4th Thematic Workshop

Environmental Statements and point of view of Public Authorities

Seville, 3rd of May of 2018

Tiberio Daddi

S.Anna School of Advanced Studies
Environmental Statement and public authorities point of view

Are there improvement opportunities in the valorisation of the Environmental Statement as tool to replace reporting obligations considered in the environmental legislation?

What about the opinion of EMAS registered companies and other key stakeholders on this kind of regulatory relief?
Source of data: RAVE project

Partners: adelphi; SSSUP; Trinomics, UBA AT; EMAS Club Catalunya

Duration: 01.01.2017 – 31.12.2017
Environmental Statement and reporting obligations: key investigated questions

Reporting:

- Is it possible to combine the added value of EMAS’ transparent and third party verified reporting with measures to reduce the burden of environmental monitoring and reporting for both organisations and authorities?
- What types of reporting obligations currently exist in the MS?
- Which overlaps currently exist between reporting obligations and the information in the EMAS environmental statement?
- How do companies currently report environmental data to EMAS CBs and other public regulatory and/or inspection authorities?
- How could the current EMAS reporting channels and/or reporting medium be adapted to facilitate more direct communication of environmental data between EMAS registered organisations, CBs, and public authorities?
- What options exist for digitalising EMAS reporting?
The largest survey on EMAS organisations

A total of 742 EMAS-registered organisations filled out the online questionnaire, giving an overall participation rate of 18.7%.

The three countries with the highest numbers of registrations - Germany, Spain and Italy - provided 82.6% of the total responses.
Survey on EMAS organisations

By turnover:

- Micro: 16.9%
- Small: 22.0%
- Medium: 24.2%
- Large: 36.9%

- < €2,000,000
- €2,000,000 - €10,000,000
- €10,000,000 - €50,000,000
- > €50,000,000

- Agriculture, Forestry & Mining: 4.6%
- Construction: 4.0%
- Energy, Water & Waste: 14.9%
- Information & Communication: 4.6%
- Manufacturing: 25.7%
- Services & Other Professional Activities: 3.4%
- Transportation: 42.9%
Survey on ISO14001 organisations

In total, **225 ISO 14001-certified organisations** participated in the survey.
Survey on EMAS verifiers

A total of 71 EMAS verifiers filled out the online questionnaire.
Environmental Statement and public authorities: EMAS organisations

Indicate the types of regulatory relief your organization has benefited

- Reduced inspection frequencies: 16.3%
- Reduced reporting or monitoring requirements: 15.9%
- Fast track permits / simplification in the application: 13.0%
- Extension of validity of permits / authorization: 11.7%
- Reduction of administrative fees: 9.8%
- Tax breaks: 8.0%
- Green public procurement: 7.0%
- Reduction of financial guarantees: 6.5%
- Credit access and funding support: 3.5%
- Self-declaration in the procedure of achieving a new permit: 3.5%
- Modification in the aim of the application: 3.0%
- Reduced inspection frequencies: 2.2%
**Environmental Statement and public authorities: EMAS organisations**

In which of the following areas would you appreciate additional regulatory relief measures?

<table>
<thead>
<tr>
<th>Area</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fast track permits / simplification in the application</td>
<td>4.18</td>
</tr>
<tr>
<td>Reduced reporting or monitoring requirements</td>
<td>4.53</td>
</tr>
<tr>
<td>Reduced inspection frequencies</td>
<td>4.82</td>
</tr>
<tr>
<td>Extension of validity of permits / authorization</td>
<td>4.97</td>
</tr>
<tr>
<td>Tax breaks</td>
<td>5.88</td>
</tr>
<tr>
<td>Reduction of administrative fees</td>
<td>6.57</td>
</tr>
<tr>
<td>Green public procurement</td>
<td>6.70</td>
</tr>
<tr>
<td>Credit access and funding support</td>
<td>7.18</td>
</tr>
<tr>
<td>Reduction of financial guarantees</td>
<td>7.66</td>
</tr>
<tr>
<td>Modification in the aim of the application</td>
<td>8.35</td>
</tr>
<tr>
<td>Reduced inspection frequencies</td>
<td>8.41</td>
</tr>
</tbody>
</table>
Environmental Statement and public authorities: EMAS organisations

Do you think that the Environmental Statement - in its current or in an adjusted form - could effectively substitute the most burdensome reporting obligations?

