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Towards EMAS Action Plan

Italy



Document carried out by **PP 3: Sant'Anna School of Advanced Studies**

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INTRODUCTION

Produced by PP 3: Sant'Anna School of Advanced Studies, this Action Plan is a document providing details on how the lessons learnt from the cooperation will be exploited in order to improve the policy instrument tackled within that region. It specifies the nature of the actions to be implemented, their time frame, the players involved, the costs (if any) and funding sources (if any). If the same policy instrument is addressed by several partners, only one action plan is required.

GENERAL INFORMATION

GENERAL INFORMATION	
Project:	ENHANCE Interreg Europe
Partner organisation:	Sant'Anna School of Advanced Studies
Other partner organisations involved (if relevant):	<ul style="list-style-type: none"> - Ministry of Environment and Spatial Planning. Regional Government of Andalusia - Ministry of Territory and Sustainability, Government of Catalonia Stockholm Environment Institute Tallinn Centre - CENIA - Czech Environmental Information Agency - Environment Agency Austria
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POLICY CONTEXT

POLICY CONTEXT	
The Action Plan aims to impact:	<p><i>[mark with a cross the valid option]</i></p> <p><input type="checkbox"/> Investment for Growth and Jobs programme</p> <p><input type="checkbox"/> European Territorial Cooperation programme</p> <p>X Other regional development policy instrument (please insert the name): Regional Law (see below)</p>
Name of the Policy Instrument addressed:	Regional Law n. 31 of 13th August 2007: Organisation of the Region for transparency and quality of contracts and concessions - Legge Regionale n. 31 del 13 Agosto 2007: Organizzazione della Regione per la trasparenza e la qualità degli appalti e delle concessioni.
Geographical coverage of the Policy Instrument:	Liguria, Italy
Responsible for the Policy Instrument:	Liguria Region, Italy.
Main features of the Policy Instrument:	<p>Europe's public authorities are major consumers. Although Green Public Procurement (GPP) is mostly a voluntary instrument, it has a key role to play in the EU's efforts to become a more resource-efficient economy. In 2016, with the new National Code of Public Tender, in Italy GPP has become a mandatory provision for every level of public body.</p> <p>The objective of the policy instrument selected is to spread the application of GPP among public bodies of Liguria through the introduction of environmental criteria in the services and products purchasing procedures. In the article 20 the policy instrument requires the adoption of a three-year Action Plan in all public institutions of the region. The article 21 gives indication of environmental criteria to consider in the green purchasing procedures and it mentions EMAS explicitly as one of the main tools to apply GPP.</p> <p>To date in Liguria about 49 different three-yearly Action Plan have been adopted by public authorities of Liguria Region.</p> <p>In the year 2012 the Liguria Region has approved a deliberation that has furtherly detailed the products and services categories to consider in the GPP procedures and the criteria that can be used, confirming the relevance and strict connection of EMAS with this policy instrument.</p> <p>The instrument has several improvement opportunities, e.g.:</p> <ul style="list-style-type: none"> •increase the number of green purchasing procedures in the public institutions; •make aware firms of the importance of EMAS to obtain public contracts; •increase the knowledge of public officers of the best modalities to use EMAS in GPP following the national and international rules in the field.
Stakeholders involved:	<ul style="list-style-type: none"> • Scuola Superiore di Studi Universitari e di Perfezionamento Sant'Anna - SSSA • Liguria Regional Government • Industrial Associations of Liguria

	<ul style="list-style-type: none"> • Representatives of EMAS-registered organisations. • Representatives of EMAS requirements verifiers (e.g. Certiquality, Rina, etc). • Representatives of the EMAS Competent Body of Italy. • Representatives of public institutions (e.g., municipalities, parks, schools) with a high number of EMAS-registered organisations and purchasing procedures • Italian Ministry of the Environment • Representatives of voluntary GPP networks such as GPPinfoNET
<p>Any other relevant information (if relevant):</p>	<p>None.</p>

DETAILS OF THE ACTIONS ENVISAGED

ACTION 1: EMAS as a mean to obtain high ranking in public tenders

ACTION 1	
Action	<i>EMAS as a mean to obtain high ranking in public tenders</i>
Type of action	<i>Green Public Procurement</i>
Voluntary scheme(s) addressed	<i>EMAS</i>
No. assigned in EMAS Joint Database	<i>AU-1GP (partially EST-2GP)</i>
Promoting region	<i>Austria</i>

