



BETTER  
REGULATION  
AIMED AT  
VALORISING EMAS

*Deliverable 3.3*

Analysis of actual and potential opportunities to include measures supporting EMAS adoption at national and regional level



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## Summary

Since the launch of the strategy for simplifying the regulatory environment in 2005, simplification has been mainstreamed into the work of the Commission. Through a range of coordinated activities, the Commission has built up a political and practical framework of action delivering tangible benefits for citizens, businesses and public administrations. This strategy is connected with the other important action of EC the “*Minimizing regulatory burden for SMEs*” – (COM(2011) 803 final) - and with the *ECAP Programme* focused on the improvement of environmental compliance of the Small and Medium enterprises.

The Commission is taking action to produce SME friendly legislative proposals, like that exempting micro-entities from unnecessary legal requirements in accounting directives. The main tools of the EC are the Simplification Programme to streamline, update and consolidate EU law: around 200 proposals have been adopted that bring substantial benefits for businesses. The second tool is the Administrative Burden Reduction Programme: Commission proposals representing a 33% reduction of the targeted burdens, well beyond the 25% objective, have been tabled.

The BRAVE is part of this European Strategy, indeed the project aims at improving the environmental legislation through a better regulation and the reduction or simplification of administrative costs and burdens for the EMAS registered organizations. The project aims at supporting the full integration of EMAS (and of other voluntary certification schemes, such as the EU Ecolabel) in the environmental legislation of EU Member States. This supports the EMAS implementation, as well as for companies adopting the EU Ecolabel or other forms of certification. The project aims at encouraging the adoption and dissemination of voluntary environmental certification by the creation of supporting instruments that simplify the administrative regulatory relief and improve the environmental legislation (better regulation) for firms certified.

The first operative action, *Policy making and implementing* (action 3), aims at analyzing the state of the art of the measures concerning better regulation and regulatory reliefs based on EMAS and on other forms of certification, addressed to organizations at European, national and regional level, as well as to investigate which are the opportunities to include EMAS-related requirements or measures in European Directives and National regional legislation in force. This action is composed by three sub actions:

- 1 Integration of EMAS into other policies and instruments in the Community
- 2 Overview of the existing experiences on simplification measures for EMAS registered organizations
- 3 *Analysis of actual and potential opportunities to develop better regulation measures based on (and supporting) EMAS adoption at national and regional level*

Article 38 of EC Regulation n. 1221/09 states that Member States, without prejudice to Community legislation, notably competition, taxation and State aid legislation, shall, where appropriate, take measures facilitating organisations to become or remain EMAS registered such as regulatory relief and better regulation. Starting from the information collected in sub action 3.2, a deep *Analysis of actual and potential opportunities to develop better regulation measures based on (and supporting) EMAS adoption at national and regional level* was carried out by thee BRAVE partners, both at national and regional level.

The result of the analysis shows a series of still existing opportunities for regulators to simplify legislation and provide incentives for EMAS registered organizations. In particular, the analysis confirms the windows of opportunity represented by the reduction of unnecessary reporting requirements as well as, the excessive costs entailing some activities, and, in some cases, the excessive burden of controls. If well designed, better regulation measures could activities free time for firms to spend on their core activities, which might reduce production costs and allow additional



investment and innovation, which in turn should improve productivity and competitiveness.

## Deliverable aims.

Building on the “*Overview of the existing experiences on simplification measures for EMAS registered organizations*” - representing the state of art of the existing experiences and assessing the effectiveness of regulatory reliefs, incentives or other simplification measures for EMAS registered organizations - the BRAVE partners, by means of the *Analysis of actual and potential opportunities to develop better regulation measures based on (and supporting) EMAS adoption at national and regional level*, aimed at providing a first set of proposals to amend/simplify national and regional environmental law in order to deliver regulatory relief and better regulation to EMAS registered (as well as ISO 14001 and Ecolabel) organizations.

The analysis has focused on the Italian and Spanish national and regional level, being those nationalities the BRAVE partners'. As far as the national level is concerned, the regions considered are Lombardy, Tuscany, Liguria, Basilicata, Friuli Venezia Giulia in Italy, and Andalucía and Valencia in Spain.

## Methodology

Building on the work done for sub-action 3.2, the BRAVE partners have analysed national (Legislative decrees, Ministerial decrees) and regional (regional laws) legislation and have identified those articles and parts to amend. The proposals for simplification measures have been classified according to the following main categories:

- *Regulatory relief*: so that a registered organisation is considered as being compliant with certain legal requirements relating to the environment laid down in other legal instruments, identified by the competent authorities;
- *Better regulation*: whereby other legal instruments are modified so that burdens on organisations participating in EMAS are removed, reduced or simplified with a view to encouraging the efficient operation of markets and raising the level of competitiveness;
- *Enforcement tool*: EMAS used as a tool in the context of application and enforcement of legislation.

Each partner completed the research for one or two geographical regions. The table below shows the territories investigated by each partner.

<b>PARTNER</b>	<b>REGION</b>	<b>COUNTRY</b>
<b>SSSUP</b>	Tuscany	-
<b>ARPA</b>	Lombardy	-
<b>IEFE</b>	-	Italy
<b>CONF. GE-LIG</b>	Liguria	-



<b>AMB. ITA</b>	Friuli V.G. Basilicata	-
<b>IAT</b>	Andalucía	-
<b>ChCom</b>	Valencia	Spain

The measures found were classified through a table composed by two sections:

- 1 *Overview of the proposals;*
- 2 *Effectiveness Analysis: qualitative assessment.*

The first section, *Overview of the proposals*, contains the details on the country, the environmental scheme promoted (EMAS, ISO 14001 or other), the type of policy instrument (national/regional), the policy area of the regulatory act considered, the subject of the regulatory act, the stage on implementation (in force/preparatory stage), the description of the proposals and the articles/parts to amend.

The second section, *Effectiveness Analysis: qualitative assessment*, aims at evaluating the costs and benefits of the proposals of amendments. This section provides the assessment of the potential outcomes connected with the adoption of the measures.

Among the costs considered there are:

- Risk of implementation of the better regulation proposed;
- Economic effort for Member State;
- Economic effort for Regional Authority;
- Organizational effort for Member State;
- Organization effort for Regional Authority

The benefits analysis has considered, on the other hand, the following indicators:

- Reduction of environmental impacts;
- Savings from energy and resources consumption;
- Image improvement;
- Legal compliance;
- Satisfy requests by customers;
- Competitive improvements;
- Regulatory and monetary incentives (de-regulation, tax relief);
- Better organization and management of activities;
- Improve relationship with stakeholders and local communities;
- Better risk management;
- Savings of financial resources;
- Savings of human resources' time;
- Potential effect in terms of stakeholders satisfactions;
- Increase of registration/certification number;
- Increasing of the scheme knowledge.

Each potential outcome has been evaluated according to 5 levels of judgment (very important, important, moderately important, of little importance, unimportant), applicable to each proposal of amendment. This methodology has revealed an assessment on the relevance of the measures

collected by the partners.  
The following Figure 1 shows the analysis table filled in by partners for each simplification measures.





