



**BETTER  
REGULATION  
AIMED AT  
VALORISING EMAS**

## Summary

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-effectiveness 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.

The aim of this Deliverable is to explain the methodology that could be used for the selection of the simplification proposals to test during the Action 5 of the project at regional and national level.

The responsible of the Action 5 is Ambiente Italia, that coordinates all the foreseen activities; all the project partners have contributed to the development of this methodology and they will use it in the regional activities before the testing activities.

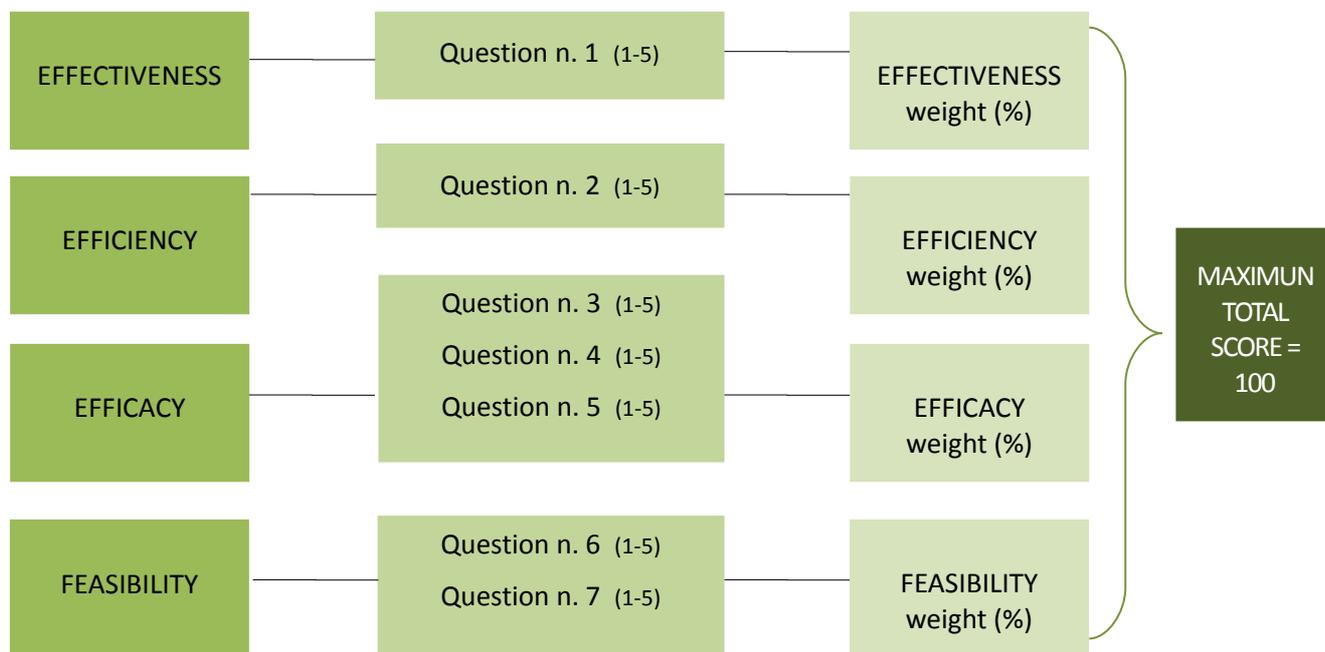
# Methodology

The methodology has been designed considering the ideas included in the project proposal sent to the EC in 2010 and the development of the project in the first year of activities.

The assessment of the proposals will be followed by each project partner and will be done with the help of the Local Working Groups (LWG) and the Regional Consultation Boards (RCB). The members of RCB will assess each regional proposal through the filling of one questionnaire (n. 1). The members of RWG will attribute the weight of each criterion with another questionnaire (n. 2). The next figure offers an overview of the general structure of the assessment methodology.

Figure 1: methodology overview

CRITERIA	QUESTIONNAIRE N.1 ASSESSMENT PROPOSALS	QUESTIONNAIRE N.2 ASSESSMENT CRITERIA WEIGHTS	TOTAL SCORE
<i>Each criteria is assessed with the help of one or more questions</i>	<i>Each question receives a score between 1 – 5 points</i>	<i>Each criterion or sub-criterion (question) is assigned a weight</i>	<i>The sums of the answers' scores with the criterion's weights</i>



The proposals will be assessed with the help of one questionnaire (questionnaire n. 1). In this questionnaire each proposal will be evaluated answering a total of seven questions, related to the selected criteria (see following table).

