	
AUSTRIA	16%	60%	In definition
DENMARK	19%	50%	Computer equipment, cleaning products, recycled paper
SPAIN	13%	<30%	
FRANCE	16%	30%	Vehicles, construction, wood products
FINLAND	16%	50%	
ITALY	12%	30%	Energy efficiency, recycled material content of products
THE NETHERLANDS	21%	50%	In 2010, 100% GPP for the central government and 50% for the rest of administrations
UNITED KINGDOM	17%	70%	Construction, catering, textiles, waste, paper and printing, energy, consumables and office equipment, furniture and transport
SWEDEN	20%	80%	

Figure 1.- European situation regarding public purchasing and procurement with environmental criteria  
 (Source: <http://www.ihobe.net/Paginas/Ficha.aspx?IdMenu=95390acd-6155-45cc-b339-1e2b3e4435ef>)

The financial volume for the public purchasing and procurement, which currently represents approximately **16% of the European Gross Domestic Product (GDP)**, shows us its clear demand pull for the development of more responsible environmental product and service markets.

Nowadays, most of the Member States of EU have already submitted their *National Plan for Green Public Procurement and Purchasing*, in which quantitative objectives for the groups of products, services and works are presented.

These National Plans for Green Purchasing are complementary and support the establishment of other policies, including:

- ❖ *Environmental advocacy policy*, such as Energy Saving and Efficiency Plan in buildings of the Spanish General Administration, Integrated National Plan of Waste and Spanish Strategy for Climate Change and Clean Energies (Horizonte 2007-2012-2020).

- ❖ *Innovation policies* promoted by the European Commission<sup>19</sup> also acknowledge the key role of the Green Public Purchasing and Procurement, highlighting the importance of public procurement in order to reinforce the innovative capacity of the European Union while improving the quality and efficiency of the public services.

However, not only the policies promote the Green Public Procurement and Purchasing, but there are also *Directives* which establish objectives for Green Public Procurement and Purchasing in different fields, such as the Directive<sup>20</sup> which includes environmental criteria for the purchase of vehicles, equipment, energy services and building and the Directive on the promotion of clean and energy-efficient road transport vehicles<sup>21</sup>, which includes environmental criteria in the purchase of vehicles, such as the life cycle costs of fuel consumption and CO<sub>2</sub> emissions.

At the beginning of 2008, the European Commission published environmental criteria of purchase standardised for the entire European Union for 10 of these products, based on practices related to Environmental Management Systems, Eco-labels and specific Directives:

**PRIORITY PRODUCTS AND SERVICES FOR GPP**

Following the different European studies, the existence of eco-labels and best practices, the European Commission has selected 16 groups of priority products and services for the implementation of environmental criteria:

<ul style="list-style-type: none"> <li>- Products and cleaning services (*)</li> <li>- Gardening services (*)</li> <li>- Medical and pharmaceutical equipment (*)</li> <li>- Electrical and communication equipment</li> <li>- Energy (*)</li> <li>- Chemicals, tires, plastic</li> <li>- Food and beverages, catering and restaurant services (*)</li> <li>- Architecture, construction and installation services</li> </ul>	<ul style="list-style-type: none"> <li>- Water and sewage treatment services</li> <li>- Environmental and health services</li> <li>- Transport equipment (*)</li> <li>- Office machinery (*)</li> <li>- Works and construction materials (*)</li> <li>- Furniture and other manufactured products</li> <li>- Paper (*) and printing services</li> <li>- Transport and communication services</li> </ul>
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(\*) included in the first selection of products and services by the EC

Figure 2.- Priority products and services for the Green Public Procurement and Purchasing  
(Source: <http://www.ihobe.net/Paginas/Ficha.aspx?IdMenu=95390acd-6155-45cc-b339-1e2b3e4435ef>)

All these series of European initiatives show that the Green Public Procurement and Purchasing is no longer an isolated initiative and has become a sample central element of good public management, minimising costs, moving the market and walking the talk for the citizenship.