## Cross-sectional analysis

The aim of the cross-sectional analysis is to enable the comparison of the proposals for better regulation and regulatory relief in the 2 European countries considered and in the 7 selected regions. This analysis represents an overview of the documents prepared by the BRAVE partners.

The first focus is connected with the number of simplification measures proposed at National and regional level. Figure n. 2 shows the percentage relating to the 2 European countries considered; 16 simplification measures have been proposed, most of them (92%) for Italy and related to the *Italian Environmental Act (Legislative Decree 152/2006)*, issued in 2006 and regulating the great majority of issues related to environmental protection (water, soil, energy, emissions, etc.).

As for Spain, only one amendment has been proposed at national level and concerning *Law 34/2007: Head of State (King Juan Carlos I) on air quality and protection*.

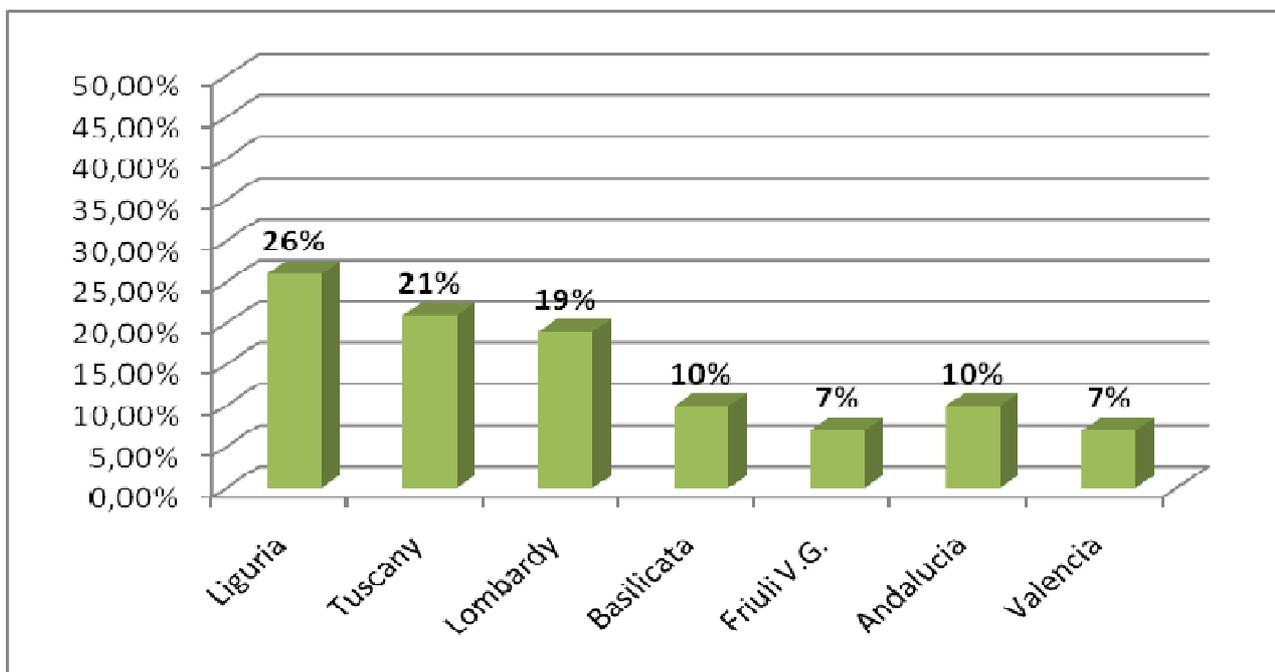
The focus on the regional level involved 7 European regions located in Italy and Spain. Overall, 42 amendments to regional laws were proposed:

*ITALY* → 11 in *Liguria*, 9 in *Tuscany*, 8 in *Lombardy*, 4 in *Basilicata* and 3 in *Friuli Venezia Giulia*.

*SPAIN* → 4 in the region of *Andalucía* and 3 in the region of *Valencia*.

Figure n. 2 shows the percentage of amendments proposed in the geographical areas considered. In Italy, Liguria, Tuscany and Lombardy show the highest number of amendments proposed, followed by Basilicata and Friuli Venetia Giulia. In Spain, of the two regions considered, Andalucía has the greatest number of proposals followed by Valencia.

**Figure 2 - Percentage of amendments proposed by region**



Source: Data BRAVE project

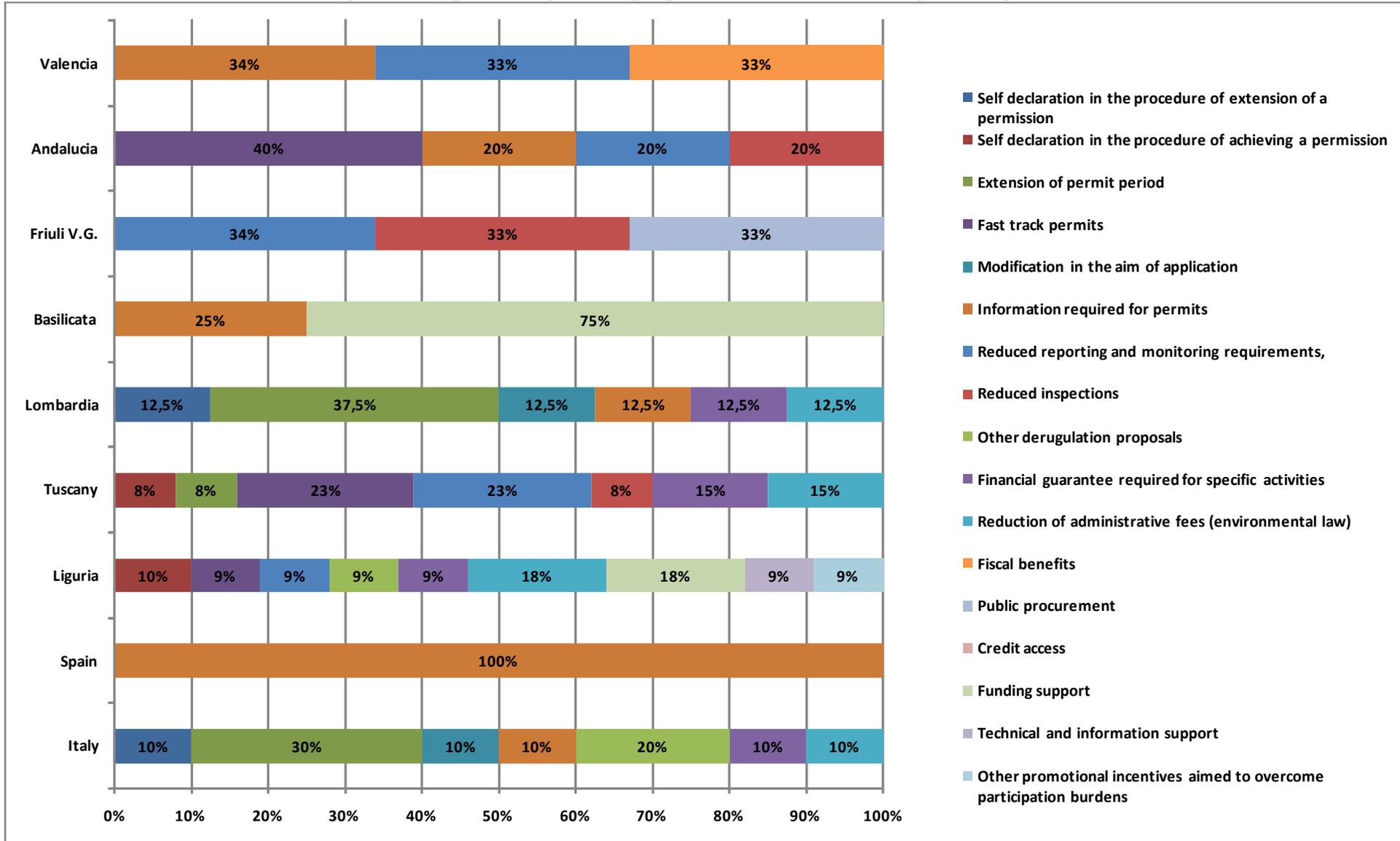
As for the type of integration proposed to the national and regional regulation, Figure 3 shows the relative percentage in each geographical region considered.