Table 1: summary of criteria and questions to value the proposals

N	Criteria	Description / sub-criterion	Questions to value the criterion	Indicator's value (question score)
1	<b>Effectiveness</b>	Capacity of the measure in increasing/maintaining the numbers of EMAS and/or ISO 14001 organizations.	"How effective could be the measure to increase/maintain the numbers of EMAS and/or ISO 14001 organizations?"	Very effective (5) Important effectiveness (4) Moderately important effectiveness (3) Effectiveness of little importance (2) Unimportant effectiveness (1)
2	<b>Efficiency</b>	Capacity of the measure of optimizing human and financial resources in registered/certified organizations.	"How well the simplification measures can increase the efficiency of EMAS/ISO 14001 organizations in terms of saving resources such as human, financial, time, etc.?"	Very important contribution (5) Important contribution (4) Moderately important contribution (3) Contribution of little importance (2) Unimportant contribution (1)
3	<b>Efficacy</b>	<b>3.1 Environmental relevance</b> How the proposal aimed to address the environmental aspects that are most important for the region.	"Could the proposal have a high positive impact on the environment in the region?"	Very important impact (5) Important impact (4) Moderately important impact (3) Impact of little importance (2) Unimportant impact (1)
		<b>3.2 Environmental legal compliance</b> How the proposals will help organizations to be compliant with environmental legislation (according to ECAP objectives).	"Is the measure effective to facilitate/simplify the maintenance of environmental regulatory compliance in organizations?"	Very effective (5) Important effectiveness (4) Moderately important effectiveness (3) Effectiveness of little importance (2) Unimportant effectiveness (1)
		<b>3.3 Eco-innovation</b> How the measure could provide an improvement in the adoption of innovative environmental technologies and techniques in the organizations.	"Does the measure provide an remarkable improvement in the adoption of innovative environmental technologies and techniques?"	Very important contribution (5) Important contribution (4) Moderately important contribution (3) Contribution of little importance (2) Unimportant contribution (1)
4	<b>Feasibility</b>	<b>4.1 Regulatory, administrative and technical feasibility</b> Real possibility of implementation (due to cost for public bodies, for instance).	"How do you think that the simplification measures and incentives will be appreciated by the legislator and will be received easily in the current legislation?"	Excellent (5) Good (4) Satisfactory (3) Poor (2) Very poor (1)
		<b>4.2 Coherence with regional policies' objectives?</b> How the proposal agrees with the objectives of socio-economic regional policies.	"Does the proposal agree with the objectives of socio-economic regional policies?"	Strongly agree (5) Agree (4) Neither agree/nor disagree (3) Disagree (2) Strongly disagree (1)

## CRITERIA (QUESTIONNAIRE N. 1)

The methodology of evaluation of the proposals will be based on four criteria:

1. *Effectiveness*
2. *Efficiency*
3. *Efficacy*
4. *Feasibility*

These criteria have been selected by all the project partners in order to assesses the simplification proposals and identify the measures to test.

### **1. Effectiveness**

In general the *effectiveness* indicates how something is adequate to accomplish its purpose, how it produces the intended or expected result. The aim of the criterion is to evaluate the capacity of the simplification in increasing/maintaining the numbers of EMAS and/or ISO 14001 organizations.

This criterion is assessed with the answer to one single question: "How effective could be the measure to increase/maintain the numbers of EMAS and/or ISO 14001 organizations?" (Unimportant effectiveness (1) – Very effective (5)).

### **2. Efficiency**

The *efficiency* designates the capacity of something in performing in the best possible manner with the least waste of time and effort. The purpose of this criterion is to evaluate the capacity of the proposal in optimizing human and financial resources in registered/certified organizations.

It will be measured with one question: "How well the simplification measures can increase the efficiency of EMAS/ISO 14001 organizations in terms of saving resources such as human, financial, time, etc.?" (Unimportant contribution (1) – Very important contribution (5)).

