



LIFE Project Number  
**LIFE ENV/IT/000423**

**FINAL Report**  
Covering the project activities from **01/10/2011 to 31/12/2014**

Reporting Date  
<**31/03/2015**>

LIFE+ PROJECT NAME or Acronym  
<**BRAVE**>

Project Data

<b>Project location</b>	Italy - Spain
<b>Project start date:</b>	01/10/2011
<b>Project end date:</b>	30/12/2014
<b>Total Project duration (in months)</b>	39
<b>Total budget</b>	€ 2,219,679.00
<b>Total eligible budget</b>	€
<b>EU contribution:</b>	€1,109,840.00
<b>(%) of total costs</b>	
<b>(%) of eligible costs</b>	50%

Beneficiary Data

<b>Name Beneficiary</b>	Scuola Superiore di Studi Universitari e di Perfezionamento Sant'Anna
<b>Contact person</b>	Mr. Marco Frey
<b>Postal address</b>	Piazza Martiri della Libertà n° 33, 56127, Pisa, Italy
<b>Visit address</b>	

<b>Telephone</b>	+39 50 883984
<b>Fax:</b>	+39 50 883936
<b>E-mail</b>	frey@sssup.it
<b>Project Website</b>	www.braveproject.eu
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## 2. Executive Summary

The BRAVE project started on October 1, 2011 and finished on 31 December 2014, as scheduled. The project aimed at supporting the full integration of EMAS (and of other voluntary certification schemes, such as the EU Ecolabel) 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, simplify the administrative costs and burdens for the EMAS registered organizations. The main targets of EMAS (Eco-Management and Audit Scheme) - the EU system designed to help organizations (private and public) to effectively manage their environmental performances- are to promote environmental improvement and to reduce the environment impact. Thanks to the adoption of EMAS, organizations of any kinds and sizes, besides reducing their raw materials consumption and their impact on the environment, can implement managerial and organizational processes that increase know-how, improve efficiency and, in many cases, develop competitive capabilities. BRAVE encouraged the EMAS adoption through the regulatory reliefs adoption and a better regulation at regional, national and European level.

The main expected results were 21 regulatory reliefs' proposals adopted by the 7 regions involved in the project. BRAVE (5 Italian regions - Basilicata, Friuli Venezia Giulia, Liguria, Lombardia, Toscana) and 2 Spanish regions (Andalucia and Valencia).

The other expected results were:

- 1 Regulation analysis including recommendations for considering EMAS registration (and other EU voluntary certifications, as clarified below) in the development of new legislation and revision of existing legislation at national (Italy and Spain) and regional level
- 1 updated Overview of existing experiences dealing with better regulation and regulatory relief;
- the constitution of 7 Regional Working Groups, 2 national Working Groups and 1 European Working Group, 7 Regional Consultation Boards;
- 1 report that will contain both the "better regulation" and "regulatory relief" proposals;
- a list of at least 35 proposals to be tested in the Regions involved in the BRAVE project;
- a report about the results of the testing in field action, containing also the proposals revised on the basis of the results of the testing in-field;
- at least 3 regional proposals adopted (in each region) by the approval of legislative amendments or law proposals, the adoption of which will be communicated to at least 2 ministries to each of the 2 states (Italy and Spain);
- at least 50 new amendments downloadable from the project web-site.
- 1 guidance tool for the EMAS-based regulation and better regulatory relief;
- at least 3 training initiatives to disseminate and sensitise on the use of the guidance tool in each Region involved in the BRAVE project.

The main BRAVE results concerned the adoption of the proposals. BRAVE achieved all the expected results; 30 approved proposals (instead of 21 as scheduled in the project) 27 at regional level (in Friuli Venezia Giulia, Liguria, Lombardy, Tuscany, Valencia and Veneto) and 3 at national level (in Italy). BRAVE provided only results at regional level but the activities by project partners allowed the adoption of 3 proposals in national acts too (1 proposal in the LEGISLATIVE DECREE n. 46 March 4th, 2014. Implementation of Directive 75/2010/EU regarding industrial emissions and 2 in Collegato alla Legge di stabilità (National Stability Law 2014). Indeed Public Authorities approved 6 tenders valorizing EMAS in the services allocation. The main deliverable was the "Guidance tool" realized during the action 7. This is the main tool for the replicability of the project experience in other European regions and countries, it incentivises the adoption of regulatory reliefs and better regulation through the inclusion of an overview of main categories of regulatory reliefs existing in Europe and many examples concerning the measures adopted and the benefits achieved. All project deliverables were realized.

## **Administrative part.**

The project management has been intense since first month. Action 1 allowed us to better organize the project activities and to share the methodologies implemented in all actions.

The coordinator and partners understand the importance to provide immediately for a meticulous planning and for the definition of operative tools to reach management target and control of project activity. The main tool for the project management was the Steering Committee (SC) representing all partners involved in the BRAVE. The SC held 11 meetings in Italy and Spain. The SC shared choices, methodology and planned the internal deadlines to achieve the expected results. SC assessed the quality of project deliverables and solved the encountered problems. Each partner coordinated at least one project action. SSSUP coordinated BRAVE and adopted many tools to manage the project activities. SSSUP periodically sent the Work Plan and the Deadline Summary (management tools) to all partners to remind the deadlines and the missing outputs. SSSUP activated a project mailing list (brave@sssups.it) to facilitate communication among the people involved in the project. SSSUP periodically held phone or web meeting with the partner's coordinator of action to assess the project progress and the active involvement of all project partnership. All partners sent to SSSUP a monthly report updating on the implemented activities.

The action 2 "project monitoring" supported the management. The main tools were: monitoring team, that periodically monitored the project progress, the monitoring tool, filled in every quarter with data and indicators concerning the project progress and the list of project indicators monitored every quarter and in the main reports sent to European Commission.

11 monitoring reports were completed.

The practice amendment to modify project partnership was added to these activities.

During the first months of project CTL abandoned the BRAVE for issues of internal organization. CTL signed the resignation to participate in the BRAVE project on December 20<sup>th</sup>, 2011 (by letter). Since the start of the project no activities have been carried out, and no costs have been incurred. SSSUP evaluated the proposal of Chamber of Commerce of Valencia to substitute the CTL in the project and to become the partner responsible of activities for Valencia region.

The Chamber of Commerce of Valencia entered in the partnership (from January 1<sup>st</sup>, 2012) in order to carry out the activities previously assigned to Centro de Tecnologías Limpías. The Chamber of Commerce accepted the budget of CTL to implement the project activities.

Confindustria Liguria, indeed, cooperated with Confindustria Genova since the start of the project (October 1<sup>st</sup>, 2011), so Confindustria Genova also asked to enter in the project partnership.

In June EC confirms the entrance of new partners (Chamber of Commerce of Valencia and Confindustria Genova) in the BRAVE.

## **Technical part.**

All project deliverables were completed and published on project website. Furthermore, activities not explicitly foreseen by the initial version of the project were carried out in order to attain a more in-depth knowledge of some relevant topics; additional deliverables were carried out such as the Report on the European Survey of EMAS organizations (250 collected questionnaires) and the 14 case studies on the regulatory reliefs adopted in Italy and Europe. The project partners started off with the Actions according to the submitted Gantt chart and all actions are completed in time or with few delay. Such delays did not influence the achievement of the project's objectives but allowed to deeply understand some relevant dynamics and to better plan and carry out the next activities. The main delay concerned the action 3 "Policy Making". The partners carried out the deliverables 3.1 Policy Opportunities for European Policy Maker, 3.2 Overview of existing experiences dealing with incentives and regulatory relief for EMAS registered organizations, 3.3 Analysis of actual and potential opportunities to include measures supporting EMAS adoption at national and regional level. This activity was ended in October 2012 instead of May 2012 to allow partners to better analyze each case study by also collecting primary data by questionnaire survey and/or interviews. Additional deliverables were carried out such as the Report on the European Survey of European EMAS organizations (250

collected questionnaires). The final report on survey results was completed on October 2013 and SSSUP presented it during the European EMAS Competent bodies meeting that was held in Brussels on 7 November 2013.

7 Regional Working Groups (RWGs) and 2 National Working Groups (NWGs) were established (Action 4) and several meetings were carried out to identify the regulatory relief proposals to share with the Consultation Boards. 7 Regional Consultation Boards (RCBs) and 2 Project Consultation Boards (PCBs) were activated; the PCBs and RCBs discussed and shared the regulatory relief proposals emerged from RWGs and NWGs. The RCBs started in September 2012 (the first was in Friuli V. G.); 4 PCBs meetings were carried out: 2 in Spain and 2 in Italy. The meetings in Spain were held at the end of 2012 while the two meetings of the Italian PCB were held in the first semester of 2013 (February and July). ARPA Lombardia and Chcom postponed the last RCB. The delay in the organization of the meetings was due to the decision to get an extensive participation of stakeholders. The objectives were achieved and high interest emerged, therefore it is possible that other PCBs or RCB meetings will be organized to follow the progress of the projects (the new meetings will be accounted as activities of Actions 5 or 6).

Action 5 started in time and the milestones and deliverables were achieved as scheduled. The partners selected 35 proposals to test at the regional level and identified the competent authorities and companies to involve in the testing phase. Each partners selected the methodology for testing the proposals. The progress of activities was in line with the project plan and Ambiente Italia (action coordinator) completed the four deliverables provided in time. The deliverable "*Report about the results of the testing in field phase*", describing the strengths and weaknesses of each proposal to adopt.

Action 6 started in advance and some results have already been achieved. This choice was shared by the partners at the end of 2012 with the following motivation: the adoption phase is the riskiest phase since it depends not only on the partners' efforts but also on the political decisions of policy makers. Legislation development is not necessarily enacted in line with the project timetable (for instance the change of a law where some regulatory reliefs could be introduced was planned by the regional government before the start of Action 6). Therefore, the project partners decided to adopt a twofold approach for Action 6. The first approach follows the project proposal; the second one aims to take advantage of all the opportunities emerging from the legislative process in each region. All deliverables are completed in time. The main results of action 7 is the "Guidance tool" a document supporting the regulatory reliefs adoption. The partners implemented the Communication plans; 50 initiatives are completed of which 23 training initiatives and 13 seminars. The target audiences involved were companies, students, researchers, public authorities and others. Totally the communication plans directly involved more than 250 people and many others by articles and web communications.

The networking activities (Action 8) started on time and the partners selected some project beneficiaries operating in the same topics of BRAVE to exchange information and knowledge.

### **Dissemination**

Dissemination was one of the main project actions. The partners attended 17 public events and an international conference with around 250 researchers. Regional and national newspapers published totally 27 articles on BRAVE. The Mid-term conference was held in Valencia on May 7, 2013 and it involved around 60 people. The Final Conference was held in ECOMONDO event (Rimini on November 7, 2014), the main Italian public event on environmental topics. The partners bought exhibition space during ECOMONDO visited by 100.000 people in 5 days. The web site [www.braveproject.eu](http://www.braveproject.eu) is periodically updated and it will be active for the next 2 years.

SSSUP bought a newspaper page to publish the main BRAVE proposals not adopted yet. The most important economical newspaper in Italy (Sole 24 Ore) published a page on BRAVE on 4 December 2014.

### 3. Introduction

The EU Action Plan for Sustainable Consumption and Production (SCP) and Sustainable Industrial Policy (SIP) (COM (2008) 397 final) cited the environmental management scheme “EMAS” as a tool for improving the resource efficiency of production processes of the industry. The ECAP Programme (Environmental Compliance Assistance Programme) (COM (2007) 379 final), launched by the European Commission, suggests the implementation of an environmental management systems (EMS) as a tool to improve the environmental performance and the legal compliance of companies and SMEs. The scientific literature introduces many data on the efficacy of certified EMS such as EMAS. A wide range of evidences from existing studies analyzed the benefits of EMS’ adoption (Patton & Baron 1995, Watson 1996, Van Der Veldt 1997, Aragon 1998, Madsen & Ulhøi 1999). Despite the efficacy of EMAS and EMS, there are still many barriers for their adoption. The barriers encountered by organizations when adopting an EMS are generally broken down into two categories: those which are external and those internal to a company (Milieu Ltd e Risk and Policy Analysis Ltd, 2009). In this framework, the role of Public Administration is to support EMAS and other EMS essential in order to remove some of the abovementioned barriers. The Public Administration operating at European, National, regional and local level can award the commitment of EMAS companies by fiscal incentives and reducing their administrative burdens through regulatory reliefs. The EMAS dissemination can improve the environmental management and reduce the environmental impacts by companies. The BRAVE objective was the introduction of new regulatory reliefs finalizing to encourage the EMS adoption and support the companies certified yet in the maintaining of their EMS. Starting from an intense research phase BRAVE detected that European countries where there are many regulatory reliefs, benefits and advantages from certified companies, EMAS is spread. The methodologies adopted by project partners allowed to define many proposals (around 180) shared with different stakeholders (NGO, trade organization, public authorities, control authorities and others..). The partners and the stakeholders defined altogether regulatory reliefs really efficacy and efficiency to award the EMAS company’s commitment. The partners held meeting and workshop to support the adoption of BRAVE proposals involving regional and national politicians, trade organizations, managers of regional authorities.

The BRAVE environmental benefits are connected with EMAS adoption; the EMS can support companies in resource efficiency and reducing environmental impact. The EMS can improve the environmental management favouring the waste reduction, the air emission controls, more efficient use of resources and many others environmental outcomes.

– Expected longer term results

The project supports the implementation of *Strategy for simplifying the regulatory environment in 2005 (COM(2005) 535 final)* approved by European Commission in 2005. Indeed BRAVE implements the strategy included in the EC Communication “*Minimizing regulatory burden for SMEs*” (COM (2011) 803 final) and the ECAP Program on the environmental compliance of small and medium companies. The project, starting from the European strategies, created many initiatives and tools to disseminate the regulatory reliefs and the better regulation strategy.

The “Guidance tool”, emerged from action 7 is the main tool for the project replicability and for the dissemination of European Strategy on simplifying the regulatory environment. This document encourages organizations to adhere to EMAS Regulation, so that organizations achieve a win-win situation in terms of administrative simplification, cost savings and a reduction of regulatory environmental controls. The training and communication initiatives aimed to disseminate the European policies, the existing simplifications and benefits for certified companies and the BRAVE proposals. These initiatives will contribute to disseminate the European strategy and encourage both the EMAS adoption and both the introduction of regulatory reliefs in the environmental legislation. The partners increased the project impact and its replicability by dissemination initiatives and networking. BRAVE attended one of the most important public event on environment in Italy (Ecomondo, Rimini 5-8 November 2014). 100.000 people participated in this event and visited the exhibition space on Life plus projects bought by BRAVE partners.

BRAVE can improve the legislation of the regions and countries not directly involved in the project. The partners will continue to promote the regulatory reliefs proposals and the Guidance tool in other territories where the EMAS adoption must be supported.

