



BETTER
REGULATION
AIMED AT
VALORISING EMAS

Deliverable 5.3

Report about the results of the testing in field phase

31/03/2014 - Rev.01



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1. Introduction and deliverable aims

The BRAVE Project aims at supporting the full integration of EMAS (and of other voluntary certification schemes) in the EU and Member States environmental legislation as a leverage to facilitate its implementation by all the organizations (*“better regulation”*) and to remove, reduce and simplify the administrative costs and burdens for the EMAS registered organizations – as well as for companies adopting the EU Ecolabel or other forms of certification recognized according to Art. 45 of EC Regulation n. 1221/09 – as a way to encourage the adoption and dissemination of voluntary environmental certification (*“regulatory relief”*).

The Action 5 of the Project aims to test the *“better regulation”* and *“regulatory relief”* proposals assessing their feasibility and their cost-effective for both organizations and institutions. In order to achieve operational and far-reaching results, this Action and the next one (Adoption) concerns the regional proposals and the national proposals that involves immediate changes (possible and able to yield effects in the time-span of the project) in the regulatory processes, permitting procedures, control activities, administrative procedures (fees, documentation, etc.) mostly at the regional and local level. In particular, sub-action 5.3 Testing in field aimed to assess the feasibility of the BRAVE proposals through the involvement of all private and public actors that are connected with the measures.

The responsible of the Action 5 has been Ambiente Italia, that has coordinated all the foreseen activities; all the project partners have contributed to this deliverable supplying information and documents about the regional testing activities followed by them.

The aim of this Deliverable is to explain the methodology and results of the 35 regional testing in field activities developed by partners in each Region involved in the project¹ from June 2013 to February 2014. At the end of the document we have enclosed the list of the measures that have been tested by partners and all the testing in field summary reports in English (for the detailed completed report in local languages please contact the project coordinator Scuola Sant’Anna di Pisa).

¹ Andalusia, Basilicata, Friuli Venezia Giulia, Liguria, Lombardy, Tuscany and Valencia

2. Methodology

The sub-action 5.3 has foreseen, for each proposal to be tested, 5 for each Region, the following actions to assess its feasibility and effectiveness:

- *Regulatory and administrative feasibility:* partners have assessed how the proposed measure (self-declaration, reduction of administrative fees, etc.) impacts on the regulatory (e.g.: changes in requirements, rules and/or control or measurement methodologies) and on the administrative processes (changes in procedures, operational implementation, control modalities, documents to be submitted, timing in the release of permits, etc.). To achieve this result, partners have involved the Competent Authorities responsible for the permitting procedure connected with an eventual simplification proposal to test it on a sample-organisation that requires a permit. The partners have carried out simulation of the new permitting procedure according to the new measures introduced and have drafted a report where strengths and weaknesses points in the proposal implementation have been explained and clarified;
- *Technical feasibility:* each partner has assessed all technical information and data that are needed to implement the proposal. An example of this feasibility study could be related to the valorising of results of EMAS monitoring activity to reduce the number and frequency of inspections. In this case, the BRAVE partner has identified with the Control Authority which kind of data the companies should send (e.g. chemical analysis of air emissions) and the characteristics of these info and data (e.g. chemical analysis carried out by a laboratory accredited in accordance with ISO17025 standard);
- *Economic and organizational impact:* the partners have assessed costs and efforts, on one side, and savings and benefits, on the other side, for both Competent Authorities and private companies. The aim of this activity was to identify the proposals with the highest economic and organizational relevance. The economic impact has included not only the financial aspects but also the time of internal human resources or external consultants spared with the simplification. This has also helped in the identification of hypothetical measures to adopt by the public Authorities to balance the decrease of financial revenue from EMAS registered organizations that benefit from the “regulatory relief” (e.g. increasing the administrative fees for polluters in accordance with Polluters Pays Principle).

Each partner completed the testing in field activities for one or two geographical regions. The table below shows the territories where partner developed these activities.

PARTNER	REGION
SSSUP	Tuscany
ARPA Lombardia IEFE	Lombardy
Confindustria Genova - Liguria	Liguria
Ambiente Italia	Friuli Venezia Giulia Basilicata
IAT	Andalucia
Camara de Comercio de Valencia	Valencia Region

3. Cross-sectional analysis

The aim of the cross-sectional analysis is to enable the comparison of the proposals tested in the two European countries considered in the project, Spain and Italy, and in the seven selected regions. This report represents an overview of the documents prepared by the BRAVE partners.

The focus regards the regional level. 35 measures have been tested in these two countries, the 34% measures of better regulation and the 66% are regulatory relief simplifications. Although the distribution of the type of measure it's the same as represented in Deliverable 5.2, some partners, during the development of the action activities, have decided to change one or different proposals to be tested in their region, due to regional government's requests, problems in the collection of data, or other reasons. The definitive list can be consulted in the Annex n.1.

Considering all the categories of *regulatory relief* proposals that actually have been tested, at the end the most common resulted to be the reduction of inspections (26%), the reduction of financial guarantees required for specific activities as for instance waste management (22%), the reduction of reporting to public authorities and monitoring (13%) and the reduction of administrative fees (13%). Instead for *better regulation* proposals, the most common tests were related to funding support (42%) and fiscal benefits (25%).

Regarding the percentage of the tested proposals by categories, the 17% of the test in field activities were related to measures on the reduction of the number of inspections, that is that this kind of proposal has been considered in all the regions except for Valencia Community. Another simplifications that has been tested in almost all the Regions is the reduction of financial guarantees required for specific activities (es. waste management), analyzed in all the pilot areas except in Friuli Venezia Giulia and Andalusia, and funding support, tested conduct in Andalusia, Basilicata (in this case for two measures), Friuli Venezia Giulia and Liguria.

Regarding the active involvement of the main actors, in all the cases except for proposal n. 5 in Lombardy (Organizational Model ex. Legislative Decree 231/2001), the Regional government is the competent authority for the implementation of the simplification, so the Region has been involved actively in almost all the tests. In addition in 20 tests (57% of the total of testing activities) different

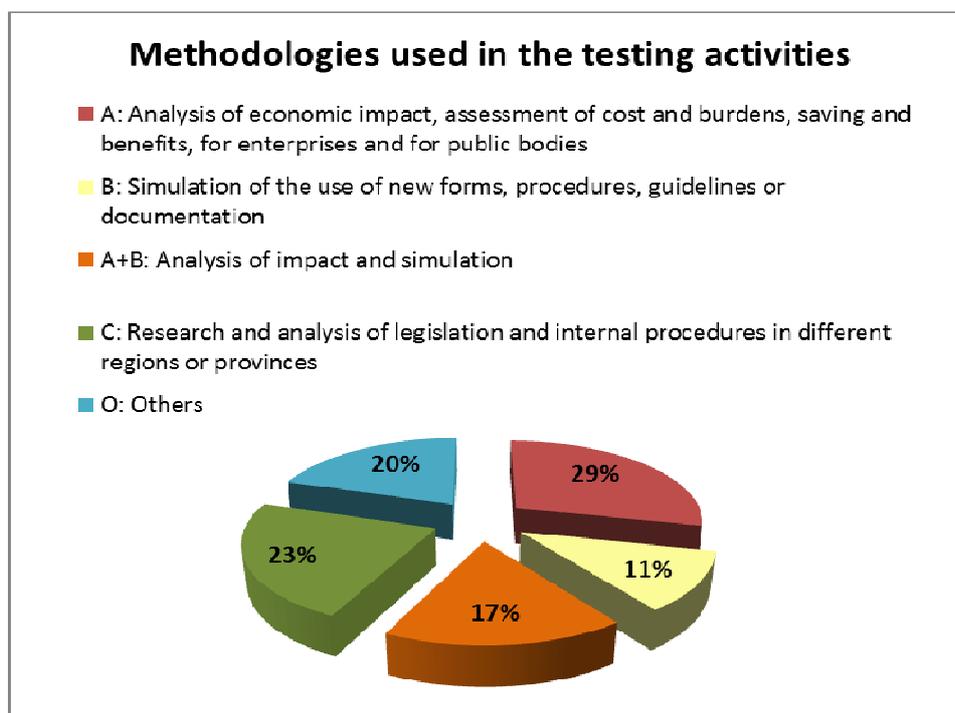
private companies have participated in the actions, through the use of new procedures or documents, the participation to surveys or the direct confront with experts or authorities. In a third part of the tests the local regional environmental agencies (Italian “ARPA” and Spanish “Consejeria de Medio Ambiente”) have been involved actively in the activities, helping partners to analyze the proposals and supplying details and data for carrying out simulations of the new permitting procedures. Another key actors have been involved in all the regions, as provincial governments, chambers of commerce, trade association or other public bodies, for developing all the testing activities that have allowed to prepare the final report with strengths and weaknesses points in the proposal implementation.

Although in some cases proposals were similar in different regions it has been very difficult to find a methodology to do a good cross-sectorial analysis considering all the parameters and characteristics of the actions, due to the nature of the testing activity. Each partner has chosen different methods to achieve the testing activities’ result. Often partners have exchange information about the kind of methodology that could be used for similar proposals, but just in some cases the methodology or documents actually used for the tests had been, at the end, the same.

We can gather together all the types of methodologies that partners have used in four groups:

- a) Analysis of economic impact, assessment of cost and burdens, saving and benefits, for enterprises and for public bodies, usually with data provided directly by competent authority or by companies (using public databases, or collecting data from public authorities or by fact-finding questionnaires or interviews in a sample of organizations); it has been used in the 36% of the cases, in some cases together with simulations;
- b) Simulation of the use of new forms, procedures, guidelines or documentation, with the active involvement of key actors organizing meetings with a sample of organizations or using fact-finding questionnaires or interviews (used in in more than one-quarter of the tests, in some cases together with cost/impact analysis);
- c) Research and analysis of legislation and internal procedures in different regions or provinces; it has been used in around the 23% of the tests;
- d) Others.

Figure 1 - Percentage of amendments tested by type



Source: Data BRAVE project

4. Description of regional testing in field activities

In this section it's possible to find all the testing in field summary reports in English. For the detailed completed report in local languages please contact the project coordinator Scuola Sant'Anna di Pisa.

ANDALUSIA

Pilot area	Andalusia
Name of the tested proposal	Expansion of eligible expenses to cover the maintenance of the Environmental Management System

1 Introduction to the report

The Regional Government for Environment, by Order of September 17 2010, convenes annual financial aids to investments in infrastructures and facilities designed to protect the environment in companies, including costs derived from the implementation and certification of an Environmental

Management System (hereafter EMS).

Experience shows that the implementation of a EMS requires that the organization has its own resources and, in many cases, external collaboration, either technique (by a specialized consulting firm) or economic (obtained from grants or financial aids by the corresponding body).

The implementation of a EMSEMS and its subsequent registration under EMAS involves costs, which may vary from one organization to another, that are largely dependent on the size and complexity of the organization, the type of activity and the starting point. Similarly, the **maintenance of a EMS** entails **annual costs** which can be broken down as follows:

- Internal or external human resources for the maintenance of the EMS.
- Cost of certification and verification of the EMS (regular reviews).

Both expenses rely mainly on the size, activity and complexity of the company.

In this sense, the purpose of this measure is to ensure that aids currently provided by the Regional Government for Environment for the implementation and certification of the EMS also covers the maintenance of these EMS, at least, during the period of validity of the EMAS registration (3 years).

On the other hand, we must mention that despite the EMAS Regulation includes the possibility to charge a fee for the registration, renewal and maintenance of the registration by the corresponding competent bodies, in some regions, as in the case of Andalusia, there are no fees for the registration, renovation or maintenance of the registration, in order to promote greater participation by the organizations in the scheme.

2 Aim of the test and methodology

The aim of the validation is to analyze the impact of the measure in organizations and in the Regional Government for Environment, which would include the maintenance of the EMS as eligible expenses, at least, for the first 3 years of validity of the registration.

Financial aids currently given by the Regional Government for Environment to investments include costs of implementation and certification of the EMS, but not those derived from maintenance.

The validation of this measure intends to prove the relevance of this financial aid, especially in these times of crisis, in order to promote EMAS registration and ensure companies that choose to request this aid commit to maintain the registration.

3 Analysis of the test activities and results

Validation aims at analyzing the cost of the maintenance of a EMS and the EMAS registration to companies.

There are 44 EMAS-registered organizations in Andalusia (year 2012). The weight of accessions to the EMAS Regulation focus primarily on Cádiz (27%), Sevilla (25%) and Huelva (20%).

Even though the maintenance of the EMS does not necessarily require hiring an external consultant firms, this option is used by some of the companies registered in EMAS. The cost of maintenance of the EMS, either with the company's own resources or through an external consultant firms, will depend on the size and complexity of the company and the type of activity carried out.

Nevertheless, to validate this measure, we start from the following assumptions:

1. Assuming that the *maintenance of the EMS*, either performed by the company's own human resources or by outsourcing, entails a cost of 4.000 € - 6.000 € *per year* for a company of medium complexity and size, not including the cost associated with the necessary regulatory inspections in order to ensure compliance with the environmental legislation.
2. Assuming that the approximate cost associated with the maintenance of the registration in EMAS (follow-up audits) ranges from 1.000 – 1.500 € *per year*.
3. Assuming that this financial aid would cover **up to 50% of costs associated with the maintenance of the EMS** up to a maximum of 3.000 €.
4. Assuming that this financial aid would cover **up to 50% of costs associated with the maintenance of the EMAS registration** up to a maximum of 750 €.
5. Considering that **no fees are charged in Andalusia for the registration and maintenance in the EMAS registration**.
6. And assuming that the aid covers at least the **first three years**:

Concept	Approx. cost/year (€)	% max. grant/year (max. 50%)	Max. grant for the first 3 years
Maintenance of the EMS	4.000-6.000	2.000-3.000 (max. 3.000)	12.000-18.000
EMAS regular verification	1.000-1.500	500-750 (max. 750)	3.000-4.500
EMAS registration	0	-	-
Approx. total	5.000-7.500	2.500-3.750 (max. 3.750)	15.000-22.500

Therefore, an organization of medium size and complexity could save **approx. 3.000 €/year** with this measure for the first three years.

4 Summary of the main activities and results

Proposal n. 1	Expansion of eligible expenses to cover the maintenance of the Environmental Management System
Aim	Analysis of the impact on companies and the Regional Government for Environment to include maintenance as eligible expenses, at least, during the first 3 years of the certificate or validity of the registration. To date, we only included costs of implementation and certification of EMS.
Competent Authorities involved	Regional Government for Environment
Other actors involved	EMAS registered organizations, environmental certifiers (ISO 14001) and verifiers (EMAS Regulation).
Methodology	The methodology to test the proposal n.1 will include the following activities: <ol style="list-style-type: none"> 1. Analysis of the economic impact on companies: assessment of cost and efforts (cost of registration/certification), savings and benefits (payback period of the registration/certification obtained with the implementation of this measure). 2. Analysis of the economic impact on the Regional Government for Environment.
Data Source	To apply this methodology the following data will be needed: <ul style="list-style-type: none"> • Annual average EMS maintenance (registration and/or certification, not from consultants) cost per company. • The increase of eligible expenses to cover the maintenance of the EMS (certification and/or registration).
Midterm results	Document of analysis of the economic impact Meetings with organizations involved in the test
Timing	Starting date: May 2013 Planned completion date: March 2014

5 Annexes

- EMAS Environmental Report (2012).
- Order of September 17 2010, by which the Regional Government for Environment establishes the regulatory bases for the granting of financial aids to investments in infrastructures and facilities designed to protect the environment in companies and the call for 2010 is executed.

Pilot area	Andalusia
Name of the tested proposal	Reducing the frequency of inspection activities in EMAS registered organizations

1 Introduction to the report

The Region of Andalusia establishes through the Chapter II of the regional law referred to the Integrated Environmental Quality Management² (hereafter GICA, from the initials in Spanish) that all activities, actions and facilities within the scope of this law will be subject to monitoring, inspection and environmental control activities. These activities will be carried out by the Regional Government for Environment in Andalusia.

These monitoring, inspection and control activities are set out for each facility in a Monitoring and Control Plan which is included as an annex in its Integrated Environmental Authorizations (hereafter IEA). There are two types of actions in the activities included in the *Control Plan* according to the *staff* involved in the activity:

1. **Internal Control Activities:** it comprises operational control actions (for instance, maintenance of production and environmental control equipments and monitoring and measuring actions (for example, self-monitoring of atmospheric emissions in accordance with the applicable environmental legislation) carried out either with the facility's own technical resources³ or by an Entity collaborating with the Regional Government for Environment (hereafter, ECCMA from the initials in Spanish) and/or accredited Testing Laboratory.
2. **External Control Activities⁴:** it includes monitoring and measuring actions (for instance, periodic controls according to the applicable sectoral environmental legislation: regulatory inspection every three years of atmospheric emissions from the combustion boiler) carried out necessarily by an ECCMA and/or accredited Testing Laboratory.

There are two types of actions in the activities included in the *Monitoring Plan* according to *when* they are carried out:

² The GICA Law transposes the Law 16/2002 of July 1, on integrated pollution prevention and control into the legal system of region of Andalusia.

³ In case the controls are carried out by technicians from the facility itself, the resources used must meet the same requirements as if it was an accredited laboratory according to the requirements of the standard UNE-EN ISO/IEC 17025.

⁴ It includes Initial Control Activities: monitoring and measuring actions carried out by an ECCMA before the start-up of the facilities.

1. **Initial Audit Activities:** it comprises inspection and evaluation actions of the legal compliance initially carried out.
2. **Regular Audit Activities:** it includes inspection and evaluation actions of the legal compliance carried out periodically, based on the frequency established in the IEA.

The **frequency of regular audits** will be established by the Regional Government for Environment in Andalusia, considering that the period between two on-site visits is based on a **risk assessment** of the corresponding facilities and that, in any case, it will not exceed one year in the facilities entailing the **highest risks** and three years in the facilities involving **minor risks** (article 23.3.b of the Royal Decree 815/2013⁵).

Therefore, this measure is aimed at encouraging the Regional Government for Environment in Andalusia to reduce the frequency of regular monitoring activities (monitoring audits) to those EMAS registered organizations, since during the Environmental Verification process the compliance of all requirements established in the EMAS Regulation (in particular, the legal requirements included in their IEA) is also verified.

2 Aim of the test and methodology

The aim of the validation is to analyse the impact that would entail to reduce the frequency of regular monitoring activities to EMAS registered organizations.

This measure intends to improve the efficiency of surveillance through a more efficient use of the resources available for monitoring activities and directing them towards those facilities and organizations that do not really show their commitment to the compliance of the legislation.

3 Analysis of the test activities and results

The aim of validation is to analyse the savings/benefits for EMAS registered organizations from reducing the frequency of monitoring activities (regular audits).

We start from the following assumptions for the validation of this measure:

1. Involving an **electric power production facility**, included in the heading 2.4.a of Annex I to the GICA Act.
2. Assuming that, as established in the IEA Monitoring Plan with regard to air emissions, monitoring audits will be carried out every two years from the granting of the IEA, therefore, three audits will be carried out throughout the period the authorization is in effect (8 years).

⁵ Royal Decree 815/2013⁵ of October 18, which approves the Regulation on industrial emissions and development of the Law 16/2002, of July 1, on integrated pollution prevention and control.

FOCUS	CONCEPT: AIR EMISSIONS	Code	MONITORING AUDIT		
			1st	2nd	3rd
1	COMPLETE SAMPLING, EMISSION. Regulatory inspection in emission point with isokinetic sampling and gas analyser, according to MO of 18/10/76, including travel expenses, daily allowances and reports	S atm-em type 2	X	X	X
3	COMPLETE SAMPLING, EMISSION. Regulatory inspection in emission point with isokinetic sampling and gas analyser, according to MO of 18/10/76, including travel expenses, daily allowances and reports	S atm-em type 2	X		
4	COMPLETE SAMPLING, EMISSION. Regulatory inspection in emission point with isokinetic sampling and gas analyser, according to MO of 18/10/76, including travel expenses, daily allowances and reports	S atm-em type 2		X	
5	COMPLETE SAMPLING, EMISSION. Regulatory inspection in emission point with isokinetic sampling and gas analyser, according to MO of 18/10/76, including travel expenses, daily allowances and reports	S atm-em type 2			X

3. Assuming *rates for pollution prevention and control*, established in Annex III to the Act 18/2003, of December 29, by which tax and administrative measures are adopted:

TABLE 2: DESCRIPTION OF THE TYPES OF SAMPLING AND ANALYSIS	CODE		VALUATION (IN EURO)
COMPLETE SAMPLING, EMISSION. Regulatory inspection in emission point with gas analyser, according to MO of 18/10/76, including travel expenses, daily allowances and reports	S atm-em	type 1	900,00
COMPLETE SAMPLING, EMISSION. Regulatory inspection in emission point with isokinetic sampling and gas analyser, according to MO of 18/10/76, including travel expenses, daily allowances and reports	S atm-em	type 2	950,00
COMPLETE SAMPLING, EMISSION. Regulatory inspection in emission point with isokinetic sampling including dioxins and furans, VOC and HAP emissions and gas analyser, according to MO of 18/10/76, including travel expenses, daily allowances and reports	S atm-em	type 3	2500,00

4. Considering the above assumptions, the fees corresponding to the total monitoring audits established in the Monitoring Plan would be **5 700 € only for air emissions** (see blue boxes).
5. With the implementation of this measure, **organizations** would move from having monitoring audits “every two years” to “every three years”, so they would start only having 2 audits throughout the period the IEA is in effect, thus removing, for example, the 2nd monitoring audit (red box), so they would save 1 900 €.

FOCUS	CONCEPT: AIR EMISSIONS	Code	MONITORING AUDIT		
			1st	2nd	3rd
1	COMPLETE SAMPLING, EMISSION. Regulatory inspection in emission point with isokinetic sampling and gas analyser, according to MO of 18/10/76, including travel expenses, daily allowances and reports	S atm-em type 2	X	X	X
3	COMPLETE SAMPLING, EMISSION. Regulatory inspection in emission point with isokinetic sampling and gas analyser, according to MO of 18/10/76, including travel expenses, daily allowances and reports	S atm-em type 2	X		
4	COMPLETE SAMPLING, EMISSION. Regulatory inspection in emission point with isokinetic sampling and gas analyser, according to MO of 18/10/76, including travel expenses, daily allowances and reports	S atm-em type 2		X	
5	COMPLETE SAMPLING, EMISSION. Regulatory inspection in emission point with isokinetic sampling and gas analyser, according to MO of 18/10/76, including travel expenses, daily allowances and reports	S atm-em type 2			X

Therefore, if we would apply this reduction of the frequency of regular monitoring activities (monitoring audits) not only to air emissions but also to the rest of environmental aspects subject to regulatory inspection activities (wastewater, contaminated soils, etc.), savings would be much greater (depending on the type of facility and the number and kind of pollution points), it could even be equated with the cost of the implementation of the EMS and verification and EMAS registration.

Similarly, this measure also involves benefits for the Regional Government for Environment in Andalusia. Starting from the following assumptions:

1. Considering that only 6 of the facilities affected by the IPPC Directive are registered in EMAS:

	Included in heading IPPC 1.1	Included in heading IPPC 5.1	Rest of facilities
No of Andalusian companies registered in EMAS	6	0	46
TOTAL	52		

(Source: http://www.juntadeandalucia.es/medioambiente/servtc1/AAlo/?lr=lang_es)

2. Assuming that 1 monitoring audit was removed for each of them.
3. Assuming that the number of IEA annual inspections was 152 (established for the year 2013 according to the Resolution of January 25 2013, of the Directorate-General for Environmental Prevention, Quality and Climate Change, which approves Environmental Inspections Sectoral Plans for 2013).
4. Considering the above assumptions, the Regional Government for Environment in Andalusia could **save a total amount of 6 inspections** (it would entail a 4% of the planned inspections).