Of all typology of better regulation and regulatory relief proposed, the most common resulted to be:

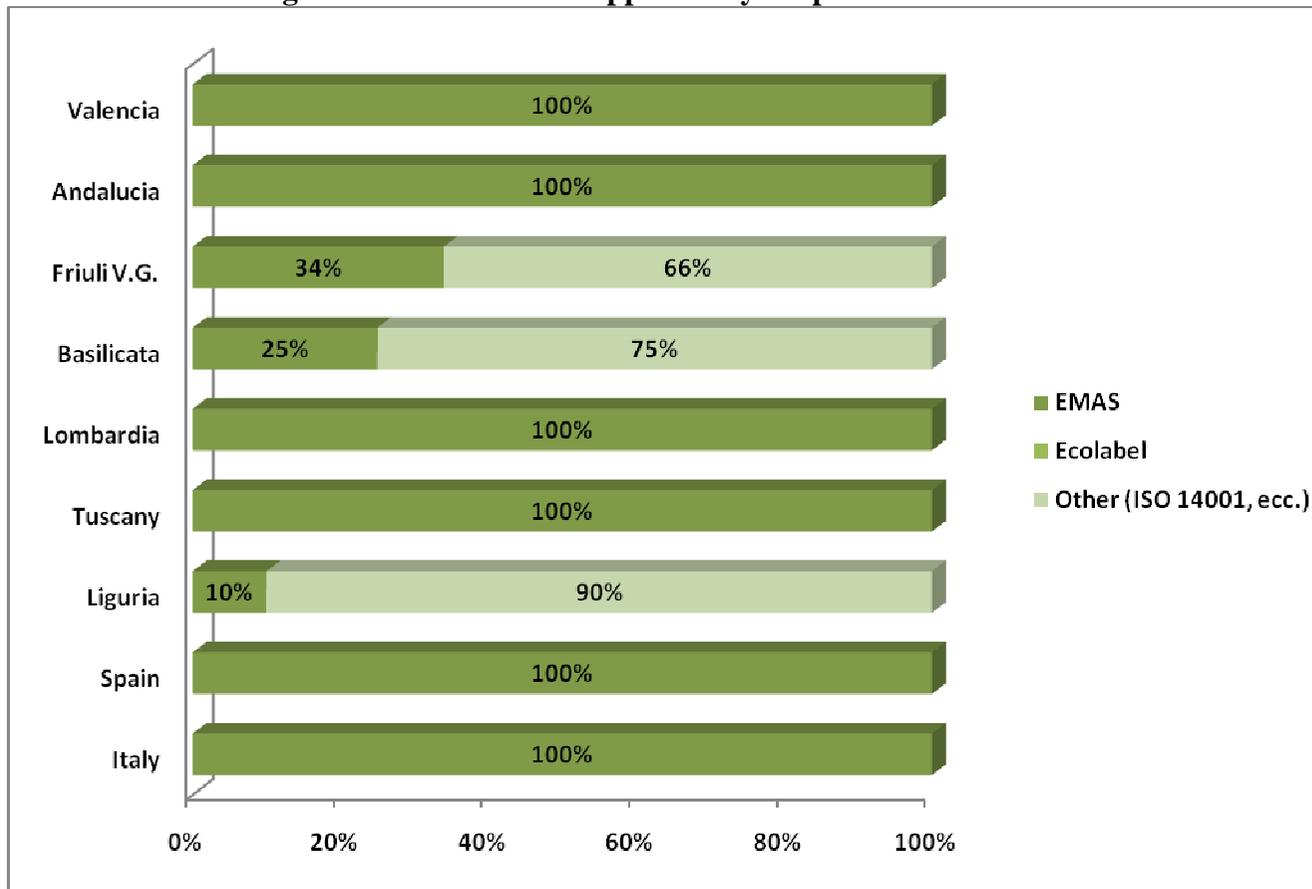
- the reduction of information required for obtaining permits;
- self-declaration when applying for the extension of a permission;
- self –declaration the when applying for a permission;
- the reduction of financial guarantees required for specific activities (waste management, waste recovery, etc.);
- the extension of permits' validity period.

With regard to the certifications that the regulation changed proposed (Figure 4), most of them refer to EMAS in all geographical regions considered, as well to other certifications like, for instance, ISO 14001.