Many other benefits can be associated to EMAS adoption. The EMS supports the companied in the improvement of environmental management. Studies and researched demonstrated that EMAS or other environmental certification allow reduction of environmental impact, cost reductions improve the employees networking and competence.

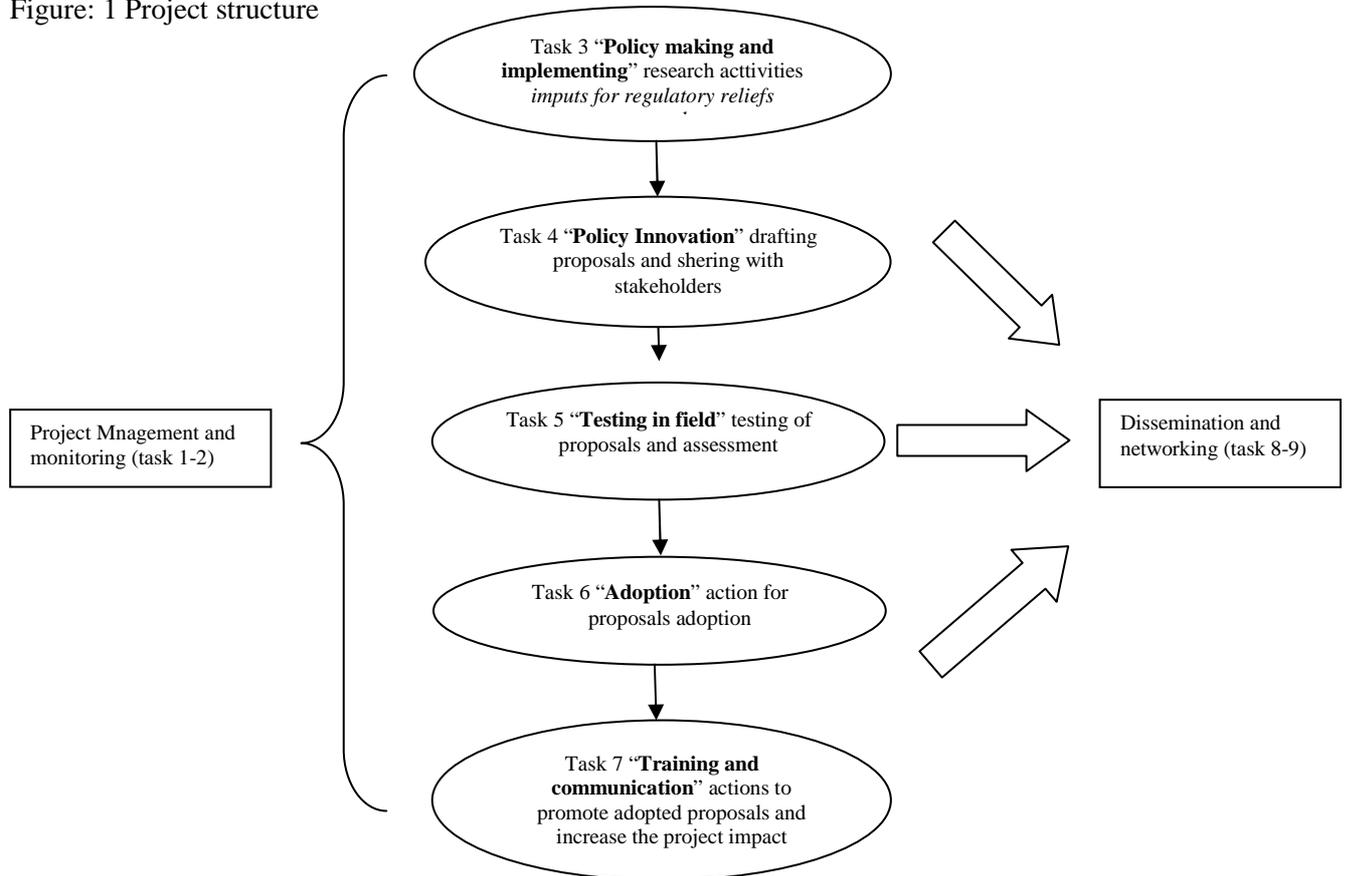
The partners promoted the BRAVE by social network as twitter, LinkedIn, promoting the replicability of BRAVE experience.

#### 4. Administrative part

##### 4.1 Description of the management system

The project is composed by 2 managing and monitoring actions (1 and 2), 6 operative actions and the dissemination (action 9).

Figure: 1 Project structure



SSSUP managed the project organizing steering committees and planning project activities. SSSUP supported all partners in the coordination of each action. SSSUP and the partners share the decisions, choices and documents. The main tools adopted for project management and monitoring were:

- Steering Committee (SC), was made up of at least one representative from each partner, but also involved other actors participating in the various actions and the members of CARTESIO

Network. For each operative action the partners held at least one Steering Committee meeting. The meeting of SC were 11 in all regions involved in the project. The partners shared choices, methodologies and problems during the meeting of SC. Deliverable Final collection of Steering Committee meeting reports (annex 1.1.) The SC followed the rules included in the deliverable Regulation of Steering Committee (annex 1.4).

- Monitoring Team (Deliverable 2.1 Annex 2.1), was composed by project partners and Cartesio Network members. It periodically monitored the project progress through monitoring tool (annex 2.2.) and project progress indicators (annex 2.3). The partners monitor the progress project every quarter. The monitoring team completed the monitoring tool and assessed the project indicators at least twice during the project period. They analyzed the state of art of BRAVE in a three months period and fills in the monitoring tool with the data collected by the other partner's interviews. The project indicators are included in the monitoring tool and are periodically measured. The monitoring reports are 11(annex 2.4). Internal Auditor (Francesco Rizzi, Scuola Superiore Sant'Anna) was an expert of SSSUP not directly involved in the project that monitored the result achieved at the end of each action. The emerged audits were on action 3, 4 and 5 and the last on the other actions completed by 30/12/2014 (annex 2.5) .
- Financial Manager Antonia Tripodi (Scuola Superiore Sant'Anna) was expert of financial reporting. Starting from June 16, 2012 the financial manager is only Antonia Tripodi since from this date Sandra Ricci does not work on the BRAVE project anymore.

The partners appointed the SC, Monitoring team, Internal auditor, and financial manager during the kick of meeting held October, 19<sup>th</sup> 2011 in Pisa.

The main tools for planning and monitoring were:

- Project mailing-list: an e-mail account for technicians and administrative representatives of each partner (brave@sssup.it) to facilitate communication among the people involved in the project.
- Monthly reports, was an updating to send to SSSUP every month; the excel file included the progress activities in each region involved. SSSUP collected the technical information and emails the general monthly report to the monitor.
- Work Plan that scheduled the deadlines for the activities in the first project year (Annex 1.2)
- Deadlines summary (Annex 1.3 Deadlines summary) that identified the deadlines for the next activities, the deadlines for past activities with the missing output and the partners that did not achieve the results provided. This tool substituted the Work Plan starting from January 2013. This tool is clearer than the Work Plan and it immediately identifies the missing output and the non-compliant partner.
- The Steering Committee timetable that identified the meeting of SC during the project and the actions to discuss.

### **Description of project coordinator and associate beneficiaries.**

#### *Beneficiary coordinator*

The Institute of Management of SSSUP is the BRAVE coordinator. SSSUP managed many European projects financed by Life and Life plus Programme or other European funds (MED, FP7, Eco innovation and others). Within Scuola Superiore Sant'Anna, the Institute of Management is active in the field of management in the context of private and public organizations, with particular reference to the management of innovation, sustainability and health. SSSUP management team (SMT) was composed by full-time project manager, full professors and associated professors, financial manager and technical and administrative SSSUP staff. SMT coordinated the project development, monitored the tasks implementation and the partner outcomes and assessed the project results. All members of SMT have high skills and competences in Life and Life plus project development.

Following, the main roles of SMT:

- *Full professor*, supporting the project decision making in the SC and IEF board and participating in

the most complex project actions. He coordinated the SMT and he is the contact point for European Commission.

- *Associated professor* is responsible for scientific project results. Coordinating the SC choices the Associated professor supported the project decision making and the project implementation. He is responsible for scientific quality of project deliverables.

- *Project Manager* (full time in BRAVE) coordinated the project and the partners. PM managed all project actions, defined deadlines and monitors the project progress. He solved the problems and promoted the relationship among partners. He was the main contact for partners and for other stakeholders interesting in the project.

- *Financial manager* is the profile dedicated to monitor and assess of financial issues for SSSUP and for all partners. She verified each cost incurred by the project and the connected documents. She is responsible for financial issues and partners expenditures.

Other personnel composed the SMT and contributed to project progress.

SMT periodically organizes the partners meetings (SC), defined the meeting agenda, drafted the internal deadlines and realized the management tools to guarantee the efficacy project coordination. SMT periodically sent the deadlines summary and checked the partners contributions. SMT managed the relationship with stakeholder interesting in the BRAVE. All partners contributed to project implementation and operated to improve the BRAVE impact in Italy, Spain and Europe.

Project Manager and SSSUP were the reference point among the project partners and the subject in charge of reporting to and communicating with the European Commission, acting as the interface between the project partners and the Commission.

#### *List of associated beneficiaries.*

- ARPA Lombardia carried out technical and scientific activities, supporting the political and administrative action of the Region, the Provinces, the Municipalities and other public bodies on environmental matters. It managed the action 8 “Networking” and participated in many dissemination initiatives. The involved profiles collaborated with Lombardy region in all project actions and especially to support the adoption phase.
- IEFE is a department of Bocconi University specialized in environmental topics. It coordinated the research action (task 3) and implemented the project activities with ARPA in Lombardy.
- Confindustria Genoa and Confindustria Liguria are trade organizations. They coordinated the “adoption” phase and their staff (around 5 people) implemented the BRAVE in Liguria.
- Ambiente Italia (AI) is a company operating in environmental consulting field. The AI staff has experiences in European project and in EMAS implementation. It coordinated the action 5 “testing in field”; it implemented the BRAVE activities in Friuli VG and in Basilicata.
- IAT attends and manages in European projects from many years. IAT coordinates the action 7 and managed the project activities in Spain and especially in Andalucía.
- CHCOM is a trade organization that supports SMEs and medium companies. It managed the dissemination and implemented the BRAVE in Valencia. Chcom substituted CTL Valencia.

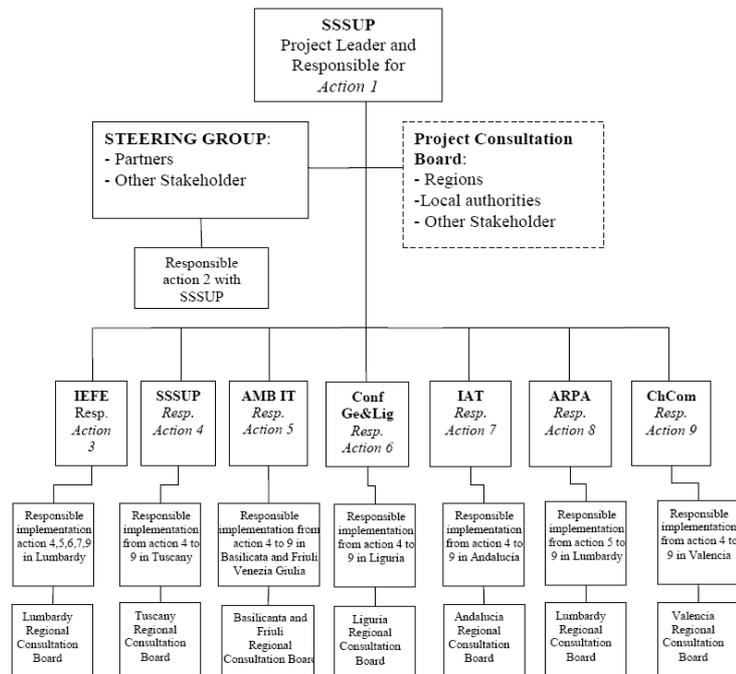
Each partner managed at least one task. The partner coordinator defined the internal deadlines of managed action, drafted the template for partner’s contribution, suggested the methodology to achieve the expected results and assessed the quality of work.

During the first months of the project CTL Valencia decided to leave the BRAVE project for internal organization issues. CTL signed the resignation letter from the BRAVE project on December 20, 2011. Since the start of the project no activities have been carried out, and no costs have been incurred. SSSUP evaluated the proposal of the Chamber of Commerce of Valencia to substitute the CTL Valencia and to become the partner responsible for the activities for the Valencia Region. The Chamber of Commerce of Valencia has joined the partnership (from January 1, 2012) in order to carry out the activities previously assigned to Centro de Tecnologías Limpías. The Chamber of Commerce accepted the budget of CTL to implement the project activities.

Confindustria Liguria, indeed, cooperates with Confindustria Genova since the start of the project (October 1, 2011), so Confindustria Genova also asked to enter the project partnership. On July 3, 2012 EC confirmed by an official amendment the entrance of new partners (Chamber of Commerce of Valencia and Confindustria Genova) in the BRAVE.

The following Organization chart shows the roles of each partner and the task coordinators.

Figure 2: Organization chart



In addition, the project structure includes some bodies that operated in the involved territory and that had a significant role to obtain the project's results. These groups were activated during the action 4 but the partners continued to meet them until the project end:

- *7 Regional Working Groups*: composed by the Partner coordinator of the regional activities and the representative of Regional Government;
- *2 National Working Groups*:
- EU-wide Working Group, composed by all project partners.
- *Regional Consultation Boards (RCB)*: composed by Representatives of private and public Local and Regional Institutions (Provinces, Regional Departments, Industrial and Trade Associations, Municipalities, NGOs, etc.)
- *Project Consultation Boards* (one for each country involved in the BRAVE project) composed by relevant national bodies from Italy and Spain, for the topics of the project.

#### 4.2 Evaluation of the management system

The partners did not encounter any particular problems in the project. High cooperation and collaboration among all partners emerged from the first project months. The partners cooperated yet in many other European projects and they already knew how SSSUP manages Life projects. Any small problems were overcome.

The management of project was efficacy so the partners achieved deliverables and the milestones scheduled. The project development followed the deadlines in the time table.

The project management involved all partners. Each partners coordinated at least one task (see the

Organization chart). Each partner contributed to project development and managed the coordinated task based on its experience and skills. Each project partner was different from the others and each has contributed through its own characteristics.

The coordination activities by partners concerned:

- Planning of activities scheduled in the task;
- Introducing tools and methodology to achieve the task expected results;
- Defining internal task deadlines;
- Drafting the deliverable;
- Monitor the partner's contribution;
- Monitor the task progress.