5. So it could target the resources initially intended to those 6 IEA inspections of the EMAS registered organizations to those facilities and organizations that do not really show their commitment to the compliance of the legislation.

And considering that, adopting this measure could imply an increase in the number of EMAS registered organizations and affected by the IPPC Directive, benefits for the Regional Government for Environment in Andalusia would be even greater.

4 Summary of the main activities and results

Proposal n. 2	Reducing the frequency of inspection activities in EMAS registered organizations.
Aim	Analysis of the impacts of the reduction the number of inspections for the Regional Government for Environment and EMAS registered organizations.
Competent Authorities involved	Regional Government for Environment
Other actors involved	Facilities affected by the IE Directive, EMAS registered organizations and Environmental Verifiers.
Methodology	<p>The methodology to test the proposal n. 2 will include the following activities.</p> <ol style="list-style-type: none"> 1. Testing by means of simulation on a sample of selected companies affected by the IE Directive and EMAS registered. 2. Analysis of the cost of the inspection for the Regional Council for the Environment. 3. Cost/benefit analyses for the company to reduce the number of inspections.
Data Source	<p>To apply this methodology the following data will be needed:</p> <ul style="list-style-type: none"> • No. EMAS registered companies and affected by IE Directive. • No. organizations affected by IE Directive. • No. annual programmed inspection activities. • No. verification activities under EMAS Regulation in Andalusia. • Environmental fees for inspections per company. • Environmental costs for EMAS verification per company.

Midterm results	Hypothesis about the actual cost of inspections Document of analysis of economic impact Meetings with involved organizations in test
Timing	Starting date: May 2013 Planned completion date: March 2014

5 Annexes

- Law 18/2003, of December 29, which approves tax and administrative measures.
- Integrated Environmental Authorisation of an electric power production facility. Resolution of January 25 of 2013, of the Directorate-General for Environmental Prevention, Quality and Climate Change, which approves Environmental Inspections Sectoral Plans for 2013.

Pilot area	Andalusia
Name of the tested proposal	Simplify environmental information's procedure in EMAS registered organizations

1 Introduction to the report

People in charge of facilities affected by the IPPC⁶ Law are obliged to notify data on the emissions produced by the facilities to the regions, at least, once a year, in order to compile the Spanish Pollutant Emissions Inventory (*E-PRTR⁷ Register*). The Region will validate the provided information in order to check its quality and consistency and refer them to the Directorate-General for Environmental Quality and Assessment within the Ministry of Environment for publication through the European Commission.

On the other hand, derived from the application of the Control and Inspection Plans included in the IPPC, people in charge of the facilities must refer periodically all information concerning their environmental behaviour to the Regional Government for Environment to be validated through **Control Reports**.

⁶Law 5/2013, June 11, by which the Law 16/2002, July 1, on Integrated Pollution Prevention and Control, is modified.

⁷ Royal Decree 508/2007, April 20, by which the provision of information on emissions from the E-PRTR Regulation and the integrated environmental authorizations is regulated.

And considering that EMAS registered are obliged to prepare an annual **Environmental Statement**⁸, which should be validated by an Environmental Verifier and referred to the competent body in the region so that it is available to the public through the European Commission, it is suggested that the Regional Government for Environment in Andalusia establishes an *environmental information simplified procedure for those EMAS registered organizations* so that the annual presentation of the Environmental Statement duly validated by an Environmental Verifier avoids that people in charge of facilities send environmental information in triplicate and the processes of validation, registration and making it available to the public by the Regional Government for Environment are simplified.

2 Aim of the test and methodology

The aim of the validation of this measure is the analysis of data and information included in the Environmental Statement and the Control Reports and in the information provided for the Spanish Pollutant Emissions Inventory and the European Emissions Inventory.

This measure intends to improve the efficiency of these environmental information validation activities that the person in charge of the facilities must refer periodically to the different competent bodies for environmental issues.

3 Analysis of the test activities and results

According to the analysis carried out (annexed), it seems doubtless that all data necessary for the Spanish Pollutant Emissions Inventory and Control Reports could be taken from the Environmental Statement which, besides, has been previously validated by an Environmental Verifier, by ensuring that reliability and consistency of data contained in it, while the unification of information included in the E-PRTR Register and in the Control Report with the Environmental Statements requires an **adaptation of the minimum content of Environmental Statements**, in order to ensure reliable, consistent and comparable data.

⁸ Regulated by the Regulation EC No 1221/2009 of the European Parliament and Council of November 25 2009 concerning the voluntary participation of organizations in an environmental management and auditing community system (EMAS), and by which the Regulation (EC) No 761/2001 and the Commission Decisions 2001/681/EC and 2006/193/EC are repealed.

4 Summary of the main activities and results

Proposal n. 3	Simplify environmental information procedure in EMAS registered organizations
Aim	Analysis of the use of new forms for the communication of data at the same time as the official procedure is used.
Competent Authorities involved	Regional Government for Environment
Other actors involved	Facilities affected by the IE Directive, EMAS registered organizations and Environmental Verifiers.
Methodology	<p>The methodology to test the proposal n.3 will include the following activities:</p> <ol style="list-style-type: none"> 1. Analysis of the use of new forms for the communication of data at the same time as the official procedure is used. 2. Analysis of data and information included in the EMAS Environmental Statement and from the Regional Government for Environment in order to simplify the environmental communication procedure.
Data Source	<p>The following data will be needed to apply this methodology:</p> <ul style="list-style-type: none"> • No. EMAS registered companies and affected by the IE Directive. • Human resources from Regional Government involved in the validation of an Environmental Statement. • Human resources from the company involved in the preparation of the Environmental Statement from EMAS Regulation.
Midterm results	<p>Document of analysis of data and information included in the EMAS Environmental Statement and from the Regional Government for Environment in order to simplify the environmental communication procedure.</p> <p>Meetings with involved organizations in test.</p>
Timing	<p>Starting date: May 2013</p> <p>Planned completion date: March 2014</p>

5 Annexes

Document compiling the analysis of Environmental Information coming from the E-PRTR Register, Control Reports and the Environmental Statement.

Pilot area	Andalusia
Name of the tested proposal	Expand simplification measures proposed (environmental permits revision and update procedure, environmental inspection and control activities and environmental information) for the activities included in Annex I of the Law 7/2007 (Autorización Ambiental Integrada, AIA, in Spanish) to others activities included in Annex I of the same Law (Autorización Ambiental Unificada, AAU, in Spanish).

1 Introduction to the report

After analysing the Decree 356-2010, of August 3, regulating the Unified Environmental Authorisation (hereafter UEA) and the requirements related to the processes of permission, environmental information and control and inspection activities, it is detected that the only simplification measure proposed for the Integrated Environmental Authorisations (hereafter IEA), that could be applicable to facilities under UEA might be the reduction the frequency of inspections, given that the UEA are not under revision process as it is established for the IEA.

The region of Andalusia establishes, through Chapter VII of the Decree 356/2010, that every activity, action and facilities under the UEA will be subject to environmental monitoring, inspection and control activities. These activities will be carried out by the Regional Government for Environment. These monitoring, inspection and control activities are established, for each facility, in a Control and Monitoring Plan, annexed to their UEA.

2 Aim of the test and methodology

The objective of the test is to analyse the impact that would suppose the reduction of the frequency of inspections for activities under UEA and which are attached to the EMAS Regulation.

This measure aims to improve monitoring efficiency through a more efficient use of the resources available for inspections activities and direct them, mainly, towards those facilities and organizations that do not show their commitment to the compliance with the legislation.

3 Analysis of the test activities and results

Test activities aim to analyse savings/benefits of reducing the frequency of inspections of monitoring activities under UEA and which are attached to the EMAS Regulation.

For the validation of this measure, we start from the assumptions below:

1. Assumption of a Plant for **Reception, Classification, and Recovery of Construction and Demolition Waste**, included in the heading 11.6 from the Annex I of Decree 356/2010.
2. Assuming that, according to the UEA Monitoring Plan, the Regional Government for Environment would accomplish regular audits, aimed to check the conditions of the authorisation accomplishment.
3. Given that audits will be considered *Inspections in Environmental Protection* and, therefore, be subject to taxes according to Section 9: “Taxes for pollution control and prevention”, from Chapter II: “Taxes” from the Law 18/2003, of December 29, where fiscal and administrative measures were adopted.

1. Inspection and optional services.
 A) Inspections in the field of environmental protection:

1. Basic inspection without taking of samples: 750 euro
2. Special inspection without taking of samples: 1 050 euro
3. In case it was necessary to take samples and carry out an analysis, the fee will be calculated as follows:

$$\text{Fee (€)} = K + C_1 S_{\text{atm-em}} + C_2 (s) \quad S_1$$

Where:
 1) K – 1050
 $C_1 - 0,35n + 0,65$, where n is the number of pollution points.
 2) $C_2 - 1$ for $s - 1$
 $C_2 - 0,5$ for $s > 1$
 s – number of samplings S

4. If the purpose of this measure is to reduce the frequency of monitoring activities in facilities under UEA and registered in EMAS, **organizations** will **save the taxes corresponding to the monitoring activity which would be removed**.

Likewise, the application of this measure will also bring benefits to **Regional Government for Environment** in Andalusia since it would be possible to target resources, initially intended to monitoring activities of the UEA of the EMAS registered organizations, to those facilities and organizations that do not show their commitment to the compliance with the legislation.

Additionally, this measure will have a bigger impact at the Regional Government for Environment given that the number of facilities under UEA (approximately 1,073) is larger than the number of facilities under IEA (582⁹)

⁹ Environmental Rapport. Basic data from 2003. Regional Council for the Environment

4 Summary of the main activities and results

Proposal n. 4	Expanding simplification measures proposed (environmental permits revision and update procedure, environmental inspection and control activities and environmental information) for the activities included in Annex I of the Law 7/2007 (Integrated Environmental Authorisation, IEA) to other activities included in Annex I of the same Law (Unified Environmental Authorisation, UEA).
Aim	Analysis of the possibility of expanding the simplification measures to other sectors (non IPPC sectors).
Competent Authorities involved	Regional Government for Environment
Other actors involved	Installations affected by the annex I of the Law 7/2007 (UEA), EMAS registered organizations and Environmental Verifiers.
Methodology	The methodology to test the proposal n.4 will include the following activities: <ol style="list-style-type: none"> 1. Analysis of economic impact: assessment of cost and efforts, saving and benefits on companies and Regional Council for the Environment. 2. Analysis of the use of new forms for the communication of data at the same time that the official procedure is used. 3. Analysis of the activities derived of the application of the UEA and of the EMAS Regulation in order to analysis those activities likely to be coordinated.
Data Source	To apply this methodology the following data will be needed: No. Companies affected by the annex II of the Law 7/2007 (UEA). No. EMAS registered companies and affected by the UEA.
Midterm results	Hypothesis about actual cost of inspections Document of analysis of economic impact Meetings with involved organizations in test
Timing	Starting date: May 2013 Planned completion date: February 2014

5 Annexes

- Decree 356/2010, of 3rd August, regulating the United Environmental Authorisation
- Andalusian Environmental Report. Basic data. 2003
- UEA of a plant for reception, classification and recovery of construction and demolition waste.

Pilot area	Andalusia
Name of the tested proposal	Establish a simplified permitting procedure (revision and update) for the IPPC permits in EMAS registered organizations.

1 Introduction to the report

Directive 2010/75/UE, on Industrial Emissions, suppress authorisations renovation responsibilities which led that facilities responsible, eight years after having received the IEA, will request the renovation to the corresponding authority, at least ten months in advance before the expiration of that time. This way, the adequacy to IEA conditions in term would be guaranteed.

It is the Regional Government for Environment in Andalusia that, by a simplified procedure, must guarantee both the IEA revision and update¹⁰. This way, authorisations will be reviewed within four years after the publication of the conclusions relating to Best Available Techniques (hereafter BAT¹¹). For that, the responsible will present, at the request of the corresponding authority, the information for IEA conditions revision. Where relevant, emissions control results must be included as well as other data which facilitate a functioning comparison of facilities with the BAT delimited on applicable conclusions relating to BAT. In this sense, the Regional Government for Environment in Andalusia must guarantee, according to Article 25.2. of the Law 5/2013¹², that:

- a. IEA conditions have been revised¹³ and, if necessary, modified.
- b. The facility complies with authorisation conditions.

The Regional Government for Environment in Andalusia (according to Article 10 of the Royal Decree 815/2013¹⁴) will consider that, for EMAS registered organizations, the compliance of control obligations derived from this system can guarantee the good performance of new derived control obligations.

Therefore, this measure aims at promoting that the Regional Government for Environment in Andalusia establishes a verification procedure of the IEA requirements after it is updated with the

¹⁰ Stipulated deadline for AAI update: January 7, 2014

¹¹ European Commission's decision containing Best Available Techniques conclusions, their description, the information required for applicability assessment, emission levels related to their implementation, associated consumption levels and, if necessary, rehabilitation measures for the site in question.

¹² Law 5/2013, of June 9, modifying Law 16/2002, of July 1, on pollution prevention and integrated control, and Law 22/2011, of July 28, of residues and contaminated soils.

¹³ Revision shall consider every conclusion related to BAT reference documents applicable to facilities, since the authorisation is granted, updated or revised.

¹⁴ Royal Decree 815/2013, of October 18, endorsing industrial emissions and development regulation from Law 16/2002, of July 1, on pollution prevention and integrated control.

conclusions related BAT which are practically automatically applicable for those EMAS registered organizations, considering that these facilities are suited to current environmental requirements after IEA update if they submit, annually, the Environmental Statement duly validated by an Environmental Verifier.

2 Aim of the test and methodology

The objective of this test is to analyse the impact of simplifying revision and update activities for EMAS registered organizations.

This measure aims to improve IEA revision and update activities efficiency through a more efficient use of available resources, by directing them, mainly, to those facilities and organizations that do not show their commitment to the compliance with the legislation.

3 Analysis of the test activities and results

Test actions aim to analyse the saving/benefits which entails for EMAS registered organizations to simply revision and update activities of their IEA.

For the validation of this measure, we start from the assumptions below:

1. Assumption that a facility is included into the **2.4.a epigraph from Annex I of the Law GICA**, and that it is under EMAS Regulation.
2. Assumption that the IEA shall be *revised and updated considering every BAT conclusion* applicable to facilities.
3. Assumption that *taxes for pollution prevention and control* delimited in Annex III of the Law 18/2003, of December 29, where fiscal and administrative measures were adopted, it is lay down a cost of 1,000 € for the administrative process, and a cost of 750 € for the inspector visit (without getting samples):

Article 112. Tax liability.

The amount of the tax liability will be requires by the following concepts:

1. Authorisations:
 - A) Integrated Environmental Authorisation:
 - a) Processing of applications: 1 500,00 euro.
 - b) Renovation: 1 000,00 euro
 - c) Modification: 1 000,00 euro

TABLE 1. DESCRIPTION OF THE KINDS OF INSPECTIONS WITHOUT TAKING OF SAMPLES		VALUATION (IN EURO)
1. Without taking of samples, basic inspection	INSPECTIONS WITHOUT TAKING OF SAMPLES Basic inspection, including preparation of questionnaire, visit to the installation made by a technician, preparation of documents and evaluation of the process depending on the Best Available Techniques and the Integrated Environmental Authorisation in activities subject to Law 16/2002 (IPPC).	750,00
2. Without taking of samples, special inspection	INSPECTIONS WITHOUT TAKING OF SAMPLES Special inspection, including preparation of questionnaire, two visits to the installation made by two different technicians, preparation of documents and evaluation of the process depending on the Best Available Techniques and the Integrated Environmental Authorisation in activities subject to Law 16/2002 (IPPC).	1050,00

1. Considering the assumption above, the corresponding taxes to be paid by EMAS registered organizations for *IEA revision and update activities* amounts to **1 750 €**.
2. Assuming that, considering this measure, IEA requirements **verification processes** after the update according to applicable conclusions relating to BAT shall be **practically automatic** for those facilities under EMAS Regulation that suit to current environmental requirements after IEA update if they submit, annually, the Environmental Statement properly verified by a environmental verifier:

Simplification of IEA revision and update activities at facilities under EMAS, so that the *inspector's visit is suppressed*, will represent, for those facilities, a saving of **750 €**.

This measure, in addition to the saving at EMAS registered organizations, will generate, at the same time, large benefits for the Regional Government for Environment in Andalusia since it would be possible to target resources, initially earmarked for review and update of IEA from EMAS registered organizations to those facilities and organisations that do not show their commitment to legislation performance.

4 Summary of the main activities and results

Proposal n. 5	Establishing a simplified permitting procedure (revision and update) for the IPPC permits in EMAS registered organizations.
Aim	Analysis of the impact to establish a simplified procedure for revision and update of IEA for EMAS registered organizations.
Competent Authorities involved	Regional Government for Environment

Other actors involved	Installations affected by the IPPC/ IE Directive, EMAS registered organizations and Environmental Verifiers.
Methodology	<p>The methodology to test the proposal n.5 will include the following activities:</p> <ol style="list-style-type: none"> 1. Analysis of the use of new forms for the communication of data at the same time that the official procedure is used. 2. Analysis of economic impact on companies: assessment of cost and efforts (cost of registration/certification), savings and benefits (payback period of the registration/certification obtained with the implementation of this measure). 3. Analysis of economic impact on Regional Council for the Environment.
Data Source	<p>To apply this methodology the following data will be needed:</p> <ul style="list-style-type: none"> • No. EMAS registered companies and affected by IE Directive. • Fees associated with permitting procedure for the IPPC permits. • Costs arising from the documentation requested in the permitting procedure for the IEA (approved technical project and all other documents required). • Human resources from company involved in the permitting procedure for the IPPC permits. • Human resources from Regional Government involved in the validation of the documentation requested in the permitting procedure for the IPPC permits.
Midterm results	<p>Hypothesis about actual cost of revision and update IEA</p> <p>Document of analysis of economic impact</p> <p>Meetings with involved organizations in test</p>
Timing	<p>Starting date: May 2013</p> <p>Planned completion date: March 2014</p>

5 Annexes

- Law 18/2003, of December 29, endorsing fiscal and administrative measures.
- Royal Decree 815/2013, of October 18, endorsing industrial emissions and development regulation from Law 16/2002, of July 1, on pollution prevention and integrated control.
- Law 5/2013, of June 11, amending Law 16/2002, of July 1, on pollution prevention and integrated control and Law 22/2011, of July 28, on residues and contaminated soils.

BASILICATA

Pilot area	<i>Basilicata</i>
Name of the tested proposal	Reduction of financial guarantees for EMAS registered or ISO 14001 organizations from the sector of waste landfill and other waste treatment.

1 Introduction to the report

The Environmental Managers Register (Albo Nazionale Gestori Ambientali) reveals that in the Basilicata region there are over 250 companies registered for the categories of activities subjected to the stipulation of financial guarantees in accordance with the Environment Code: 147 of them are in the Province of Potenza and 106 are in the Province of Matera. None of them is registered EMAS.

The experimentation of the proposal was conducted by an interview with a few companies in Basilicata, in order to compare benefits obtained with the simplification and the costs to achieve EMAS certification.

2 Aim of the test and methodology

The test in field step was conducted with the following aims:

- ✓ evaluation of impacts obtained with the reduction of guarantees for discharges and waste treatment plants,
- ✓ test of economic savings and benefits obtained with the reduction of guarantees for EMAS and/or ISO registered organizations,
- ✓ analysis of economic impact on the Region balance sheet.

For this purpose two companies, from the sectors of waste landfill and other waste treatment, were selected and interviewed. All of them are included in the Environmental Managers Register for at least 7 years and they perform their services throughout the whole regional territory.

An appropriate questionnaire, including two main sections, was prepared. The first section was committed to collect useful information about the organization such as the benefits achieved by the attainment of ISO certification. The second one was aimed to test the acceptance for the proposal and to characterize possible limits and difficulties during the registration path.

3 Analysis of the test activities and results

Both companies involved in test activities are ISO 14001 certified and both of them acknowledge to have got the following advantages as a consequence of registration:

- improvement of the corporate image,
- improvement of the internal management system,
- gain an increased competitiveness.

The interviews revealed a good level of acceptance for the proposal by companies even if they suggest a bigger discount highlighting that - according to the local production - proposed percentages of financial guarantees reductions are unimportant compared to the costs for the achievement or the maintenance of the EMAS registration.

The simplification proposal should be able to:

- demand for a more important discount (over 40%) to advantage companies who want to get a EMAS registration,
- bind obtained savings to the achievement/maintenance of the EMAS certification only,
- dedicate a funding system (to be attached to previous discounts) for companies subjected to lower financial guarantees in order to balance savings made by the registration/maintenance of certification ISO or EMAS.

4 Summary of the main activities and results

Proposal	Reduction of financial guarantees for EMAS registered or ISO 14001 organizations from the sector of waste landfill and other waste treatment.
Aim	Evaluation of impacts obtained with the reduction of guarantees for discharges and waste treatment plants. Test of economic savings and benefits obtained with the reduction of guarantees for EMAS and/or ISO registered organizations and analysis of economic impact on the Region balance sheet.
Competent Authorities involved	Basilicata Region
Other actors involved	Private companies operating in the waste management sector.
Methodology	<ol style="list-style-type: none"> 1) Selection of n.3 companies from the sector of waste landfill and other waste treatment 2) Meetings and interviews with companies involved in test activities and compiling a specifically prepared questionnaire 3) Analysis of main economic effects resulting from the implementation of the measure (assessment of cost and efforts occurred pursuant to ISO 14001 certification; savings and benefits achievable with an EMAS registration) 4) Analysis of questionnaire results 5) Comparison between current reductions of financial guarantees provided for by national law and reductions supposed by the simplification to be eventually ratified

	by a Regional DGR 6) Drawing a summary report
Data source	Environmental Manager Register Companies involved in testing activities
Results	Enterprises involved in testing activities: 3 Questionnaires results Evaluation of reduction to introduce with the implementation of this measure and need for appropriate amounts to be pledged by Basilicata Region to advantage EMAS registered organizations.
Timing	September 2013 - February 2014

5 Annexes

Questionnaire edited in order to conduct the interview with the organizations involved.

Pilot area	<i>Basilicata</i>
Name of the tested proposal	Public tender for the granting of loans for programs on environmental education and training for increasing the number of registered EMAS school organizations.

1 Introduction to the report

The main motivation of the proposal is to create a supply chain project to increase the number of EMAS registered organizations in the region. The priority aim is to use EMAS brand to achieve higher environmental performance, resulting in cost savings for the regional education system, and to disseminate, through teachers, students and families, the culture of sustainability.

This project is based on the following principles:

- Respect the autonomy of schools;
- Improving the quality of school activities;
- Appraise the Battaglini Institute experience (first school in the Basilicata region with an EMAS certification);
- Access to reserved funds for Schools belonging to the Network.

Some comprehensive schools headmasters were interviewed to understand what they know about Environmental Management Systems and what are the sustainability issues addressed within the educational programs. The aim of the conversations was to understand possible limits and difficulties to face during the registration path.

2 Aim of the test and methodology

The conversations with the headmasters were conducted leading an appropriate questionnaire made of two main sections: the first one was aimed to collect information about schools involved in test, and to characterize environmental education themes actually addressed within teaching plans and extracurricular projects (energy and water consumptions, Green Public Procurement, Sustainable Mobility, etc...); the second section was oriented to explore the Environmental Management Systems topic and to identify achievable benefits and possible difficulties to be faced in the event of certification of a school organization.