Figure 3 - Type of integrations proposed for national and regional regulation

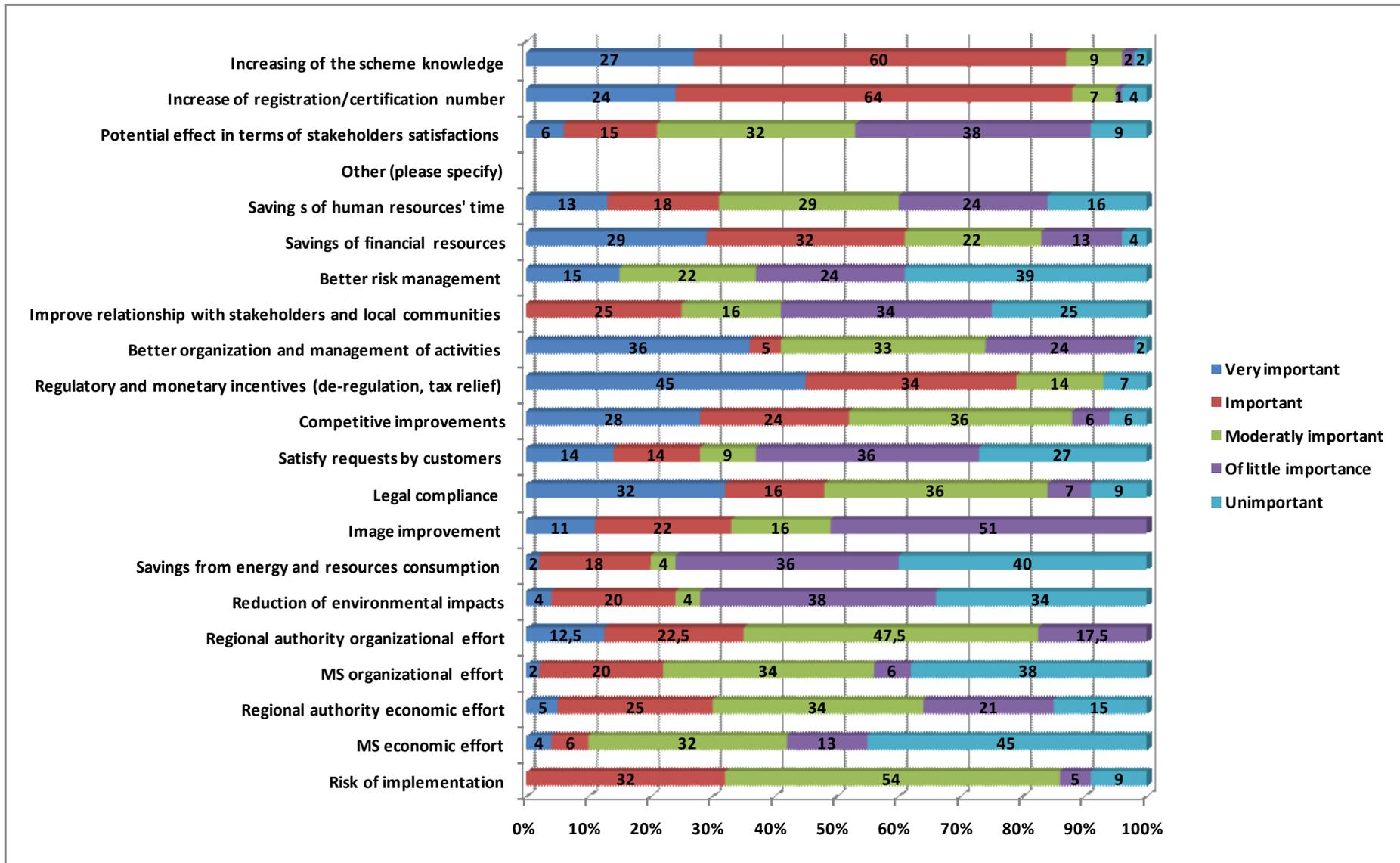


**Figure 4 - Certification supported by simplification measures**



**Figure 5 – Costs / benefits analysis**





# Geographical analysis – Summaries

## ITALY

The analysis has focused on Italian national environmental law and, more precisely, on the *Italian Environmental Act (Legislative Decree 152/2006)* with its subsequent modifications and integrations. Furthermore, the analysis has offered the opportunity to consider non-environmental legislation, with particular reference to *Legislative Decree 231/2001* on the “*Administrative responsibility of legal persons, firms and non legal persons*”.

The Matrix shows those parts and articles that can be amended and gives a short description of the amendments proposed. All better regulation opportunities identified for the Italian national level fall into the policy area “Environment, Consumers and Health”, with the subject of the legislation being “Environment”. Furthermore, all opportunities fall into the category “Regulatory Relief”.

As for the integrations/modifications proposed, they are related to the following types:

- Extension of permits validity period
  - extension of all simplification foreseen for EMAS/ISO 14001 firms under Integrated Environmental Authorization (longer validity of the authorization to run plants) to all other sectors by means of a special "single authorization" valid for water, waste, emissions, etc.;
  - extension of all simplification foreseen for EMAS/ISO 14001 firms under Integrated Environmental Authorization (longer validity of the authorization to run plants) to all other sectors by foreseeing a longer validity for the special "single authorization" valid for water, waste, emissions, etc.;
  - extension at the national level of a the measure foreseeing a reduction of administrative proceedings for releasing the Integrated Environmental Authorization.
- Simplification / streamline application of information required for permits;
  - insertion of EMAS / ISO 14001 as parameters for the evaluation of the "goodness" of project for building new plants that require a Environmental Impact Assessment procedure.
- Self-declaration in the procedure of extension of a permission
  - Actual application of the measure foreseen by the former art. 18 L. 93/2001, now art. 209 of the Legislative Decree 152/2006, (possible auto-certification for the renewal of the authorization to run plants in favor of EMAS / ISO 14001 firms).
- Reduction of administrative fees
  - Extension of the range of case when applying a reduction of costs: reduction of costs
    - related to administrative proceedings, controls, verifications, etc, foreseen by the legislation on Integrated Pollution Prevention and Control;
    - reduction of costs related to the administrative proceeding for the Integrated

- Environmental Authorization;
- reduction or exemption from fees foreseen for the first EMAS registration;
  - reduction of fees for running waste management plants;
  - reduction of fees due for the use of public water in industrial activities.
- Reduction of financial guarantees
    - Extension of the cases when applying a reduction of financial guarantees:
      - in the case of waste management and recovery plants;
      - financial guarantees required to firms operating in the sector of waste collection and transportation, as well as waste trading and management of mobile plants for waste management;
      - financial guarantees required for international transportation of waste;
      - financial guarantees due to the State in case of firms operating in the field of land reclaim.
  - Modification in the aim of application of the regulation
    - Modification of the application field of the procedures for the Environmental Impact Assessment in favor of EMAS / ISO 14001 firms. Examples:
      - raise of the dimensional threshold of firms for the application of the Environmental Impact Assessment procedure to projects of transformation and enlargement of EMAS / ISO 14001 ;
      - exemption from the Environmental Impact Assessment procedure of case of substantial modification of production plants with EMAS / ISO 14001.
  - Other deregulation proposals
    - Presumption of conformity to the organizational model as contained in the D.Lgs. 231/2001 for EMAS/ISO 14001 firms with respect to environmental crimes, as legislation further developments will potentially include such kind of responsibility in the Decree provisions;
    - Acknowledgment of the validity of EMAS and ISO 14001 environmental management schemes as guarantee of the adoption of measures aimed at preventing and limit environmental damages.

Matrix 3.3 for the identification of actual and potential opportunities to revise Italian national regulation for valorizing EMAS has been then complemented with a costs and benefits analysis for actors involved (Member State, Regional Authority, organizations), based, for instance, on to the following criteria: burden addressed, EMAS requirements addresses, financial and organizational, risks, costs of implementation, benefit for organizations, potential effect in terms of adopter satisfactions or increase of registration number, etc.

## SPAIN AND VALENCIA REGION

The analysis has chosen 3 regional regulations in which there are two regional laws and one regional decree. There is one additional law from the Spanish government.

The Matrix shows those parts and articles that can be amended and gives a short description of the amendments proposed. All opportunities identified fall into the policy area “Environment, Consumers and Health”. 3 opportunities fall into the category “Regulatory Relief” and 1 into “Better regulation”.