<sup>19</sup> COM (2006) 502 final: Putting knowledge into practice: a wide strategy of innovation for the European Union, COM (2007) 860 final: Lead market initiative of Europe, Brussels and COM (2007) 799 final: Pre-commercial procurement. Boosting the innovation in order to offer high quality and sustainable public services in Europe.

<sup>20</sup> Directive 2006/32/EC of the European Parliament and of the Council of 5 April 2006, on energy end-use efficiency and energy services.

<sup>21</sup> Directive 2009/33/EC of the European Parliament and of the Council of 23 April 2009, on the promotion of clean and energy-efficient road transport vehicles.

The *first General Report about Green Public Procurement*<sup>22</sup> confirms this fact, showing the results regarding the establishment of environmental criteria in the Spanish General Administration and Public Bodies for acquisitions and procurement.

This report contains information about the degree of compliance regarding goals set in the Plan for Green Public Procurement<sup>23</sup> of the Spanish General Administration, its Public Bodies and Managing Bodies of Social Security.

In particular, there is a growing compliance with the *separate collection of waste, incorporation of environmental parameters in works projects, in the acquisition of high energy-efficient computer equipment (labelled “Energy Star”) and the implementation of cleaning services.*

The implementation of the Plan for Green Public Procurement helps to improve the environmental quality, gives a boost to innovative methods in the private sector, and all this in a background of austerity, and it has not given an increase in the corresponding budget items.

In this Plan quantitative objectives are established for each of the following product categories:

1. Construction and maintenance.
2. Transport.
3. Energy.
4. Office equipment.
5. Paper and publications.
6. Furniture.
7. Cleaning.
8. Events.

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<sup>22</sup> <http://www.magrama.gob.es/es/prensa/noticias/el-primer-informe-general-sobre-contrataci%C3%B3n-p%C3%ABlica-verde-constata-la-implantaci%C3%B3n-de-criterios-ambientales-en-la-administraci%C3%B3n-general-del-estado--y-organismos-p%C3%ABlicos-para-adquisiciones-y-contrataciones-/tcm7-181128-16>

<sup>23</sup> PRE/116/2008 Order of 21 January for which the Spanish Cabinet Agreement is published and the Plan for Green Public Procurement of the Spanish General Administration and its Public Bodies and Managing Body of Social Security is passed.

### **3. Analysis**

#### **3.1. Analysis of "implementation level" of the measure**

The economic importance of the public market makes it a very powerful tool in the economic and social policy to which belongs. In Spain public procurement represents approximately 18.5% of GDP, according to data published by the Public Procurement Observatory.

In view of its importance, the promotion of aspects like innovation and incorporation of sustainability criteria in the public policies is becoming more necessary, through the public procurement. In this sense, GPP is a tool of acknowledged importance in order to promote and implement environmental policies and strategies. However, the definition of environmental criteria is not enough. These are specifications that to date were not demanded in the public procurement, and therefore the early communication between the offer and the demand is vital in order to assure the possibility of local economic adaptation to these environmental requirements. The GPP is a key tool in order to move the market and promote the innovation, but for this purpose, the former must be informed.

From different municipalities and Public Administrations, the sustainable or green public purchasing in Spain is being promoted, however, the possibilities for environmental criteria and clauses integration encounter limit linked to guarantee of community economic freedom and, more particularly, in the respect of principles of equal treatment and publicity. Because of this, it is necessary to analyse legal possibilities and limits that procurement bodies have in order to use environmental clauses and criteria in the different phases of procurement.

#### **3.2. Analysis of benefits derived from the implementation of the measure**

At first, the cost of measures such as the one described in this study can be higher than if the usual method is followed. However, it has been proven that this kind of measure is depreciated. GPP benefits are obvious for the administration and for all society in general. Among the benefits derived from the implementation of the measure the following can be highlighted:

- ❖ Reduction of the environmental resources exploitation and waste generation.
- ❖ Increase of the demand on this sector, improving prices.
- ❖ Energy saving derived from implementation of systems based on renewable energies and energy efficiency.
- ❖ Enhancement of the public image of administrations.
- ❖ Environmentally sustainable development of the market.
- ❖ Reduction of the environmental impacts of the administration and companies.
- ❖ Introduction of better environmental products and services in the market for the rest of users.