Most of the headmasters met claim to know the environmental management systems and certifications even if none of the schools involved has implemented any kind.

From the interviews it was found that in almost all comprehensive schools, specific educational projects related to sustainability and the environment are developed; these issues are often promoted through initiatives that involve private, companies or municipalities, too.

The only topic almost unknown is the Green Public Procurement. Most of the headmasters met, in fact, claims to pay no attention at all to the sustainability requirements in possession to the supplier at the time of the purchases.

All respondents agree to recognize such benefits to be obtained by the adoption of an environmental management system a better management of the school and a reduction of the environmental impact.

Most of the possible difficulties are related to the lack of qualified staff to be assigned at the task of carrying out all the procedures about the attainment and maintenance of certification, and the excessive costs to be incurred.

They concluded the interviews explicitly requiring that simplification should result in an administrative and technical, as well as financial support.

3 Analysis of the test activities and results

The aim of the proposed simplification is to increase the number of school EMAS registered organizations in the Basilicata region, creating a Network of Schools.

This project obtained a good interest among schools involved in test. The interviewed headmasters, however, highlighted the lack of economic resources and qualified staff able to manage the path of adoption and maintenance of certification efficiently.

It's a common belief that Schools Network, using the experience of the Battaglini Institute of Venosa, could be able to lead and to support the following activities:

- Use of a self-analysis tool aimed at simplifying the planning stages of the environmental management system ;
- Provisioning documentation and tools for the implementation of the environmental management

system (eg by a technical service network) ;

- Staff training ;
- Analysis and assistance during the audit and management review;
- Comparison and analysis on environmental improvement actions.

For the implementation of the proposal should be entered an agreement between the Basilicata Region and the participating educational institutions which allocates appropriate amounts to:

- Support the school leader for the supporting and coordinating activities;
- Coverage of costs for obtaining EMAS registration (audit and verification by external authority);
- Partial coverage of the amounts allocated to the implementation of actions to improve the environment presented by the schools belonging to the Network.

4 Summary of the main activities and results

Proposal	Public tender for the granting of loans for programs on environmental education and training for increasing the number of registered EMAS school organizations.
Aim	Involving some school organizations in a network supported by the high school E. Battaglini which provides documentation and tools for the implementation of the environmental management systems.
Competent Authorities involved	Basilicata Region
Other actors involved	Istituto E. Battaglini di Venosa Schools involved in test activities
Methodology	<ol style="list-style-type: none"> 1) Selection of some school organizations to get involved in test activities 2) Interviews with n.5 school heads from comprehensive institutions and compiling a specifically prepared questionnaire 3) Analysis of questionnaire results 4) Understanding of current environmental education themes addressed within teaching plans and extracurricular projects (energy and water consumptions, Green Public Procurement, Sustainable Mobility, etc...) 5) Exploring the Environmental Management Systems topic and identifying achievable benefits and possible difficulties to be faced in the event of certification of a school organization. 6) Promoting with the schools involved in test activities a series of meeting to be planned with schools, student, families with the purpose to illustrate aims and

	<p>contents of the EMAS registered schools network</p> <p>7) Drawing a summary report</p>
Data source	<p>School organizations involved in test activities</p> <p>Istituto Battaglini</p>
Results	<p>N. schools involved: 5</p> <p>N. meetings with representatives and directors of schools involved: 5</p> <p>Questionnaire: 5</p> <p>Need for a pledged credit line for schools joining to the EMAS registered schools network of the Basilicata Region</p>
Timing	<p>September 2013 - February 2014</p>

5 Annexes

Questionnaire edited to lead the conversation.

Pilot area	<i>Basilicata</i>
Name of the tested proposal	A new regional DGR for the reduction of inspections to companies with an environmental management system certificate ISO 14001 and/or EMAS registered.

1 Introduction to the report

This proposal is aimed to propose guidelines about compulsories administrative controls on enterprises with an environmental management system.

The testing in field activities were conducted to understand impacts caused by reduction of inspections for both companies and ARPAB: assessment of cost and efforts, saving and benefits, for Competent Authorities and private companies, comparing cost of inspections for ARPAB and rate paid by enterprises.

These activities were managed with some selected organizations and some officials from Arpab.

2 Aim of the test and methodology

The purpose of this proposal is to propose guidelines for the reduction of administrative controls to advantage companies and organizations with an environmental management system certificate ISO 14001 and/or EMAS registered.

The guidelines, in particular, should pursue the following purposes:

- Rationalization of controls,
- Prolongation the time between a control and the next,
- Presumption of minor need for controls because of the implementation of an Environmental Management System.

This proposal has been tested conducting studies and audits aimed to identify measures that could represent a greater opportunity for the dissemination of EMAS.

The first study was designed to assess which kind of companies are currently subjected to Integrated Environmental Authorization: most of them are from the sector of waste landfill and other waste treatment but there are some organizations from industrial sector and from livestock industry.

The test phase was conducted involving both the Regional Agency for Environmental Protection and some appropriately selected companies with the purpose to compare procedural burden and costs supported by each of them.

At first selected companies were interviewed following an appropriate questionnaire with 7 questions: first 4 are intended to understand if Arpab evaluates all the activities carried out for the maintenance of the environmental management system; the other three questions investigate the existence and complexity of monitoring and control procedures of the relevant rules and emergency situations.

The comparison with ARPAB occurred during a series of meetings with leaders and officials from the Information Monitoring Control and Prevention Sector and the Environmental Certification Operating Unit and Technical Activities. During these meetings all the contents of the simplification proposal were exposed and all issues related to the AIA were addressed. Furthermore, in order to quantify costs to be supported for inspections and administrative controls, referring to the same selected companies, it was asked to fill in a table relating to staff costs, analysis costs, and costs related to inspections.

3 Analysis of the test activities and results

The selected companies belong to the food industry and to the paper factory; all of them have a plant in Basilicata Region, while belonging to a group of industries at national and international scale.

Both companies interviewed, ISO 14001 certified, declared that during Arpab inspections all procedures enforced in range with the environmental management system are not considered at all and the opportunity to share with Arpab a monitoring plan to be managed in a self-control system could be a very convenient benefit.

Furthermore, a lot of documents to be drawn up with AIA, seems to be partially overlapping with

the documentation required under the procedures for the maintenance of ISO certification. These conversations showed an excessive bureaucratic burden to be completely compliant with the requirements and relevant costs to be incurred for administrative inspections. Respondents agreed that reduction of administrative burdens would be a substantial incentive, both for the initial implementation and for subsequent maintenance of a certified management system.

All the meetings with Arpab officials have been useful to understand all the steps belonging to the procedure to be followed to give off an Integrated Environmental Authorizations.

Basilicata Region receives authorization requests and draws up the monitoring and control plan for for that company. This plan, before being approved, will be presented during a decisional meeting with all competent authorities, among which is ARPAB. In this way Basilicata region receives all the comments and integrations by Arpab which, however, doesn't participate the drafting stage of the plans.

Futhermore, the officials interviewed highlighted a lack with staff and economic resources that doesn't allow Arpab to be completely performing the functions provided by the Integrated Environmental Authorizations.

4 Summary of the main activities and results

Both companies and the working group from Arpab shown a good interest to the proposals and declared to be interested in producing a contribution for drafting of the guide lines.

Some of the simplifications that companies would expect are:

- reducing waiting periods for authorizations and permissions from the Region,
- being allow to perform an increased number of self-certification documents,
- simplifications of all the procedures to communicate any change about production system.

Arpab, on the other side, should be involved by the Basilicata Region during the drafting stage on the Monitoring and Control Plans in order to propose reduction on administrative inspection to advantage companies and organizations that, achieving an EMAS certificate, show a greater awareness to environmental issues.

Proposal	A new regional DGR for the reduction of inspections to companies with an environmental management system certificate ISO 14001 and/or EMAS registered.
Aim	Understanding of impacts of the reduction of inspections for both companies and ARPAB. Analysis of saving and benefits achieved by both: assessment of cost and efforts, saving and benefits, for Competent Authorities and private companies, comparing cost of inspections for ARPAB and rate paid by enterprises.
Competent Authorities involved	Basilicata Region ARPAB

Other actors involved	Enterprises subjected to AIA
Methodology	<p>1) Understanding with the collaboration of the working group from ARPAB of all the steps belonging to the procedure to be followed to give off an Integrated Environmental Authorizations</p> <p>2) Characterization of controls and inspections (kind of inspection, frequencies, identification of emission sources, recognition of all the components of the environmental matrix to be monitored, etc...) provided by the Monitoring and Control Plan</p> <p>3) Meetings with the working group from Arpab (leader and officials from the Department of Environmental and Territorial Monitoring and from Department of Operative Unit of Environmental Certification and Technical Activities)</p> <p>4) Interviews with n.2 companies and compiling a specifically prepared questionnaire</p> <p>5) Analysis of questionnaire results</p> <p>6) Comparison among all the procedures for the achievement or the maintenance of the Integrated Environmental Authorization and those implemented with the environmental management system ISO registered</p> <p>6) Drawing a summary report</p>
Data source	<p><i>Arpab</i></p> <p><i>Basilicata Region</i></p> <p><i>Companies involved in test activities</i></p>
Results	<p>N. organizations involved in test:3</p> <p>Questionnaire: 2</p> <p>Need for Arpab to be involved in drawing the Monitoring and Control Plan to be attached to AIA</p> <p>Need for reduction of administrative burdens</p>
Timing	September 2013 - February 2014

5 Annexes

Filled Questionnaires.

Pilot area	<i>Basilicata</i>
Name of the tested proposal	Simplifications on authorizations of enterprises with an EMAS or ISO 14001 EMS belonging to supply chains, reducing administrative burdens, time to obtain the authorizations and simplification of the technical and administrative documentation.

1 Introduction to the report

This document displays the results obtained with testing activities on the simplifications on authorizations of enterprises with an EMAS or ISO 14001 EMS belonging to supply chains. The aims of this simplification are reducing administrative burdens and time to obtain the authorizations and the reduction of the technical and administrative documentation.

Among all sectors belonging to supply chains (Agriculture, Enterprises, Tourism) the working group chose to test the proposal on enterprises sector, involving some organizations belonging to Industrial Development Consortium of the Province of Potenza.

Some companies from the Baragiano Industrial Area were interviewed in order to know present procedures about waste management and their agreement with the proposal.

These conversations show a satisfactory agreement with the simplifications even though several deficiencies about the current Industrial Area Management.

2 Aim of the test and methodology

The tested simplification consists into prospect a common waste storage area to service the entire industrial area, whereas the ASI itself is considered as "the place of production of waste". The management of this area should be assigned to an external managing authority in possession of all the authorizations provided for by law.

An appropriate questionnaire, including three main sections, was edited:

- the first section was committed to collect useful informations about the organizations such as actual procedures and costs incurred for all kind of waste disposal;
- the second was committed to understand the agreement with the current industrial area management about the waste setting;
- the last one was aimed to test the acceptance for the proposal.

Four companies belonging to the Industrial Area of Baragiano were selected and contacted to test the simplification.

3 Analysis of the test activities and results

The comparison with four of the companies belonging to the industrial area of Baragiano, managed by the Consortium for Industrial Development of the Province of Potenza, revealed a good interest for the simplification.

Respondents declared that the presence of an only storage area for the entire industrial area would benefit interviewed enterprises and the management by an external subject would imply a reduction of the time, currently believed to be particularly burdensome, to be spent for the compilation of all the documents provided for by law.

Respondents, however, highlighted actual deficiencies about the Industrial Area Management that doesn't provide any service in favor of companies belonging to the consortium.

4 Summary of the main activities and results

Proposal	Simplifications on authorizations of enterprises with an EMAS or ISO 14001 EMS belonging to supply chains, reducing administrative burdens, time to obtain the authorizations and simplification of the technical and administrative documentation.
Aim	Understanding of administrative burdens for enterprises belonging to supply chains and identification of a simplifying executive procedure to obtain authorizations for registered EMAS trade association and enterprises.
Competent Authorities involved	Basilicata Region Consortium for Industrial Development of the Province of Potenza
Other actors involved	Enterprises belonging to the Baragiano Industrial Area - Consortium for Industrial Development of the Province of Potenza -
Methodology	<ol style="list-style-type: none"> 1) Analysis of current procedures related to waste management enforced by enterprises belonging to an Industrial Area and supposing possible simplification to be implemented 2) Selection of Baragiano Industrial Area belonging to the Consortium for Industrial Development of the Province of Potenza 3) Meetings and interviews with four companies and compiling a specifically prepared questionnaire 4) Analysis of questionnaire results 5) Comparison between current waste management system and an hypothetical common waste storage managed by an external managing authority 6) Drawing a summary report
Data source	Enterprises involved in testing activities: 4
Results	Questionnaires results Need to solve current critical situations about costs to be paid with the waste fee
Timing	September 2013 - February 2014

5 Annexes

Edited questionnaire to conduct interviews.

Pilot area	<i>Basilicata</i>
Name of the tested proposal	A new regional DGR for the reduction of costs incurred to achieve and renew AIA reserved to companies with an environmental management system certificate ISO 14001 and/or EMAS registered.

1 Introduction to the report

This proposal is aimed to propose a costs reduction to be applied to investigations and inspections on Integrated Environmental Authorization, in accordance with DM April 24th, 2008, provisioning a price list including a discount for all organizations with an environmental management system proved by ISO 14001, ISO 16001 or EMAS certification.

This discount reserved to industrial sector, to the management of waste sector and to the livestock industry, should be applicable both to charges for investigations and controls and for activities to be executed during each inspection.

The testing in field activities were conducted to understand impacts caused by reduction of inspections for both companies and ARPAB: assessment of cost and efforts, saving and benefits, for Competent Authorities and private companies, comparing cost of inspections for ARPAB and rate paid by enterprises.

These activities were managed with some selected organizations and some officials from Arpab.

2 Aim of the test and methodology

This proposal has been tested conducting studies and audits aimed to identify measures that could represent a greater opportunity for the dissemination of EMAS.

The first study was designed to assess which kind of companies are currently subjected to Integrated Environmental Authorization: most of them are from the sector of waste landfill and other waste treatment but there are some organizations from industrial sector and from livestock industry.

The test phase was conducted involving both the Regional Agency for Environmental Protection and some appropriately selected companies with the purpose to compare procedural burden and costs supported by each of them.

The comparison with ARPAB occurred during a series of meetings with leaders and officials from the Information Monitoring Control and Prevention Sector and the Environmental Certification

Operating Unit and Technical Activities. During these meetings all the contents of the simplification proposal were exposed and all issues related to the AIA were addressed. Furthermore, in order to quantify costs to be supported for inspections and administrative controls, referring to the same selected companies, it was asked to fill in a table relating to staff costs, analysis costs, and costs related to inspections.

3 Analysis of the test activities and results

In order to quantify costs incurred by the Regional Agency for inspections and administrative controls, unit costs and all the essential data to quantify the staff cost, the costs of analysis and those related to inspections were required.

Procedures related to control activities carried out by the Agency consist of several stages involving different actors which have a different duration according to the variables linked with the specific analyzed practice and with internal organization.

Inspections usually involve a Manager, an official and a specialist technician who, in order to examine the practice and prepare all the documents, spend n. 6 hours on the average.

The inspection lasts n.9 hours on the average and involves a working team of at least two people, who can be officials or specialists according to the kind of operations to be performed , the number of sample taking, the specificity of the environmental matrix components and the characterization of the analytes to be tested.

Surveys in self-control regime have a duration in 6 and 9 hours on the average and require the presence of different actors depending on the same variables previously reported.

Sampling and emissions controls, usually last 9 hours and they are planned and organized according to the kind of control and, therefore, the specific skills required by role.

A final report is drawn up after the inspection and it requires the involvement of at least two people, who may be two officials or one official and a manager, for an estimated time of 2 hours on the average.

Costs incurred by Arpab for inspections, regardless of the specific costs of sampling (instrumentation and equipment, laboratory analysis, etc ...), are calculated referring to a unit cost equal to € 61.97 / h for Managers, € 46.48 / h for officials, 30.00 € / h for technicians. This cost also includes costs related to the travel expenses.

These costs, to be assumed on the average, doesn't include all the variables linked to the specificities of individual files.

The cost of the sampling and the subsequent processing and analysis, for example, can be different depending on the number of emission points, the number and type of analytes to be monitored, and the frequency with which such tests should be repeated throughout the year.

All these informations are included into the document attached to the DGR that confers the Integrated Environmental Authorization.

Referring to the same interviewed companies Arpab provided costs incurred by companies for inspections which took place during the self controls sampling.

Arpab has available an information system which includes the information and data relating to the plants, the components of the environmental matrix on which the productive activity appears to be impacting and, for each of them, the relevant data in order to characterize and quantify rates (number of emission sources, number of discharges, electromagnetic fields, etc ...).

With all the collected data it was possible to evaluate an order of size of costs incurred by Arpab and by companies for administrative inspections.

4 Summary of the main activities and results

Both companies and the working group from Arpab showed a good interest to the proposals and declared to be interested in producing a contribution for drafting of the guide lines.

Data collected during all the meetings occurred with the working group by Arpab allow to compare costs supported by both Arpab and companies to be compliant to all the administrative inspections and controls.

The rationalization of controls and the reduction of frequencies could be a relevant benefit for the companies; in this way, furthermore, Arpab could be allowed to establish a different internal organization and a better allocation of the economical resources.

Proposal	A new regional DGR for the reduction of costs incurred to achieve and renew AIA reserved to companies with an environmental management system certificate ISO 14001 and/or EMAS registered.
Aim	Evaluation of impacts obtained with the reduction of fees for achievement and renewal. Test of economic savings and benefits obtained with the reduction of fees for EMAS and/or ISO registered organizations. Comparison between costs incurred to achieve EMAS certification and economic saving obtained with the implementation of the proposal.
Competent Authorities involved	Basilicata Region, ARPAB
Other actors involved	Enterprises subjected to AIA
Methodology	<ol style="list-style-type: none"> 1) Understanding with the collaboration of the working group from ARPAB of all the steps belonging to the procedure to be followed to give off an Integrated Environmental Authorizations 2) Characterization of controls and inspections (kind of inspection, frequencies, identification of emission sources, recognition of all the components of the environmental matrix to be monitored, etc...) provided by the Monitoring and Control Plan 3) Meetings with the working group from Arpab (leader and officials from the Department of Environmental and Territorial Monitoring and from Department of Operative Unit of Environmental Certification and Technical Activities)

	<p>4) Evaluation of cost incurred by enterprises for surveys in self-control regime performed by Arpab</p> <p>5) Evaluation of costs incurred by Arpab for inspections, regardless of the specific costs of sampling (instrumentation and equipment, laboratory analysis, etc ...), on the average</p> <p>6) Interviews with n.2 companies and compiling a specifically prepared questionnaire</p> <p>7) Analysis of questionnaire results</p> <p>8) Comparison between costs incurred by Arpab and enterprises for administrative inspections</p> <p>9) Drawing a summary report</p>
Data source	<p>Unit costs incurred by Arpab for staff costs, analysis costs, and costs related to inspections.</p> <p>Costs incurred by companies for inspections in self control system.</p>
Results	<p>N. organizations involved in test: 3</p> <p>Questionnaire: 2</p> <p>Unit costs incurred by Arpab to perform inspections</p> <p>Costs incurred by companies for inspections provided into the self-control system</p>
Timing	September 2013 - February 2014

5 Annexes

Summary data tables including costs supported by companies for inspections happened during self control sampling.

Summary data tables including all the data considered to calculate cost to be paid by companies.

FRIULI VENEZIA GIULIA

Pilot area	Friuli Venezia Giulia
Name of the tested proposal	Simplifications of the procedure relating to environmental controls and inspections for organizations with an ISO 14001 or EMAS certified EMS.

1 Introduction to the report

The present document provides a brief description of the testing-in-field activities carried out in Friuli Venezia Giulia region regarding to the proposal of regulatory relief dealing with simplifications of the procedure relating to environmental controls and inspections for organizations with an ISO 14001 or EMAS certified EMS.

More in detail this report gives account of the methodology used for the testing of the proposals, the actors involved and the main results achieved.

2 Aim of the test and methodology

The test of this proposal n. 1 consisted on the definition of new procedures and forms for the compliance related to the commitments of ex-directive IPPC, now the industrial emissions directive 2008/01/CE adopted in Italy with the D. Lgs 128/2010. These new procedures, collected in a guideline attached to the report, are foreseen to be shared by control authority and enterprises.

It has been done a simulation using those documents and procedures the same time that the official existing procedure, in a selection of 3 enterprises of industrial sector that have the Environmental Integrated Authoritation and an environmental management system certified ISO 14001.

These companies has been identified by ARPA FVG and they have been contacted by Ambiente Italia to participate to the test: one in the province of Trieste, one in the province of Udine and one in the province Pordenone.

Once the simulation were completed with the support of an specialized technician of Ambiente Italia, guideline have been completed and share with regional authority.

3 Analysis of the test activities and results

Main results of the test activities for this measure:

- ✓ Enterprises involved in test: n. 3

- ✓ Meeting with public authority ARPA Friuli Venezia Giulia: n. 4
- ✓ One regional guideline related to environmental controls and inspections for organizations with an ISO 14001 or EMAS certified EMS.

4 Summary of the main activities and results

Proposal	Simplifications of the procedure relating to environmental controls and inspections for organizations with an ISO 14001 or EMAS certified EMS.
Aim	To analyze how is possible to simplify the procedure relating to environmental controls and inspections for organizations with an ISO 14001 or EMAS certified EMS.
Competent Authorities involved	ARPA Friuli Venezia Giulia (general services and provincial departments) Friuli Venezia Giulia Region
Other actors involved	Enterprises (with and without EMS ISO 14001 or EMAS).
Methodology	<ol style="list-style-type: none"> 1) Definition of new procedures and forms shared by control authority and enterprises and the creation of forms for the communication of annual data to be presented and used by firms: it was prepared a draft of the guidelines the 04/12/2013 and the final version the 28/02/2014. 2) Analysis of potential beneficiaries of the measure (IPPC companies with an ISO 14001 or EMAS certified EMS). 3) Simulation using them at the same time that the official existing procedure, with a selection of 3 enterprises ISO 14001, two from the metal and mechanics industry sector and one from furniture sector. Activity done in January 2014. 4) Results' analysis, finalization and share with regional authority of the final version of guideline.
Data source	ARPA FVG
Results	<ul style="list-style-type: none"> - Enterprises involved in test: n. 3 - Meeting with public authority ARPA Friuli Venezia Giulia: n. 4 - Confirmation on the necessity of this measure in the region - One regional guideline related to environmental controls and inspections for organizations with an ISO 14001 or EMAS certified environmental management system.

Timing	July 2013 – February 2014
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5 Annexes

- 1) Final report on testing activities: “FRIULI VENEZIA GIULIA: REGOLAMENTO REGIONALE PER UNIFORMARE LE REGOLE UTILIZZARE NELLE CONFERENZE DEI SERVIZI” (in Italian)
- 2) Guideline “Linee guida per l’introduzione di semplificazioni del procedimento in materia di controlli ambientali e riduzione delle ispezioni per le aziende in possesso di certificazione ISO 14001 e Registrazione EMAS ai sensi del Regolamento CE 1221/200)” (versione 02 del 28/02/2014 (in Italian)
- 3) List of companies with a EMS and EIA.
- 4) Presentation letter for the enterprises involved in the activities (in Italian)
- 5) Data sheet for the collection of data after the simulation (in Italian)
- 6) Reports about the results of each enterprises’ simulation (in Italian)

Pilot area	Friuli Venezia Giulia
Name of the tested proposal	Reduction of costs of preliminary authorization charges and costs of routine checks for companies with an environmental management system certified ISO 14001 or EMAS with an Integrated Environmental Authorization (IPPC directive)

1 Introduction to the report

The present document provides a brief description of the testing-in-field activities carried out in Friuli Venezia Giulia region regarding to the proposal of regulatory relief dealing with simplifications of the reduction of costs of preliminary authorization charges and costs of routine checks for companies with an environmental management system certified ISO 14001 or EMAS with an Integrated Environmental Authorization related to IPPC directive.