Indeed all partners contributed to BRAVE dissemination and networking. All partners attended public events and published articles and news. Following a brief description of added value of each partner in the BRAVE:

- SSSUP, its high experiences in project management allowed to coordinate the project and achieve the expected results. The supported especially the research and the training activities.
- IEFE contributed in the research actions and in the legislative analysis. Its high skill in research continually guaranteed an updating on environmental legislation development to all partners.
- ARPA had contacts with many public authorities and check bodies. Its network in Italy and in Europe allowed disseminating and promoting BRAVE and improving the project impact. ARPA strongly cooperated with SSSUP and Confindustria to create an Italian network, composed by politicians, institutions, trade organizations, companies and other stakeholders, supporting BRAVE.
- Confindustria Genoa and Liguria strongly cooperated with SSSUP in the stakeholder relation and in the management of adoption phase. Confindustria contributed to disseminate BRAVE among industrial trade organizations of Italy.
- Ambiente Italia had experiences in European projects and its added value emerged in the project decision making and in the drafting the main project methodologies.
- Chcom was an expert of communication and managed the project dissemination in Spain.
- IAT had high skills and competences in the project management and drafting guidelines and methodological tools. Its experience was essential drafting "Guidance tool" one of the most important project deliverable.

There were few delays concerning the action 3, action 4 and some changes interested the action 6. Some delays were experienced but they did not affect the achievement of the project's objectives. They are:

- the end of sub action 3.2 due to the in-depth analysis carried out by ad-hoc case studies. Sub-action 3.2 continued until October 30, 2012 to analyze the regulatory relief adoptions in-depth. The benefits achieved with the additional research (included in the deliverable 3.4 *Overview of existing experiences: case studies on simplification measures adopted*) allowed the partners to demonstrate the importance of regulatory reliefs to support the adoption of EMAS and provided useful insight for the next actions.
- the partners decided to organize some RCB in Autumn 2013 instead of August to avoid low participation due to the summer holidays.
- The action 6 started in advance (December 2012 instead of June 2013) and finished in December 2014 instead of July 2014. This choice was shared by the partners at the end of 2012 and has the following motivations: the adoption phase is the riskiest phase since it does not depend only on the partners' efforts but it involves the political decisions of policy makers; the legislative opportunities are not always consistent with the project timetable (for instance, the change of a law where some regulatory relief could be introduced was planned by a

regional government before the start of Action 6). The partners used all project duration to achieve the expected results.

At the end of December 2013, some partners decided to slightly change the distribution of their costs in order to increase the amount for personnel and reduce the costs for travel and accommodation. The project activities require a major commitment in terms of people involved, while travel costs were reduced by organizing web conferences and by using public transport or low cost solutions. The budget for consumable and external assistance has also been modified. The amount of the budget changes does not require an official amendment to the Grant Agreement. Details are provided in the financial part of this report.

SSSUP was the contact with European Commission and the Monitoring team. SSSUP sent all scheduled report in time. SSSUP shared with the monitoring team some encountered changes and the amendment process.

During 2012 the monitoring team changed and Ms. Marrucci was substituted by Ms. Calabrese operating in the Timesis-Astrale team. The first meeting with Ms Calabrese was on February 28, 2013. The partners did not attend this event, therefore only SSSUP met Ms Calabrese. The partners attended two "working days" on February 13 and 14 (PCB, SC and EWG) in Pisa, therefore SSSUP decided to spare them from coming back to Pisa for the meeting with the monitoring team. SSSUP and Dott.ssa Calabrese decided to organize a new meeting with all project partners in the first months of 2014 to solve the misunderstanding relating to the first meeting. The partners held the meeting with Dott.ssa Calabrese on 3 June 2014. During this meeting the partners especially showed the commitment to achieve the expected results and the proposals adoption.

At the project end Dott. Calabrese was substituted by Dott. ssa Yael Meroz revising the final report .

## **5. Technical part**

### **5.1. Technical progress.**

The B.R.A.V.E. project aimed to support 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 facilitates EMAS implementation by all organisations (better regulation) and remove, reduce and simplify the administrative burdens for EMAS-registered organisations, as well as for companies adopting the EU Ecolabel or other forms of certification. This initiative can encourage the adoption and dissemination of voluntary environmental certification (regulatory relief). The BRAVE was implemented in Italy and Spain and in 7 regions: Basilicata, Friuli V. G., Liguria, Lombardy, Tuscany, Andalucía and Valencia.

The technical part of the BRAVE project is composed by the following actions:

Action 3: Policy making and implementing

Action 4: Policy innovation

Action 5: Testing in field

Action 6: Adoption

Action 7: Communication and training

Furthermore, actions for networking (action 8) and dissemination (action 9).

The following paragraphs describe the activities for the actions that are started in the reporting period.

#### *5.1.1. Action 3 Policy making and implementing*

The aim of this action was to analyze the state of the art and the effectiveness of 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, and to investigate the opportunities to include EMAS-related requirements or measures in European Directives in force at the stage of their next revision, or at a preparatory stage for new Directives. All activities were carried out within the timing of the project. Sub-action 3.2 continued until October 30, 2012 to analyze the regulatory relief adoptions in-depth. The benefits achieved with the additional research (included in the deliverable 3.4 *Overview of existing experiences: case studies on simplification measures adopted*) allowed the partners to demonstrate the importance of regulatory reliefs to support the adoption of EMAS and provided useful insight for the works of RCBs and PCBs. The partners introduced the case studies during the RCBs, PCBs and other public events; the results achieved in other experiences encouraged the stakeholders to work in the BRAVE project.

The main problem encountered during the action 3 is linked with the substitution of CTL Valencia with Chamber of Commerce of Valencia. Starting from January ChCom has substituted CTL Valencia in all research activities implemented during the Action 3. Although this substitution slowed the initial activities, the delay was made up for and it did not affect the achievement of the project's targets.

**Table 1 Timetable of action 3 sub-tasks**

<b>Actions</b>	<b>Foreseen start-date</b>	<b>Actual start-date</b>	<b>Foreseen start-date</b>	<b>Actual start-date</b>	<b>Status</b>
Action 3 - Policy making	Oct-2011	Oct-2011	May-2012	<b>Oct-2012</b>	<b>Concluded with a delay of 5 months</b>
<i>Sub-action 3.1 - Integration of EMAS into other policies and instruments in the Community</i>	<i>Oct-2011</i>	<b><i>Oct-2011</i></b>	<i>Mar-2012</i>	<b><i>April-2012</i></b>	<b><i>Concluded with a delay of 1 month</i></b>
<i>Sub- action 3.2 - Overview of the existing experiences dealing with regulatory reliefs, incentives or other simplification measures for EMAS registered organizations and assessment and evaluation of their effectiveness</i>	<i>Dec-2011</i>	<b><i>Dec-2011</i></b>	<i>Mar-2012</i>	<b><i>Oct-2012</i></b>	<b><i>Concluded with a delay of 7 months</i></b>
<i>Sub- action 3.3 - Analysis of actual and potential opportunities to develop better regulation measures based on (and supporting) EMAS adoption at national and regional level</i>	<i>Feb-2012</i>	<b><i>Feb-2012</i></b>	<i>May-2012</i>	<b><i>June-2012</i></b>	<b><i>Concluded with a delay of 1 month</i></b>

**Table 2 Deliverable status**

<b>Sub-tasks</b>	<b>Deliverable</b>	<b>Annex</b>	<b>Foreseen end-date</b>	<b>Actual end-date</b>	<b>Status</b>
3.1	3.1 Policy opportunities for European Policy Maker	Annex 3.1	Apr-2012	May 2012	<i>Concluded with a delay of 1 month</i>
3.2	3.2 Overview of existing experiences dealing with incentives and regulatory relief for EMAS registered organizations	Annex 3.2	May 2012	June 2012	<i>Concluded with a delay of 1 month</i>
3.3	3.3 Regulation analysis and recommendations for considering EMAS registration	Annex 3.3	May 2012	June 2012	<i>Concluded with a delay of 1 month</i>
3.2	3.4 <i>Overview of existing experiences: case studies on simplification measures adopted</i> (ADDITIONAL DELIVERABLE)	Annex 3.4	Oct-2012	Oct-2012	<i>Concluded</i>

### **Sub action 3.1 Integration of EMAS into other policies and instruments in the Community**

In this sub action, project partners analyzed the opportunities for EMAS integration into European policies and instruments.

- *Analysis* of around 200 European directives to introduce simplification and improve the environmental legislation for EMAS companies (or other environmental certifications).
- *Definition of 105 regulatory relief proposals* that could be introduced.
- Identification of “milestones” to act in terms of EMAS-based better regulation or regulatory relief. The partners identified the next steps necessary to identify the proposals, and shared these with many stakeholders to improve the regulatory reliefs defined.
- For each proposal, the partners performed a qualitative assessment of its possible impacts in terms of benefits for organizations and promotion of the environmental scheme, as well as of the organizational and a costs and benefits analysis to introduce to institutional authorities for regulatory reliefs adoption. The assessment was conducted by a matrix drafted by IEFÉ (action coordinator).
- The qualitative assessment and the cost and benefit analysis involved the partners and the regional public institutions, both for European Commission, regulatory public bodies and targeted organizations.
- Drafting the deliverable 3.1 Policy Opportunities for European Policy Maker.

### **Sub action 3.2 Overview of the existing experiences and assessment of their effectiveness dealing with regulatory reliefs, incentives or other simplification measures for EMAS registered organizations**

This sub action had a twofold purpose: i) to provide the European Commission with information about the measures currently enacted and, more importantly, their effectiveness in the Member States with a high number of EMAS-registered organizations; ii) to raise the awareness of national authorities about different national experiences.

The project partners investigated the existence of simplification measures and supporting tools for EMAS-registered organizations (or ISO 14001-certified and Ecolabel-adopters) at regional and national level. The research focused on the countries with the highest number of EMAS registrations and on the Italian, Spanish, German and Portuguese regions selected during the processing stage of the project:

- 81 measures found at national level;

- 155 measures at regional level (20 European regions located in Germany, Italy, Spain and Portugal);
- Regional simplification measures distribution: 70 in Germany, 60 in Italy, 23 in Spain and 2 in Portugal.
- 14 types of simplification (as founding support, reporting reduction, fee reduction and many others)

236 measures were selected and analyzed and they were described in the Deliverable 3.2 *Overview of existing experiences dealing with incentives and regulatory relief for EMAS registered organizations*.

The partners introduced the contents of the Overview in many meetings and public events to sensitize national and regional authorities on the experiences and approaches by other countries.

The first project event in Milan was focused on the action 3 results.

### **Sub action 3.3 Analysis of actual and potential opportunities to develop better regulation measures based on (and supporting) EMAS adoption at national and regional level**

The aim of this sub-action was deeply analyzing the current and potential opportunities to include measures supporting EMAS adoption at national and regional level by focusing on the environmental legislation of territories involved in the BRAVE project: Lombardy, Tuscany, Liguria, Basilicata, Friuli Venezia Giulia in Italy; Andalucía and Valencia in Spain.

The deliverable 3.3 *Analysis of actual and potential opportunities to include measures supporting EMAS adoption at national and regional level* includes the analysis of the improvement opportunities identified by the project partners.

Following the main activities concerning the **cost benefit analysis**.

- Selection of 63 measures from the European member states legislation;
- Analysis of 63 measure for type, level of adoption, stakeholder involved and others. The measures emerged from European research were classified in categories.
- The partners drafted another metrics to assess the potential opportunities to include simplification measures. The main criteria for assessment were:
  1. Time span for implementation
  2. Risk of implementation
  3. Actors involved
  4. Economic effort for companies
  5. Regional Authority Economic effort
  6. Companies Organizational effort
  7. Regional Authority Organizational effort
  8. Reduction of environmental impacts (potential)
  9. Many others criteria

42 proposals emerged as more efficacy from the assessment:

Proposals emerged for country and region:

*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*.

#### 5.1.2. Action 4 *Policy Innovation*

The aim of this action was the elaboration of better regulation and regulatory relief proposals based on the idea that a voluntary environmental certification can help a company streamline and simplify the abovementioned processes. The delay in action 4 is due to the following:

- the organization of the RCB scheduled for August 2012 and postponed to September 2012 to encourage the stakeholders' involvement;

- the III RCB in Andalucia, Valencia and Lombardy held in Autumn 2013 instead of July 2013. The reason for this delay is the same of the previous year: July is holiday time especially for public authorities. The partners decided to move the meetings to encourage the stakeholders' involvement.
- sub action 4.3 started with a 5 months delay to better plan and coordinate the activities of the RCBs.

The partners achieved the expected results as the constitution of 7 RCB and 7 RWG, 2 PCB and 2 NWG and 1 EWG. The main result concerns the identification of regulatory reliefs proposals: 54 proposals at European level, 39 at national level and 91 at regional level. The involvement in the meetings was large and includes many different stakeholder categories, such as institutions, trade organizations, companies and others. 25 stakeholders were involved in the PCBs and 95 stakeholders attended the RCBs meetings. The delay concerning action 4 did not affect the project's progress. The partners did not encounter any problems during this action; they planned the meetings at different times in order to get the highest level of participation.

All deliverables were realized and the partners completed the last RCB meetings in November.

**Table 3 Timetable of action 4 sub-tasks**

<b>Actions</b>	<b>Foreseen start-date</b>	<b>Actual start-date</b>	<b>Foreseen end-date</b>	<b>Actual end-date</b>	<b>Status</b>
Action 4 - Policy innovation	Mar-2012	<b>Mar-2012</b>	Apr-2013		<b>In progress</b> (expected end-data 30/9/2013)
<i>Sub-action 4.1 - Working Groups constitution</i>	<i>Mar-2012</i>	<b><i>Mar-2012</i></b>	<i>May-2012</i>	<b><i>May-2012</i></b>	<b><i>Concluded</i></b>
<i>Sub-action 4.2 - Consultation Boards constitution</i>	<i>Apr-2012</i>	<b><i>Apr-2012</i></b>	<i>Aug-2012</i>	<b><i>Sept-2012</i></b>	<b><i>Concluded with a delay of 1 month</i></b>
<i>Sub-action 4.3 - Elaboration of better regulation and regulatory relief proposals</i>	<i>May-2012</i>	<b><i>Oct-2012</i></b>	<i>May-2013</i>	<b><i>May 2013</i></b>	<b><i>Concluded (started with a delay of 5 months)</i></b>
<i>Sub-action 4.4 - Stakeholder consultation and approval</i>	<i>Jan-2013</i>	<b><i>Jan-2013</i></b>	<i>Jul-2013</i>	<b><i>Sept-2013</i></b>	<b><i>Concluded (with a delay of 2 months)</i></b>
<i>Sub action 4.5 - Workshop in Brussels</i>	<i>Mar-2013</i>	<b><i>Mar-2013</i></b>	<i>Jul-2013</i>	<b><i>June 2013</i></b>	<b><i>Concluded</i></b>

**Table 4 Deliverables status**

<b>Sub-action</b>	<b>Deliverable</b>	<b>Annex</b>	<b>Foreseen end-date</b>	<b>Actual end-date</b>	<b>Status</b>
4.1	4.1 List of the member of of Regional, National and European Working Groups	Annex 4.1	-	May-2012	<i>Concluded</i>
4.2	4.2 List of the member of Regional and Project Consultation Boards	Annex 4.2	-	Sept-2012	<i>Concluded</i>
4.3	4.3 Report with the list of the simplification proposals shared by the Consultation Boards	Annex 4.3	May 2013	May 2013	<i>Concluded</i>
4.5	4.4 Report about the workshop held in Brussels	Annex 4.4	July 2013	June 2013	<i>Concluded</i>
	BRAVE Project – Indagine sulle aziende italiane registrate EMAS ( <b>ADDITIONAL DELIVERABLE</b> )	Annex 4.5	-	June 2013	<i>Concluded</i>
	Survey among European EMAS companies ( <b>ADDITIONAL DELIVERABLE</b> )	Annex 4.6	-	September 2013	<i>Concluded</i>

#### **Sub action 4.1 Working Groups constitution**

During this sub action the project partners identified the representativeness of institution and other organizations to involve in the Working Groups (WG). 7 RWGs were defined, one for each region; the RWGs are composed by representatives of Regional authorities and project partners. There were **30** RWG meetings.