As for the integrations/modifications proposed, they are related to the following types:

- Information required for permits
  - Exemption of environmental impact assessment for EMAS firms under Integrated Environmental Authorization and Environmental License.
  - Possibility of proposing a specific auto-control system for EMAS firms classified into categories A and B according to the national law on air quality and air protection.
- Fiscal benefits
  - Reduction of tax related to discharge of waste water for EMAS firms. The tax depends on quality of waste water and flow.
- Reduced reporting and monitoring requirements
  - Modification of requirement for Prevention and Reduction Plan of wastes. Exemption from this Plan for EMAS installations.

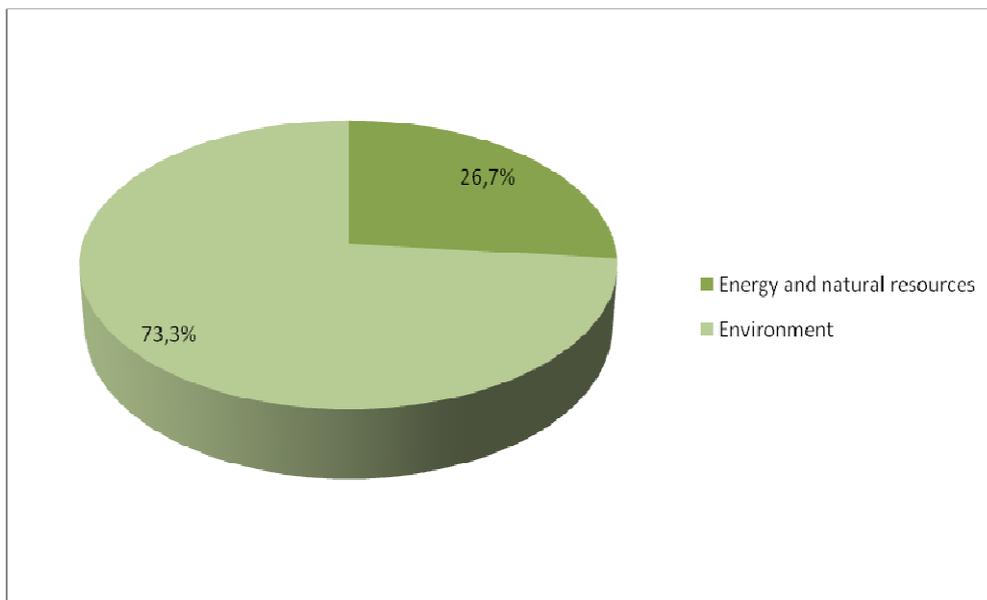
Matrix 3.3 for the identification of actual and potential opportunities to revise national and regional regulation applied in Valencia for valorizing EMAS has been then complemented with a costs and benefits analysis for actors involved (Member State, Regional Authority, organizations), based on to the following criteria: burden addressed, EMAS requirements addresses, financial and organizational, risks, costs of implementation, benefit for organizations, potential effect in terms of adopter satisfactions or increase of registration number, etc.

## TUSCANY

The analysis has focused on two policy areas: environment (Environment, consumers and health) and energy and natural resources.

15 simplification opportunities were identified: 4 on Energy and natural resources laws and 11 on environmental laws (see figure below). The main 3 proposals concern the Regional Law of February 12th, 2010 n. 10 - *Rules on Strategic Environmental Assessment (VAS), Environmental Impact Assessment (VIA)* - that suggest the reduction of fees and the reduction of reporting and monitoring requirements for EMAS organizations.

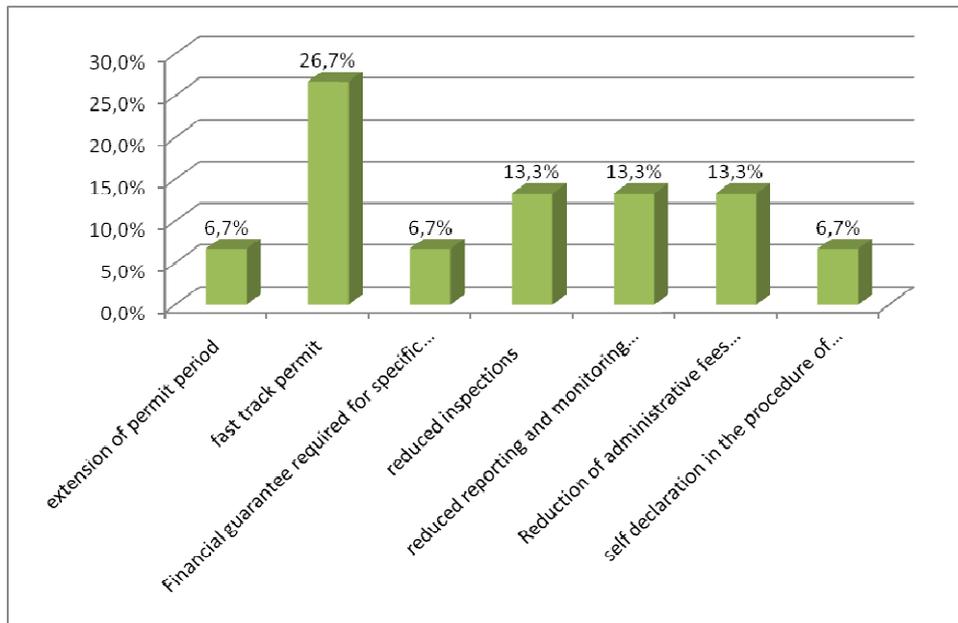
Additionally, there are 5 financial measures: 2 aim to reduce the regional and local fees and 3 aim to reduce financial guarantee required for specific activities such as waste plants or mining permits.



**Figure 2 Proposals for policy areas**

The figure below shows the proposals for type of measures. The main category is the “fast track permit” (26,7%) to allow registered companies to reduce the time required for the issue and renewal of permits. Other measures dealt with the reduction of inspections, monitoring and reporting activities and administrative fees for EMAS companies.

The aim of the proposals is to increase the number of EMAS registration in Tuscany and to award the companies engaged in the improvement of the environmental performances.



**Figure 3 Proposals for type of measures**

## LOMBARDY

The analysis has focused on Lombardy regional environmental law and, more precisely, on the Regional Law 12 December 2003, n. 26 and subsequent integrations and modifications, the main regional environmental regulation and concerning waste management, water use and soil protection. In addition, the analysis has also considered Regional Law 12/2005, the main regional legislation regulating Environmental Impact Assessment and Environmental Strategic Assessment procedures. The Matrix shows those parts and articles that can be amended and gives a short description of the amendments proposed. All better regulation opportunities identified for the Lombardy regional level fall into the policy area “Environment, Consumers and Health”, with the subject of the legislation being “Environment”. Furthermore, all opportunities fall into the category “Regulatory Relief”. As for the integrations/modifications proposed, they are related to the following types:

- Extension of permits validity period
  - extension of all simplification foreseen for EMAS/ISO 14001 firms under Integrated Environmental Authorization (longer validity of the authorization to run plants) to all other sectors by means of a special "single authorization" valid for water, waste, emissions, etc.;
  - extension of all simplification foreseen for EMAS/ISO 14001 firms under Integrated Environmental Authorization (longer validity of the authorization to run plants) to all other sectors by foreseeing a longer validity for the special "single authorization" valid for water, waste, emissions, etc.;
  - extension of the measure foreseeing a reduction of administrative proceedings for releasing the Integrated Environmental Authorization.