More in detail this report gives account of the methodology used for the testing of the proposals, the actors involved and the main results achieved.

2 Aim of the test and methodology

The aim of the test was to do an analysis of economic impact of the proposal comparing cost of inspections for ARPA and rate paid by enterprises.

The test has consisted on a compare analysis of measure’s impact: assessment of cost and efforts, saving and benefits, for Competent Authorities (ARPA FVG) and private companies.

Ambiente Italia established a working group with officials from ARPA FVG, central and provincial units. With then different documents and an excel table was prepared to get information on the cost of inspections for ARPA FVG and rate paid by the organization. The sample was of 10 representative enterprises.

The analysis of the results has allowed to define how to reduce inspections though the definition of a regional guideline (activity linked with the test of Proposal n. 1).

3 Analysis of the test activities and results

The main result of the test activities is the confirmation on the necessity of this measure in the region. Ten enterprises and the main competent authority related to IPPC directive in the Region have been involved in the test. Thanks to the results' analysis and conclusions, Ambiente Italia and ARPA FVG have prepared one regional guideline related to environmental controls and inspections for organizations with an ISO 14001 or EMAS certified environmental management system (activity linked with the test n. 1).

4 Summary of the main activities and results

Proposal	Reduction of costs of preliminary authorization charges and costs of routine checks for companies with an environmental management system certified ISO 14001 or EMAS with an Integrated Environmental Authorization.
Aim	Analysis of economic impact: assessment of cost and efforts, saving and benefits, for Competent Authorities and private companies, comparing cost of inspections for ARPA and rate paid by enterprises.
Competent Authorities involved	ARPA Friuli Venezia Giulia (general services and provincial departments)
Other actors involved	Enterprises (with and without EMS ISO 14001 or EMAS)
Methodology	<ol style="list-style-type: none"> 1) Establishment of a working group with officials from ARPA FVG, central and provincial units. 2) Analysis of economic impact: assessment of cost and efforts, saving and benefits, for Competent Authorities and private companies, comparing cost of inspections for ARPA and rate paid by enterprises. 3) Results' analysis, finalization and share with regional authority of the final version of guideline.
Data source	ARPA FVG

Results	<ul style="list-style-type: none"> - Enterprises involved in test: n. 10 - Confirmation on the necessity of this measure in the region - One regional guideline related to environmental controls and inspections for organizations with an ISO 14001 or EMAS certified environmental management system.
Timing	May 2013 – February 2014

5 Annexes

- 1) Final report on testing activities: “Friuli Venezia Giulia: Riduzione degli oneri per istruttorie autorizzative (Autorizzazione Integrata Ambientale) e costi dei controlli ordinari per imprese certificate ISO14001 e/o registrate EMAS.” (in Italian)
- 2) Guideline “Linee guida per l’introduzione di semplificazioni del procedimento in materia di controlli ambientali e riduzione delle ispezioni per le aziende in possesso di certificazione ISO 14001 e Registrazione EMAS ai sensi del Regolamento CE 1221/200)” (versione 02 del 28/02/2014 (in Italian)

Pilot area	Friuli Venezia Giulia
Name of the tested proposal	Rewarding conditions and incentives for EMAS registered municipalities relating to their functions in terms of air pollution, noise pollution, light pollution containment and energy saving.

1 Introduction to the report

This report describes the testing in field activities for the proposal about the need rewarding conditions and incentives for EMAS registered municipalities regarding their responsibilities in environmental issues.

The focus on the environment by public administrations is always higher (in GPP, in managing resources, managing waste collection, etc.) and municipalities have expressed interest in the regulation EMAS, that is seen as useful tool for managing many activities with environmental effects, for transparency and public communication of the results obtained, but also as a means of promotion and awareness for organizations in the territory of the correct and proactive asset management of the environment.

For the reasons described above, the objective of the measure is to create conditions more favorable to the EMAS registration of the municipalities of the Region Friuli Venezia Giulia

facilitating EMAS registered municipalities in the implementation of some of the legislative requirements dependent on them (especially some municipal plans).

This measure promotes the adhesion of Municipalities to EMAS registration, and makes it easier a regulatory compliance, required in order to obtain and maintain EMAS registration.

After an examination of regional legislation in force, focusing the research on the laws that already foresaw financial contributions from the Region to the municipalities for purposes required by law, there was the identification of the proposed amendment which sets out priorities to municipalities EMAS registered for the provision of regional contributions regarding the municipal plan on air pollution, plan for noise, plan of municipal lighting. Then the measure has been tested through the analysis of the status of implementation of municipal plans in the Region and interviews with the managers of the various municipalities.

The proposed changes can incentive the diffusion of EMAS in the towns even if the economic incentive alone is not enough to allow the execution of the procedures required due to the complexity of the context in which the plans are to be inserted.

2 Aim of the test and methodology

The aim of the test activities is to verify whether the economic incentives identified in the proposal for the EMAS registered municipalities can be effective to promote the diffusion of EMAS in public administration.

The measures identified are:

- 1) terms of priority for municipalities EMAS registered for the granting of contributions to municipalities for the implementation of the actions set out in the action plan to reduce air pollution in the event of exceeding the limits;
- 2) grant contributions up to 100% of eligible costs to municipalities for the elaboration of municipal noise abatement plan
- 3) grant contributions up to 100% of eligible costs to municipalities for the elaboration of the lighting plan and for the adjustment of the facilities and for the construction of street lighting systems with high efficiency

The methodology applied is divided into three phases:

The test was done following these steps in the period July 2013-February 2014:

- Cooperation with Regional government to evaluate the feasibility of the measure, getting information on the number of municipalities that have a certified EMS, overview on municipalities commitments (obligatory local plans). (July 2013- September 2013)
- Simulation on environmental benefits for the region. (October 2013-February 2014)
- Technical assistance for the implementation of the measure. (October 2013-February 2014)

The actors involved were Regional Government (official and regional Councillors, Inspection and Control Agency (ARPA FVG), EMAS/ISO 14001 registered municipalities (Udine, Porcia, Prata di Pordenone, Brugnera) and municipalities interested in certifications (Pordenone).

3 Analysis of the test activities and results

Data collection from ARPA FVG about obligatory local plans are:

- 1) only 5 municipalities (2.3% of the municipalities in the region) have adopted the plan of municipal action to reduce air pollution. Only one of these is registered EMAS (Udine).
- 2) 42 municipalities (20% of the municipalities in the region, 24% of territory involved) have adopted the plan for territory acoustic classification. 4 municipalities are EMAS registered, other 4 municipalities are ISO 14001 certified.
- 3) There are no data available about the number of municipalities that have adopted lighting plan. A few of the municipalities surveyed have adopted the plan.

Interviews were conducted with mayors, councilors, municipal officials (4 municipalities registered EMAS: Udine, Porcia, Prata di Pordenone, Brugnera, and 1 municipalities non certified and not registered: Pordenone) to check the progress of the plans and the expected benefit from the measure. All considered useful incentives that could definitely benefit provided for the execution of the plans and the related activities that could be included in environmental improvement plan for EMAS.

But the economic incentive alone is not enough to allow the execution of the procedures required due to the complexity of the context in which the plans are to be inserted.

The measure was presented to an official of Friuli Venezia Giulia Region (Lino Vasinis) to begin the evaluation of the feasibility of the measure, and it is being evaluated by some regional Councillors of the Friuli Venezia Giulia Region to start the legislative process of approval.

It is planned to joint hearing in council committees (environment ad enterprises) for the month of March 2014 after the end of the test phases.

4 Summary of the main activities and results

Proposal	Rewarding conditions and incentives for EMAS registered municipalities relating to their functions in terms of air pollution, noise pollution, light pollution containment and energy saving.
Aim	Prepare a data analysis about the need rewarding conditions and incentives for EMAS registered municipalities regarding their responsibilities in environmental issues.
Competent Authorities involved	Regional Government (official Lino Vasinis and regional Councillor Chiara Da Giau, Renata Bagatin)

Other actors involved	4 EMAS/ISO 14001 registered municipalities (Udine, Porcia, Prata di Pordenone, Brugnera) and 1 municipality interested in certifications (Pordenone).
Methodology	Cooperation with Regional government to evaluate the feasibility of the measure, getting information on the number of municipalities that have a certified EMS, overview on municipalities commitments (obligatory local plans).(July 13- Sept. 13) Simulation on environmental benefits for the region. (Oct. 13-Feb14) Technical assistance for the implementation of the measure.(Oct. 13-Feb14)
Data source	Inspection and Control Agency (ARPAFVG), 4 EMAS/ISO 14001 registered municipalities (Udine, Porcia, Prata di Pordenone, Brugnera) and 1 municipality interested in certifications (Pordenone).
Results	All the municipalities interviewed considered useful incentives that that can promote the execution of the plans and the related activities that could be included in environmental improvement plan for EMAS. But the economic incentive alone is not enough to allow the execution of the procedures required due to the complexity of the context in which the plans are to be inserted.
Timing	<i>Starting date: 20/06/13</i> <i>Ending date: 21/02/14</i>

5 Annexes

Final report in Italian: “Friuli Venezia Giulia: incentivi per amministrazioni comunali registrate EMAS per l’elaborazione e l’attuazione di piani comunali”.

Pilot area	Friuli Venezia Giulia
Name of the tested proposal	Incentives to certified organizations (ISO 14001, EMAS) or those with Ecolabel products of supplies to the public bodies (Green public procurement).

1 Introduction to the report

This report describes the testing in field activities for the proposal about incentives to certified organizations (ISO 14001, EMAS) or those with Ecolabel products of supplies to the public bodies (Green public procurement).

The measure provides that the Regional Finance Law contains an article providing incentives for

organizations with environmental certification in the procurement of goods and services. In this way establishes that public bodies in the preparation of tenders for the supply of goods and services, are required to provide additional scores for the products and / or services offered by the organizations certified (ISO 14001 and EMAS) or with product certifications (EU Ecolabel, EPD, FSC, etc..). Scores reward should be differentiated according to the type of environmental certification, focusing on organizations that have certifications required by European Regulations.

The proposal is to seize the opportunity presented by the purchases of goods and services by the public sector to enable companies with environmental certification system and / or product to gain a competitive advantage.

Then the measure has been tested through the analysis of the status of implementation of GPP in municipality with interviews with the managers of the various municipalities to assess the introduction of environmental requirements of the product or organization in the purchase process.

In the cases examined is already widely used the demand for environmental certification of the products and there is no demand for environmental certification system because it was considered unlawful. It is appropriate to establish clear and uniform to allow proper application of the scores reward for certification of management systems.

2 Aim of the test and methodology

The aim of the test activities is to verify whether the introduction of reward scores for products and organizations with environmental certification has already been implemented and if it promote the certified organizations to obtain the contract.

The methodology applied is divided into four phases:

The test was done following this steps in the period July 2013-Feb 2014:

- Cooperation with Regione Friuli Venezia Giulia to verify feasibility of procurement proposals
- Identify the procurement body to issue a request for proposals with the characteristics required by this new approach
- Verify results
- Definition of guidelines to uniform procedures

The actors involved were Regional Government (official and regional Councillors, EMAS/ISO 14001 registered municipalities (Udine, Porcia, Prata di Pordenone, Brugnera) or municipalities with no certifications (Pordenone), and Provincia di Pordenone. Indirectly was involved Consip, that is a national public company that provides consulting, service and support in favor of the government in the context of purchases of goods and services (public procurement).

3 Analysis of the test activities and results

During the interviews were examined about 10 tenders for the acquisition of goods (4) and services (10) and two regulations for the GPP (Provincia di Pordenone e Comune di Prata di Pordenone). It is almost always required environmental product certification. It is never required certification of the management system, even if the regulations so provide investigated.

This requirement is not introduced for fear of protests by the firms participating in the tender.

The explanation of the absence of any reference to the environmental certification system (ISO 14001 or EMAS) in tendering, both as a technical and professional requirements required or subject to score bonus, to be found in national and local regulatory uncertainty and fragmentation of purchases responsibilities in the public procurement.

The measure was presented to an official of Friuli Venezia Giulia Region (Lino Vasinis) to begin the evaluation of the feasibility of the measure. This stage is not yet complete

This measure has been evaluated by some regional Councillors of the Friuli Venezia Giulia Region to start the legislative process of approval.

Is planned joint hearing in council committees (environment ad enterprises) for the month of March 2014 at the end of the test phases.

Based on the experiences examined it can be said that the introduction of clear and defined in the regional law for the inclusion of scores to reward companies have environmental certification system and / or product would fill a gap in the legislation required to ensure a uniform and consolidated application of these criteria, however, already present in other forms of request, indicating that the sensitivity and attention of the public for the introduction of environmental requirements of service and product is still high and widespread.

4 Summary of the main activities and results

Proposal	Incentives to certified organizations (ISO 14001, EMAS) or those with Ecolabel products of supplies to the public bodies (Green public procurement).
Aim	The aim is to produce a report on how to reward companies from Friuli Venezia Giulia that are ISO14001 certified and/or EMAS registered in Green public procurement.
Competent Authorities involved	Regional Government (official Lino Vasinis and regional Councillor Chiara Da Giau, Reanata Bagatin), EMAS/ISO 14001 registered municipalities (Udine, Porcia, Prata di Pordenone, Brugnera) and 1 municipality interested in certifications (Pordenone). Provincia di Pordenone

Other actors involved	CONSIP (indirectly)
Methodology	<p>The methodology used is:</p> <ul style="list-style-type: none"> - Cooperation with Regione Friuli Venezia Giulia to verify feasibility of procurement proposals - Identify the procurement body to issue a request for proposals with the characteristics required by this new approach - Verify results - Definition of guidelines to uniform procedures.
Data source	Friuli Venezia Giulia Region, municipalities in the Region, Province of Pordenone
Results	<p>Based on the experiences examined it can be said that the introduction of clear and defined in the regional law for the inclusion of scores to reward companies have environmental certification system and / or product would fill a gap in the legislation required to ensure a uniform and consolidated application of these criteria, however, already present in other forms of request, indicating that the sensitivity and attention of the public for the introduction of environmental requirements of service and product is still high and widespread.</p> <p>The measure was presented to an official of Friuli Venezia Giulia Region (Lino Vasinis) to begin the evaluation of the feasibility of the measure. This stage is not yet complete.</p> <p>This measure has been evaluated by some regional Councillors of the Friuli Venezia Giulia Region to start the legislative process of approval.</p>
Timing	<p><i>Starting date: 20/06/13</i></p> <p><i>Ending date: 21/02/14</i></p>

5 Annexes

- Final report in Italian: “Friuli Venezia Giulia: Incentivare le organizzazione certificate (ISO 14001, EMAS o Ecolabel) nelle forniture agli enti pubblici (acquisti verdi, GPP)”.
- Draft of GPP guideline for Friuli Venezia Giulia Region, in Italian: “Linea Guida per gli Acquisti Verdi per gli Enti Pubblici della Regione Friuli Venezia Giulia”

Pilot area	Friuli Venezia Giulia
Name of the tested proposal	IRAP tax rate reduction for EMAS registered and ISO14001 certified companies

1 Introduction to the report

The reduction of the IRAP tax rate for EMAS registered and ISO14001 certified organizations is one of most desired type of measures, a *better regulation* proposal that deals with fiscal benefits.

This provision, already in force in Tuscany, would reward environmental commitment of registered/certified companies, through the implementation of a regular fiscal benefit. This would probably increase the number of registered companies since it provides great resource savings for companies, who could re-invest in continuous improvement of environmental management systems and their efficiency.

2 Aim of the test and methodology

The test of this proposal consisted on:

- The analysis of companies that have obtained the environmental certification and annual trends in the region, with the aim to estimate the potential for the application of the incentive;
- The analysis of the law that determines the rate of IRAP at the regional level and on the proceeds from the tribute;
- The IRAP introduction effects analysis on the basis of scenarios designed to cover the costs that companies incur for environmental certification and in relation to their environmental performance (virtuous firms);
- Analysis of the effects of the introduction of the incentive on the revenue of the region, with some considerations of a qualitative nature relating to the corresponding benefits.

3 Analysis of the test activities and results

This proposal can produce significant benefits for both organizations and for the environment. The organizations could maintain or acquire environmental certification using the savings for the concessional rate to cover the costs of the environmental management system, but also part of the investment needed to improve the environmental performance of the company.

The whole community can benefit from an increase in environmental quality in the regional system, with a saving of the cost to restore the pollution situations not quantified for the purposes of this test. Moreover, among the indirect benefits, consideration should be given to increase the competitiveness of enterprises, with the environmental certification can position themselves in the market with processes and cleaner products.

The impact on tax income in the region would be modest, because the benefits provided would have an impact on total revenue for a percentage less than 3%, but an increase in the number of organizations registered / certified variable between 20% and 23%.

4 Summary of the main activities and results

Proposal	IRAP tax rate reduction for EMAS registered and ISO14001 certified companies
Aim	<ul style="list-style-type: none"> - Verify the benefit that companies can achieve in relation to the application of the incentive measure; - Provide a range of information to the Region on the effect of the incentive on regional legislation and the regional budget.
Competent Authorities involved	Friuli Venezia Giulia Regional government
Other actors involved	-
Methodology	<ul style="list-style-type: none"> - The analysis of companies that have obtained the environmental certification and annual trends in the region, with the aim to estimate the potential for the application of the incentive; - The analysis of the law that determines the rate of IRAP at the regional level and on the proceeds from the tribute; - The IRAP introduction effects analysis on the basis of scenarios designed to cover the costs that companies incur for environmental certification and in relation to their environmental performance (virtuous firms); - Analysis of the effects of the introduction of the incentive on the revenue of the region, with some considerations of a qualitative nature relating to the corresponding benefits.
Data source	Friuli Venezia Giulia Region
Results	The impact on tax income in the region would be modest, because the benefits provided would have an impact on total revenue for a percentage less than 3%, but an increase in the number of organizations registered / certified variable between 20% and 23%.
Timing	December 2013 – February 2014

5 Annexes

Final report on testing activities: “Friuli Venezia Giulia: agevolazioni IRAP per le imprese con sistemi di gestione ambientale registrati EMAS o certificati ISO 14001” (in Italian)

LIGURIA

Pilot area	Liguria
Name of the tested proposal	Reduction of inspections through new rules and operational proposals for EMAS registered and ISO14001 certified companies

1 Introduction to the report

With this report we describe the steps made in order to obtain from Liguria Region new rules concerning the reduction of environmental inspections and a different and rational way to proceed with controls concerning EMAS registered and ISO14001 certified companies. The assumption of new law it is not sufficient, so it has been decided to stimulate also the production of administrative acts by the competent authorities in order to give effect to the law.

2 Aim of the test and methodology

The aim has been to verify the required steps to make the regulation operational , support the region that will have to make the regulation operational by means of decisions in council or circulars enabling actual simplification of controls effective 2014.

The **methodology** applied consisted in Confindustria cooperation in drafting the content of the new regulation by means of:

- pressure by Confindustria on the competent authorities to approve the 2014 Annual Plan of Environmental Controls within the legislated timeframe;
- cooperation between Confindustria and Arpal through a dedicated working group aimed to the approval of new control proceedings on certified firms;
- pressure by Confindustria on the competent authorities for the approval of regional agreements with other relevant entities to align the management of controls;

The **actors involved**: Liguria Region, Regional Environmental Control Agency (ARPAL Liguria), Emas registered or ISO 14001 certificated companies and private organizations.

3 Analysis of the test activities and results

First meeting with ARPAL to make pressure for the approbation of the 2014 annual plan of environmental controls has taken places on the 30th September. During the meeting Confindustria described the simplification proposal to ARPAL, the test project and the results expected.

ARPAL confirmed its interest in this activity and confirmed that the Annual Plan of Environmental Controls within the legislated timeframe will sent to Liguria Region within December 2013. As a result ARPAL has adopted the Plan with its own act: *Decreto del Direttore Generale n. 255 del 23/12/2013 "Piano annuale delle attivita` di ARPAL contenente il Programma annuale dei controlli*

ambientali di cui all'art. 27 comma 3 della legge regionale 20/06, per l'anno 2014. Adozione della proposta di piano."

The Plan is now under Regional examination and would have to be approved as soon as possible as it is or with new prescriptions .

We are still waiting for the official approval.

Confindustria and Arpal decided to organize a Working Group on February 12 during a meeting. The subjects has decided the necessary actions to reach a new control proceeding consisting in:

- Controls guide lines
- training for the environmental inspectors
- check list approved as a model by Confindustria and submitted to Arpal agreement that will be used by certificated firms to simplify the control activities
- real support to the effective acceptance of autocertification.

Confindustria obtained the approval and the publication of a regional / Guardia di Finanza agreement with the DGR n.1504 del 29/11/2013. The act contains some of the main finalities informing the project of controls rationalization and has been the result of Confindustria attitude towards the competent authority. The main achievement is the fact that in the agreement is declared that in order to rationalize, to cut or to simplify the acts of the controller will be taken into account the status of certificated company with reference to the environmental situation.

This achievement is a first step finalized to a real control simplification and Confindustria believes that, taken into account that there is a legal base underneath the regional /Guardia di Finanza agreement (art. 14, par. 5, D.L. 9 febbraio 2012, n. 5 converted in law 4 aprile 2012, n. 35) , the same simplification intent will inform other future agreement between the institutional competent authority and other control entity acting on the territory.

4 Summary of the main activities and results

Proposal n. 1	Reduce inspections through new rules and operational proposals for EMAS registered and ISO14001 certified companies
Aim	Verify the required steps to make the regulation operational , support the region that will have to make the regulation operational by means of decisions in council or circulars enabling actual simplification of controls effective 2014.
Competent Authorities involved	Liguria Region, Regional Environmental Control Agency (ARPAL Liguria).
Other actors involved	Emas registered or ISO 14001 certificated companies and private organizations .

Methodology	<ul style="list-style-type: none"> - preassure by Confindustria on the competent authorities to approve the 2014 Annual Plan of Environmental Controls within the legislated timeframe; - cooperation between Confindustria and Arpal throught a dedicated working group aimed to the approval of new control procedings on certified firms; - preassure by Confindustria on the competent authorities for the approval of regional agreements with other relevant entities to align the management of controls.
Data source	meetings
Timing	<p>Starting date: 30/09/13</p> <p>Ending date: 28/02/14</p>

5 Annexes

Minutes concerning 30 September 2013 and 12 February 2014 meetings
DGR 1504/2013

Pilot area	Liguria
Name of the tested proposal	Implementation of simplification via regulation to reduce the procedural times for the approval of the rain water management for EMAS registered and ISO14001 certified companies

1 Introduction to the report

According to the lack of explicitness of the regional regulation of the rain water management Confindustria tried to obtain a most helpful specification in the law in order to give to the firms the legal possibility to present a rain water management plan without the need of an authorization by the competent authority.

2 Aim of the test and methodology

The **aim** has been to demonstrate that the actual regional law is not clear because all provinces operate with different procedural times for the approval of the rain water management, and the procedural time can be shorter for EMAS registered and ISO14001 certified companies.