The RWG aimed at sharing the proposals among the each partner and the regional authorities competent for each territory (for instance SSSUP+ Tuscany regional authority). The NWG provided the common information exchange among all partners and all regional authorities (all together), The aim of NWG was encouraging the regional authorities to indentify and support regulatory reliefs emerged from BRAVE.

There are two National Working Group (one in Italy and one in Spain), composed by:

- *Spain*: Spanish Partners (IAT + ChCom) and the representatives of Regional Governments (Valencia and Andalusia) operating in the RWGs.
- *Italy*: Italian Partners (SSSUP, IEFÉ, Conf Liguria e Conf Genova, Ambiente Italia, ARPA) and the representatives of the Regional Governments (Tuscany, Lombardy, Liguria, Friuli V. G., Basilicata) operating in the RWGs.

The NWG meetings were 6 (some by web conferences) in Italy and 2 in Spain.

The European WG was composed of all the Italian and Spanish members of WGs (at regional and national level). The deliverable 4.1 “List of Working Group members” contains the details of the WGs members.

The following tables show in detail the meetings held by EWGs, NWGs and RWGs

**Table 5 Meetings organized by EWGs and NWGs**

<b>Meeting</b>	<b>EWG</b>	<b>Italian NWG</b>	<b>Spanish NWG</b>
<b>I°</b>	Oct 16 <sup>th</sup> 2012	Nov 21 <sup>th</sup> 2012	Nov 5 <sup>th</sup> 2012
<b>II°</b>	Feb 14 <sup>th</sup> 2013	Jan 24 <sup>th</sup> 2013	July 7 <sup>th</sup> 2013
<b>III°</b>	May 6 <sup>th</sup> 2013	Feb 13 <sup>th</sup> 2013	
<b>IV°</b>		Apr 24 <sup>th</sup> 2013	
<b>V°</b>		June 6 <sup>th</sup> 2013	

Table 6 meetings of RWG

PARTNER	TERRITORY	RWG	
		NUMBER	DATE
Ambiente Italia	Basilicata	I	07/03/2012
		II	05/12/2012
		III	16/01/2013
		IV	12/06/2013
	Friuli Venezia Giulia	I	20/04/2012
		II	12/11/2012
		III	17/12/2012
		IV	15/02/2013
Confindustria	Liguria	I	30/05/2012
		II	25/07/2012
		III	21/11/2012
		IV	21/01/2013
		V	06/02/2013
ARPA/IEFE	Lombardia	I	15/06/2012
		II	13/12/2012
		III	15/01/2013
		IV	15/03/2013
		V	13/05/2013
SSSUP	Toscana	I	28/06/2012
		II	23/10/2012
		III	19/02/2013
		IV	20/06/2013
IAT	Andalucia	I	28/05/2012
		II	19/12/2012
		III	23/05/2013
Chamber of Commerce	Valencia	I	27/06/2012
		II	12/09/2012
		III	26/3/2013
		IV	07/06/2013
		V	24/07/2013

### **Sub action 4.2 Consultation Boards constitution**

This sub task was concluded with a month delay. Such delay did not affect the general progress of the project; it only influenced the beginning of sub action 4.3 which started a few months later than the time scheduled in order to better plan and coordinate the activities of the RCBs.

In this sub-action, two different level of Consultation boards were established:

1. **Regional Consultation Boards (RCBs):** composed by representatives of the private and public organizations (Provinces, Regional Department of Control and Inspection Institutions, representatives of Regional Government not involved in the Regional Working Groups, Industrial and trade Associations, Municipalities, NGOs, etc.)
2. **Project Consultation Boards (PCB):** composed of Italian and Spanish representatives of institutions operating in the environmental certification schemes such as: trade organization, verifier, control authorities, institutions and the representatives of EMAS competent body, EMAS companies, etc.). The PCB aims to share and approve the regulatory reliefs proposals elaborated by the National Working Groups and European Working Group.

The partners organized an event in Milan on May 16<sup>th</sup>, 2012 to encourage participation in the RCBs and PCBs. During the event the partners described the activities and objectives of these two boards and their role in the definition of regulatory relief proposals. After this event some organization joined at PCB. The PCB meetings were 4, 2 in Spain and 2 in Italy.

The first meetings of RCBs were scheduled in October instead of August, to encourage a greater participation. The RCBs are activated in each region involved in the project (7 RCBs). The deliverable 4.2 *List of the member of Regional and Project Consultation Boards* contains all details on the stakeholders involved in the RCBs and PCBs.

The following tables show the meetings of PCBs and RCBs. The RCB meeting were 21, 3 for each region as scheduled in the project.

**Table 7 Meetings of PCBs**

<b>Meeting</b>	<b>Italian PCB</b>	<b>Spanish PCB</b>
<b>I°</b>	Feb 13 <sup>th</sup> 2013	Oct 3 <sup>th</sup> 2012
<b>II°</b>	July 11 <sup>th</sup> 2013	Nov 27 <sup>th</sup> 2012

**Table 8 Meetings of RCBs**

<b>PARTNER</b>	<b>TERRITORY</b>	<b>RCB</b>	
		<b>NUMBER</b>	<b>DATE</b>
Ambiente Italia	Basilicata	I	17/01/2013
		II	12/06/2013
		III	4/7/2013
	Friuli Venezia Giulia	I	25/09/2012
		II	21/02/2013
		III	01/07/2013
Confindustria	Liguria	I	22/01/2013
		II	05/04/2013
		III	16/7/2013
ARPA/IEFE	Lombardia	I	25/01/2013
		II	21/03/2013
		III	22/11/2013
SSSUP	Toscana	I	23/04/2013
		II	23/05/2013
		III	20/06/2013
IAT	Andalucia	I	26/12/2012
		II	28/05/2012
		III	09/07/2013
Chamber of Commerce	Valencia	I	26/04/2013
		II	10/06/2013
		III	17/10/2013

The partner held additional RCB and PCB meetings to update the members on the project activities such as the testing in field (Action 5) and adoption (Action 6) phase.

#### **Sub action 4.3 Elaboration of better regulation and regulatory relief proposals**

This sub-action started with a delay of 5 months. The delay is related to the organizational activities and with the RCBs activation. The sub-action started after the RCBs' institution (September 2012). The partners made up for the delay as demonstrated by the achieved results. The partners worked hard to define the better regulation and regulatory relief proposals concerning European, national and regional legislation. In detail:

- Starting from the results achieved in the sub-task 3.1 (184 proposals) the partners selected **54** incentive measures for EMAS companies in approximately 50 European Directives or Regulations.
- At the national level, the partners analyzed the national legislation concerning the environmental topics (water, energy, air emission and others). Each partner developed from 3 to 7 amendments to introduce incentives or regulatory reliefs in the legislation. **39 proposals** are completed and described by a standard template. The process to define the proposals has been developed; the partners shared the proposals before introducing them to PCB.
- At the regional level the partners developed **91** regulatory relief proposals on the main environmental topics that emerged from the meeting with RWGs and with the first RCB meeting.

The list of all identified regulatory relief proposals is included in the deliverable 4.3. *Report with the list of the simplification proposals shared by the Consultation Boards.*

#### **Sub action 4.4 Stakeholder consultation and approval**

This sub action aimed to carry out a large stakeholder consultation, by the Consultation Boards, in order to improve and approve the identified proposals at European, national and regional level.

At the *national level*, the Italian partners introduced the 33 regulatory relief proposals during the I° Italian PCB (February 2013); the PCB members (around 20 stakeholders) assessed the proposals through a “voting process”. The PCB members assigned a rating from 1 to 5 (1 being “does not agree with the proposal” and 5 “strongly agrees”) to each proposal, and at the end of the meeting the partners presented the results achieved and the most appreciated regulatory relief (e.g. inspection reduction for EMAS organizations, cost reduction of administrative fees, reduction of financial guarantees). Moreover, the proposals were shared with other stakeholders (not included in the PCB) by an on-line survey on LinkedIn social network. The feedback from LinkedIn survey came from 34 actors: citizens, government, associations, non-governmental organizations, companies, environmental certification, other. The II Italian PCB (Florence, 11 July 2013) liked the selected proposals and the changes introduced by partners. Finally, the PCB members encouraged the partners to diffuse the proposals at the National Authorities. 28 stakeholders attended this meeting.

The Spanish partners introduced the proposals at the I PCB organized during the “*Congreso Nacional de Medio Ambiente (CONAMA) on October 3<sup>rd</sup> 2012*” which is main Spanish event on the environment. Around 30 stakeholders attended the meeting. IAT and Chcom introduced the first version of proposals.

The II PCB held on 27 November 2012 in Madrid. 7 stakeholders attended the meeting and shared the proposals drafted by IAT and Chcom. The partners introduced the proposals revised after the first PCB meeting (The proposals were improved as suggested by PCB members).

- At the *European level*, the partners introduced the results of European activities and the 54 proposals during the II PCB in Italy. The PCB approved the proposals on European legislation. As mentioned in the sub-action 4.5 the proposals were presented to DG Environment and received some positive feedback during the Annual Meeting ex art 49 of the Regulation 1221/2009.
- At the *regional level*, each partner introduced the proposals during the first or the second meeting of RCB. The feedbacks emerged from RCBs was to encourage the partners to improve the proposals and to identify the regulatory reliefs most appreciated among regional EMAS organizations. The partners used e-mails to share the process between RCBs and RWGs.

At the end of this action the proposals (regional and national) were improved following the suggestions emerged in the PCB and RCB.

6 new proposals were drafted to satisfy the requests by trade organization (Assocarta,) control authority (ISPRA) and some regional institutions. The Spanish partners decided to not focus on national level, so they support the adoption at regional level only.

SSSUP sent the revised proposals and the new simplification measures to all RCB and PCB participants in Italy. IAT sent the final version of the proposals to all PCB participants and to many other stakeholders involved in CONAMA events.

After this stakeholder consultation the proposals were ready to test (action 5).

#### **Sub-task 4.5 Workshop in Brussels**

The partners organized the workshop in Brussels on 22th May 2013. The DG Environment – EMAS Unit attended the workshop with SSSUP and IEFE. SSSUP introduced the Life+ BRAVE to the EC representatives by a comprehensive presentation of the structure and the activities of the project, in terms of: i) objectives and partnership; ii) main results achieved within the project activities carried out so far.

The Commission appreciated all the activities described. The BRAVE approach of giving the highest level of recognition to EMAS compared to ISO 14001 within the elaboration of the simplification proposals was particularly appreciated.

The Deliverable 4.5 *Report about the workshop held in Brussels* presents the results of workshop.

After this event, the EMAS Unit showed high interest in the BRAVE activities and in the European survey among EMAS companies and decided to introduce the BRAVE and the results achieved by the project during the annual meeting of the Forum of Competent Bodies (article 49 EC Regulation 1221/2009) that held on June 7<sup>th</sup> 2013.

The Forum of Competent Bodies offered some feedback on the BRAVE especially from the Belgian and German Competent Bodies.

Then, the EMAS Unit proposed new meetings in Brussels: so SSSUP and ARPA participated in a meeting on 7<sup>th</sup> November 2013. All European EMAS competent bodies attended the meeting. SSSUP introduce the EMAS survey results.

#### 5.1.3. Action 5 *Testing in field*

Action 5 aimed to test the “better regulation” and “regulatory relief” proposals at the regional level, by assessing their feasibility and their cost-effectiveness for both organizations and institutions. In order to achieve operational and far-reaching results, this Action concerns the regional proposals that involve 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 action was developed following the foreseen deadlines. The partners realized the deliverables provided and achieved the expected results. They defined and applied the methodology to select the simplification proposals and they identified the 35 proposals to test and the competent authorities to involve.

There were no delays or problems concerning this Action.

**Table 9** Timetable of action 5 sub-tasks

<b>Actions</b>	<b>Foreseen start-date</b>	<b>Actual start-date</b>	<b>Foreseen end-date</b>	<b>Actual end-date</b>	<b>Status</b>
Action 5 - Testing in field	Jan-2013	<b>Jan-2013</b>	Mar-2014	<b>Mar-2014</b>	<i>Concluded in time</i>
<i>Sub-action 5.1 Selection of simplification proposals to test</i>	<i>Jan-2013</i>	<b><i>Jan-2013</i></b>	<i>Mar-2013</i>	<b><i>Mar-2013</i></b>	<b><i>Concluded</i></b>
<i>Sub-action 5.2 Identification of Competent Authorities to involve in the testing activities</i>	<i>Mar-2013</i>	<b><i>Mar-2013</i></b>	<i>May-2013</i>	<b><i>May-2013</i></b>	<b><i>Concluded</i></b>

<i>Sub-action 5.3 Testing in field</i>	<i>Apr-2013</i>	<i>Apr-2013</i>	<i>Feb-2014</i>	<i>Feb-2014</i>	<i>Concluded</i>
<i>Sub-action 5.4 Feedback</i>	<i>Nov-2013</i>	<i>Nov-2013</i>	<i>March-2014</i>	<i>March-2014</i>	<i>Concluded</i>

**Table 10 Deliverables status**

<b>Sub-actions</b>	<b>Deliverable</b>	<b>Annex</b>	<b>Foreseen end-date</b>	<b>Actual end-date</b>	<b>Status</b>
5.1	Methodology to select the simplification proposals	Annex 5.1	<i>Feb-2013</i>	<i>Feb-2013</i>	<i>Concluded</i>
5.2	List of the simplification proposals selected	Annex 5.2	<i>May-2013</i>	<i>May-2013</i>	<i>Concluded</i>
5.3	Report about the results of the testing in field phase	Annex 5.3	<i>March-2014</i>	<i>March-2014</i>	<i>Concluded</i>
5.3	Updated version of the Report that contains the simplification proposals revised on the basis of the results of this action	Annex 5.4	<i>March-2014</i>	<i>March-2014</i>	<i>Concluded</i>

#### **Sub-action 5.1 Selection of simplification proposals to test**

Ambiente Italia, responsible for Action 5, with the contribution of all partners, drafted a methodology to select the proposals to test. The partners shared the methodology by e-mail and the final version was accepted during the Steering Committee on February 14, 2013.