- Self-declaration in the procedure of extension of a permission
  - Actual application of the measure foreseen art. 209 of the Legislative Decree 152/2006, (possible auto-certification for the renewal of the authorization to run plants in favor of EMAS / ISO 14001 firms).
- Reduction of administrative fees
  - Extension of the range of case when applying a reduction of costs: reduction of costs
    - related to administrative proceedings, controls, verifications, etc, foreseen by the legislation on Integrated Pollution Prevention and Control;
    - reduction of costs related to the administrative proceeding for the Integrated Environmental Authorization;
    - reduction or exemption from fees foreseen for the first EMAS registration;
    - reduction of fees for running waste management plants;
    - reduction of fees due for the use of public water in industrial activities.
- Reduction of financial guarantees
  - Extension of the cases when applying a reduction of financial guarantees:
    - in the case of waste management and recovery plants;
    - financial guarantees required to firms operating in the sector of waste collection and transportation, as well as waste trading and management of mobile plants for waste management;
    - financial guarantees required for international transportation of waste;
    - financial guarantees due to the State in case of firms operating in the field of land reclaim.
- Modification in the aim of application of the regulation
  - Modification of the application field of the procedures for the Environmental Impact Assessment in favor of EMAS / ISO 14001 firms. Examples:
    - raise of the dimensional threshold of firms for the application of the Environmental Impact Assessment procedure to projects of transformation and enlargement of EMAS / ISO 14001 ;
    - exemption from the Environmental Impact Assessment procedure of case of substantial modification of production plants with EMAS / ISO 14001.
- Information required for permits
  - Insertion of EMAS / ISO 14001 as parameters for the evaluation of the "goodness" of project for building new plants that require a Environmental Impact Assessment procedure.

Matrix 3.3 for the identification of actual and potential opportunities to revise Italian national regulation for valorizing EMAS has been then complemented with a costs and benefits analysis for actors involved (Member State, Regional Authority, organizations), based, for instance, on the following criteria: burden addressed, EMAS requirements addresses, financial and organizational, risks, costs of implementation, benefit for organizations, potential effect in terms of adopter satisfactions or increase of registration number, etc.

## **LIGURIA**

The analysis is based on the regional legislation of Liguria connected in some way with environmental voluntary certification (EMAS and others).

The analysis has chosen eleven regional regulations in which there are two regional laws and nine administrative acts. The policy area concerning the selected acts is business for all of them.

As far as the regional laws are concerned the main aim of the two chosen laws is implementation of a faster procedure in the achievement of any authorization, permission or funding support. This goal is obtained through reduced reporting and monitoring requirements, a frequent use of self declaration and the reduction of administrative fees.

The first regional law that has been examined is the last one concerning a new service for industrial activities called “Sportello Unico” that is capable of giving any administrative information about procedures, costs, declarations and the necessary extent of time to obtain the final act. It's important to stress that the described structure is the subject that issues the permission.

The way to the implementation of a fast track for permits has been individuated in the procedure simplification throughout a wider use of any sort of silence approval to the application.

The second regional law is concerning the rules to manage the environmental impact evaluation (VIA). This is an administrative procedure that guarantees the minimum environmental impact in the realization of important infrastructures.

It seems correct to give a faster track to certificated firms (EMAS), that present application for certain realizations, avoiding the administrative passage through VIA procedure that costs time and money. It seems also correct to extend the simplification to the firms certificated ISO 14001.

As far as the administrative acts are concerned, has been taken in account any regional act having aims in the development of new environmental schemes for typical cluster products; simplification of control regulations; better results in waste collection, treatment and landfill management; incentive to typical regional productions.

In the control field has been stressed the necessity of more promotional incentives aimed to avoid too many participation burdens at the present time usually connected to activities as inspections and controls in regional firms not involved in IPPC law. There is no doubt that for these firms is useful the chance to self certification of their corrected industrial processes.

Waste management, waste treatment activities (preliminary to the landfill), implementation of the CE directive about the waste landfill, implementation of the reduction in the tax connected with the service costs applied on some kind of waste management installations are the most important subjects of the research.

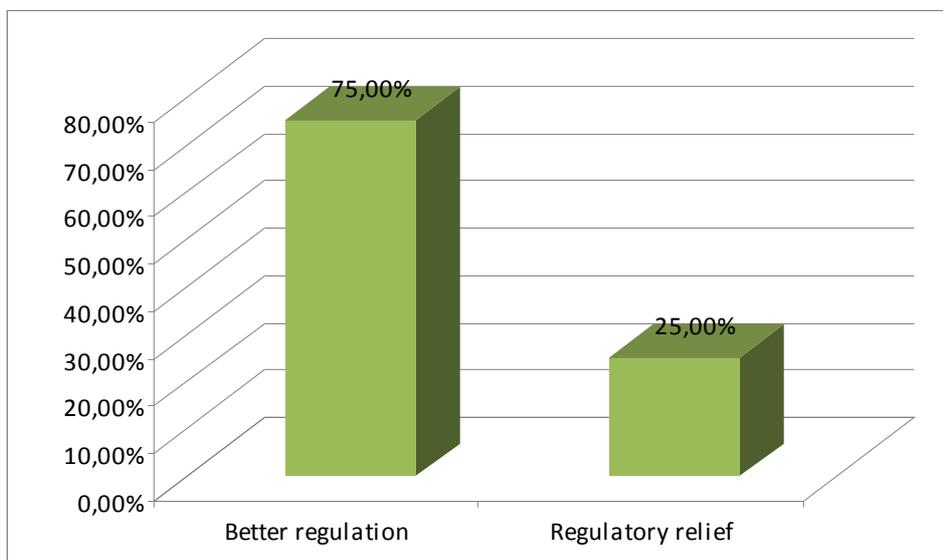
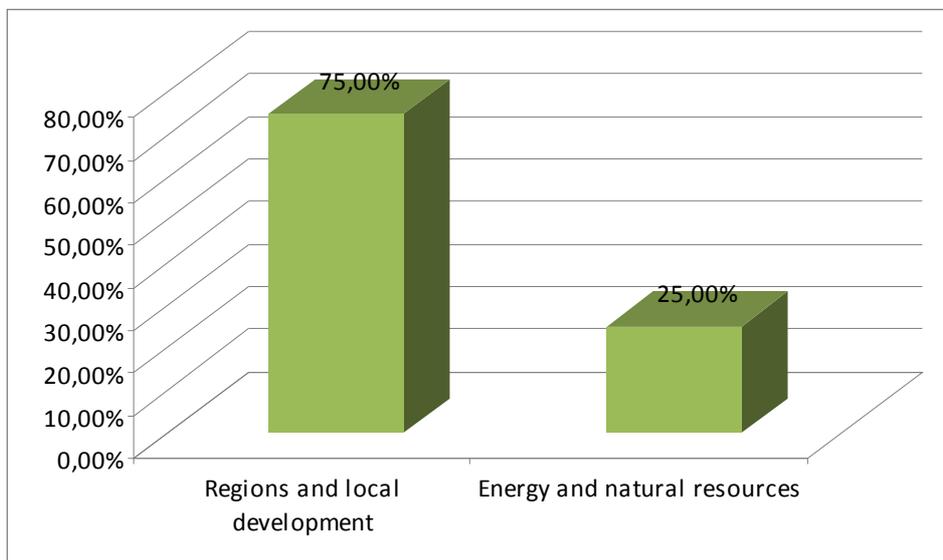
According to the study the best behavior seems to be the organization of funding support and reduction of administrative fees and financial guarantees for the certificated firms that are involved in the described activities. This target can be reached giving prize money to the firm registered EMAS and ISO 14001 that has achieved significant result in separate collection of the urban waste.