The **methodology** applied consisted in the verification with provincial authorities of the effective time savings in administrative procedures by granting approval of rain management plans through acknowledgement versus authorization.

The **actors involved**: Liguria Region and provinces.

3 Analysis of the test activities and results

Confindustria has checked the provincial authorities:

- Genova, Imperia e La Spezia: the Plan must be approved by authorization in 90 days time.
- Savona: the Plan it is not authorized by the Province that simply agrees to it, saving time and procedures.

The four Provinces have declared they are willing to accept any change of procedure if the regional regulation will be clearly modified by law, in order to indicate the exact behavior.

The provinces, with the exception of Genova, agree with any form of simplification and confirm to be positive about a sort of standard procedure that could easily get to shorter terms.

4 Summary of the main activities and results

Proposal n. 2	Implementation of simplification via regulation to reduce the procedural times for the approval of the rain water management for EMAS registered and ISO14001 certified companies
Aim	Demonstrate that the actual regional law is not clear because all provinces operate with different procedural times for the approval of the rain water management, and the procedural time can be shorter for EMAS registered and ISO14001 certified companies
Competent Authorities involved	Liguria Region and provinces
Other actors involved	Confindustria
Methodology	Verification with provincial authorities of the effective time savings in administrative procedures by granting approval of rain management plans through acknowledgement versus authorization.
Data Source	Phone contacts with referents of provincial authorities
Timing	Starting date: 30/09/13 Ending date: 15/12/13

5 Annexes

None.

Pilot area	Liguria
Name of the tested proposal	Increase the % of the reduction of guarantees, approved with Delib.G.R. 3-8-2012 n. 1014, concerning landfills and waste treatment plants EMAS registered and ISO14001 certified .

1 Introduction to the report

The meaning of the proposal test takes place from the fact that the four Provinces do not follow the regional law indications concerning the percentage of the reduction of guarantees.

2 Aim of the test and methodology

The aim has been to verify the real effects of the reduction till now, and to analyse the economic impact on companies of the new stronger reduction.

The **methodology** applied consisted in Contact with regional/provincial authorities to identify the companies operating in the waste management sector in order to verify the standard of application of DGR 1041/13 and its effects on the companies budget.

Testing private and public situation:

- verify the real effects of the reduction at present ;
- analysis of economic impact of the new stronger reduction on companies, assessment of cost and efforts (cost of registration/certification), savings and benefits, etc.

The **actors involved**: Liguria Region.

3 Analysis of the test activities and results

On 24th October Confindustria has met the responsible of waste sector in Genoa Province. The result has been the formal acknowledge that the deliberation is not yet effective so that no firms has reached any discount.

The deliberation is now submitted to a modification maneuver aimed to fix different way of application and/or percentage of discount between EMAS registered and ISO14001 certified firms accordingly to their specific activities.

Imperia Province: telephone conversations indicate that the subject regulation is not applied: they are awaiting a revision of the subject regulation.

La Spezia Province: telephone conversations with the Province indicate that the subject regulation is not applied. As a result, there are no expectations of guarantee reductions for ISO14001 certified or EMAS registered companies. As of the publication date of the regulation, the Province was under trusteeship and to date no regulation has been implemented.

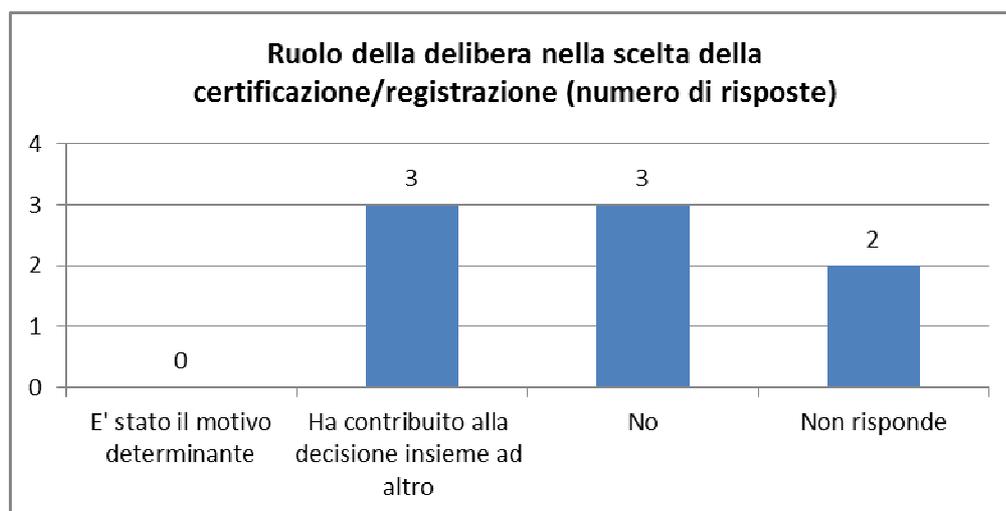
Savona Province: the regional regulation was implemented. Since, however, the discount percentages are lower than the former ones, the province has withdrawn the new regulation in a decision on Dec 17, 2013 at the request of both the other provinces and the companies affected.

With reference to the questionnaire fixed up by Confindustria, eight Liguria firms answered. The main results that you can read in the following templates are:

- Strong interest of the companies in the reduction increasing percentage of the guarantees.
- No interest of the companies in the actual content of the regional act due to the insufficient discount in the guarantees that is considered useless to achieve versus the great discharge of energy and costs to obtain or maintain the environmental certification.

Tab.1 CONOSCENZA E FRUIZIONE DELLA DELIBERA			
Certificate ISO14001/ registrate EMAS	Conoscenza della delibera regionale sulla riduzione delle garanzie finanziarie	Richiesta di usufruirne	Interesse all'aumento della % di riduzione prevista
75%	88%	63%	71%

Tab. 2 ANALISI DEI VANTAGGI NELL'USUFRIURE DELLA DELIBERA (numero di risposte)			
	Molto importanti	Poco importanti	Per nulla importanti
Riduzione di costi	1	3	
Risparmio di tempo		2	2
Migliori relazioni con le autorità competenti			2
Migliore motivazione aziendale nel mantenere la certificazione		1	1



4 Summary of the main activities and results

Proposal n. 3	Increase the % of the reduction of guarantees, approved with Delib.G.R. 3-8-2012 n. 1014, concerning landfills and waste treatment plants EMAS registered and ISO14001 certified .
Aim	The aim is to verify the real effects of the reduction till now, and to analyses the economic impact on companies of the new stronger reduction
Competent Authorities involved	Liguria Region
Other actors involved	Provinces and private companies operating in the waste management sector
Methodology	- Contact with regional/provincial authorities -verify the standard of application of DGR 1041/13 - analysis of economic impact
Data Source	phone contact with provincial referents
Timing	Starting date: 30/09/13 Ending date: 28/02/14

5 Annexes

Questionnaires

Pilot area	Liguria
Name of the tested proposal	Introduction of reward criteria for the adoption of ISO14001 and/or EMAS certified management systems in the wording of “green” procurement documents for the purchase of goods and services by the Public Administration

1 Introduction to the report

The proposal takes in consideration goods and services categories that are quoted in the National Plan of Action (PAN), aimed to the GPP (Green Public Procurement) particularly important are the services towards which it is possible to demand the certification ISO 14001 and/or EMAS registration as a selection criteria for the candidates. The main services that have been chosen by the law following the Minimum Environmental Criteria (CAM) are: cleaning services, buildings energetic efficiency and catering services. In the future could be possible to enlarge the list of main services including waste management.

The key element to allow the participation to the bid is the environmental certification.

In the last few years, in the Liguria contest, a choice has been made with reference to the most significant bids activated by the local authorities.

2 Aim of the test and methodology

The aim is to verify how many procurement bodies choose the environmental criteria in its public procurements and the results obtained.

The **methodology** applied consisted in cooperation with Regione Liguria to verify feasibility of procurement proposals :

- Identify the procurement body to issue a request for proposals with the characteristics required by this new approach
- Selection of the bids with a relevant money value;
- Verify results

The **actors involved**: Liguria Ricerche.

3 Analysis of the test activities and results

Confindustria verified that the public authorities which have published a public procurement with the characteristics required by this new approach are:

- 1)Municipality of Pietra Ligure: a proper environmental management of waste collection services and public streets cleaning services

2) Municipality of Genoa: cleaning

3) Liguria Region: stationary – cleaning - toner

Description

1) On January 2013, the Municipality of Pietra Ligure have published a public tender on a proper environmental gestion of waste collection services and public streets cleaning services including the request for proposals asks for proof of certification ISO 14001 and/or EMAS registration.

The request for bids specifically mentions environmental sustainability as a requirement in waste treatment.

The municipality of Pietra Ligure is highly regarded for their environmental sustainability policies with particular attention to differentiated garbage collection on account of both the percentage achieved and the service improvement with door to door coverage. This area has been a major focus of the administration. The sustainability requirement in bids is part of the municipality's overall sustainability approach.

The municipality itself is ISO14001 certified and is particularly engaged in fostering compliance with environmental regulations through information initiatives for the population primarily focused on the provision of sustainable environmental services.

The bid requests are for a six year contract with possibile extention to a further three years for a total of 12 million euros, a sizeable contract. The selection criterion is best offer based with 70/100 given to technical characteristics and the balance focused on quality of service. ISO9001 and ISO14001 are requirements.

Two certified companies have submitted a proposal.

2) In the Official Records of March 22, 2013 the Municipality of Genova published a request for submissions by registered companies for low environmental impact cleaning services in the municipality's premises.

The request was issued by the centralized municipal bid manager (SUAC) which handles all relevant submissions open to registerd providers.

The municipality of Genova includes the issue of "green purchases" in its environmental sustainability policies, particularly within specific programs such as SMART CITIES and the Mayors' Pact.

The request for proposals makes specific reference to minimum environmental criteria for cleaning services. As proof of the ability to apply appropriate environmental protection measures to minimize possibile impacts, proposal requirements include the adoption of a SGA aligned to EMAS or ISO14001.

We note that products to be used in the cleaning service must have proof of environmental suitability with preference for Ecolabel designation or alternatively other ISO type 1 designations or a declaration of product conformity with such designations.

With respect to selection criteria, 60 percent focus on technical features – 20% to solutions intended to reduce the environmental impact and 40% to economic factors. The total contract value was 3 million euros over 3 years.

3) Liguria region has a regional law (l.r.31/07) to promote "green" purchases on its territory. This anticipated the adoption of three-year plans for green purchases for municipalities with over 2000

people and for public service entities. The region has also undertaken sensitivity training using, among others, European funded programs and developed a regional framework for the green purchase plan.

In 2013 the region launched the Centralized Unit for submissions (SUA) which currently structures frameworks for the entire region and the local entities wanting to participate.

In 2013 the region activated requests for proposals with green features making referente to CAMs for the following categories:

- Paper (now closed). The request for proposals refers to the Ministry CAMs for both white and recycled paper. As to the quality of the paper, reference is made to sustainable forest management (FSC and PEFC designations). Request for a 3 year contract for 611,000 euros.
- Office products (issued Sept 12, 2012) request for the supply of traditional office products and related services with eco-sensitive characteristics. Within the product range, recognition by points is given to green features, particularly for paper products where mention is made of sustainable forest management (FSC and PEFC).
- Toner request issued July 26,2013. The request concerns the supply of material with reduced environmental impact for printing activities. A share of the toner to be from recycled product. One bid received for about 800,000 euros.
- Cleaning services at reduced environmental impact; bid request issued on March 21,2013 and still open. The request issued by the centralized unit refers to the CAMs. Beyond the requirement of reduced environmental impact, the request for proposals asks for proof of certification ISO9001, ISO 14001, OHSAS 18991, SA800. This shows particular attention to workplace safety and social criteria over and above attention to environment quality and management. Not yet allocated.

Tab.1. Verify bids

AUTHORITY	START DATE	SERVICES	AMOUNT (euro)	DURATION (months)	REQUESTS
Municipality of Pietra Ligure	Jan. 2013	waste collection services and public streets cleaning services	12 Mln	72	ISO9001 e/o EMAS
Municipality of Genoa	Mar. 2013	low environmental impact cleaning services in the municipality's premises	3 Mln	36	SGA in order to EMAS/ISO9001
Liguria Region	July 2013	material with reduced environmental impact for printing activities	800.000	36	-
Liguria Region	Apr. 2013	white and recycled paper	611.000	36	FSC and PEFC
Liguria Region	Mar.2013	Cleaning services at reduced environmental impact (not yet allocated)	13 Mln	48	ISO 9001, ISO14001, OHSAS18001, SA800
Liguria Region	Sept. 2012	traditional office products and related services with eco-sensitive characteristics	600.000	36	FSC and PEFC

The template clearly indicates with its results that despite the considerable amount of money that every different municipality bids put at firms disposal, a low number of firms applied because of the environmental certification boundary. Despite these results the local authority have to insist in offering the same kind of bids because the firms will understand that, due to the requested certifications, will be easy for the appliance to have the commission because a new space in the market has been created due to certification requirements.

4 Summary of the main activities and results

Proposal	Introduction of reward criteria for the adoption of ISO14001 and/or EMAS certified management systems in the wording of “green” procurement documents for the purchase of goods and services by the Public Administration
Aim	The aim is to verify how many procurement bodies choose the environmental criteria in its public procurements and the results obtained.
Competent Authorities involved	Regional Authorities
Other actors involved	Liguria Ricerche
Methodology	<ul style="list-style-type: none"> -Cooperation with Liguria Region to verify feasibility of procurement proposals; -Identify the procurement body to issue a request for proposals with the characteristics required by this new approach; - Selection of the bids with a relevant money value; -Verify results.
Data source	Liguria Region Municipalities
Timing	Starting date: 30/06/13 Ending date: 28/02/14

5 Annexes

Bids.

Pilot area	Liguria
Name of the tested proposal	Introduction in the 2014-2020 plan of specific economic measures applicable to the EU structural funds to co-finance environmental investments envisioned by the improvement programs for ISO 14001 and/or EMAS certified environment management systems

1 Introduction to the report

It is opinion of Confindustria that this sort of economic measure is extremely important in any environmental improvement that inform structural programs. In any case considered the role of Confindustria in the public/private economical and institutional relationship it is undoubtedly necessary the acting to obtain this sort of result that Confindustria desires to be the base that will inform and structure the 2014-2020 regional economic plan.

2 Aim of the test and methodology

The aim is to change the focus of the measure. A.G. co-finance the environmental investments for companies EMAS registered and ISO14001 certified.

The **methodology** applied consisted in Make pressure to Liguria Region in order to accelerate their understanding and acceptance of the proposal

The **actors** involved: Liguria Region, Filse

3 Analysis of the test activities and results

The test activities has been followed by Confindustria Liguria that cooperates with the national Industry Association (Confindustria) on a variety of common issues and particularly carries out a deep cooperation on the environment through workgroups shaping the relationship of Confindustria with the private and public sectors. It has to be considered that Confindustria Liguria has a direct involvement at the regional level on environmental, economic and administrative legislation. Furthermore, as a participant in consultative commissions, Confindustria Liguria supports the interests of local entrepreneurs in the sustainable interaction between entrepreneurial and environmental needs, that why the object of the present proposal reaches the goal of Confindustria duty.

To reach the mentioned result Confindustria has worked hard and continuously with the institutional subjects interacting and involved in the preparation of the POR 2014-2020 and has stressed with its professional and technical skills the real positive effects of the proposal on the environmental management.

The entire lobby activities that Confindustria has done towards Regione Liguria during the last year

had the target to obtain the regional convincement to the utility and importance to co-finance environmental investments and this target has been got.

4 Summary of the main activities and results

Proposal n. 5	Introduction in the 2014-2020 plan of specific economic measures applicable to the EU structural funds to co-finance environmental investments envisioned by the improvement programs for ISO 14001 and/or EMAS certified environment management systems
Aim	The aim is to change the focus of the measure. A.G. co-finance the environmental investments for companies EMAS registered and ISO14001 certified
Competent Authorities involved	Liguria Region, Filse
Other actors involved	Confindustria
Methodology	Make pressure to Liguria Region in order to accelerate their understanding and acceptance of the proposal
Data source	Lobby's activities
Timing	Starting date: 30/07/13 Ending date: 28/02/14

5 Annexes

None

LOMBARDY

Pilot area	Lombardy
Name of the tested proposal	1. Inspections re-organization within ARPA Lombardia by modification of Operative Instructions deriving from ARPA Guideline on inspections planning

1 Introduction to the report

Inspections are one of the most critical issues for companies to face. Lombard partners of BRAVE project thus decided to address the issue, by elaborating a regional measure to be tested. The *regulatory relief* proposal is to re-organize inspections, usually carried out by ARPA Lombardia local departments, through the modification of the Operative Instruction which provides inspections guidelines to companies under IPPC directive.

The idea is to better organize inspections in order to streamline them whenever an EMAS registration is in force, with the purpose of reward environmental commitment of EMAS registered organizations, whose data is moreover easily available and system is better managed.

2 Aim of the test and methodology

First of all one specific Operative Instruction has been selected, namely IO.SL.004 that settles inspections to companies under IPPC directive, with Inspection Sector Responsible. ARPA Lombardia (responsible for the measure) has proposed some changes in the text (see attached document "Modifiche IO SL 004") that would streamline the inspection. These changes has been shared and discussed with local departments.

Secondly participation at two inspections has been organized, in order to assess whether certified EMS documentation could be officially further valorised. ARPA local departments involved have been ARPA Varese and ARPA Pavia. Inspections took place on January 21st 2014 at Tramonto s.r.l. (Vergiate, VA) and January 29th 2014 at Ecodeco (Corteolona, PV).

3 Analysis of the test activities and results

Four modifications in the text have been proposed and approved by local departments (see attached document "Modifiche IO SL 004").

Participation at two inspection were organized and carried out in January 2014 to:

- Tramonto s.r.l. (Vergiate, VA) waste treatment company, January 21st 2014;

- Ecodeco / A2A S.p.A. (Corteolona, PV) waste treatment and disposal company, January 29th 2014. Participation at these inspections and discussions with inspectors from ARPA local departments revealed that Operative Instruction modifications could be likely to be approved and applied aiming at simplify and mainstream inspections to EMAS registered companies. As far as ISO14001 is concerned, this simplification would not be approved since the certification provides less guarantees than EMAS.

4 Summary of the main activities and results

Proposal	1. Inspections re-organization within ARPA Lombardia by modification of Operative Instructions deriving from ARPA Guideline on inspections planning
Aim	Valorisation of EMS documentation in ARPA Operative Instructions for information collection during inspections. EMAS registered or ISO14001 certified organizations [by an accredited body] should be subject to inspections that take into account and valorise their environmental commitment.
Competent Authorities involved	Regional Environmental Control Agency (ARPA Lombardia)
Other actors involved	2 ARPA local departments: Varese and Pavia 2 EMAS registered companies inspected by ARPA and operating under IPPC directive: Tramonto s.r.l. (Vergiate, VA) and a2a ex Ecodeco (Corteolona, PV)
Methodology	<ul style="list-style-type: none"> - Analysis of some inspections reports drawn up by ARPA Lombardia; - Analysis of ARPA Operative Instructions used during inspections; - Selection of operative instruction no. IO.SL.004 (companies operative under IPPC directive) - Simulation of the use of new forms for the communication that valorise the certified EMS documentation already drawn up; - Participation at 2 inspections, in order to assess whether certified EMS documentation could be officially further valorised.
Data source	<ul style="list-style-type: none"> - ARPA Operative Instructions; - ARPA inspections.
Midterm results	No. of Operative Instructions: 1; No. of organizations involved: 2; Associated costs: none.

Timing	<p>Starting date: June 2013</p> <p>Ending date: February 2014</p>
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5 Annexes

Enclosed to the report are most relevant documents produced during the testing activities (in Italian):

- IO per nuova LG controlli - modifiche_20131008 (.xls);
- IO.SL.004.Rev.03 - verifiche ispettive su aia (.pdf);
- Modifiche IO SL 004 (.xls);
- Nominativi aziende per sperimentazione controlli_20131021 (.xls);
- Verbale riunione del 15 ottobre 2013 con Porro-APC (.doc);
- Verbale VI A2A Ecodeco 29-01-14 (.pdf);
- Verbale VI Tramonto srl 21-01-14 (.pdf).

Pilot area	Lombardy
Name of the tested proposal	2. Financial guarantees reduction for waste disposal and recovery EMAS registered and ISO14001 certified plants and landfills

1 Introduction to the report

The present document provides a picture of the testing-in-field activities carried out at the Lombardy regional level with respect to the proposal of regulatory relief dealing with financial guarantees reduction for waste disposal and recovery EMAS registered and ISO14001 certified plants and landfills. The measure aims at reducing administrative burdens for organization with a certified EMS in force. It has been tested through a questionnaire sent by Federambiente to its associated companies.

2 Aim of the test and methodology

The measure proposes a higher financial guarantees reduction already foreseen by D.g.r. 19 novembre 2004 – n.7/19461, Annex C, point 10: -65% for EMAS registered organizations (instead of -50%) and -40% for ISO14001 certified companies (by an accredited body – instead of -25%).

Testing activities aimed at knowing actual benefits for companies and evaluating further ones whenever measure would come into force.

A questionnaire has been developed and shared with Federambiente, that sent it to its associated companies dealing with waste disposal and recovery in December.

3 Analysis of the test activities and results

Federambiente sent the questionnaire to its associated companies in December. We received back 19 questionnaires from different Italian regions, 42% of the total from Lombardy.

There is a clear prevalence of ISO14001 certifications: 63% of companies are ISO14001 certified only, whereas 32% are both certified with ISO and EMAS (just one company has no certified EMS). In Lombardy all companies are ISO14001 certified and 25% have both EMS in force.

All Lombard companies have taken advantage from existing financial guarantees reduction foreseen by D.g.r. 19 novembre 2004 – n.7/19461. This advantage however has represented the main reason, or one of the incentives for adopting a certified EMS only for 26% of companies (60% out of which in Lombardy). Yet, it represented an important advantage for the majority of companies (81% - grand total; 46% out of which in Lombardy) and a secondary advantage for the rest (19% - grand total; 66% out of which in Lombardy).

It is a very appreciated simplification measure, causing any bureaucratic difficulties in using it.

The last part of the questionnaire revealed that more than half of companies know about BRAVE project, and this percentage dramatically increases in Lombardy where 87.50% are acquainted with it.

4 Summary of the main activities and results

Proposal	2. Financial guarantees reduction for waste disposal and recovery EMAS registered and ISO14001 certified plants and landfills
Aim	Rewarding environmental commitment of EMAS/ISO14001 plants and landfills further reducing the request for financial guarantees up to 65% for EMAS registered plants and 40% to ISO14001 certified plants (by an accredited body).
Competent Authorities involved	Regional Government
Other actors involved	- Federambiente; - Federambiente associated companies.
Methodology	<ul style="list-style-type: none"> - Simulation, to test the simplification on a sample of organizations through a fact-finding questionnaire: <ul style="list-style-type: none"> - Sent to Federambiente's associated organizations; - To assess how many organizations have benefit from existing

	<p>financial guarantees reduction;</p> <p>- To assess the achievable higher savings from introduction of further percentage reduction;</p> <ul style="list-style-type: none"> - Analysis of questionnaire answers; - Final report.
Data source	Data from organizations replying to questionnaire
Results	19 filled questionnaire, 8 out of which from Lombard companies
Timing	<p>Starting date: September 2013</p> <p>Ending date: February 2014</p>

5 Annexes

Enclosed to the report are most relevant documents produced during the testing activities (in Italian):

- *Questionario Federambiente DEF (.doc);*
- *19 Questionari (.pdf);*
- *Questionari Federambiente BRAVE – Elab (.xls);*
- *Risultati indagine questionaria(.doc).*

Pilot area	Lombardy
Name of the tested proposal	3. IRAP fee reduction for EMAS registered and ISO14001 certified organizations

1 Introduction to the report

The reduction of IRAP fee for EMAS registered and ISO14001 certified organizations is one of most desired type of measures, since it deals with fiscal benefits. This is a *better regulation* proposal, that foresees a fee reduction from 3.9% to 2.98% for EMAS registered organization and to 3.4% (or 3.2%) for ISO14001 certified organizations by an accredited body.