### **3. Efficacy**

The *efficacy* indicates the capacity or power of something to produce a desired effect. In this case we will use the following three sub-criteria to evaluate the simplification proposals:

- 3.1. *Environmental relevance*: identify the measures that could have the highest positive impact on the environment, so, in particular, how the proposal aimed to address the environmental aspects that are most important for the region. It will be evaluated with the question "Could the proposal have a high positive impact on the environment in the region?" (Unimportant impact (1) - Very important impact (5)).

3.2. *Environmental legal compliance*: according to this class of criteria it will be possible identifying the proposals that will help the organizations to be compliant with environmental legislation (according to ECAP objectives). The following question will be used for the assessment: “Is the measure effective to facilitate/simplify the maintenance of environmental regulatory compliance in companies?” (Unimportant effectiveness (1) – Very effective (5)).

3.3. *Eco-innovation*: how the measure could provide an improvement in the adoption of innovative environmental technologies and techniques in the registered/certified organizations (e.g. simplifications in IPPC legislation and permitting procedures to favor the adoption of BAT). It will be evaluated with the following question: “Does the measure provide a remarkable improvement in the adoption of innovative environmental technologies and techniques?” (Unimportant contribution (1) – Very important contribution (5)).

#### **4. Feasibility**

The *feasibility* indicates the real possibility of implementation of the proposal. Two sub-criteria will be considered to evaluate the simplification proposals:

4.1. *Regulatory, administrative and technical feasibility*: real possibility of implementation (due to cost for public bodies, for instance). The question in this case will be: “How do you think that the simplification measures and incentives will be appreciated by the legislator and will be received easily in the current legislation?” (Very poor (1) - Excellent (5)).

4.2. *Coherence with regional policies’ objectives*: How the proposal agrees with the objectives of socio-economic regional policies. This question has to be answered to evaluate the sub-criterion: “Does the proposal agree with the objectives of socio-economic regional policies?” (Strongly agree (1) – Strongly disagree (5)).

The questionnaire n.1 (appendix) will help partners to create the personalized document for each region.

### **WEIGHTS (QUESTIONNAIRE N.2)**

The total score of each proposal will be a product of the points received from the answer to questionnaire n. 1 with the weight attribute to each criterion/sub-criterion.

In this case Ambiente Italia will prepare the questionnaire n.2 that will allow to decide the weight of each criterion. It will be developed following the Analytical Hierarchy Process (AHP)<sup>1</sup> technique.

---

<sup>1</sup> The Analytic Hierarchy Process (AHP) is a structured technique for organizing and analyzing complex decisions, based on mathematics and psychology, it was developed by Thomas L. Saaty in the 1970s.

## APPENDIX

### Model of questionnaire for the assessment of the proposals (n.1)

**PILOT AREA:** *(name of the Region)*

**Please give an evaluation for the proposal (from 1 to 5).**

**PROPOSAL N.1:** -

How effective could be the measure to increase/maintain the numbers of EMAS and/or ISO 14001 organizations?	Very effective (5)	Important effectiveness (4)	Moderately important effectiveness (3)	Effectiveness of little importance (2)	Unimportant effectiveness (1)
How well the simplification measures can increase the efficiency of EMAS/ISO 14001 organizations in terms of saving resources such as human, financial, time, etc.?	Very important contribution (5)	Important contribution (4)	Moderately important contribution (3)	Contribution of little importance (2)	Unimportant contribution (1)
Could the proposal have a high positive impact on the environment in the region?	Very important impact (5)	Important Impact (4)	Moderately important Impact (3)	Impact of little importance (2)	Unimportant impact (1)
Is the measure effective to facilitate/simplify the maintenance of environmental regulatory compliance in organizations?	Very effective (5)	Important effectiveness (4)	Moderately important effectiveness (3)	Effectiveness of little importance (2)	Unimportant effectiveness (1)
Does the measure provide an remarkable improvement in the adoption of innovative environmental technologies and techniques?	Very important contribution (5)	Important contribution (4)	Moderately important contribution (3)	Contribution of little importance (2)	Unimportant contribution (1)
How do you think that the simplification measures and incentives will be appreciated by the legislator and will be received easily in the current legislation?	Excellent (5)	Good (4)	Satisfactory (3)	Poor (2)	Very poor (1)
Does the proposal agree with the objectives of socio-economic regional policies?	Strongly agree (5)	Agree (4)	Neither agree/nor disagree (3)	Disagree (2)	Strongly disagree (1)