- Yes, the Environmental Statement in its current form does meet current reporting obligations; 30.2%
- Yes, but with some minor adjustments to the data and information in the Environmental Statement; 29.2%
- Yes, but only with considerable adjustments to the data and information in the Environmental Statement; 10.3%
- No; 30.2%
Environmental Statement and public authorities: EMAS organisations

What are the main barriers preventing the Environmental Statement from substituting the reporting obligations mentioned in the previous answer?

- Reporting obligations are too lengthy to be included in the Environmental Statement: 36%
- The Environmental Statement addresses a different audience (e.g. clients and partners, instead of authorities): 35%
- Reporting obligations are too technical compared to the Environmental Statement: 24%
- The Environmental Statement is not considered a reliable and trustworthy document by authorities: 5%
Environmental Statement and public authorities: ISO14001 organisations

Would you consider adopting EMAS if specific additional typologies of regulatory reliefs would be provided?

<table>
<thead>
<tr>
<th>Relief</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tax breaks</td>
<td>4.2</td>
</tr>
<tr>
<td>Extension of validity of permits / authorization</td>
<td>4.7</td>
</tr>
<tr>
<td>Fast track permits / simplification in the application</td>
<td>4.7</td>
</tr>
<tr>
<td>Reduced inspection frequencies</td>
<td>5.3</td>
</tr>
<tr>
<td>Reduced reporting or monitoring requirements</td>
<td>5.5</td>
</tr>
<tr>
<td>Self-declaration in the procedure of extension of duration of...</td>
<td>6.3</td>
</tr>
<tr>
<td>Reduction of administrative fees</td>
<td>6.4</td>
</tr>
<tr>
<td>Credit access and funding support</td>
<td>6.8</td>
</tr>
<tr>
<td>Self-declaration in the procedure of achieving a new permit</td>
<td>7.2</td>
</tr>
<tr>
<td>Green public procurement</td>
<td>8.1</td>
</tr>
<tr>
<td>Reduction of financial guarantees</td>
<td>8.2</td>
</tr>
<tr>
<td>Modification in the aim of the application</td>
<td>8.6</td>
</tr>
</tbody>
</table>
Environmental Statement and public authorities: ISO14001 organisations

Do you think it would be feasible to simplify the environmental reporting process by integrating mandatory environmental information into a unique consolidated report/interface that would be shared with the authorities?

- Yes, a consolidated report/interface could be used to transmit all environmental data to authorities: 55%
- Yes, some information could be consolidated but other data requested by reporting obligations are too specific and cannot be consolidated: 20%
- Yes, but only with considerable adjustments to the data (type, reporting format, etc.) to be communicated to authorities: 19%
- No: 6%
Environmental Statement and public authorities: EMAS verifiers

Do you think that the Environmental Statement - in its current or in an adjusted form - could effectively substitute the most burdensome reporting obligations?

- Yes, the Environmental Statement in its current form does meet current reporting obligations; 20%
- Yes, but only with some minor adaptation; 18%
- Yes, but only with considerable adjustments to the data and information contained in the Environmental Statement; 38%
- No; 25%
Environmental Statement and public authorities: EMAS verifiers

What additional regulatory relief measures would be mostly effective in simplifying the verification process of EMAS-registered organizations?

- Fast track permits / simplification in the application: 5.0
- Tax breaks: 5.1
- Extension of validity of permits / authorization: 5.1
- Reduced reporting or monitoring requirements: 5.4
- Reduced inspection frequencies: 5.6
- Reduction of administrative fees: 6.3
- Reduction of financial guarantees: 6.7
- Credit access and funding support: 6.9
- Self-declaration in the procedure of achieving a new permit: 7.0
- Green public procurement: 7.5
- Modification in the aim of the application: 8.8
Conclusions

Environmental Statement and reporting obligations - policy improvement opportunities:

a) Implement regulatory relief for reporting obligations that overlap is surely a priority policy area to focus
b) Increase authorities' awareness of EMAS and its added value and provide guidance on how to use EMAS in integrated reporting could help
c) Make the Environmental Statement more flexible to adapt it in fulfilling key reporting obligations
Thank you !!!

Tiberio Daddi

tiberio.daddi@santannapisa.it
let's do it!