It has been selected for the testing in field phase because of its critical aspects. Impacts and effects of the implementation of the measure has been assessed through the testing activities, both on

companies and PA side.

Companies have been assessed as beneficiaries of measure implementation whereas a likely negative economic impact has been assessed on regional balance sheet.

This provision, already in force in Tuscany, would reward environmental commitment of registered/certified companies, through the implementation of a regular fiscal benefit. This would probably increase the number of registered companies since it provides great resource savings for companies, who could re-invest in continuous improvement of EMS and system efficiency. It would cause lower income on regional balance sheet, therefore a compensation measure should be established.

2 Aim of the test and methodology

Test activities on the proposal aimed at studying economic impacts both on companies and on regional government.

As far as companies are concerned, all regional proposals were introduced during 2nd Regional Consultation Board (March 21st 2013) and participants were asked to apply for measure they were more interested in to test on their organization.

Three companies were selected for testing IRAP fee reduction measure: Autogrill S.p.A., Ressler s.r.l. and UniCredit S.p.A.. With each company ARPA Lombardia (responsible for the measure) has organized email and phone contacts and meetings, through which the proposal was explained in details and companies were asked to provide some data and information on IRAP paid in previous fiscal years. Once data has been collected, the reduced fee has been applied (2,98% instead of 3,9%) to IRAP taxable income of each company.

In one case it was possible to calculate the payback period of EMAS registration as well.

As far as regional side is concerned, Lombard partners were asked to assess the economic impact on regional balance sheet upon the hypothesis of IRAP fee reduction and consequent hypothesis of increase on EMAS registrations number. The result is the attached document "*Compensazione IRAP_ver4_20140117*".

3 Analysis of the test activities and results

Economic impact on companies

Three private companies were involved in testing in field phase (alphabetic order):

1. Autogrill S.p.A., food service and retail, large enterprise;
2. Ressler s.r.l., photovoltaic, SME;
3. UniCredit S.p.A., bank and financial services, large enterprise.

Each company has provided its data on IRAP taxable income on which new hypothetical IRAP to be paid has been calculated.

Savings has resulted as follows:

1. Autogrill S.p.A.: average (4 years) € 872,134.20 – total (4 years) € 3,488,536.80;

2. Ressler s.r.l.: average (5 years) € 10,209.29 – total (5 years) € 61,255.73;
3. UniCredit S.p.A.: average (4 years) € 14,914,165 – total (4 years) € 59,656,659.

For one company, namely Ressler s.r.l., it was possible to evaluate EMAS registration payback period, in form of IRR (internal rate of return) equal to 31.67% (using actual inflation rate 0.67%).

Economic impact on regional balance sheet

A report with economic impact assessment on regional balance sheet has been developed. First of all it studies IRAP fee reduction measure consequences in Tuscany region, where it was introduced in 2003 and it still in force. A comparison on EMAS registration rates follows, from which an hypothesis of “physiological differential” has been extrapolated, equal to 530%, representative of difference in EMAS growth rate between Tuscany and Lombardy from 2004 (1st year of enforcement of IRAP fee reduction in Tuscany) to 2007.

The report continues

- analyzing Lombard entrepreneurship status quo,
- calculating the average IRAP per employee for each dimensional class of enterprises and total IRAP paid by each class of enterprises,
- then calculating IRAP paid only by EMAS registered companies in Lombardy,
- applying the “physiological differential” to the number of EMAS registration and
- eventually estimating IRAP levy loss on regional balance sheet, consequence of increased number of registration and of reduced fee application. This is equal to € 58,659,186.65 and needs a compensation measure in order to fix the lower income.

Hypothetical compensation measure would come from increase of specific regional income, namely “special toll” for solid waste disposal and regional automobile tax. These two taxes has been selected upon specific characteristics:

- coherence: tax can be incremented according to “polluter pays” logic;
- economic sustainability: tax growth is economically feasible and sustainable.

4 Summary of the main activities and results

Proposal	3. IRAP fee reduction for EMAS registered and ISO14001 certified organizations
Aim	Rewarding environmental commitment of EMAS/ISO14001 companies in Lombardy region by IRAP fee reduction from 3.9% to: <ul style="list-style-type: none"> - 2.98% for EMAS registered companies; - 3.4% or 3.2% for ISO14001 certified organizations (by an accredited body).
Competent Authorities involved	Regional Government
Other actors involved	3 private companies: <ul style="list-style-type: none"> - Autogrill S.p.A. (food service and retail);

	<ul style="list-style-type: none"> - Ressler s.r.l. (Photovoltaic); - Unicredit S.p.A. (bank and financial services).
Methodology	<ul style="list-style-type: none"> - Simulation, to test the simplification on a sample of organizations; - Analysis of economic impact both on companies and regional balance sheet: assessment of cost and efforts (cost of registration/certification), savings and benefits when possible (payback period of the registration/certification obtained with the implementation of this measure).
Data source	Lombardy region balance sheets, companies
Midterm results	<p>No. of companies involved: 3</p> <p>Associated costs: savings for companies; lower income from IRAP fee and need for compensation (increasing other taxes/fees) in order to maintain regional economic and fiscal balance.</p>
Timing	<p>Starting date: June 2013;</p> <p>Ending date: February 2014.</p>

5 Annexes

Enclosed to the report are most relevant documents produced during the testing activities (in Italian):

- *Verbale primo incontro Ressler (.doc);*
- *Verbale primo incontro Unicredit (.doc);*
- *Calcoli sperimentazione IRAP (.xls);*
- *Compensazione IRAP_ver4_20140117 (.pdf).*

Pilot area	Lombardy
Name of the tested proposal	4. Valorization of the registration/certification when applying for the renewal of the IEA in case of substantial modifications

1 Introduction to the report

The present document provides a picture of the testing-in-field activities carried out at the Lombardy regional level with respect to the proposal of regulatory relief dealing with the Integrated Environmental Authorization (IEA) and the administrative proceedings related to its release and renewal.

More in detail this report gives account of the methodology used for the testing of the proposals, the actors involved and the main results achieved.

2 Aim of the test and methodology

The activities carried out at the regional level have aimed at testing one of the regulatory relief measures proposed and agreed upon by the Lombardy Regional Consultation Group (RCB), which is the measure of valorization of the EMAS registration/ISO 14001 certification in order to simplify the IEA renewal administrative proceedings, even in case of substantial and non-substantial modifications. The methodology has focused on the involvement of local authorities, namely the Region and two Provinces (Milan and Bergamo). These latter actors have been involved by means of an *ad hoc* regional roundtable, which has taken place on the 5th November 2013, aimed at identifying possible measures of regulatory relief for the administrative proceedings of release and renewal of the IEA in case of modifications. The focus of the work has been devoted to the reduction of the number of documents and red tape required to EMAS registered and ISO 14001 certified firms, with an eye on the possible valorization of the documents produced within the environmental management system (EMS), such as the initial environmental analysis, the environmental declarations, procedures, etc.

3 Analysis of the test activities and results

In occasion of the roundtable a series of companies cases, described by the representatives of the Provinces (Milan and Bergamo), have been analyzed and, on the basis of the observations emerged during the debate, 3 new regulatory relief proposals have been developed:

1. In case of IEA renewal, without the occurrence of modifications, the possibility for EMAS registered and ISO 14001 certified firms to provide a self-declaration, together with a valid and up-dated registration/certification document;

2. In case of non-substantial modifications, the possibility for EMAS registered and ISO 14001 certified firms to substitute some of the technical documents required for the renewal with those documents produced within the EMS and containing the information needed;
3. In case of substantial modification, the scenario of increased threshold values when assessing if a modification is substantial or not. This better regulation measure is conceived as a modification of the regional law (D.G.R. 2 febbraio 2012, n. 9/2970) determining the threshold values.

The first proposal, the one dealing with the self-declaration in the case of a firm applying for the simple renewal of the IEA, has been inserted in the group of national proposals presented to selected national authorities for approval and adoption.

4 Summary of the main activities and results

Proposal	4. Valorization of the registration/certification when applying for the renewal of the IEA in case of substantial modifications
Aim	This activity has aimed at testing the feasibility of a simplification of the administrative procedure for the renewal of the Integrated Environmental Authorization in case of substantial modifications. More in detail, the testing has analyzed the ways in which the documents produced within EMAS can be used to replace the technical documents required by the authorization procedure.
Competent Authorities involved	Provinces (Milan and Bergamo).
Other actors involved	- Lombardy Region
Methodology	- Involvement of Provinces - Roundtable with Provinces on the 5 th November - Testing by means of simulation on a sample of procedures regarding IEA renewal for selected companies
Data source	/
Midterm results	- 3 Authorities involved (Lombardy Region and Provinces of Milan and Bergamo) - 3 new regulatory relief proposals

	- 1 regulatory relief proposal presented to national authorities for adoption
Timing	Starting date: June 2013; Ending date: February 2014.

5 Annexes

- Minutes of the roundtable held on the 5th November 2013;
- Proposte di semplificazione nazionali - Documento definitivo presentato al Parlamento

Pilot area	Lombardia
Name of the tested proposal	5. Presumption of compliance of the EMS (EMAS registered and/or ISO 14001 certified) with the Italian Organizational Model ex. Legislative Decree 231/2001

1 Introduction to the report

The present document provides a picture of the testing-in-field activities carried out at the Lombardy regional level with respect to the proposal of regulatory relief dealing with the “Presumption of compliance” of the EMS - EMAS registered and/or ISO 14001 certified – with the Italian Organizational Model ex. *Legislative Decree n.231/2001*. The field testing of this proposal represents an exception within the activities of the Action 5.3, as it is a measure that the BRAVE partners aim to promote at *national level*. Even if not explicitly foreseen by the project, the BRAVE partners decide nevertheless to test the measure because of its relevance and of the expectations of companies as regards its adoption by national institutions (as emerged both from the Regional Consultation Boards carried out in Lombardy and the Project Consultation Board carried out at national level). The underlying idea was to strengthen the submission of the proposal to the national institutions with empirical evidence collected from companies’ experience able to confirm the *ratio* of the measure.

2 Aim of the test and methodology

The aim of the testing activities was to collect evidence from companies’ experience in the adoption and use of their EMS as the part of their Organizational Model ex. *Legislative Decree n.231/2001* addressing the environmental offences, in terms of:

- strengths and weaknesses in using EMAS registered and/or ISO 14001 certified EMS compared to the requirements of the “231 Model”;

- ii) hints on how to develop contents with which articulating the text of the proposal.

The methodology adopted may be summarized as follows:

- a) Testing by means of simulation with a sample of EMAS registered and/or ISO 14001 certified companies selected among those that presented their candidacy within the Regional Consultation Board;
- b) Analysis and simulation of the conformity of the selected companies' EMS with the part of the Organizational Model ex. Legislative decree n.231/2001 addressing the environmental offences. The main methodological reference to carry out the analysis were the Guidelines issued by Assolombarda "*The Environmental Management System ISO 14001 and EMAS as a means of prevention of the environmental offences ex. Legislative decree n.231/2001*" (May 2013).

Four companies were selected for the activities:

- *UniCredit SpA*, one of the most important Italian banks and the largest EMAS registered organization in the world, in terms of both registered sites (around 4.400) and number of employees (around 45.000);
- *Autogrill SpA*, a leading provider of food & beverage services for travellers, with a number of sites EMAS registered and/or ISO 14001 certified;
- *Giovanni Bozzetto SpA*, a chemical ISO 14001 certified company;
- *A2A SpA*, one of the largest Italian multiutility companies with a number of sites EMAS registered and/or ISO 14001 certified.

Overall, the testing activities were carried out between June 2013 and February 2014. The activities were carried out individually with each company, as the investigation of their experiences required the collection of confidential information, both through the carrying out of face to face interviews and the analysis of companies' documentation (pertaining both to their EMS and their 231 Organizational Model). Two out of four companies were deeply involved by way of an in-depth investigation of their EMS with respect to their 231 Model, while the analysis of the remaining two companies was limited to a general preliminary investigation.

3 Analysis of the test activities and results

The analysis of the experiences of the two companies deeply involved in the testing activities support the main ratio of the measure. i.e. the idea that an EMAS-registered and/or ISO 14001 certified Environmental Management System may usefully work as the "environmental" part of the 231 Model of an organization, and that the national policy maker should recognize the appropriateness of the approach of a certified EMS in preventing environmental offences (similarly to what already happens for the OHSAS certified occupational health and safety management systems).

The whole test activities support the drafting of the text of the proposal, which has been approved

by the all the national partners and then included in the proposals submitted to the Italian Parliament. The text of the proposal aims at defining and clarifying under which conditions a certified EMS may be considered compliant with a 231 Model as regards the prevention of the environmental offences, in terms of: *legal compliance; resources, roles and responsibilities, documentation, training, monitoring, etc.*

The results of the test may be summarized as follows:

- Four (4) companies involved;
- Nine (9) meetings held at companies' headquarters;
- One (1) measure articulated in a structured text and submitted to the Italian Parliament.

4 Summary of the main activities and results

Proposal	5. Presumption of compliance of the EMS (EMAS registered and/or ISO 14001 certified) with the Italian Organizational Model ex. Legislative Decree 231/2001
Aim	To collect evidence from companies' experience in the adoption and use of their EMS as the part of their Organizational Model ex. Legislative decree n.231/2001 addressing the environmental offences, in terms of: i) strengths and weaknesses in using EMAS registered and/or ISO 14001 certified EMS compared to the requirements of the "231 Model"; ii) hints on how to develop contents with which articulating the text of the proposal.
Competent Authorities involved	None
Other actors involved	- Companies; - Category Association (<i>Assolombarda</i>).
Methodology	- Testing by means of simulation with a sample of selected companies; - Analysis and simulation of the conformity of companies' EMAS registered and/or ISO 14001 certified EMS with the part of the Organizational Model ex. Legislative decree n.231/2001 addressing the environmental offences. The main methodological reference to carry out the analysis are the Guidelines issued by <i>Assolombarda</i> (May 2013) " <i>The Environmental Management System ISO 14001 and EMAS as a means of prevention of the environmental offences ex. Legislative decree n.231/2001</i> ".
Data source	Companies (internal documentation, pertaining both to their EMS and their 231 Organizational Model); <i>Assolombarda's</i> Guidelines.

Results	<ul style="list-style-type: none"> • Four (4) companies involved; • Nine (9) meetings held at companies' headquarters; • One (1) measure articulated in a structured text and submitted to the Italian Parliament.
Timing	<ul style="list-style-type: none"> - Starting date: June 2013; - Ending date: February 2014.

5 Annexes

- *Presentazione "Il Progetto BRAVE e la sperimentazione della misura volta ad introdurre la presunzione di conformità dei Sistemi di Gestione Ambientale al Modello org.vo ex d. lgs.vo n.231/2001"*
- *Proposte di semplificazione nazionali - Documento definitivo presentato al Parlamento.*

TUSCANY

Pilot area	Tuscany
Name of the tested proposal	Extension of IRAP (tax) rate reduction for EMAS registered and ISO14001 certified companies at least for next 3 year

1 Introduction to the report

The IRAP reduction was an important incentive to disseminate the EMAS registration in Tuscany. Tuscany Region has enacted a rate reduction for a regional tax on productive activities. This measure was approved for the first time in 2004 by the L.R. of 24/12/2003 n. 58 and was applicable for the fiscal years of 2005-2007. In 2008 and 2009 this reduction was confirmed by the L.R. financial laws of 24/12/2007 n. 67 and L.R. of 24/12/2007 n. 69. In the end, the financial law of 2009 (n. 69/2008) was extended to the reduction of the IRAP until 2010 and the Regional Law of 29/12/2010 n. 65 art. 119 "Renewal of expected incentives from the financial law of 2005," confirms the reduction until 2013. The data on the number of EMAS enterprises in Tuscany shows that from the introduction of the reduction of the IRAP the adoption of EMAS in the Region has significantly increased. Regional law n.58 of 19/12/2003 provides a reduction of the IRAP percentage of 3.50% rather than 4.25% for EMAS organizations. This percentage was further reduced for the 2008 fiscal year and, as a consequence, the IRAP for all EMAS and ISO 14001 organizations was reduced to 3.21% and 3.53% respectively. Financial law 27/12/2011 n.66 extended the fiscal incentive to enterprises with environmental and ethical certifications until 2013.

The reason for the testing in field of the IRAP reduction is connected with the relevance of this tool

in the EMAS dissemination process.

2 Aim of the test and methodology

The aim of test activity is to support the renewal of the incentive even in the next three financial years (from 2014 to 2016). The IRAP reduction was scheduled until 2013. The Regional Authorities was wondering if it would be still useful to extend the IRAP incentive and its preliminary idea was to eliminate the IRAP reduction for EMAS and ISO14001 companies and promote other solutions to encourage the environmental improvement.

The testing in field on the IRAP reduction extension aims at demonstrating the relevance of the incentive especially in this economic period; indeed the test assesses the economic commitment for the Region maintaining the incentive.

3 Analysis of the test activities and results

The testing in field is composed by three research activities:

The first part of the test activity aims to analyze the costs that businesses usually argue for joining the EMAS scheme and it estimates the coverage rate of these costs through the IRAP reduction. The study demonstrated how the incentive IRAP is a real resource for businesses who want to maintain its commitment to environmental sustainability.

Table 1 Results achieved

Company dimension	EMAS costs	Average savings IRAP (2009)	Average savings IRAP declared from BRAVE survey	<u>Rate of costs recovery</u>
Small(< 50 employees)	20.000	28.037	33.000	100%
Medium (50 <250)	35.000	28.037	35.000	80%
Big (over 250 employees)	50.000	28.037	41.000	56%

The second activity of test aims to modify the incentive. SSSUP proposed a "revision" of the IRAP reduction trying to give a greater recognition to the EMAS compared to ISO14001. EMAS provides a greater commitment compared to other tools for environmental management in terms of communication activities, transparency and dissemination of environmental performance. The final report of testing in field presents 4 proposals of modification of IRAP reduction .

These proposal cab be summarized as follows:

- The first hypothesis has been proposed to further reduce the tax rate for businesses EMAS passing from 3.21 to 3 and leaving unchanged the incentive for organizations ISO14001.
- In the hypothesis 2 and 3 the IRAP rate is varied for both businesses EMAS for the ISO14001:
 - - EMAS rate 3%, ISO14001 rate 3,65% (hypothesis number 2);

- EMAS rate 2,90% , ISO14001 rate 3,75% (hypothesis number 3).
- The hypothesis number 4 provides the IRAP rate reduced only for EMAS organizations (2,90%) and no incentive for the ISO14001 certificated.

The last part of the research aims to assess each proposal to modify the incentive based on some criteria: costs for Region, efficiency (number of registrations), environmental improvement, changes in administration activities of Region. For each criteria we defined a future status:

- Worsening= -
- No changes= 0
- Improvement= +

The Table 2 provide a detail of the emerged results,

Table 2 Assessment of IRAP incentive revision .

Hypothesis of incentive IRAP revision	Regional costs	Efficacy	Environmental improvement	Administration activities
Hypothesis 1	-	+	0	0
Hypothesis 2	0	+	0	0
Hypothesis 3	0	+	0	0
Hypothesis 4	+	+	0	0
1. Number of “Key performance indicators” improbe in the last year	0	0	+	-
2. environemntal aims achieved in the last years	0	0	+	-

4 Summary of the main activities and results

Proposal	Extension of IRAP (tax) rate reduction for EMAS registered and ISO14001 certified companies at least for next 3 year
Aim	Promote the extension of the measure and demonstrate its feasibility
Competent Authorities involved	Regional Authorities
Other actors	-

involved	
Methodology	<ul style="list-style-type: none"> - Study on the efficacy of IRAP reduction on the EMAS registration increase - Comparison between the EMAS costs and the IRAP incentive to demonstrate the value of the incentive to cover the registration costs. - Definition of 6 hypothesis to modify the IRAP incentive valorizing EMAS - Sharing of hypothesis with Regional competent authority
Data source	<p><i>Region</i></p> <p><i>Milieu Ltd.and RPA Ltd, 2009</i></p> <p><i>BRAVE survey</i></p>
Timing	<p><i>Starting date: 01/07/13</i></p> <p><i>Ending date: 30/12/13</i></p>

5 Annexes

Revision hypothesis for IRAP fiscal incentive.

Pilot area	Tuscany
Name of the tested proposal	Homogenizing the frequency of checks for IPPC companies in the Tuscany Provinces and reduction of IPPC inspection frequency for EMAS registered and ISO14001 certified companies

1 Introduction to the report

Studies and researches demonstrated the different approaches in the IPPC inspections by competent authorities of Tuscany (provinces and ARPAT).

All Tuscan provinces and ARPAT departments (competent control authorities) realize periodically inspections on the IPPC companies. The frequency of the inspections changes from one province to another depending on the number of plants included in the European Directive 96/61/CE active in the province. The first part of our research demonstrates, indeed, that the costs applied for the IPPC checks are very different among the Tuscany provinces. The method to plan the IPPC inspections by ARPAT does not provide simplifications or frequency reductions for EMAS or ISO14001 organizations; the ARPAT's IPPC inspections plan does not valorise the environmental certifications.

The complexity of the topic suggested to SSSUP to elaborate a proposal to reduce the IPPC inspections for EMAS and ISO 14001 companies operating in Tuscany. SSSUP considered important the identification of a method to eliminate the differences in the frequency of inspections, before enhancing the environmental certifications.

As suggested by European Recommendation 2001/331/CE the environmental checks plan should consider the EMAS registration, valorising the data and information in the audit report and environmental statement.

2 Aim of the test and methodology

The aim of testing in field is to realize a method for IPPC inspections planning valorising EMAS. The study demonstrated the improvement of the inspections planning through the adoption of the method defined by SSSUP. The aim of our method is to homogenize the inspection frequency in the Tuscan provinces on the basis of risk associated with each plant. SSSUP defined the method for the risk value processing during the testing in field. The method aims to analyze key industrial sectors with significant negative impacts on human health and environment in order to identify the sectors and the plans with the “highest risk value” to associate a higher checks frequency. SSSUP shared the method with the ARPAT.

3 Analysis of the test activities and results

The testing in fields is composed by three activities:

- Assessment of costs and frequency of IPPC checks in the Tuscan provinces.
- Method to define the risk value and the frequency of checks design
- Final version of method

The first phase of testing in field aims to assess the frequency and the costs of IPPC inspection in three important sectors of Tuscany’s economy: Ceramic, Waste, Paper. The analysis of costs, based on the ARPAT data, shows the different approach adopted in each province and by local ARPAT departments.

The following table shows the results concerning the inspection frequency for some fields:

Table 3 Frequency of inspection in each Tuscan province.