The methodology was designed using an xls file and it is based on the following criteria: i) Effectiveness; ii) Efficiency; iii) Efficacy; iv) Feasibility.

The partners implemented the methodology in the regional activities and identified 35 regulatory relief proposals for field testing phase (Deliverable 5.1 Methodology to select the simplification proposals - Annex 5.1)

#### **Sub-action 5.2 Identification of Competent Authorities to involve in the testing activities**

The partners identified 12 competent authorities to involve in the field testing phase. The RCBs assessed the regulatory reliefs proposed and applied the methodology by assigning a score to each criteria. This allowed to rank the proposals and identified the **5 proposals to test in each region**.

Many members of RCBs are involved in the test phase such as trade organizations, companies, control authorities and especially regional departments.

The partners have chosen a testing method for each proposal and the competent authorities to involve. The Deliverable 5.2 *List of the simplification proposals selected* (Annex 5.2) includes the details on the selected proposals tested.

#### **Sub-action 5.3 Testing in the field**

The testing phase was concluded. The partners selected different approaches for this action according to the type of regulatory relief. The following table shows the methods implemented to test each proposal. The “*Activities implemented to test*” column summarizes the activities realized or on-going. The table presents only the main aspects of testing in the field but many other activities were carried out. The details of the activities was included in the deliverable “*Report about the results of the testing in the field phase*” (annex 5.3).

**Table 11 Testing in fields summary**

<b>Partner and region</b>	<b>Proposal tested</b>	<b>Activities implemented to test</b>
SSSUP-	Extension of IRAP (tax) rate reduction for	Study on the efficacy of IRAP reduction and

<b>Partner and region</b>	<b>Proposal tested</b>	<b>Activities implemented to test</b>
<b>Tuscany</b>	EMAS registered and ISO14001 certified companies at least for next 3 years	analysis of regional economic sources to extend the fiscal incentive.
	Homogenizing the frequency of checks for IPPC companies in provinces in Tuscany and reduction of IPPC inspection frequency for EMAS registered and ISO14001 certified companies	Identifying the inspection frequency in each province in Tuscany and establishing a methodology to plan the checks enhancing the EMAS registration.
	Introduction of regulatory relief for EMAS organizations in Municipality waste regulation (Tavarnelle)	Analysis of national and regional legislation. Legal feasibility study on the adoption of regulatory reliefs in local waste regulation.
	Introduction of regulatory reliefs for EMAS registered and ISO14001 certified companies operating in the mining sector: measures for tax reduction	Feasibility assessment and identification of regulatory reliefs effects on the reduction of administrative costs.
	Introduction of several regulatory reliefs for EMAS registered and ISO14001 certified companies operating in the mining sector: EMS documentation enhancement.	Feasibility assessment and identification of regulatory reliefs effects on the reduction of administrative burdens.
<b>Ambiente Italia Basilicata</b>	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 EMS.	Participation in drafting the 2014-2020 plan for introducing regulatory relief.
	Reduction of financial guarantees for EMAS registered or ISO 14001 organizations in the waste landfill sector and other waste treatments.	Analysis of economic impact of regulatory relief on companies.
	Public tender for granting loans for programs on environmental education and training for increasing the number of registered EMAS school organizations.	Review of the regional documents and support for EMAS adoption.
	A new regional DGR for the reduction of inspections to companies with an environmental management system certificated	Research on regional legislation on the coordination of administrative inspections.
	Simplifications of authorizations of enterprises with an EMAS or ISO 14001 EMS belonging to supply chains, in order to reduce administrative burdens, time to obtain the authorizations, and simplification of the technical and administrative documentation.	Simulation of the use of new forms and documentation to forward the requests for authorizations comparing costs and administrative burdens. Introducing of simplification forms for EMAS companies.
<b>Ambiente Italia Friuli Venezia Giulia</b>	Simplifications of environmental controls and inspections for organizations with an ISO 14001 or EMAS certified EMS.	The test consists in defining new procedures and forms shared by check authority and enterprises and the creation of forms for the communication of annual data to be presented and used by firms.
	Reduction of costs of preliminary authorization charges and costs of routine	The test consists in analysing the economic impact: assessment of cost and efforts,

Partner and region	Proposal tested	Activities implemented to test
	checks for companies with an environmental management system certified ISO 14001 or EMAS with an Integrated Environmental Authorization.	savings and benefits, for Competent Authorities and private companies, comparing cost of inspections for ARPA and rate paid by enterprises.
	Rewarding conditions and incentives for EMAS registered municipalities relating to their functions in terms of air pollution, noise pollution, light pollution and energy saving.	Simulation of environmental benefits for the region emerging from regulatory relief adoption.
	Incentives to certified organizations (ISO 14001, EMAS) or those with Ecolabel products of supplies to the public bodies ( GPP)	Cooperation with Friuli Venezia Giulia administration to verify feasibility of procurement proposals and definition of guidelines to promote GPP.
	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 EMS	Assisting the Friuli Venezia Giulia Region in their understanding and acceptance of the proposal and give them technical assistance in the drafting of amendment.
<b>Confindustria-Liguria</b>	Reduce inspection through new rules and operational proposals	Cooperation between Confindustria and Arpal regarding the new checks for certified firms.
	Implementation of simplification via regulation to reduce the procedural times for approval of rain water management projects	Verification with provincial authorities of the actual time savings in administrative procedures by approving rain management plans through acknowledgement versus authorization.
	Reduction of financial guarantees required for waste management activities.	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 company budgets.
	Introduction of reward criteria for the adoption of ISO14001 and/or EMAS certified management system in the wording of “green” procurement documents for the purchase of goods and services by the Public Administration	Cooperation with Liguria region to verify feasibility of procurement proposals to promote the GPP. Identify the procurement body to issue a request for proposals with the characteristics required by this new approach
	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 EMS	Meetings with staff from Liguria regional administration to explain the relevance of regulatory relief and to accelerate their understanding and acceptance of the proposal.
<b>ARPAL IEFE-Lombardia</b>	Reorganizing inspections re- within ARPA Lombardia by modifying the Operative Instructions deriving from ARPA Guidelines on inspections planning	Simulation of the use of new forms for the communication that valorise the certified EMS documentation already drawn up; Participation in a new inspection, in order to assess whether certified EMS documentation could be officially further enhanced.
	Fiscal Guarantees reductions for waste disposal and recovery EMAS registered and	Simulation, to test the simplification on a sample of organizations through a fact-

Partner and region	Proposal tested	Activities implemented to test
	ISO14001 certified plants and landfills	finding questionnaire. Analysis of economic impact on companies
	IRAP fee reduction for EMAS registered and ISO14001 certified organizations	Simulation, to test the simplification on a sample of organizations through a fact-finding questionnaire. Analysis of economic impact on companies
	Promotion of the registration/certification when applying for the renewal of the IEA in case of substantial modifications	Testing by means of simulation on a sample of procedures regarding IEA renewal for selected companies; Parallel and simultaneous simulation of both a simplified procedure based on the use of simplified data/documents between companies and public authorities, and the official procedure; Analysis of economic impact.
	Presumption of compliance with the Italian organizational model ex. Legislative decree 231/2001	Analysis and simulation of the conformity of EMAS registered companies and/or ISO 14001 certified EMS with the part of the Organizational Model ex. Legislative decree No. 231/2001 addressing environmental violations.
<b>IAT-Andalucia</b>	Expansion of eligible expenses to cover EMS maintenance	Simulation to test the simplification on a sample of organizations. Analysis of economic impact on companies
	Reduce the frequency of monitoring and reporting activities in EMAS registered organizations	Testing by means of simulation on a sample of selected companies affected by the IE Directive and EMAS registered companies. Cost/benefit analyses
	Simplify environmental information's procedure in EMAS registered organizations	Analysis of the data and information included in Environmental Statement from EMAS and from the Regional Government for the Environment in order to simplify the periodic environmental communication procedure.
	Expand simplification measures to the activities included in annex II of Italian Law 7/2007	Analysis of the activities derived from the application of the AAU and of the EMAS Regulations in order to analysis those activities likely to be coordinated
	Establish a simplified permits procedure for the IPPC permits in EMAS registered organizations	Analysis of economic impact on companies of the tested measure. Assessment of costs and burdens, savings and benefits.
<b>Chcom-Valencia</b>	Financial Guarantees Reduction required by the Administration for certain activities such as waste management, landfill, etc.. to those companies with EMAS registration	Simulation, to test the simplification on a sample of organizations. Analysis of economic impact on companies
	Indicate in the authorization procedures of waste management activities (solids and liquids) the need to prove an adequate environmental management (equivalent to	Assessment of technical, economic and legal feasibility of the proposal

Partner and region	Proposal tested	Activities implemented to test
	EMAS / ISO 14001 requirements). Environmental management requirements would stated by the Resolutions for Authorization.	
	EMAS registration may allow more flexibility in obtaining certain approvals and subsequent regulatory control, by submitting the Environmental Statement or any other item of SGA that is considered appropriate .	Testing by simulation on a sample of selected companies affected by the IE-IPPC Directive and EMAS registered.
	In control of integrated environmental authorizations or environmental assessments to be made, considering the availability of EMAS as a guarantee of fulfillment of applicable legal requirements	Analysis of modification of Inspection Plan of IE-IPPC companies, enhancing EMAS registration
	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	Survey of EMAS registered companies. Agreement with Administrative Service to simplify procedure

#### Sub –action 5.4 Feedback

This sub action started on time and was concluded. Action 5 outcomes were reports, minutes, slides; all documents included the results emerged from the test. The BRAVE partners updated the regulatory relief proposals on the basis of the test results. The deliverable “*Updated version of the Report that contains the simplification proposals revised on the basis of the results of this action*” was completed. The testing phase generally confirms the relevance of the regulatory reliefs and the partners modified the list of regional proposals only in a few cases.

#### 5.1.4. Action 6 Adoption

The main aim of Action 6 was the adoption of three regulatory reliefs for each region involved (21 in total). The action was coordinated by Confindustria Liguria. The deliverable scheduled was completed on time. Generally speaking there have been no problems, but the adoption process was particularly complex because it involved many institutions and public authorities. Communications with regional and national institutions were often slow and adoption may take a longer time. So the deadline for the action has been shifted from July 2014 to December 2014. Action 6 started in December 2012 as stated in the Mid-Term Report. This decision was agreed by the partners at the end of 2012 due to the fact that the adoption phase is the riskiest phase since it depends not only on the partners' efforts but it involves the political decisions of policy makers; opportunities for legislation are not always consistent with the project timetable (for instance, the change of a law where some regulatory relief could be introduced was planned by a regional government before the start of Action 6).

**Table 12 Timetable of action 6 sub-tasks**

Action	Scheduled start-date	Actual start-date	Scheduled end-date	Actual end-date	Status

Action 6- Adoption	June-2013	<b>Dec-2012</b>	Jul-2014	Dec-2014	<b>Concluded (started 7 months early and concluded 5 months later)</b>
<i>Sub-action 6.1 Selection of proposals</i>	<i>Jun-2013</i>	<i>Dec-2012</i>	<i>Sept-2013</i>	<i>Sept -2013</i>	<i>Concluded</i>
<i>Sub-action 6.2 Preparation of amendments</i>	<i>Aug-2013</i>	<i>Dec-2012</i>	<i>Jan-2014</i>	<i>Jan -2014</i>	<i>Concluded</i>
<i>Sub-action 6.3 Adoption of amendments and developments of legislative proposals</i>	<i>Nov-2013</i>	<i>Dec-2012</i>	<i>Jul-2014</i>	<i>Dec -2014</i>	<i>Concluded</i>

**Table 13 Deliverables status**

<b>Sub-action</b>	<b>Deliverable</b>	<b>Annex</b>	<b>Foreseen end-date</b>	<b>Actual end-date</b>	<b>Status</b>
6.1	Methodological tool for the selection of the proposal of simplifications	Annex 6.1	<i>Oct- 2013</i>	<i>Oct- 2013</i>	<i>Concluded</i>
6.2	List of submitted proposal	Annex 6.2	<i>March-2014</i>	<i>March-2014</i>	<i>Concluded</i>
6.3	List of approved amendments	Annex 6.3	<i>Aug-2014</i>	<i>Dec- 2014</i>	<i>Concluded</i>

#### **Sub-action 6.1 Selection of the proposals**

Confindustria and all partners completed the “Methodological tool for the selection of the proposal of simplifications” deliverable (Annex 7.1.1) in October 2013. The partners approved the final version of methodological tool in the steering committee meeting on 18 October 2013. The deliverable is on the project website.

#### **Sub-action 6.2 Preparation of amendments**

The partners drafted the list of amendments at a regional level and in Italy at a national level. They shared the amendments with regional institutions to improve the contents and increase the chance of adoption.

Following the meetings held by partners to support the adoption:

*SSSUP*: Meeting with financial regional Competent Authority 18 October 2013 and

- Meeting with ARPA Toscana (control authority) 17 December 2013
- Meeting with regional department of mining field 2 December 2013
- Meeting with regional politicians on 24 March 2014

*Ambiente Italia Friuli V.G. Regional administration*:

- Meeting with regional authorities February 3, 2014
- Meeting with regional authorities February 10, 2014
- Meeting with regional authorities April 30, 2014

*Basilicata*:

- Meeting with regional authorities April 9, 2014
- Meeting with regional authorities May 13, 2014
- Meeting with regional authorities June 24, 2014

*Cofindustria*: Two meetings with members of the Regional simplification office on November 12<sup>th</sup>.

2013 and January 14<sup>th</sup>, 2014.

- Meeting with regional authorities July 16, 2013
- Meeting with ARPA Liguria (control authority) September 14<sup>th</sup>, 2013.
- Meeting with Geneva Provincial administration October 24<sup>th</sup>, 2013
- Meeting with regional authorities August 6, 2014

*IEFE/ARPA Lombardia*: Meeting with Assolombarda (trade organization) December 12<sup>th</sup> 2013

- Meeting with provincial administrations in Lombardy November 5<sup>th</sup>, 2013

*IAT*: Regional Government for Environment, EMAS registered organizations and environmental certifiers: October 15<sup>th</sup> 2013 and November 20<sup>th</sup> 2013, February 5, 2014 and February 21, 2014

*ChCom*: Regional Government for Environment, EMAS registered organizations and environmental certifiers: December 3<sup>th</sup>, 2013 and January 21<sup>th</sup>, 2014.

### **Sub-task 6.3 Adoption of amendments and developments of legislative proposals**

As mentioned above, the partners decided to adopt a two- approaches for Action 6.