#### **3.3. Analysis of environmental benefits derived from the implementation of the measure**

As mentioned, the introduction of measures by administrations such as GPP brings very different environmental and economic benefits.

The green public purchasing is a strategy combining several decisions, such as to procure products and services from providers with sustainable criteria; to analyse the life cycle of products in order to minimise as a whole the environmental impacts; to keep price competitiveness with systems like ceiling price, for which we are willing to pay a bigger percentage to the providers or suppliers as long as they prove the ecological benefits; those responsible for public investment or works are required to take over environmentally friendly criteria; to apply environmental consultancy, etc.

In this way among the environmental benefits derived from the implementation of the measure, energy saving and reduction of water consumption, use of recycled paper, reduction of the waste generation, etc are included.

### **3.4. Analysis of results obtained at macro level with the implementation of the measure**

As stated in the seventh annual report about Sustainability in Spain 2011 published by the Sustainability Observatory in Spain, Spanish companies continue consolidating leadership position at European level in environmental management. Spanish work centres with Environmental Management Systems according to EMAS Regulation have passed from representing 13% in 2004 to 20% in 2010 of the total of work centres registered in EMAS.

Spain continues being the second country of the European Union with more organisations and centres registered in EMAS after Germany that is in first place with only 364 work centres more than Spain in EMAS. On the regional level, Galicia, Catalonia and Community of Madrid include more than 60% of the total of work centres in EMAS (21.97% Galicia, 20.9% Catalonia and 19.54% Community of Madrid). On the contrary we find La Rioja (.44%), Community of Navarra (.59%) and Extremadura (.59%).

The Autonomous Communities with a higher level of industrialisation and development are those which present bigger percentages of implementation of Environmental Management Systems (SGA), although we cannot obtain a direct relation between the implementation of EMS and the existence and start up of Sustainable Development Strategies, since there is not an analysis of percentage of companies with implementation of SGMA about the comprehensive inventory of companies.



Figure 3: Distribution of centres with EMAS by Autonomous Community.  
 Source: Sustainability Observatory in Spain

However, even so, in order to success with the implementation of the measure, it is needed to continue promoting the awareness and training of each involved party, as well as to have the corresponding budget support.

### 3.5. Analysis of the knowledge grade created with regard to the EMAS frame

The organisations that have taken part in this study have stated the need for a better promotion of the system through information and publicity campaigns. These actions would increase the visibility of the system so that more agents become aware of its existence (including the community in general).

*A lack of general knowledge of the EMAS frame* is identified - and the lack of rewarding by the market, interested parties and public bodies, as one of the most important handicaps for the development of EMAS.

### **3.6. Análisis of satisfacción leve**

The study carried out highlights the lack of existing knowledge regarding the simplification measures applicable to registered organisations in EMAS. So, 52% of the organisations that have responded to the question raised, claim to ignore the existence of simplification measures.

To the question rose in order to know if the organisations have obtained any profit derived from this simplification measures, 67% have responded negatively.

However, if we put together the positive answers and the knowledge of simplification measures applicable to organisations registered in EMAS with the procurement of benefits derived from these simplifications, 60% of organisations that affirmed to know the existence of these measures have stated to have obtained benefits.

With respect to the major difficulties that organisations can find in the implementation of EMAS, costs of implementation seems to be a handicap to be considered, since 90% of companies that have responded to the questionnaire consider the cost associated to the implementation is very important or slightly important.

In case of difficulties related to the competent body functions, results obtained in the questionnaires show that 40% do not consider this aspect as a handicap to the implementation of EMAS, 10% consider it very important, 45% slightly important and the answer of the rest has been “No applicable”. These data lead to conclude that the difficulties related to the competent body functions are not presented as a major handicap to the implementation of EMAS.