PROVINCE	Ceramic		Paper		Waste	
	Inspections	% in the last three years	Inspections	% in the last three years	Inspections	% in the last three years
PISA	3	150%	0	0%	3	75%
LIVORNO	2	100%	0	0%	9	225%
SIENA	3	43%	0	0%	7	233%
AREZZO	3	75%	3	300%	3	150%
EMPOLI	0	0%	0	0%	2	100%

MASSA	0	0%	2	100%	2	100%
LUCCA	0	0%	18	51%	1	100%
PISTOIA	0	0%	8	160%	1	100%
GROSSETO	0	0%	0	0%	2	100%
FIRENZE	0	0%	0	0%	2	100%
PRATO	0	0%	0	0%	0	0%

The method is composed by the following criteria:

- **CRITERIA 1 Environmental complex of each productive field:** based on classification by International Accreditation Forum – IAF MD5:2009.
- **CRITERIA 2 Energy consumption and CO2 emission** (Emission trading Directive).
- **CRITERIA 3 Water consumption and water discharge**
- **CRITERIA 4 IPPC** relevance Based on limits of IPPC classification
- **CRITERIA 5 air emission** (limit of Directive 75/2005)
- **CRITERIA 6 Number of employees**
- **CRITERIA 7 Environmental penalties received**
- **CRITERIA 8 Application of Seveso directive**
- **CRITERIA 9 Territorial relevance**

For each criteria a value from 1 to 3 is associated, which allows to obtain a value to which is associated a “risk value”. The method identifies three levels of risk value to associate a different inspection frequency.

Table 4 Identification of the frequency of checks

Risk value	Risk class	Frequency of checks
$R \leq 1,7$	Low	2 checks in 3 years
$1,7 < R \leq 2,2$	Medium	2 checks in 2 years
$R > 2,2$	High	1 checks for each year

For the EMAS registered companies the risk value is reduced of 0,5 and consequently the inspection frequency.

4 Summary of the main activities and results

Proposal	Homogenizing the frequency of checks for IPPC companies in the Tuscany Provinces and reduction of IPPC inspection frequency for EMAS registered and ISO14001 certified companies
Aim	<i>Homogenizing the frequency of checks for IPPC companies in the Tuscany Provinces and reduction of IPPC inspection frequency for EMAS registered and ISO14001 certified companies</i>
Competent Authorities involved	Regional Government, ARPAT, Tuscany Provinces.
Other actors involved	-
Methodology	<p>This test has a twofold aim. Firstly it aims to carry out actions to homogenize the inspections frequency of IPPC installations among the different IPPC Competent Authorities (Provinces) of Tuscany. Secondly it aims to establish a method to reduce the inspections frequency for EMAS and ISO14001 certified companies. In detail, the following step will be carry out:</p> <ol style="list-style-type: none"> 1. Identifying the inspection frequency in each Province 2. Establishing a methodology to homogenize the inspection frequency and share with ARPAT by specific meetings 3. Defining a method to reduce inspections frequency for EMAS and ISO14001 certified companies; 4. Present and share the methodology to the Regional IPPC group; 5. Identification of the best way to implement it in the current legislative framework of this field 6. Assessment of economical impact on the ARPAT balance connected with the reduction of inspections in IPPC installations registered EMAS and certified ISO14001 and elaboration of proposals to compensate it
Data source	<i>Region and ARPAT</i>
Timing	<p><i>Starting date: 01/07/13</i></p> <p><i>Ending date: 28/02/14</i></p>

5 Annexes

Slides on frequency and cost analysis and slides with the method

Pilot area	Tuscany
Name of the tested proposal	<i>Introduction of regulatory relief for EMAS organization in waste regulation of Municipality</i>

2 Introduction to the report

Our study identified the opportunities to fill in regulatory reliefs in the legislation of Municipalities. The test concerns the analysis of Italian legislation on the municipality's competences to adopt regulatory reliefs in their regulation on environmental topics (as waste, water and others). The study is focused on the waste legislation and the incentives adoptable to award the EMAS companies.

The study confirms the capability of the municipalities to promote EMAS in their territories. The Italian municipalities are becoming more interesting in the environment; 240 Italian municipalities obtained EMAS registration and many others have adopted ISO14001 standard. This interest is confirmed by many incentives adopted in a large number of municipalities in the centre or north Italy.

2 Aim of the test and methodology

This test aims to analyze the opportunities to introduce regulatory reliefs in the local laws by municipalities. The project BRAVE has, in fact, promoted regulatory reliefs both in the national and regional legislation and therefore we have tried to encourage the development of a commitment even at the local level in order to strengthen the presence of EMAS. The information presented below demonstrates how the promotion of EMAS can be pursued by local institutions and authorities too. The analysis identified the main sources of law that allow local authorities to work in this direction; the study results, indeed, show some of the latest and innovative experiences on EMAS regulatory reliefs adopted by local authorities in Tuscany and in other Italian regions.

3 Analysis of the test activities and results

The Italian legislation assigns legislative autonomy to municipalities and local institutions. The main laws on this topic are the n. 4671 adopted on 17 March 1861 and the D.lgs. n.267 adopted in 2000. These laws discipline the competences of municipalities and list the topics where the local authorities can approve rules. Starting from the main Italian Laws the study focuses on the environmental legislation and the competences of local institution on this topic. The main Italian environmental law (D.lgs 152/2006) assigns to the municipalities the role to define some fees on environmental services as the waste management. For instance the tariff on local collection and disposal of waste is managed by municipalities that define the amount for the organization and citizens for the service. Many municipalities adopted reduction of waste tariff for EMAS companies

to incentive the dissemination of the scheme in their territory. The main case studies are in the Firenze province and in other Italian region as Emilia Romagna. The incentives adopted concern the reduction of waste tariff around 20-50% for EMAS or ISO14001 companies.

SSSUP defined a proposal for a Tuscan municipality (Tavarnelle Val di Pesa) to promote the registration among the companies placed in this town.

4 Summary of the main activities and results

Proposal	<i>Introduction of regulatory relief for EMAS organization in waste regulation of Municipality</i>
Aim	Phone contact with Tavarnelle Val di Pesa mayor. The Municipality of Tavarnelle, EMAS registered, decided to promote the Schema in its territory. SSSUP proposed and shared some regulatory relief proposals for EMAS companies with the mayor and other staff members of municipality. One of the SSSUP proposals (the reduction of waste fee) is adopted in a local Regulation on waste fee (TARES).
Competent Authorities involved	local authorities
Other actors involved	-
Methodology	<ul style="list-style-type: none"> • Analysis of national and regional regulations on waste • Legal feasibility study • Definition of regulatory relief proposal to introduce in the waste regulation • Phone contacts to promote proposals
Data source	Web, studies, researches.
Timing	<i>Starting date: 01/07/13</i> <i>Ending date: 30/10/13</i>

5 Annexes

Analysis of the opportunities to introduce regulatory reliefs and incentives in local laws and regulations.

Pilot area	Tuscany
Name of the tested proposals (2)	<i>Introduction of several regulatory reliefs for EMAS registered and ISO14001 certified companies operating in the mining sector. Measures for tax reduction</i>
	<i>Introduction of several regulatory reliefs for EMAS registered and ISO14001 certified companies operating in the mining sector. Measures for the permit extension and to valorize the EMAS documents for institutional communication.</i>

1 Introduction to the report

EMAS scheme is not diffused in Tuscan mining sector. Only a company adopted this schema but generally organizations operating in the mining sector are not interesting to environmental management tools. So, SSSUP defined five regulatory reliefs' proposals to be introduced in the mining legislation adopted by Tuscany Region. This legislation is old (L n. 78/ 1998) and the regional authority decided to improve it. For these reasons SSSUP decided to define the proposals and test their feasibility. The study starts from the analysis of the national and regional legislation of mining sector. The main activity of the test phase is the questionnaire survey to assess the level of interest on the proposals among companies, trade organization and municipalities placed in the Tuscany zones with higher number of mines.

2 Aim of the test and methodology

The aim of testing in field is to assess the interest of different stakeholders operating in the mining sector on the proposals defined by SSSUP during the BRAVE project. The test phase aims to improve the Tuscan legislation on the mining activity through the adoption of the regulatory relief to aware the EMAS or ISO14001 organization. Other aim is the dissemination of environmental management tools in the mining sector of Tuscany and sensitize businesses especially the small and medium.

So the test has twofold objectives:

- To improve the legislation existing in Tuscany
- To spread EMAS registration in the mining sector of this region.

The testing in field is focused on a questionnaire survey among different stakeholders operating in the mining sector. The survey aims to detect the knowledge level on the EMAS, the main barriers for its adoption and the interest on the regulatory relief's proposals by SSSUP.

3 Analysis of the test activities and results

The testing in field demonstrated as the regulatory relief's adoption could support the EMAS dissemination. The main activities of the testing in field are:

- deepening of Tuscan and national legislation of the mining sector

- data collection and proceeding on the financial guarantee applied to businesses
- questionnaire survey and drafting of final report

The analysis of legislation shows the absence of references to environmental certification as a tool to reduce the environmental impact of mines.

The testing in field investigated the financial guarantee costs. The study assessed the impact of the proposal on the financial guarantee reduction which would allow lower costs for businesses. The data on the amount of financial guarantee are collected by Municipalities of main areas of Tuscany where the mining sector is concentrated. The testing in field demonstrated the cost saving both for EMAS both ISO14001 companies.

Table 5 Assessment of financial guarantee reduction

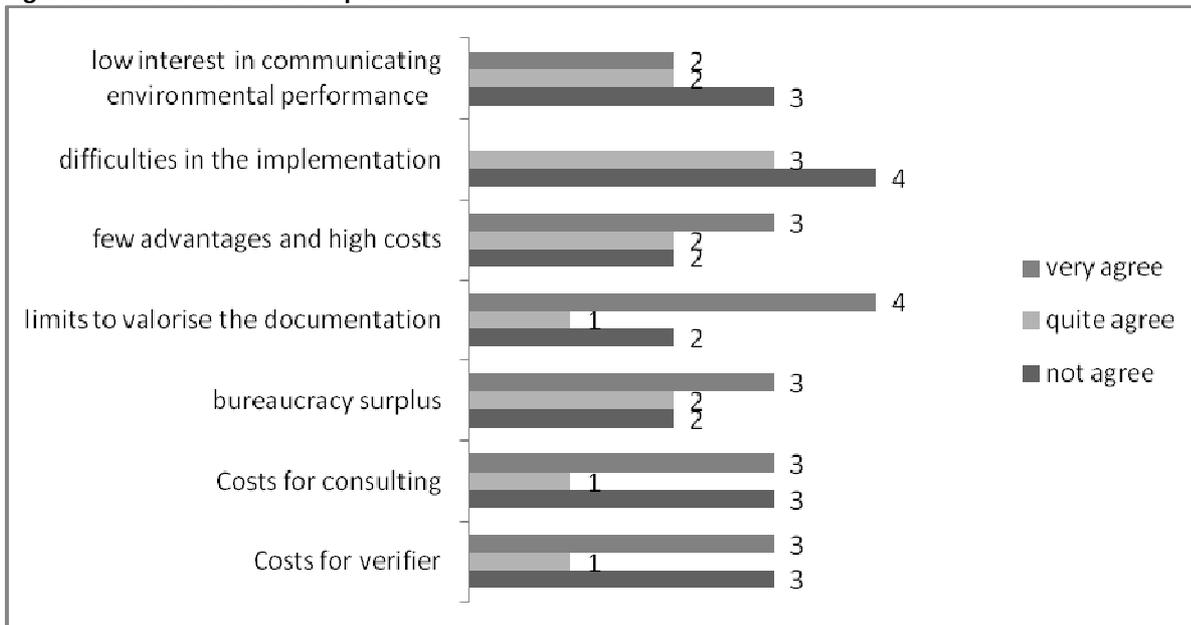
Amount of financial guarantee €	Costs for 20 years	Costs for EMAS (with reduction of 15%)	Costs saving for EMAS	Costs for ISO14001 (with reduction 10%)	Costs saving for ISO 14001
25.000	22.500	19.125	3.375	20.250	2.250
50.000	45.000	38.250	6.750	40.500	4.500
100.000	90.000	76.500	13.500	81.000	9.000
150.000	135.000	114.750	20.250	121.500	13.500
200.000	180.000	153.000	27.000	162.000	18.000

The main results concern the high level of satisfaction on the proposals. The questionnaire survey involved 8 stakeholders operating in the mining sector (2 companies, 4 municipalities, 2 trade organizations). The questionnaire investigated two topics:

- the level of knowledge about the EMAS and ISO14001
- the interest on regulatory reliefs proposed by SSSUP.

The results achieved show that the stakeholders know the environmental certifications. The main barrier emerged to EMAS or ISO14001 dissemination is the lack of opportunity to valorise these tools. The stakeholders identified other limits as the too much bureaucracy and the high costs. The following figure shows the results achieved.

Figure 1 Barriers for EMAS adoption

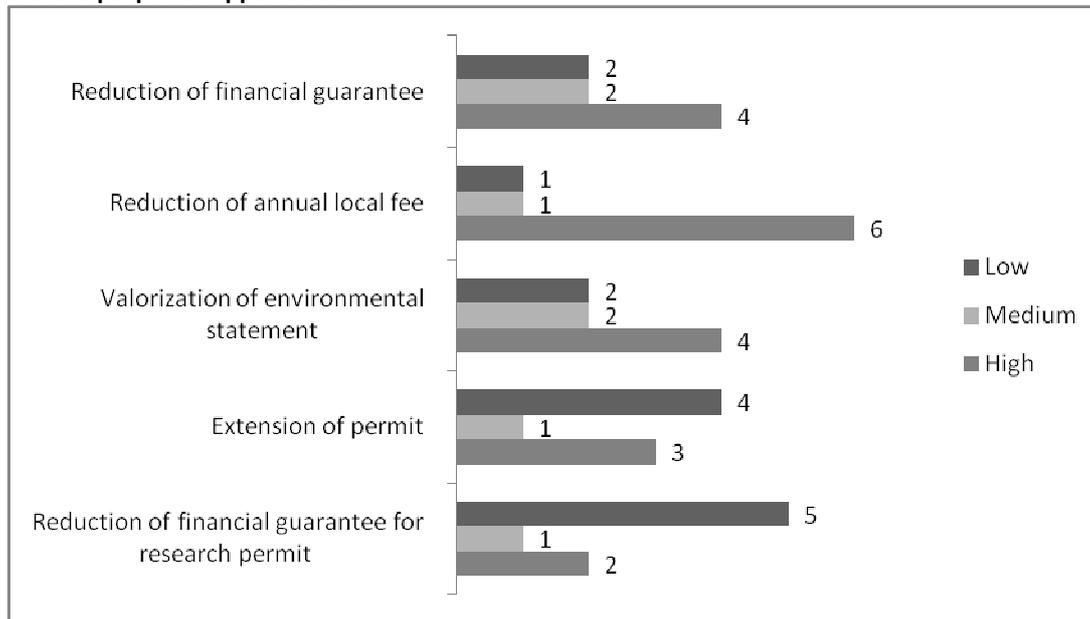


The regulatory reliefs proposed in the questionnaire survey are the followed:

- *Reduction of financial guarantee for mining activities (-15% for EMAS organizations and -10% for ISO14001 organizations)*
- *Reduction of annual local fee (-15% for EMAS organizations and -10% for ISO14001 organizations)*
- *Valorisation of environmental statement for annual communication with local institutions.*
- *Extension of permit from 20 years to 30 years for EMAS companies and to 25 years for ISO14001*
- *Reduction of financial guarantee for research permit (-15% for EMAS organizations and -10% for ISO14001 organizations)*

From survey a high interest for the reduction of local fee emerges; 6 stakeholders interviewed confirmed the relevance of this proposal. The respondents identified the proposal concerning the reduction of financial guarantee very important as the other proposal on valorisation of environmental statement in the communication process with local institutions. The following figure shows the results achieved.

Figure 2 Level of proposals appreciation



The results of survey are enriched by feedback received with telephone interviews. Generally the survey has shown a high interest on simplification proposals developed by the project BRAVE both as tools to encourage the spread of environmental certifications among firms both to increase awareness of the mining sector on environmental issues.

4 Summary of the main activities and results

Proposal	<i>Introduction of several regulatory reliefs for EMAS registered and ISO14001 certified companies operating in the mining sector. Measures for tax reduction</i>
Aim	<i>The aim of this test is the improvement of the regional law for mining sector (n.78/1998) introducing regulatory reliefs for EMAS companies. The test will demonstrate as the introduction of regulatory reliefs can support the EMAS spread in the this sector.</i>
Competent Authorities involved	Regional Government
Other actors involved	<ul style="list-style-type: none"> - Companies operating in the mining field - Trade Associations - Municipality
Methodology	<p>In order to test the feasibility of the selected regulatory relief, two approaches will be carried out:</p> <p>1) Feasibility assessment and identification of its effect on the reduction of</p>

	<p>administrative burdens:</p> <ul style="list-style-type: none"> • Meeting with regional competent department to discuss the proposal; • Identification and sharing of burdens reduction. <p>2) The second aim is to analyze the level of approval of this regulatory reliefs by the companies operating in the mining sector .</p> <ul style="list-style-type: none"> • Questionnaire design to collect data • Data collection by phone interview and on line questionnaire • Data processing • Report <p>Sharing of results with regional institution competent</p>
Data source	<p><i>Survey</i></p> <p><i>Data supplied by Chamber of commerce, municipalities and trade organizations.</i></p>
Timing	<p><i>Starting date: 01/07/13</i></p> <p><i>Ending date: 02/12/13</i></p>

Proposal	<i>Introduction of several regulatory reliefs for EMAS registered and ISO14001 certified companies operating in the mining sector. Measures for the permit extension and to valorise the EMAS documents for institutional communication.</i>
Aim	<i>The aim of this test is the improvement of the regional law for mining sector (n.78/1998) introducing regulatory reliefs for EMAS companies. The test will demonstrate as the introduction of regulatory reliefs can support the EMAS spread in the this sector.</i>
Competent Authorities involved	Regional Government
Other actors involved	<ul style="list-style-type: none"> - Companies operating in the mining field - Trade Associations - Municipality
Methodology	<p>In order to test the feasibility of the selected regulatory relief, two approaches will be carried out:</p> <p>3) Feasibility assessment and identification of its effect on the reduction of administrative burdens:</p> <ul style="list-style-type: none"> • Meeting with regional competent department to discuss the proposal; • Identification and sharing of burdens reduction. <p>4) The second aim is to analyze the level of approval of this regulatory reliefs by</p>

	<p>the companies operating in the mining sector .</p> <ul style="list-style-type: none"> • Questionnaire design to collect data • Data collection by phone interview and on line questionnaire • Data processing • Report <p>Sharing of results with regional institution competent</p>
Data source	<p><i>Survey</i></p> <p><i>Data supplied by Chamber of commerce, municipalities and trade organizations.</i></p>
Timing	<p><i>Starting date: 01/07/13</i></p> <p><i>Ending date: 02/12/13</i></p>

5 Annexes

Report on regulatory reliefs proposals for mining sector assessment.

VALENCIA COMMUNITY

Pilot area	Valencia
Name of the tested proposal	Reduction of Financial Guarantees required by the Administration for certain activities such as waste management, landfill, etc.. to those companies with EMAS registration

1 Introduction to the report

This report is intended to reflect the viability for certain actors within the regulatory framework of production and waste management, which can exist for a reduction of financial guarantees that are required in administrative authorizations, for waste management activities. It has focused the report on the activities of management of hazardous waste, as are activities with a more mature administrative procedure.

2 Aim of the test and methodology

The spirit of this test was to evaluate the feasibility of implementing a reduction in financial guarantees to certain waste management activities on the existing administrative proceedings in the competent Regional Authority in these matters, under the Waste Service control.

The **methodology** applied consisted in Chamber of Commerce cooperation in drafting the content of the new proposal to consider a reduction of financial guarantees by:

1. Selection of companies affected and study of financial guaranties fixed by administration
2. Testing by means of simulation with a sample of selected companies and with collaboration of Waste Service staff
3. Analysis of economic impact: assessment of cost and efforts, saving and benefits. Point of view of other agents involved.
4. Legal Feasibility study.

The actors involved were:

- Waste Management Service of Regional Ministry of Infrastructure, Planning and the Environment
- Waste Management companies

3 Analysis of the test activities and results

In the authorization procedure for waste treatment operations indicated that documentation to accompany the application for authorization is:

- Accreditation by any permissible method under right of representation that shows the person signing the application.
- Project development, preferably in electronic format (CD) of that facility that includes at least the following information:
(In accordance with Article 26.2 of Royal Decree 833 /1988).
- Detailed description of the processing activities that seeks to make including the types of planned operations identified as codified set out in Annexes I and II of Law 22 /2011, of 28 July , Waste and Contaminated Land .
- Methods to be used for each type of processing operation, the safety and precautionary measures, and monitoring and control operations previews.
- Technical capacity to perform the processing operations envisaged in the installation.
- Records of acceptance of waste arising from the exercise of the processing operations of the facility, issued by authorized agent, where applicable.
- Proof of compliance guarantee scheme where appropriate as provided in Article 20.4 of Law 22 /2011, of 28 July , waste and contaminated soils ; liability insurance and payment letter evidencing deposit of financial guarantee.

This Article 20 requires:

- Subscribe constitute insurance or a financial guarantee equivalent in the case of entities or undertakings carrying hazardous waste treatment and if required the rules governing the management of specific waste or regulating management operations , to cover responsibilities arising from these operations.

This proposal is based on example of national law 26/2007 of 23 October Environmental Responsibility, which states in Article 28:

Exemptions to the requirement for the establishment of mandatory financial security, "are exempt from the requirement to provide mandatory financial security:

- Operators of activities likely to result in damage to be assessed by an amount between 300,000 and 2,000,000 euros proving by production of certificates drawn up by independent bodies which are permanently attached and continued well into the Community system management and audit scheme (EMAS) or to environmental management system EN ISO 14001.

After the testing phase, we have reached the following conclusions:

1. There are legislative references, such as Environmental Accountability Act, already introduced a reduction in financial guarantees for EMAS organizations.
2. The study of waste management companies affected by the possible reduction of financial guarantees, shows savings for both companies and the administration.
3. Each Spanish region applies a different method of implementing the internal due to management activities of financial security. In this sense it continues to work with contacts in the Ministry of Environment is coordinating a working group on financial guarantees.
4. It is interesting to consider the possession of the EMAS Register for activities that produce waste (producers).
5. It has made an assessment of the benefits for businesses and the administration to consider EMAS as a reason to reduce financial guarantees.

Benefits applicable, average

	Expenses	Without EMAS	With EMAS	SAVINGS
Company	Financial guarantee insurance for 300,000 euros	720 euros / year	-	720 euros
Administration	dossiers review	150-180 euros/dossier		
	Visit to the facilities	75 – 100 euros / dossier (included 25€/travel)		75 – 100 euros
	Writing of report	25 – 50 euros / dossier		
TOTAL SAVINGS				820

6. After several meetings and searching for information, it seems that there are legal references, consider reducing due to the activities of production and management, as the Order of January 16, 2007 financial guarantees for which criteria are set calculation for the determination of the security activities specified in Decree 174/2005 of 9 June, establishing the legal framework for the production and management of waste and the General Register of Producers and Managers Galicia is regulated. This legislation marks a coefficient of 0.9 to apply, in the case of own environmental management systems, and for dangerous waste management activities, according

to the formula:

$$Cbf = 1343,17 \cdot \sqrt{t / \text{año}}$$

4 Summary of the main activities and results

Proposal n. 1	Reduction of Financial Guarantees required by the Administration for certain activities such as waste management, landfill, etc.. to those companies with EMAS registration
Aim	The spirit of this test was to evaluate the feasibility of implementing a reduction in financial guarantees to certain waste management activities on the existing administrative proceedings
Competent Authorities involved	Waste Management Service of Regional Ministry of Infrastructure, Planning and the Environment
Other actors involved	Waste Management companies
Methodology	<ol style="list-style-type: none"> 1. Contact with representatives of the administration responsible for the approval and registration procedures to assess the possibility of including the improvement described in these procedures 2. Selection of companies and agents involved in test 3. Testing by means of simulation with a sample of selected companies. 4. Analysis of economic impact: assessment of cost and efforts, saving and benefits. Point of view of other agents involved. Legal Feasibility study.
Data source	<p>Waste Management Service. Official List of Waste Treatment Companies. (http://www.cma.gva.es/web/indice.aspx?nodo=4623&idioma=C) List of EMAS registered companies http://www.cma.gva.es/webdoc/documento.ashx?id=108970</p>
Timing	<p>Starting date: 30/06/13 Ending date: 28/02/14. Following contacts with National Ministry Working Group of Financial Guarantees.</p>

5. Annexes

Minutes of 3 December 2013 and 18 February 2014 meetings
Report on "Feasibility of reducing financial guarantees for management activities and waste, for EMAS registered companies."