The proposals adopted are 30 and some municipalities of Liguria adopted on the top of it also 6 tenders valorising EMAS. 27 proposals were adopted by following regions: Friuli V.G.(4), Liguria (5), Lombardy (7), Tuscany (8) and Valencia (1). Veneto (Italian region) adopted a regulatory relief in the first month of 2015. Ambiente Italia contacted the regional politicians operating on environment to promote the regulatory reliefs and the guidance tool. Ambiente Italia supported Veneto administration in the adoption process to introduce a reduction of financial guarantee for companies operating in the waste field.

**Table 14**Regulatory reliefs adopted

<b>Region/Country</b>	<b>N. of adopted measures</b>	<b>Target BRAVE</b>
Tuscany	8 (4 adopted + 4 adopted in the Regional proposal law approved by “Giunta” on 10 March 2015 but there is still not the final legislation number).	3
Lombardy	7	3
Liguria	5 (regional Acts and 6 tenders)	3
Valencia	1	3
Friuli	4	3
Veneto (region not directly involved in the project)	1	-
Basilicata	0	3
Andalucía	1	3
Italy	3 (1 adopted and 2 amendments approved)	-
<b>Total</b>	<b>30+ 6 tenders</b>	21

The Italian National Parliament adopted 3 BRAVE proposals. The Italian partners worked to support the adoption of regulatory reliefs in the national legislation. The partners organized NWGs (18/10/2013-20/01/2014) and decided to increase the regulatory relief proposals and so deepen some of the legislative drafts currently in the approval process at the national institutions. The partners emailed all the proposals to the Environmental commissions of Italian Parliament on December 19<sup>th</sup> 2013. The partners also requested an official audience with the members of commissions operating at the Italian Senate and at the Chamber of Deputies. We received no response so the partners decided to organise a public event for all Government and Parliament representatives working in environmental

issues. At the same time, each partner contacted representatives in national institutions to disseminate our regulatory relief proposals. Below is a list of the main contacts:

- Ambiente Italia and SSSUP contacted a member of the Senate operating in the Environmental commission for the meeting organization (November /December 2013).
- ARPA Lombardia and SSSUP held a meeting with an MP on February 18th 2014 to introduce the proposals.
- SSSUP emailed the president of Environmental commission at Chamber of Deputies on December 20<sup>th</sup> 2013. We sent all regulatory reliefs amendments and asked for an official meeting with the commission's members. We did not receive an official answer from the president, but generally the parliamentarians preferred attend to a public event instead of an audience.
- Confindustria discussed the regulatory relief proposals with the national direction of Confindustria (October 28<sup>th</sup> 2013). They received a positive feedback on all BRAVE proposals and the national management of Confindustria showed great interest in promoting the adoption of regulatory reliefs.

The *main event* to disseminate the regulatory reliefs at national level was on *4 June, 2014 in Rome*. The event involved the main Italian representatives of trade organizations (Assocarta, Federlegno, Confindustria etc) and politicians operating in the Environmental commission at Chamber of Deputies. Around 30 people attended the event. As a result of the event, SSSUP and ARPA Lombardia supported some Italian politician in the drafting of regulatory reliefs to introduce in the "*Collegato alla legge di stabilità 2014*" (national financial law). 2 regulatory reliefs for EMAS companies are in this law.

The deliverable "List of adopted proposals" includes all details on adopted regulatory relief.

The regions where the project target was not achieved implemented many activities to obtain the adoption of their proposals.

For instance in Basilicata a political change modified the interest on EMAS and administrative simplification. AI attended many meetings and events to encourage the new administrator in the adoption process, but new politicians declared the absence of resources to fill in regulatory reliefs in regional legislation.

Chcom obtained only one adoption but regional institutions of Valencia are discussing the possible adoption of two other measures in these months.

IAT conducted many meeting with different regional departments to promote the adoption of regulatory reliefs. The initial interest of public administration was reduced progressively and the regional politicians decided to not adopt the IAT proposals. Despite this, IAT conducted many communication initiatives to encourage other stakeholders in supporting EMAS.

The deliverable *List of approved amendments* included details on the adoption process in these regions also.

#### 5.1.5. Action 7 Communication and training

The action aimed at disseminating the regulatory relief proposals and the measures adopted by local, regional and national authorities among various stakeholder categories. IAT is the coordinator of the activities concerning the action. There have been no problems in implementing this action.

**Table 15 Timetable of action 7 sub-tasks**

Action	Scheduled start-date	Actual start-date	Scheduled end-date	Actual end-date	Status

Action 7- Communication and training	Jan-2014	<b>Jan-2014</b>	Dec-2014	<b>Dec-2014</b>	<i>completed</i>
Sub-action 7.1 Creation of the Guidance tool	Jan-2014	<b>Jan-2014</b>	Jul-2014	<b>Jul-2014</b>	<i>completed</i>
Sub-action 7.2 Communication Process	Jan-2014	<b>Jan-2014</b>	Dec-2014	<b>Dec-2014</b>	<i>completed</i>
Sub-action 7.3 External communication	May 2014	<b>May 2014</b>	Dec-2014	<b>Dec-2014</b>	<i>completed</i>

**Table 16 Deliverables status**

Sub-actions	Deliverable	Annex	Foreseen end-date	Actual end-date
7.1	Communication Plan for each Regio	Annex 7.1	30 Jan 2014	30 Jan 2014
7.2	“Guidance tool for the EMAS-based regulation and better regulatory relief” manual	Annex 7.2	30 June 2014	30 Oct 2014
7.1	Synthesis of communication & training initiatives carried out in each region	Annex 7.3	30 Nov 2014	30 Nov 2014

### **Sub-action 7.1 Creation of the “Guidance tool for the EMAS based regulation and better regulatory relief”**

IAT and SSSUP shared the Guidance tool structure in January and set out an agenda for the meeting held in Seville on February 25<sup>th</sup> 2014. The first draft of Guidance tool included some sections concerning some topics. The Guidance tool was completed by all partners’ contribution. This Guide support and facilitate the implementation of this kind of measures by the different Member States, by providing a compilation of experiences existing at different levels (European, national and regional) of the regulatory improvements, incentives or other simplification measures for EMAS registered organizations.

IAT coordinated the Guidance tool drafting.

The first draft of Guidance tool was completed in July 2014. The main reason for delay concerned the stakeholder consultation that allow to improve the Guidance tool. IAT, SSSUP and other partners implemented a stakeholder consultation to share the contents of Guidance tool. The stakeholder consultation was made up by LinkedIn, BRAVE web project and among the RCBs members.

The partners introduced the final version of Guidance tool (annex 7.2) during the final Conference on 7 November 2014. The deliverable includes the description of main regulatory reliefs and incentive categories and examples of existence simplification measures in Europe. The downloads from web site were around 160. SSSUP sent the Guidance tool by LinkedIn to around 216 subjects. Indeed during Ecomondo exhibition the partners distributed 500 drive pens with the guidance tool in electronic version.

### **Sub-action 7.2 Communication**

IAT and SSSUP drafted a template for the Communication plans and each partner completed its plan on time (Annex 7.1.2). The partners selected five or more events (distinguishing between communication and training) and specified the aim of the event, the target audience and the period.

All partners completed the Communication Plans and held training and communication initiatives. 46 Communication initiatives were held instead of 35 as scheduled in the project.

17 training activities and 10 seminars (27 initiatives aimed to train different target groups) were held with more than 700 involved people. The deliverables Communication Plans and Synthesis of communication & training initiatives carried out in each region include details and results of communication and training initiatives. The following table summarizes the implemented activities. More details are included in the deliverable:

**Table 17 Deliverables status**

Communication Action	Region							Total
	Basilicata	Friuli Venezia Giulia	Liguria	Lombardia	Tuscany	Valencia	Andalusia	
Training initiative	3	3	4	4	5	3	3	25
Meeting	0	0	0	0	0	0	1	1
Seminar	1	1	4	4	0	2	0	12
Brochure	0	0	0	0	1	0	0	1
Article	1	1	1	3	2	2	2	12
Workshop	0	0	0	0	0	0	0	0
Others	0	0	0	0	0	1	0	1
<b>Total</b>	5	5	9	11	8	8	6	52

### Sub action 7.3 External Communication

Each partner contacted regions not directly involved in the project. The aim of this activity is promotion of regulatory reliefs proposal outside of BRAVE “territories”. The contacts were by e-mail or skype conference. The partners sent the list of regional and national proposals and the Guidance tool. During the all workshop, seminars and training activities the partners introduced the guidance tool. SSSUP sent the Guidance tool by LinkedIn to around 216 subjects. Indeed during Ecomondo exhibition the partners distributed 500 drive pen with the guidance tool in electronic version.

The following table shows the regions and the contacted person. The contacted regions were 11 (with 14 entities) instead of 7 as scheduled in the project.

**Table 18 External regions contacted**

Date	Partner	Region contacted	Organization	Contact person
October / November 2014	Spanish partners	País Vasco	IHOBE (Regional Government for Environment in País Vasco)	José Antonio Armolea
		Cataluña	Regional Government for Environment in Cataluña	M <sup>a</sup> José Sarrias
		Castilla y León	Regional Government for Environment in Castilla y León	Mercedes Pinacho
		Madrid	Regional Government for Environment in Madrid	M <sup>a</sup> José Quintas Susana Marredo
November / December 2014	Italian partners	Emilia Romagna	ERVET (Emilia Romagna Valorizzazione del Territorio) Society of Emilia Romagna Region	Alessandro Bosso

Date	Partner	Region contacted	Organization	Contact person	
		Piemonte	Regione Piemonte	Stefano RIGATELLI (Environmental Government and Territory Director)	
				Giuliana FENU (Competitiveness System Region Director)	
			Arpa Piemonte as regional of EMAS and Ecolabel network	Marco Glisoni (Area Education and Environmental Promotion)	
		Veneto	Regione Veneto	Maurizio Conte (Environmental Assessor)	
				Marialuisa Coppola (Economy, Development, R&D Assessor)	
		Puglia	Regione Puglia	Laura Capone (Regional Ministry of Economic Development)	
				Antonello Antonicelli (DG Environment)	
				ARPA Puglia (environmental control authority)	Angelini Giuseppe
				Puglia Sviluppo Spa	Paola Fiorita
		Campania	Regione Campania	Giovanni Romano (regional ministry of environment) Michele Palmieri (Direzione Generale per l'Ambiente e l'Ecosistema)	
		Campania	ARPA Campania (environmental control authority)	Antonio Risi	
March 2014	Italian partners	Latina Province	Environmental department	Dott. Valle	

#### 5.1.6. Action 8 Networking

**Table 19 Timetable of action 8**

Actions	Scheduled start-date	Actual start-date	Scheduled end-date	Actual end-date	Status
Action 8 - Networking with other projects	Apr-2012	<i>Apr-2012</i>	Dec-2014	<i>Dec-2014</i>	<i>completed</i>

The aim of this action was networking with the other projects on BRAVE topics. ARPA Lombardia coordinates this action and updates all partners on progress. SSSUP and other partners support ARPA in the networking. ARPA have selected some projects for networking with BRAVE project. It sent e-mails in order to relate with beneficiaries of selected projects (in the first project months). Then ARPA tried to organize a web conference during which sharing projects details, methodology and building up synergies that can enhance the results of the project, as well as discussing problems encountered.

The first meeting with Life plus beneficiaries held on 4 June 2014 (afternoon) in Rome. All Italian projects operating in the BRAVE topics were invited. The Italian Life plus National point attended the meeting and introduced the new Life III Programme (Mrs.Stefania Betti). Some projects attended the meeting:

- LIFE11 ENV/IT/000168 MGN,
- LIFE/11/ENV/000277 PRISCA,
- LIFE/ENV/IT/275 Ecoremed,
- LIFE 08/INF/312 PROMISE,
- ECOLIFE - LIFE12 INF/IT/000465.

The second meeting was on 7 November 2014 at *Ecomondo* event, Rimini. ARPA invited many Italian and European Life projects to introduce the main objectives of their projects. 4 project beneficiaries attended the meeting:

- LIFE+ 2011 ENV/IT/109 - SOREME
- LIFE 2012 ENV/IT000336 After-Cu
- LIFE LIFE08 ENV/IT/000404 Ecorutour
- LIFE/11/ENV/000277 Prisca

SSSUP and ARPAL actively participated in the following forum:

- ECAP forum
- Club Emas Cataluña, <http://clubemas.cat/es/>
- Club Emas Murcia, <http://www.clubemas-rm.org/>
- Iema <http://www.iema.net/> Institute of Environmental management and assessment

Many other networking activities were conducted with the following projects:

The networking activities will continue with the following 4 projects. These projects were periodically updated on the project progress and on the achieved results. ARPAL sent all deliverables to all:

- iGREEN - (UK);
- SAGE10 - (Greece);
- I.MO.S.M.I.D. - (Italy);
- Project Go4Emas;

## 5.2. Dissemination

### 5.2.1 Objectives

The dissemination aimed to communicate the project progress and the achieved results. The dissemination included public events, articles, conferences to involve different target audience in the BRAVE (companies, public authorities, trade organization and others). The main objectives of dissemination were:

- promoting the BRAVE in Italy, Spain and other European countries,
- disseminating the project results in other regions to support the replicability of project,
- increase the project impacts on local, regional, national and European institutions,
- support the EMAS adoption and the regulatory reliefs as an instrument of incentive,
- disseminate the European policies and strategies on better regulation and regulatory reliefs.

### 5.2.2 Dissemination: overview per activity

Chcom coordinated the dissemination. SSSUP supported the Chcom in dissemination and coordinated the initiatives in Italy.

In the first project months the partners drafted a project brochure in Italian , English and Spanish. The partners printed 1000 copies disseminated in the public event and in the RCB and PCB.

#### Sub-action 9.1- Website

The main tool of dissemination was the website available at <http://www.braveproject.eu/dissemination/>.

The web site contacts were 3.581 especially from Italy, Spain, Brazil, Germany and other European countries (attached the web site statistic Annex 9.17). The BRAVE LinkedIn group is composed by 216 members and is periodically updated by Fabio Iraldo. All partners participated in the group discussion.

During the kick of meeting the partners selected some logos for the BRAVE project. The partners chose the following logo after several changes:

**Figure 3: BRAVE Logo**



The project logo and the Life plus logo are on all deliverables, ppt presentation, posters, merchandise materials and other dissemination tools.

The web site is composed of two sections: an institutional menu with the partners information and an operative menu with the progress of the project

#### Sub action 9.2 Communication Plan

The partners drafted and implemented 7 Communication Plans (as action 7). The communication initiatives were 46, of which 27 training initiatives. The people trained were around 700. The total of people involved in the communication plan is around 1.000 and many other “met” BRAVE on web.

### Sub-action 9.3 - Notice boards

The Notice Board was designed by Mediaus. There are 2 versions:

A roll up (1,5 mt x 1 mt) presented in the conferences and in the BRAVE events;

The A4 notice board placed in all partner’s offices and in the office of the regional departments involved in the project.

Both versions contain the main information on the project, including the general objective and all partners and Life Plus logos.

The notice board was updated after the changes in the partnership; therefore the last version of the notice board was completed in December 2012.