Another financial simplification concerns the amount of financial guarantee connected to certain activities as the reset of the environment in the case of closing of a waste landfill. If the firm is certificated the guarantee amount must be reduced. In order to save money, it has to be decided to avoid the VIA procedure to the certificated firms that applied to obtain a permit to waste treatment setting up. The tax amount for the treatment of every waste Kg in the landfill must be cut of the 40% in order to submit to lower administrative fees certificated firms.

As far a better evaluation of typical regional production is concerned, it is suggested to reduce reporting and monitoring requirements to obtain approvals of the products.

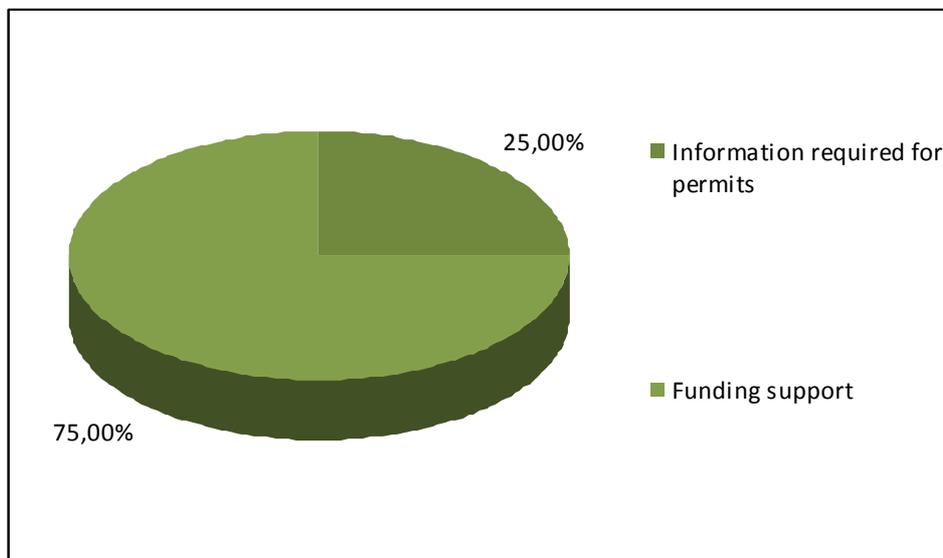
## BASILICATA

4 simplification opportunities were identified, 3 on regional and local development laws and one on Energy and natural resources laws (see figure below), 3 proposals of Better regulation and one of Regulatory relief.



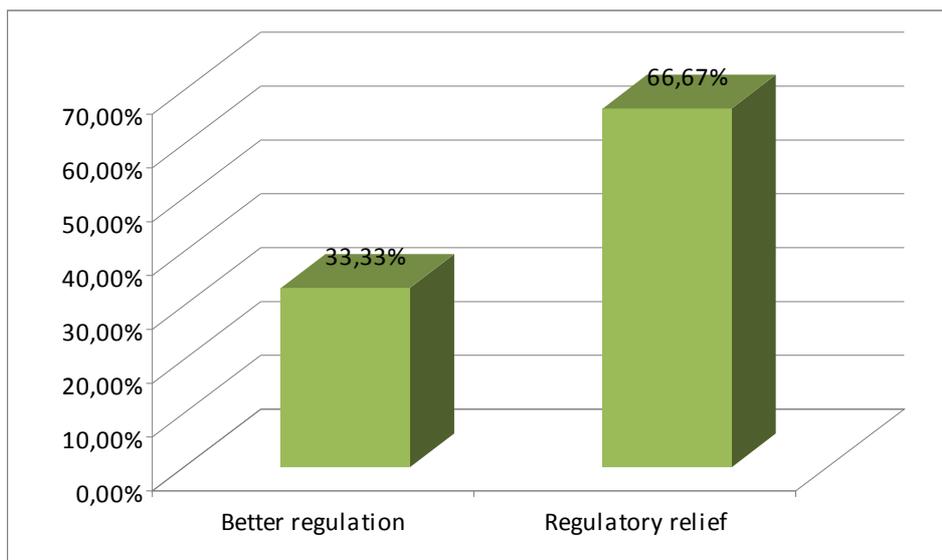
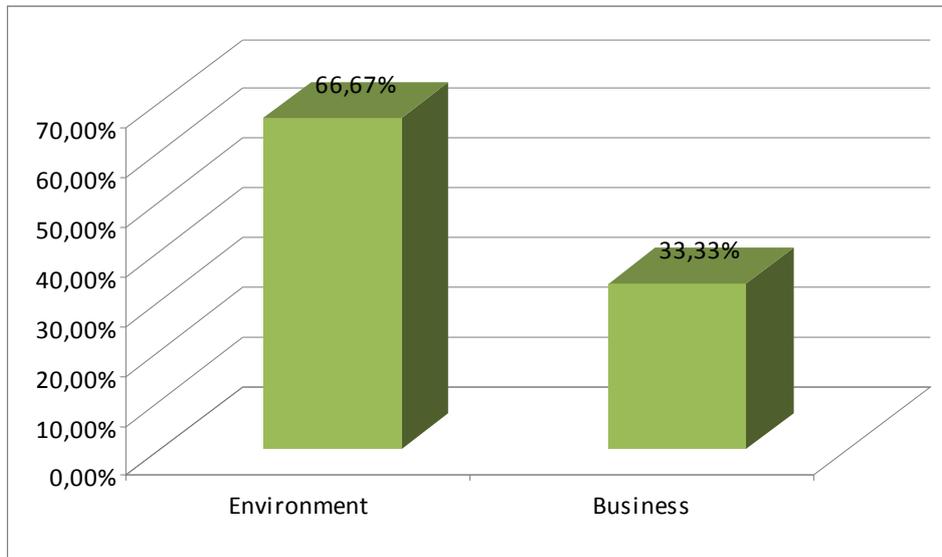
The integrations/modifications proposed are related to the following types:

- Funding support
  - Increase of score bonus for enterprises EMAS registered and maintenance of the registration for at least 10 years (in the D.G.R. n.1094 of July 5, 2010-ERDF Operational Programme Basilicata 2007/2013);
  - Require maintenance of the ISO 14001 certification or EMAS registration for all the enterprise life (in the Regional Law n.1/2009 - Granting of concessions for the construction of Industrial Development Plans aimed at re-industrialization-, and in the Call for Industrial Development Plans in the territory of the Basilicata region)
- Information required for permits:
  - Require maintenance of the ISO 14001 certification or EMAS registration for all the wind farm life (in Regional Law n. 1/2000 – DGR 2260/2010 - Regional Environmental Energy Plan (PIEAR));



## FRIULI VENEZIA GIULIA

We have identified 3 simplification opportunities, 2 on Environmental laws and one on Business laws (see figure below), 3 proposals of Regulatory relief and one of Better regulation.



The integrations/modifications proposed are related to the following types:

- Public procurement

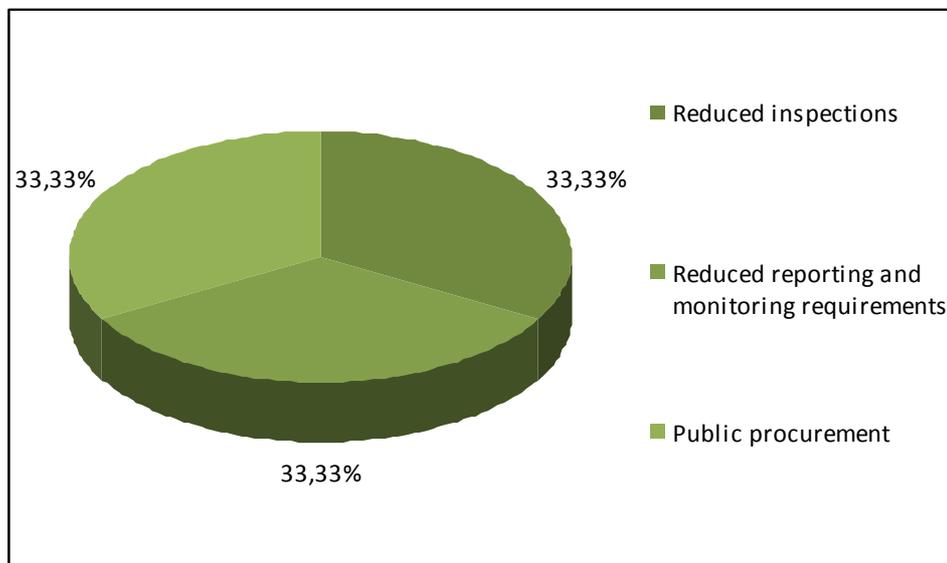
EMAS and ISO 14001 can be required as a technical specification regarding certified EMS (proposal to be included in the Regional Law n.14/2002 of Public administration procurement)

- Reduced inspections

Recommendations to the Provinces and ARPA offices to take account of EMAS in the checks planning (proposal to be included in Regional Law n.37/2008 of Urgent measures regarding the environment, land, building, town planning, hunting, reconstruction, seismic retrofitting, transportation, tourism and maritime domain.

- Reduced reporting and monitoring requirements

The timing of administrative proceedings over 30 days is reduced of a quarter for EMAS registered, ISO14001 certified organizations and for those that have at least one product Ecolabel certified (to be included in the Regional Law n. 37/2008).



## ANDALUCIA

The Royal Decree 509/2007 of 20 April, which approves the Regulation for the development and application of the Law 16/2002 of Integrated Pollution Prevention and Control (that transposes the IPPC Directive into the Spanish legal system) contemplates within its articles the possibility for the autonomous communities to establish measures to accelerate and simplify the procedures for the granting and renewal processing of the Integrated Environmental Authorisation (IEA), as well as the verification mechanisms of fulfilment of the obligations under the IEA to the facilities that apply an Environmental Management System (EMS), according to the requirements of the ISO 14001 and/or EMAS Regulation.

Under the competence corresponding the Autonomous Communities to dictate additional environmental protection regulations, the Ministry of Environment of the Andalusian Government, as a competent body in environmental matter of Andalusia, gathered such requirement in its regional regulation (Law 7/2007 of 9 July, of Integrated Management of Environmental Quality and the Decree 5/2012 of 17 January, which regulates the Integrated Environmental Authorisation), if there has not been yet established the necessary guidelines to carry out its coordination.

In this sense, the objective of this matrix 3.3 has been *to analyse the activities arising from the IPPC Law and the EMAS Regulation subjects of been coordinated, integrated and/or simplified* by the Ministry of Environment of the Andalusian Government.

With the results obtained in this stage, there will be established, in a second stage, the regulating basis which frames these guidelines of coordination into the actual regulatory context aiming to be

embedded in the administrative processes associated to the IPPC Law in Andalusia (see actions 4, 5 and 6 of the project).

The activities of the IPPC Law subjects of been embedded with the EMAS Regulation are summarised in the following table:

IPPC Law		EMAS Regulation	
Processes	Activities	Activities	Processes
Granting and Renewal of the IEA	Processing and Resolution	Environmental Declaration	Environmental Declaration and Environmental Verification Environmental Management System (UNE-EN ISO 14001)
	Previous verifications at the beginning of the activity	Environmental Verification	
Monitoring, Inspection and Control (Monitoring and Control Plans of the IEA)	<b>Control Plan</b>	<b>Environmental Management System</b>	
	Operational Control	Operational Control	
	Monitoring and Measurement	Monitoring and Measurement	
	<b>Monitoring Plan</b>	<b>Environmental Verification</b>	
	Inspections	---	
	Evaluation of Legal Fulfilment	Evaluation of Legal Fulfilment	
<b>Environmental Information</b>	<b>Environmental Declaration</b>		

*Table 1.- IPPC-EMAS coordination proposal*

The benefits obtained with this coordination would be the following:

1. If the documentation for the application of the IEA is presented validated by an Environmental Verifier it could:
  - a. Avoid document rectifications.
  - b. Minimise the deadlines associated to the IEA granting process.

2. If the Environmental Declaration validated by an Environmental Verifier gathers the environmental information required for the renewal of the IEA it could:
  - a. Avoid document rectifications;
  - b. Minimize the deadlines associated to the IEA renewal process;
  - c. Avoid the duplicity of information.
  
3. If the Environmental Declaration validated by an environmental Verifier gathers the environmental information subject of the application of the IEA Monitoring and Control Plans, it could:
  - a. Enhance the effectiveness of the control activities;
  - b. Simplify the monitoring activities.

Finally, what is intended with the establishment of these IPPC-EMAS coordination guidelines is *to reduce administrative burdens and costs associated to the IEA processing, as well as to accelerate the environmental regulatory controls.*