Pilot area	Valencia
Name of the tested proposal	Indicate in the authorization procedures of waste management activities (solids and liquids) the need to prove an adequate environmental management (equivalent to EMAS / ISO 14001 requirements). Environmental management requirements would be spelled out by the Resolutions for Authorization.

1 Introduction to the report

An administrative authorization is required to carry out waste treatment operations. Besides, those activities are subject to environmental control during the authorization process (requisite documentation) and during the resolutions.

By its very nature, management operations have certain environmental risk, and EMAS register could offer guarantees to the authorities responsible for carrying out the control of those management operations.

2 Aim of the test and methodology

The aim has been to assess the feasibility of introducing typical elements of EMAS or ISO 14001 environmental management in the documentary requirements which are asked to the management companies, which carry out this type of operations or in the authorization resolutions emitted by the administration.

The following methodology has been used to the realization of the test:

- a) Evaluation of the degree of management systems implementation at the solid waste management companies.
- b) The selection of the companies which will take part in the process, by getting new permits or by the renewal of existing permits.
- c) To make a proposal for the amendment of the authorization procedure in order to include the environmental management requirements which are easily reachable by an EMAS system.
- d) Technic, economic and legal feasibility study of the proposal.
- e) Preparation of a proposal for approval.

Actors involved: Waste management service of the Conselleria de Medio Ambiente and waste management companies.

3 Analysis of the test activities and results

The existing documentary requirements in both administrative procedures related to waste

management activities have been analysed. One of them is used for the authorization of management operations and the other is used for treatment facilities.

MANAGEMENT OPERATIONS

Operation project of the facilities, preferably in electronic format, which include at least the following information:

(According to Article 26.2 of Royal Decree 833/1988)

- A detailed description of the treatment activities that are expected to be done, including the type of operations which should be identify according to the coding established by the Annex 1 and by the Annex 2 of Law 22/2011,of 28th July, of Waste and Contaminated Soils.
- Methods that will be used to each treatment operation, the security and caution measures, and monitoring and control operations.
- Technical capacity to carry out the expected treatment operations at the facilities.

TREATMENT FACILITIES

-Facility project, preferably in electronic format, with a detailed description of it, including its technical data and any other type of data applicable to it or applicable to the place where the treatment operations will be carried out. The project will include at least the following information:

(According to Article 26.1 of Royal Decree 833/1988)

- Descriptive memory
- Types of waste treatment operations which are expected to be developed at the facilities, identified according to LER codes (Order MAM/304/2002, of February 8).
- Special technical requirements listing
- Plans
- The budget for the facilities.
- Location of the facilities where the waste treatment operations will take place, identified by coordinates (UTM in the ETRS89 system).

In case of application for the authorization to exploit the treatment activity, the operation project including the content described for treatment operations should be submitted.

- Methods that will be used for each type of treatment operation, security and caution measures and monitoring and control operations.
- Technical capacity to carry out the expected treatment operations at the facilities.

Through the testing phase of this proposal, the environmental management points which should be included in the authorization procedure and/ or in the resolution (conditioned). Mainly those points are the following:

1. Operational control of the activities related to waste generation, emissions and discharges.
2. Emergency Environmental Plan
3. Legal accomplishment assessment
4. Environmental training of the staff

4 Summary of the main activities and results



Proposal n. 2	Indicate in the authorization procedures of waste management activities (solids and liquids) the need to prove an adequate environmental management (equivalent to EMAS / ISO 14001 requirements). Environmental management requirements would be spelled out by the Resolutions for Authorization.
Aim	To assess the feasibility of introducing typical elements of EMAS or ISO 14001 environmental management in the documentary requirements which are asked to the management companies carrying out this type of operations or in the authorities resolutions.
Competent Authorities involved	Waste Management Service of Regional Ministry of Infrastructure, Planning and the Environment
Other actors involved	Waste management companies
Methodology	<ul style="list-style-type: none"> • Work meetings with the Waste Management Service responsible. • Evaluation of the degree of management systems implementation at the solid waste management companies. • The selection of the companies which will take part in the process, by getting new permits or by the renewal of existing permits. • To make a proposal for the amendment of the authorization procedure in order to include the environmental management requirements which are easily reachable by an EMAS system. • Technic, economic and legal feasibility study of the proposal. • Preparation of a proposal for approval.
Data Source	Waste Management Service. Official List of Waste Treatment Companies. http://www.cma.gva.es/web/indice.aspx?nodo=4623&idioma=C
Timing	Starting date: 30/09/13 Ending date: 28/02/2014

5. Annexes

Report-proposal for the inclusion of environmental management requirements in waste management procedures.

Pilot area	Valencia
Name of the tested proposal	EMAS registration may allow more flexibility in obtaining certain approvals and subsequent regulatory control, by submitting the Environmental Statement with the appropriate data in each case, or any other item of SGA

	that is considered appropriate.
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1 Introduction to the report

The aim of this proposal is to give value to EMAS environmental management elements such as the Environmental Assessment, in order to be used in authorization or renewal procedures of Integrated Environmental Authorization. During the testing of this alternative the documentary requirements which are enforceable to obtain the Integrated Environmental Authorization and those requirements included in Integrated Environmental Authorization resolutions have been analysed. The problem that has arisen during the testing has been the national legislative change motivated by the transposition of Industrial Emissions Directive. Also there is a regional proposal in the public consultation phase. It will be send a proposal of contents in this regional law.

2 Aim of the test and methodology

The aim has been to verify the feasibility of the use of environmental information that the companies prepare in the running context of the EMAS environmental management system to avoid duplicities and to save time.

The following methodology has been used to the realization of the test:

1. Simulation test of a panel of companies affected by IE – IPPC Directive and companies with EMAS records.
2. The analysis of the data and the information included in the EMAS environmental statement and the information asked by Conselleria, in order to simplify the environmental communication procedure.
3. Environmental impact analysis: costs and efforts assessment, the saving and the benefits of companies and Conselleria de Infraestructuras, Territorio y Medio Ambiente.
4. The analysis of the use of new documentation (environmental assessment) for the communication of data when the new official procedure is used.
5. Proposal for the amendment of EMAS companies procedure.

3 Analysis of the test activities and results

Integrated pollution prevention and control law demands a great amount of documentation to the companies subjected to Integrated Environmental Authorization in order to obtain the necessary authorizations. This documentation consists of the following reports:

- Compatibility report from the district council.
- Soils preliminary study
- Environmental impact assessment
- Basic installation project
- Non-technical report
- Analysis of wastes
- Analysis of emissions

- Acoustic audit

Most of this information is already detailed in the environmental assessment, so a EMAS member company which could be affected later by an Integrated Environmental Authorization, wouldn't need to present again such documentation.

Benefits provided

	Expenses	WITHOUT EMAS	WITH EMAS	SAVINGS
Company	Wastes analysis	2.400 euros / year (Quarterly analysis)	600 euros /year (yearly analysis)	1800 euros / year
	EPRT- Intern Technician Costs	50 – 75 euros	25 – 50 euros	25 euros/year
Administration	Project review	150 -200 euros /record	150 -200 euros /record	-
	Objections writing	25 - 50 euros / record	25 - 50 euros / record	-
	Verification visit	75 – 100 euros / record (including 25€/movement)		75 – 100 euros / record
	Verification report writing	25 - 50 euros / record		25 - 50 euros / record
TOTAL SAVINGS				1.975 €

4 Summary of the main activities and results

Proposal n. 3	EMAS registration may allow more flexibility in obtaining certain approvals and subsequent regulatory control, by submitting the Environmental Statement with the appropriate data in each case, or any other item of SGA that is considered appropriate.
Aim	The aim has been to verify the feasibility of the use of environmental information that the companies prepare in the running context of the EMAS environmental management system to avoid duplicities and to save time.
Competent Authorities involved	Conselleria de Infraestructuras, Territorio y Medio Ambiente. Service with competence in IPPC
Other actors involved	Companies with Integrated Environmental Authorization
Methodology	<ol style="list-style-type: none"> 1. Simulation test of a panel of companies affected by IE – Directive and EMAS registered IPPC. 2. The analysis of the data and the information included in the EMAS environmental statement and the information asked by Conselleria, in order to simplify the environmental communication procedure.

	<ol style="list-style-type: none"> 3. Environmental impact analysis: costs and efforts assessment, the saving and the benefits of companies and Conselleria de Infraestructuras, Territorio y Medio Ambiente. 4. The analysis of the use of new documentation (environmental assessment) for the communication of data when the new official procedure is used. 5. Proposal for the amendment of EMAS companies procedure.
Data Source	Meetings with enterprises and Administration Staff
Timing	Starting date: 30/07/13 Ending date: 28/02/14

5 Annexes

“Use of EMAS management model element in environmental authorization procedures of activities”

Pilot area	Valencia
Name of the tested proposal	In control of integrated environmental authorizations or environmental assessments to be made, considering the availability of EMAS as a guarantee of fulfilment of applicable legal requirements

1 Introduction to the report

Unlike other models of management systems, EMAS regulation requires compliance with legal requirements and an assessment shall be done by the company. Every year this information is validated by an entity considered as an EMAS verifier, properly accredited. In Comunidad Valenciana, those verifiers are also contributing entities of authorities that respect environmental quality. With this proposal it is intended that companies with EMAS record can be seen as low environmental risk companies when the facilities inspection plans with environmental impact developed by Conselleria are introduced.

2 Aim of the test and methodology

The aim is to verify the possibility of the companies which have EMAS record and which are going to be inspected by the authorities can be considered as low risk companies and consequently can be less frequently inspected.

The following methodology has been used:

1. Selection of companies affected by IE - IPPC Directive and companies with EMAS records.
2. Analysis of the amendment of the IE-IPPC companies Inspection Plan, considering EMAS records.
3. Analysis of economic impact: costs and efforts assessment, the saving and the benefits of companies and Conselleria de Infraestructuras, Territorio y Medio Ambiente
4. Proposal for the amendment of EMAS companies procedure.

3 Analysis of the test activities and results

The companies placed in protected areas, sensitive areas, near to watercourses, as well as companies that have suffered some environmental accident and companies that have been subjected to Integrated Environmental Authorization are usually firmly inspected (Some of them even more than 20 inspections in less than 8 months).

Both for inspections and for controls, the law already provides that in certified facilities with a community management system and environmental audit, the control derived from EMAS system already assists to the effective compliance of the RD 815/2013¹⁴ control obligations. Besides, due to these controls, it could be said that the facility has a lower risk.

By other side, Law 21/2013¹⁵ proposes proceedings simplification, reducing administrative burdens of the companies, legal security operators increment of operators' legal security and coherence of environmental assessment normative throughout the country.

Benefit provided

	Spends	WITHOUT EMAS	WITH EMAS	SAVINGS
Company	Wastes analysis	2.400 euros / year (Quarterly analysis)	600 euros /year (Yearly analysis)	1800 euros / year

¹⁵ Ley 21/2013, de 9 de diciembre, de evaluación ambiental. (Boletín oficial del estado, nº296 de 11-12-2013)

Authorities ¹⁶	Verification visit	75 – 100 euros / recor(including 25€/movement)	75 – 100 euros / record
	Verification report writing	25 - 50 euros / record	25 - 50 euros / record
TOTAL BENEFITS			1.950 €

4 Summary of the main activities and results

Proposal	In control of integrated environmental authorizations or environmental assessments to be made, considering the availability of EMAS as a guarantee of fulfilment of applicable legal requirements
Aim	The aim is to verify the possibility of the companies which have EMAS record and which are going to be inspected by the authorities, can be considered as low risk companies and consequently can be less frequently inspected
Competent Authorities involved	Regional Authorities
Other actors involved	<i>IPPC companies and contributing entities</i> of authorities respect environmental quality
Methodology	<ol style="list-style-type: none"> 1. Selection of companies affected by IE - IPPC Directive and companies with EMAS records. 2. Analysis of the amendment of the IE-IPPC companies Inspection Plan, considering EMAS records. 3. Analysis of economic impact: costs and efforts assesment, the saving and the benefits of companies and Conselleria de Infraestructuras, Territorio y Medio Ambiente 4. Proposal for the amendment of EMAS companies procedure.
Data source	http://www.docv.gva.es/datos/2013/11/04/pdf/2013_10384.pdf http://www.cma.gva.es/web/indice.aspx?nodo=55450&idioma=C
Timing	<p><i>Starting date: 30/05/13</i></p> <p><i>Ending date: 28/02/14</i></p>

5 Annexes

Text proposal to be included in the approval resolution of the Environmental Inspection Plan 2014.

¹⁶ 613 Autorizaciones ambientales integradas en la Comunidad Valenciana. Consulta 21/01/2014. <http://www.cma.gva.es/web/indice.aspx?nodo=55450&idioma=C>

Pilot area	Valencia
Name of the tested proposal	Establish the possibility of using the validated information within EMAS, for showing legal compliance related to certain specific environmental legislation such Packaging and Waste of Packaging Prevention Plans, especially for Monitoring Reports

1 Introduction to the report

In the Spanish legislation of packaging and packaging waste, it was introduced a requirement to be accomplished by the companies which introduced on the market certain quantity of waste and packaging waste: Business Plans of Waste Prevention. These plans can be done by means of Integrated Management System or by their own. Anyway, the administrative obligation is to present the plans every three years to the authorities, and to present every year an annual accomplishment report of the plan. The requirement which has been propose to simplify has been the obligation to present every year a monitoring report.

2 Aim of the test and methodology

The aim of these tests is to asses, from a legal point of view and from the costs of carrying out the EMAS Environmental Assessment changes, in order to use this document as source of information that demonstrates the accomplishment with Business Plans of Waste Prevention monitoring.

The following methodology has been used:

1. Analysis of the needed documentation (monitoring reports) and analysis of the information laid down in Environmental Assessments of EMAS companies.
2. Study of submission deadlines of EMAS documents and of the documents required by the Regulation.
3. Study of legal, technical and economic feasibility of the EMAS Assessment submission, which has been conveniently modified to simplify the proceedings of EMAS companies
4. Proposal for procedure amendment or new legal provision which indicates the possibility of submit the documentation in this format, only for EMAS companies.

3 Analysis of the test activities and results

According to Royal Decree 782/1998¹¹, packers must develop a Business Plans of Prevention that during a calendar year, introduces on the market a quantity of packed goods and industrial or commercial packaging which are subject to generate more than the following packaging waste:

- 250 tons (glass exclusively)
- 50 tons (steel exclusively)
- 30 tons (aluminium exclusively)
- 21 tons (plastic exclusively)
- 16 tons (wood exclusively)
- 14 tons (carton and composed materials)

-350 tons, if are different materials and each of these materials, individually, don't exceed the previous quantities.

Business Plans of Prevention shall include the prevention objectives quantified, the measures contemplated to achieve the objectives and the control mechanisms to check the accomplishment, with reference to the following aspects: percentage of reusable packaging/recyclable packaging, improvement of physical properties, weight of the material, relation between content and container.

By other side, Business Plans of Prevention have to be approved by the environmental competent authorities from each Autonomous Communities. The Autonomous Communities shall inform the Ministry of Environment about the Plans which have been approved in order to check the reduction targets accomplishment and in order to carry out convenient cooperation tasks and coordination through Environment Sector Conference.

Royal Decree shows that Business Plans of Prevention will have a triennial periodicity, but should be inspected in case some relevant change takes place in outputs or in the type of packages. After the approval of the plan and every year before 31 March, it must be proved the degree of compliance with the targets of the previous year.

This means proceedings for the company that should develop the plans and for the authorities that should inspect them.

Benefits provided

	EXPENSES	WITHOUT EMAS	WITH EMAS	SAVINGS
Company	PEP project	2.500 euros / year	2.500 euros /year	-
	PEP monitoring	1.200 euros / year	100 - 200 euros/year	1.100 - 1.000 euros /year
Administration	Project review	25 euros / record		25 euros / record
	Objections writing	25 euros / record		25 euros / record
TOTAL SAVINGS				1.100 €

During a calendar year it is usually received 250 Monitoring Reports of Business Plans of Prevention of Comunidad Valenciana

4 Summary of the main activities and results

Proposal n. 5	Establish the possibility of using the validated information within EMAS, for showing legal compliance related to certain specific environmental legislation such Packaging and Waste of Packaging Prevention Plans, especially for Monitoring Reports
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Aim	The aim of these tests is to assess, from a legal point of view and from the costs of carrying out the EMAS Environmental Assessment changes, in order to use this document as source of information that demonstrates the accomplishment with Business Plans of Waste Prevention monitoring (PEP in Spanish)
Competent Authorities involved	Industrial Waste Service and Càmara de Valencia, by delegation of Conselleria
Other actors involved	EMAS companies which develop PEP reports
Methodology	<ol style="list-style-type: none"> 1. Analysis of the needed documentation (monitoring reports) and analysis of the information laid down in Environmental Assessments of EMAS companies. 2. Study of submission deadlines of EMAS documents and of the documents required by the Regulation. 3. Study of legal, technical and economic feasibility of the EMAS Assessment submission, which has been conveniently modified to simplify the proceedings of EMAS companies 4. Proposal for procedure amendment or new legal provision which indicates the possibility of submit the documentation in this format, only for EMAS companies.
Data source	Càmara de Comercio database of monitoring reports of PEPS
Timing	Starting date: 30/07/13 Ending date: 28/02/14

5 Annexes

Feasibility report of the use of EMAS Assessment to replace PEPs monitoring report.

5. Annexes

Annex 1: list of tested simplification proposals

ANDALUSIA	
Proposal n.1	Expansion of eligible expenses to cover the Environmental Management System maintenance
Proposal n.2	Reduce the frequency of monitoring activities in EMAS registered organizations
Proposal n.3	Simplify environmental information's procedure in EMAS registered organizations
Proposal n.4	Expand simplification measures to the activities included in the annex II of the Law 7/2007
Proposal n.5	Establish a simplified permitting procedure for the IPPC permits in EMAS registered organizations

BASILICATA	
Proposal n.1	Reduction of financial guarantees for EMAS registered or ISO 14001 organizations from the sector of waste landfill and other waste treatment.
Proposal n.2	Public tender for the granting of loans for programs on environmental education and training for increasing the number of registered EMAS school organizations.
Proposal n.3	A new regional DGR for the reduction of inspections to companies with an environmental management system certificate ISO 14001 and/or EMAS registered.
Proposal n.4	Simplifications on authorizations of enterprises with an EMAS or ISO 14001 EMS belonging to supply chains, reducing administrative burdens, time to obtain the authorizations and simplification of the technical and administrative documentation.
Proposal n.5	A new regional DGR for the reduction of costs incurred to achieve and renew Integrated Environmental Authorization reserved to companies with an environmental management system certificate ISO 14001 and/or EMAS registered.

FRIULI VENEZIA GIULIA	
Proposal n.1	Simplifications of the procedure relating to environmental controls and inspections for organizations with an ISO 14001 or EMAS certified EMS.
Proposal n.2	Reduction of costs of preliminary authorization charges and costs of routine checks for companies with an environmental management system certified ISO 14001 or EMAS with an Integrated Environmental Authorization.

Proposal n.3	Rewarding conditions and incentives for EMAS registered municipalities relating to their functions in terms of air pollution, noise pollution, light pollution containment and energy saving.
Proposal n.4	Incentives to certified organizations (ISO 14001, EMAS) or those with Ecolabel products of supplies to the public bodies(Green public procurement)
Proposal n.5	IRAP tax rate reduction for EMAS registered and ISO14001 certified companies

LIGURIA	
Proposal n.1	Reduce inspections through new rules and operational proposals for EMAS registered and ISO14001 certified companies
Proposal n.2	Implementation of simplification via regulation to reduce the procedural times for the approval of the rain water management for EMAS registered and ISO14001 certified companies
Proposal n.3	Increase the % of the reduction of guarantees, approved with Delib.G.R. 3-8-2012 n. 1014, concerning landfills and waste treatment plants EMAS registered and ISO14001 certified .
Proposal n.4	Introduction of reward criteria for the adoption of ISO14001 and/or EMAS certified management systems in the wording of “green” procurement documents for the purchase of goods and services by the Public Administration
Proposal n.5	Introduction in the 2014-2020 plan of specific economic measures applicable to the EU structural funds to co-finance environmental investments envisioned by the improvement programs for ISO 14001 and/or EMAS certified environment management systems

LOMBARDY	
Proposal n.1	Inspections re-organization within ARPA Lombardia by modification of Operative Instructions deriving from ARPA Guideline on inspections planning
Proposal n.2	Financial guarantees reduction for waste disposal and recovery EMAS registered and ISO14001 certified plants and landfills
Proposal n.3	IRAP fee reduction for EMAS registered and ISO14001 certified organizations
Proposal n.4	Valorization of the registration/certification when applying for the renewal of the IEA in case of substantial modifications
Proposal n.5	Presumption of compliance of the EMS (EMAS registered and/or ISO 14001 certified) with the Italian Organizational Model ex. Legislative Decree 231/2001

TUSCANY	
Proposal n.1	Extension of IRAP (tax) rate reduction for EMAS registered and ISO14001 certified companies at least for next 3 year
Proposal n.2	Homogenizing the frequency of checks for IPPC companies in the Tuscany Provinces and reduction of IPPC inspection frequency for EMAS registered and ISO14001 certified companies
Proposal n. 3	Introduction of regulatory relief for EMAS organization in waste regulation of Municipality
Proposal n. 4	Introduction of several regulatory reliefs for EMAS registered and ISO14001 certified companies operating in the mining sector. Measures for tax reduction.
Proposal n. 5	Introduction of several regulatory reliefs for EMAS registered and ISO14001 certified companies operating in the mining sector. Measures for the permit extension and to valorize the EMAS documents for institutional communication.

VALENCIA COMMUNITY	
Proposal n.1	Reduction of Financial Guarantees required by the Administration for certain activities such as waste management, landfill, etc.. to those companies with EMAS registration
Proposal n.2	Indicate in the authorization procedures of waste management activities (solids and liquids) the need to prove an adequate environmental management (equivalent to EMAS / ISO 14001 requirements). Environmental management requirements would be spelled out by the Resolutions for Authorization.
Proposal n.3	EMAS registration may allow more flexibility in obtaining certain approvals and subsequent regulatory control, by submitting the Environmental Statement with the appropriate data in each case, or any other item of SGA that is considered appropriate.
Proposal n.4	In control of integrated environmental authorizations or environmental assessments to be made, considering the availability of EMAS as a guarantee of fulfilment of applicable legal requirements
Proposal n.5	Establish the possibility of using the validated information within EMAS, for showing legal compliance related to certain specific environmental legislation such Packaging and Waste of Packaging Prevention Plans, especially for Monitoring Reports