### Sub action 9.4. - Workshops and meeting

The project partners attended events at local, national and European level to disseminate the BRAVE results. The table below summarizes the 17 events attended by partners at national and international level.

**Table 20 List of public events (not included in Communication plan)**

<b>Partner involved</b>	<b>Event</b>	<b>Data and place</b>	<b>Target audience</b>
<b>IAT</b>	Congreso Nacional de Medio Ambiente (CONAMA) 2014	November 24-27th 2014, Madrid	Public institutions, companies, trade organization
<b>ARPA</b>	Chamber of commerce of Mantova	Mantova, 4 December 2014	Companies
<b>ARPA</b>	Packaging sostenibile	Milano, 16 September 2014	Companies
<b>IEFE/SSSUP</b>	L'evoluzione dei sistemi di gestione ambientale nel quadro degli schemi di certificazione volontaria e delle politiche comunitarie	Milano, 25 May, 2014	Companies and trade organization
<b>IAT</b>	Better Regulation Aimed At Valorising EMAS	Brussels, 28 <sup>th</sup> October 2013	Public institutions, companies, trade organization
<b>Confindustria</b>	The BRAVE project	Latina, 16 October 2013	Public institutions, companies, trade organization
<b>SSSUP</b>	Sul “Ruolo della certificazione ambientale nello sviluppo locale: EMAS come strumento per gli Enti Locali, il Territorio e i Sistemi Produttivi”	June 19 <sup>th</sup> , 2013 Sarroch (CA)	Public institutions, companies, trade organization
<b>EMAS Unit with SSSUP support</b>	MEETING of the Working Group of EMAS Experts	June 6-7 2013, Dublin	European institutions
<b>SSSUP and IEFE</b>	workshop in Brussels at DG environment	May 22th 2013	European institutions

<b>Partner involved</b>	<b>Event</b>	<b>Data and place</b>	<b>Target audience</b>
<b>SSSUP and IEFE</b>	Sistemi di gestione ISO 14001 ed EMAS nella prevenzione dei reati ambientali	May 16th, 2013, Milano Italy	Public institutions, companies, trade organization
<b>ChCom</b>	Life Plus Networking Event	May 14 <sup>th</sup> , 2013 Paterna, Spain	Public institutions, other life plus projects
<b>SSSUP</b>	Sotto gruppo Ambiente CONFORMA	April 10th, 2013 Milano	verifiers
<b>SSSUP</b>	Presentazione progetto BRAVE comitato EMAS Latina	March 13, 2013	Public institutions, companies, trade organization
<b>IAT</b>	Congreso Nacional de Medio Ambiente (CONAMA) 2012	November 27th 2012, Madrid	Public institutions, companies, trade organization
<b>Confindustria</b>	Club Ambiente	September 26th, 2012, Genova, Italy	Companies
<b>Ambiente Italia</b>	Sfide e opportunità per le imprese EMAS/Iso14001	September 25th, 2012, Pordenone, Italy	Public institutions, companies, trade organization
<b>All Italian partners</b>	Progetto Life+ BRAVE (Better Regulation Aimed at Valorising EMAS and Ecolabel)	May 16th, 2012, Milano Italy	Public institutions, companies, trade organization

The partner realised different BRAVE gadget: pen drives with the main project deliverables and a small block notes with life plus logo and BRAVE logo. 1200 drive pen were distributed to PCB and RCB members, during the main project event (Mid term and final conference) and other communication activities implemented in the action 7. The target audience that received the drive pen were: companies, public authorities, students, researchers and others.

### **Sub-action 9.6 - Public conference**

The conference “EMAS: Added value in times of crisis” was held on May 7 at the Fundación Bancaja of Valencia, in the framework of the European Project BRAVE (LIFE/ENV/IT/000515). This conference brought together over 60 participants from various institutions, companies and public administrations. The event was promoted by all project participants. The presentations are hosted on the project's website [www.braveproject.eu](http://www.braveproject.eu)

Coordinator of this Conference was the Chamber of Commerce of Valencia, which publicized it by emails and the weekly news service Camara On Line.

The Midterm conference was scheduled for March 2013, so this event was organized with a month's delay. The deliverable was completed a few days after the event (Annex 7.1.16).

SSSUP introduced the project results during an international event: “The 2013 International Conference on Energy, Environment, Ecosystems and Development”, July 16-19, 2013, Rhodes (Rodos) Island, Greece. The participants of this conference were around 250 researchers and the article on the BRAVE project was published on the Conference proceedings.

The final conference was held at the Ecomondo exhibition (Rimini, Italy) on November 7. The conference “*Prodotti e organizzazioni green “piu’ vitali” grazie a “life plus”?*”, introduces the results of European Project BRAVE (LIFE/ENV/IT/000515). This conference brought together over

30 participants from, companies, public administration and trade organization. This event was promoted by all project partners.

### Sub action 9.7 Lyman's report

The layman's report was realized in Spanish, Italian and English (around 1000 copies).

The layman's report included some of regulatory reliefs adopted and describes the project activates

The partners disseminated the Layman's to companies (around 500), public authorities (around 150), students(around 50), researchers and others during the final conference and Ecomondo. The electronic version of Layman's was sent to all companies involved in the survey (255), all stakeholder involved in the action 4 and many others subjects.

### Sub-action 9.8 – Publications

The articles published by all partners on BRAVE are 27. The project scheduled 3 articles published for project year but the results achieved are greater than expected results.

The following table shows the list of published articles.

**Table 21 List of articles published**

Source	Type	Date	Title
Las Provincias	Local	1 January 2015	<i>Empresas Valencianas por la Gestion medioambiental</i>
Il Sole 24 Ore	National	4 December 2014	<i>Appello per la valorizzazione di EMAS e ISO14001 nella prevenzione dei reati ambientali</i>
ARPAT news	National	11 November 2014	<i>Brave la scelta di cambiare il coraggio di premiare</i>
News ARPA Lombardia	National	31 October 2014	<i>Progetto Life plus BRAVE: Semplificazioni per le certificazioni ambientali</i>
Genova impresa	Regional	14-20 November 2014	<i>BRAVE ad Ecomondo</i>
Milano on line	Regional	31 October 2014	<i>Progetto Life+ BRAVE, semplificazioni Per le certificazioni ambientali</i>
ADNKronos	National	12 June 2014	<i>Assessore all'Ambiente del Friuli Venezia Giulia, Sara Vito: "Regione verso sviluppo sostenibile"</i>
Newsletter ChCom of Valencia	Regional	April 2014	<i>Proyecto BRAVE, un paso hacia la simplificación de la legislación ambiental. (</i>
Genova impresa	Regional	February 2014	<i>Ambiente semplificato</i>
Blog Semplificazione Regione Liguria	Regional	22 January 2014	<i>BRAVE proposte di Confindustria su ambiente</i>
Certificazione ambientale	National	13 March 2013	<i>EMAS in Europa</i>
EMAS news 3		September 2013	<i>Le proposte di semplificazione a supporto di EMAS emerse dal progetto BRAVE</i>

Source	Type	Date	Title
Blog Corporativo	Regional	25 July 2013	<i>Sostenibilidad y las buenas prácticas de gestión ambiental - Proyecto Go4EMAS-</i>
ISPRA web site	National	19 November 2013	<i>Progetto BRAVE</i>
ARPAT news	Regional	October 2013	<i>Progetto BRAVE</i>
Ecosostenibile 21(2013)	National	Mayo-Junio, 2013	<i>EMAS: Más valor en tiempos de crisis</i>
www.distrettodelmobilelivenza.it	Local	30th July 2013	<i>Progetto BRAVE</i>
DML News 8	Local	July 2013	<i>Progetto BRAVE</i>
www.cartesio.it	National	8th July 2013	<i>I Progetti della rete Cartesio</i>
Corriere della sera online	National	8th July 2013	<i>AIA ambiente e semplificazioni: progetto BRAVE e Linee Guida 231</i>
Genova impresa	Regional	n.3 April 2013	<i>I vantaggi dell'Ecogestion</i>
EMAS news	National	May 2013	<i>Semplificazione normativa e agevolazioni a favore delle aziende dotate di una certificazione Ambientale: il progetto BRAVE</i>
www.camaravalencia.com.	Regional	28th June 2013	<i>PROYECTO BRAVE. EMAS, Una oportunidad para PYMES y organizaciones</i>
Sviluppo e rispetto del Territo	National	December 2012	<i>Buone Pratiche : Progetto BRAVE</i>
EMAS news	National	November 2012	<i>Il progetto BRAVE</i>
EMAS news	National	September 2011	<i>Nuove opportunità per EMAS con il progetto BRAVE</i>
La Nazione	Regional	31 <sup>st</sup> November 2012	<i>Al via il progetto BRAVE</i>

SSSUP sent a **technical paper** to international conference. The article “*Environmental performance improvements and external stakeholder pressures in companies with certified Environmental Management System*” is published in the conference proceeding.

#### **Sub action 9.9 After Life Communication plan.**

The partner drafted the “After life communication plan”. This document identifies the main events that the partners will attend in the next two years. The After life scheduled the dissemination activities for the next years to communicate the BRAVE and its results.

The stakeholder consultation was completed during the actions 4 and 6. Politicians, companies, trade organization and many other actors attended the stakeholder consultation.

#### **Sub-action 9.10 Stakeholder consultation**

The partners intensively consulted stakeholders on the regulatory reliefs proposal as described in Action 4.

Consultation Boards both at regional and national level play a key role for the stakeholder's consultation. During 16 meetings, 9 Boards were created involving almost 100 stakeholders. Moreover, a LinkedIn survey among different stakeholders was carried out and obtained

feedback from 34 of them.

### **Sub-action 9.11 Local communication initiatives**

The partners implemented local communication activities to disseminate the BRAVE; the main tool is the local press and the local journal on environmental topics.

Many articles have been published and many others will be drafted by the partners for the local press and other media until the project's end.

The partners organized local communication initiatives in the last project year. These initiatives were included in the communication plans and have involved different target audience.

The activities include in this sub action were implemented by action 7 “Communication and Training activities.

### **Enhance activities**

- The partners drafted a documents to support the BRAVE dissemination and the diffusion of regulatory relief proposals among national institutions. The document, called “BRAVE Position Paper”, is a summary of the project activities and includes the list of regulatory relief proposals to be included in the national legislation. Its main objective is to promote the identified proposals and increase the opportunities of their adoption. The “BRAVE Position Paper” was shared with the members of PCB during the second meeting on July 11. The partner sent to all national institution (Parliament members and Government) and all national trade organization (Confindustria, Assocarta, Assoconcia, and others). Around 100 stakeholders received the Position Paper.
- SSSUP and Ambiente Italia promoted the “BRAVE group” on the social network LinkedIn. The group is composed of approximately 216 members.

### **5.3 Evaluation of Project Implementation.**

The project methodology is included in the deliverable “Guidance tool”. The methodology describes how the partner drafted the regulatory reliefs proposals and how these proposals became amendments and then official acts. The methodology tested by BRAVE represented a success. 28 simplification proposals were adopted, 7 more than expected in the project.

The following table summarizes results achieved in each action by monitoring indicators.

**Table 22 Performance Indicators monitored**

<b>Action</b>	<b>Indicators</b>	<b>Data and results</b>
<b>1 Project Management</b>	Number of meetings among partners for the project management (also online)	11 Steering Committees
	Number of regional meetings (meetings of each Consultation Board)	17 RCB meetings
	Number of reports submitted to the EC	4
<b>3 Policy making and implementing</b>	Number of European directive selected and analyzed	Approximately 200
	Number of national and regional regulations selected and analyzed	Approximately 500
	Number of incentives for EMAS registered organizations identified in the different context	155 measures at regional level 81 at national level (in 6 European countries)

<b>Action</b>	<b>Indicators</b>	<b>Data and results</b>
	Number of incentives whose effectiveness is analyzed	14 case studies
	Number of EMAS adopters, non adopters and Applicant involved in the analysis of effectiveness	100 through the European survey 141 through the Italian survey 10 representatives of regional departments
<b>4 Policy innovation</b>	Number of members of Consultation Boards;	95 members
	Number of Working Groups meetings	28 RWG meetings 3 EWG meetings and a workshop in Brussels 8 NWG (6 in Italy and 2 in Spain)
	Number of simplification proposals related to the existing legislation;	184 proposals: 54 at European level 39 at National level 91 at regional level
	Number of simplification proposals related to the permitting procedure	25 proposals - 30% (at regional, national and European level)
	Number of simplification proposals related to inspection and control activities;	14 proposals - 7,5% (at regional, national and European level)
	Number of simplification proposals related to environmental tax and administrative fees reduction;	13 proposals - 7% (at regional, national and European level)
	Number of meetings of the Regional Consultation Board;	19 RCB meetings
	Number of meetings of Project Consultation Board	4 PCB meetings
<b>5 Testing in field</b>	Number of criteria included in the methodology to select the simplification proposals to test	1. Effectiveness 2. Efficiency 3. Efficacy 4. Feasibility
	Number of competent authorities involved in the testing in field phase	12
	Number of tested proposals	35
	Number of modified proposals after the test	3
<b>6 Adoption</b>	Number of approved proposal;	28 + 6 tenders
	Number of proposal downloadable from website	Around 200
	Number of meeting with regional politician or policy makers	24
	Number of meeting with national politician or policy makers	2 in Italy
<b>7 Communication and training</b>	Number of communication initiatives	46
	Training initiative and seminars	27
	People trained	Around 700
	Number of region not directly involved in the project contacted	10
<b>8 Networking</b>	Number of projects selected	4 Life plus projects 1 Eco innovation project

Action	Indicators	Data and results
		1 FP7 4 On line Forum
	Number of projects involved in BRAVE meetings	9
<b>9 Dissemination</b>	Number of website contacts	3.581 from May 2012 to December 2014
	Number of public events	17
	Number of notice boards displayed	20
	Number of BRAVE pen drive disseminated	1200
	Number of layman's report disseminated	1000
	Number of visitors at Ecomondo (BRAVE exhibition space)	100.000
	Number of participants in Ecomondo seminar on BRAVE	10
	Number of participants in Final Conference	30
	Number of subjects participating to midterm conference	60
	Number of participants in the 1 <sup>o</sup> project Event in Milano (16 May 2012)	70
	Number of participants in the International Conference in Rodi (July 2013)	250 researchers
	Number of issued publications	1 paper on international journal (Conference proceeding) 28 articles on local/National press or web-sites

The following table compares the results achieved against the objectives.

**Table 23 Achieved results compared with expected results**

Task	Foreseen in the revised proposal	Achieved	Evaluation
3	Policy opportunities for European Policy Maker for considering EMAS registration under in the development of new legislation and revision of existing legislation ( <b>deliverable</b> )	yes	The main outcome of this deliverable is a comprehensive set of proposals of amendments and integrations covering major EU policy areas, whose contents may give a boost to European Policy makers.
	Regulation analysis and recommendations for considering EMAS registration under in the development of new legislation and revision of existing legislation at national (Italy and Spain) and regional level ( <b>deliverable</b> )	yes	This document was necessary to support the partners in drafting proposals
	Overview of existing experiences dealing with incentives and regulatory relief for EMAS registered organizations and their effectiveness ( <b>deliverable</b> )	yes	This document is very thorough and detailed. It contains the depth of 14 case studies. From this document emerged interesting suggestion to draft the proposals.
4	4.1 List of the member of of Regional,	yes	This document lists the main

<b>Task</b>	<b>Foreseen in the revised proposal</b>	<b>Achieved</b>	<b>Evaluation</b>
	National and European Working Groups( <b>deliverable</b> )		stakeholders involved in the WGs.
	4.2 List of the member of Regional and Project Consultation Boards( <b>deliverable</b> )	yes	This document lists the main actors involved in the stakeholders consultation.
	4.3 Report with the list of the simplification proposals shared by the Consultation Boards( <b>deliverable</b> )	yes	This is an important project results. It contains around 30 proposals shared with the main national stakeholders by some criterion as efficacy of proposals, efficiency and others.
	4.4 Report about the workshop held in Brussels ( <b>deliverable</b> )	yes	The deliverable summarize the feedback by EC on BRAVE simplification proposals.
	Activation of RWG, NWG, EWG, RCB, PCB ( <b>expected results</b> ).	yes	Many stakeholders attended the BRAVE meetings and events to contribute in the proposals improvement. The WG and CB gave a high value added to drafting proposals.
	large stakeholders involvement ( <b>expected results</b> )	yes	
	Policy recommendations and proposals to European policy makers ( <b>expected results</b> )	yes	54 proposals concerned the European directives
5	Methodology to select the simplification proposals( <b>deliverable</b> )	yes	This methodology support the partner in the proposals selection. It is shared with many other stakeholders.
	List of the simplification proposals selected (5 for each region) ( <b>deliverable</b> )	yes	Included the 35 proposals selected to test
	Report about the results of the testing in field phase ( <b>deliverable</b> )	yes	This is a key deliverable. It highlights the proposals most useful and feasible.
	Updated version of the Report that contains the simplification proposals revised on the basis of the results of this action( <b>deliverable</b> )	yes	Included the proposals modified after the test
6	Methodological tool for the selection of the proposal of simplifications	yes	The methodology supported the partners in the selection of proposals to promote for adoption
	List of submitted proposal	yes	The partners sent this deliverable to politicians, public institutions and others to support the adoption
	List of approved amendments (at least 3 for each region)	yes	Included the 30 acts adopted and the 6 tenders valorising EMAS. 3 Regions not achieve the expected results. Andalucía and Valencia obtained only 1

Task	Foreseen in the revised proposal	Achieved	Evaluation
			adoption instead of 3. Basilicata no achieves adoptions.
7	Communication Plan for each Region( <b>deliverable</b> )	yes	This tool allowed to promote the BRAVE and EMAS among different target group (scholars, companies, trade organization institution..)
	“Guidance tool for the EMAS-based regulation and better regulatory relief” manual( <b>deliverable</b> )	yes	This is the main project deliverable. This allows implementing the BRAVE in other regions and countries. Downloads from web site were around 160. SSSUP sent the Guidance tool by LinkedIn to around 216 subjects. Indeed during Ecomondo exhibition the partners distributed 500 drive pens with the guidance tool in electronic version.
	Synthesis of communication & training initiatives carried out in each region (at least 3 training initiatives for region) ( <b>deliverable</b> )	yes	This includes the main results of training (27 instead of 21 as scheduled in the project) and communication (46 instead of 35) initiatives.
	At least 7 external regions contacted by e-mail( <b>deliverable</b> )	yes	The activity scheduled in the sub task 7.3 promoted the BRAVE and the achieved results in many regions not directly involved in the project.

The main impact of the BRAVE project is the modification of the policy regime at the regional level by the inclusion of 30 new regulatory reliefs to promote the adoption of EMAS and ISO 14001 certification. These adopted regulatory reliefs have modified the environmental legislation in the following regions: Friuli, Liguria, Lombardy, Tuscany and Valencia and Veneto.

This result offers private organizations a significant indication as to whether to adopt or keep the EMAS or ISO 14001 certification. The project results created both tools to support the EMAS adoption and tools for the new adoption of regulatory reliefs. The 28 adopted amendments can encourage the companies to maintain EMAS or to adopt one of the EMS. The organizations can be interested to obtain the administrative advantages or other benefits brought by BRAVE (as inspection reduction, fee reduction and others).

For each regulatory reliefs adopted there are advantages and benefits already.

For instance, the Tuscany EMAS companies had a reduction of regional fee from 2014 and the small companies implementing EMAS or ISO14001 can obtain a reimbursement up 15.000€ for the encountered costs. In Lombardy the EMAS companies pay reduced costs (-30%) for administrative procedures and for check. In Friuli and Liguria the EMAS and ISO14001 companies obtained simplified procedures for checks and monitoring by competent authority. In Friuli and Liguria the BRAVE results incentive the green public procurements. Two adopted amendments aimed to encourage the market of Ecolabel product and the EMAS companies as service provider for public

administrations. The Italian EMAS companies with Environmental Integrated Authorization obtained a permit extension until 16 years.

Thanks to BRAVE, EMAS and ISO14001 companies received a significant “recognition” by public institutions for their commitment.

The dissemination represented a relevant tool to promote the regulatory reliefs and to support their adoption. The stakeholders involved in all communication activities were a lot; only the two conferences and the first public event involved around 300 people, representatives of institutions, trade organization, companies and others. Around 500 people attended the RCB and PCB meetings held during the action 4. The public event of Roma (4 June 2014) involved around 40 actors and many politicians. IAT and Chcom participated at CONAMA in 2012, 2013 and 2014, the most important event on environmental topics in Spain. SSSUP and Chacom attended the Green Week in Bruxelles in 2014. The public events and the relation with many stakeholders contribute to regulatory reliefs adoption. The dissemination activities followed all project actions. The communication of project progress was through local and national newspapers, web site, social e-tools as LinkedIn. The people contacted and informed on BRAVE were a lot (around 7000) and come from different target groups: local communities, trade organization, industrial fields, institutions, research institute. The project dissemination also involved the European commission (workshop in Bruxelles, event of EMAS competent bodies). The web site contacts were more than 3000 and around 1000 people downloaded the results of EMAS survey.

#### **5.4 Analysis of long-term benefits**

The BRAVE environmental benefits are strongly connected with the EMAS adoption. The diffusion of EMAS and other EMS can support the companies in their environmental management. The companies implemented EMS can reduce their environmental impacts. The survey among European EMAS companies (conducted by BRAVE) demonstrated that the EMAS companies achieve improvements concerning the air emission, reduction of waste production and become more efficiency in the use of natural resources. Around 50% declared improvement on air emission and reduction of water consumption; around 60% of interviewed confirmed a reduction of waste. The companies operating in manufacturing achieved the best results concerning the pollution reduction. For this reason the adoption of regulatory reliefs is very relevant, especially in this period where the EMAS registrations decrease.

The BRAVE was part of the European Strategy on better regulation. The European Commission and other EU institutions have promoted a number of initiatives in recent years to codify, consolidate and simplify existing EU legislation and to evaluate better the likely economic, social and environmental impacts of new regulation. Implementing regulations and laws entails costs. The project support this Policy and the ECAP programme, aimed to improve the environmental legal compliance in SMAs, through the EMS too. Indeed the BRAVE promoted and disseminated the European strategy on better regulation and regulatory reliefs during the public events to encourage the public institution following the European approach. BRAVE also support the EC implementing the Communication “Minimizing regulatory burden for SMEs”(COM(2011) 803 final)”. Many simplification proposals emerged from BRAVE aimed to reduce the burdens especially for SMEs.

##### **1. Long-term benefits and sustainability**

The long term benefits of sustainability of the project activities are strictly linked on the increase of EMAS adoption pushed by the implementation of several regulatory reliefs that reduce the

administrative burdens of adopters. Several studies on the effect of EMAS on environmental performance stressed how the adoption of an EMS generates long term effect. In particular the recent studies carried out by Testa et al (2014)<sup>1</sup> found that EMAS has a big positive impact on reducing an organisation's CO2 emissions in the long term. Companies which had been EMAS-registered for the full four years were roughly 1.3 times more likely to show decreases in CO2 emissions of 75% or more than they were to show minimal reductions of 25% or less, or increased CO2 emissions.

The project changed the legislative policy regime at the regional level

Moreover, the changes in regional legislation in support of an EMAS adoption will increase the awareness of the policy maker on how to support (often without further expenses) the uptake of one of the most important environmental policy instruments based on a voluntary approach. Such approach could be easily followed also by other Regional Governments not directly involved in the BRAVE project.

Regarding the economic benefits of the project, it possible to identify a twofold effect. From the one hand, the adoption of EMAS provides relevant benefits and possible advantages for organizations.

The experience of many EMAS registered organizations shows that by implementing an EMS they are able to raise the organizational and management efficiency of the whole company (Biondi et al. 2000). The introduction of EMAS should enable an organization to identify opportunities for the better management of resources, including saving in raw materials and energy in the supply chain of an organization, or in the reuse or recycling of resources. Such steps reduce consumption and in turn reduce the operating costs of that organization. Moreover, a positive impact on the increase of turnover and exports is also found, especially when a company is able to achieve significant learning by adopting EMAS. Furthermore, a recent study by Iraldo et al. (2009), based on a sample of 100 interviewed organizations showed a positive impact of well-designed EMS complied with EMAS on technical and organizational innovations and competitive performance. A survey by Florida and Davidson (2001) among 241 EMAS companies detects that the 87% declared economic benefits and improvement of business performance.

On the other hand, regulatory reliefs and legislative simplification reduce inefficiencies in public administrations by removing not value added actions and increase the productivity of public employees.

Indeed the BRAVE approach is spreading and many other regions are interesting to adopt it. For instance the Veneto region, contacted by Ambiente Italia to promote the regulatory reliefs, adopted a measure reducing financial guarantee for EMAS companies operating in waste field.

Also social benefits can be gained in the long term thanks to the BRAVE project. First of all the reduction of pollutant emissions derived by the increase of EMAS adoption is an undeniable benefit for local communities where the registered site operates. Moreover, the implementation of an environmental management system increase employee satisfaction and the quality of human capital and partially reduces the risk for health and safety of worker (for instance fire prevention and emergency management are in the scope of an EMS).

Finally, the reduction of bureaucracy and the increase of productivity of public employees could be considered another indirect benefit for the entire society.

At the national level, the definition and dissemination of ready-to-use regulatory relief will facilitate the lobby action of trade associations or could be used by policy makers to support EMAS adoption by the national legislation as well. Moreover, the wide consultation activities during which public and private authorities jointly discuss how to support the EMAS scheme will create a positive environment around this tool and increase the EMAS adopters' trust on the entire system that governs the scheme.

At the regional level, the effort of consultation boards and working groups has supported the team working among public authorities and creates a positive collaboration that will also support other

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<sup>1</sup> Testa, F., et al. (2014). EMAS and ISO 14001: the differences in effectively improving environmental performance. *Journal of Cleaner Production*. DOI: 10.1016/j.jclepro.2013.12.061

policies on environmental topics. Within the RCBs and in the PCBs the stakeholders develop synergies to define and adopt regulatory reliefs proposals. Different stakeholders (such as control authorities, trade organizations, companies' verifiers) cooperated to identify regulatory reliefs supporting EMAS and ISO14001 companies in maintaining the certification. These synergies will also continue after the project end to achieve new results.

Moreover, the regulatory reliefs proposals and the results of the European survey can be used to improve the European legislation. With the involvement of other DGs, the DG Environment can implement the proposals on European Directives and Regulation identified by project partners to improve the EU legislation on the environment and on other topics such as transport, energy, agriculture. The project results and the guidance tool will be introduced during a public event scheduled in July in Milan. This event will be connected with the EXPO 2015 and will involve many institutions and companies from European countries. This will be an opportunity to encourage other States in the BRAVE project implementation.

The main tool for replicability of BRAVE is the guidance tool. The guidance tool introduces and suggests the approach to adopt for EMAS dissemination and to improve the environmental legislation. The Guidance tool is in English and is available on the project web site. The partners sent the Guidance tool to many Italian and Spanish regions to support the regulatory reliefs adopted. The Guidance tool was introduced during the training activities so many people know the instrument very well. The partners continue to promote the guidance tool by social network as LinkedIn, Twitter and others. SSSUP continue to promote this tool in the communication and training activities connected with the other projects at local and national level.

The project will continue many other activities:

- Training activities , the partners especially SSSUP, scheduled training activates for student on the BRAVE topic. For instance in the Master on environmental management by SSSUP is provided a session on BRAVE, EMAS and regulatory reliefs.
- Some tools as NWG and RCB will be active to identify new regulatory reliefs to adopt.
- The web site periodically will be updated.

These activities will allow to increase the project result and supporting the replicability of project.

The other tool for project replicability and dissemination is the web site where all project deliverable are available. The project web site will be active for the next two years.

Indeed SSSUP will continue in networking and so it will meet other Life plus project in may at Ravenna. During this event SSSUP will introduce the Guidance tool and the BRAVE approach.

Cartesio Network, that supports the project, is disseminating the BRAVE deliverable and especially the Guidance tool among other Italian regions.

IAT will introduce the Guidance tool and the BRAVE results in European Forum on Eco innovation scheduled in Spain, to promote the project replicability at European level.

The best practices implemented by BRAVE were:

- 1) The stakeholder consultation to identify the best regulatory reliefs to promote for adoption process.
- 2) The activities with RCB and PCB supporting the duration of the project. The relation born in the consultation boards supported the partners in the adoption process. The different stakeholder's categories cooperated with project partners and worked to success of regulatory reliefs proposals.
- 3) The partners tested the regulatory reliefs through studies, researches, cost benefit analysis and others. The regulatory reliefs emerged from BRAVE were: efficiency, efficacy, effectiveness and feasibility.

The main innovation of project is connected with the high level of sharing of regulatory reliefs. During the action 4 there were intensive activities to share and improve the regulatory reliefs proposals. Indeed the regulatory reliefs emerged from action 4 were tested. The partners involved in the testing activities, public institution, trade organization, check authorities to guarantee a high quality of proposals. Ambiente Italia and other partners created a methodology to select the more innovative regulatory reliefs. The key element of the project concerns the level of appreciation; the main stakeholders and the companies have greatly appreciated the BRAVE proposals encouraging the adoption by regional and national competent authorities.

The main indicators to monitor the BRAVE replicability and impact in the future can be:

- Number of EMAS registration in the regions adopting the BRAVE regulatory reliefs.
- Number of EMAS registration in Italy and Spain
- Number of regulatory reliefs adopted in Italy and Spain
- Number of articles published on the BRAVE
- Number of EMAS companies using the regulatory reliefs emerged from BRAVE
- Download to Guidance tool 160