Lessons Learnt and Background

This action has been selected for the potentiality to spread the EMAS adoption in the Ligurian Context. Green Public Procurement are one of the mainly policy instrument chosen by SSSA for the ENHANCE project, inside the Regional Law n. 31 of 13th August 2007: Organisation of the Region for transparency and quality of contracts and concessions. Try to match GPP with Environmental management systems is a challenge and this match could benefit both Public Authorities and private sector in spread the functioning of GPP. In this case, the firm participating in the tender would benefit of the implementation of EMAS. The result expected is a spread of EMS adoption by firms interesting in public tenders. More in detail, Regional Law n.31/2007 foresees, at the chapter 4, art. 20, a Three-year Action Plan for the Green Purchasing for every Public Authorities over 2.000 inhabitants, aimed at defining an operational program for the introduction of environmental criteria in the procurement procedures for supplies and services. The Plan determines the conversion target at the end of three years of its supplies, in addition to identifying and selecting the sectors of intervention and the relative order of priority. Then, this Plan should define the specific objectives to be achieved in each sector or product category at the end of the three-year period. At art. 21, it is foreseen that contracting authorities have to insert, in calls for tenders and tender specifications for public contracts for works, supplies and services, specific requirements for the integration of environmental aspects into tender procedures. In doing this, contracting authorities may request, among the requisites necessary to prove the technical ability of the competitors, the specific needs of the competing company in the environmental field and/or the indication of the environmental management measures that the operator will apply during the execution of the contract. By the way, public officers in charge of purchasing shall refer to the Community eco-management and audit scheme (EMAS) or to environmental management standards based on relevant European or

international standards certified by bodies compliant with Community legislation or relevant European and international standards to certification (EN ISO 14001).

Regarding, for example, the GPP Plan of Liguria Region, the present was released in June 2017 and has for target period the years 2017-2019. In the Plan, it is reported that the number of organizations that are registered EMAS and the number of certified ISO 14.001: 2015 are both n.7. Then, it is clear the role that GPP could have in improving EMAS and ISO adoptions. Within the actions foreseen by the Plan, there are, among the others: internal training addressed to the referents of the regional system and to other local administrations; preparation of operating tools; training for entrepreneurs and businesses. All these activities will benefit from the exchange of practices from the Enhance project.

Description of the action

In the original version from the NaBe Action Plan (Austria), EMAS registered organizations are simply ranked higher than other organizations. The main stakeholder, Liguria Region, has interest in reward the EMAS registered organizations in public tenders but, due to the legal feasibility still to be assessed and both the actual regulation on National Code of Public Tender and the changes that probably will happen in the next months in Italy regarding that Code, at this stage EMAS could serve to prove the existence of Environmental Management Systems. If the feasibility assessment will give positive result, EMAS organizations will be directly ranked higher in public tenders. Otherwise, public administration will be encouraged to use EMAS as a proof for EMS reward ranking.

Sub-action 1.1: Verifying the feasibility of the Action as in the original version on the Italian (Ligurian) context

In this phase, SSSA and Liguria Region will assess the feasibility of the Austrian Best practice on the Ligurian context, by a complete study of the national and regional regulatory framework and, if needed, asking competent authorities to express, if possible, a legal position on the recognition of a score to EMAS registered organizations.

Stakeholders involved:

- Liguria Region. If possible, Italian Ministry of Environment.

Time frame

- 1° semester 2019 (expected) but, anyway, until the response of public authorities asked.

Costs

- Not applicable

Funding sources

- Not applicable

Dissemination & Communication strategy or those actions that will be carried out in order to ensure that the regulatory relief/incentive will reach the target:

- website of the Liguria Region: in this phase of assessment, there will be no need of massive communication campaign.

Monitoring (if appropriate)

- reports will be done on the regulatory study and, if done, on the request for a legal opinion addressed to competent authorities.

Sub-action 1.2: EMAS as a mean to obtain high rankings in public tenders

In this second phase, SSSA and Liguria Region will share with the other stakeholders the results from the previous phase. Consequently, they will work with other public administrations and private stakeholders to promote EMAS as a tool to obtain high ranking in public tenders, as direct recognition or as a mean of proof.

Stakeholders involved:

- Liguria Region;
- Representatives of public institutions (e.g., municipalities, parks, schools);
- Industrial Associations of Liguria;
- Representatives of EMAS registered organisations.

Time frame

- 2° semester 2019: communication (if sub-action 1.1 will respect the time frame);
- Whole year 2020: communication and monitoring on public tenders.

Costs

- Not applicable

Funding sources

- Not applicable

Dissemination & Communication strategy or those actions that will be carried out in order to ensure that the regulatory relief/incentive will reach the target:

- website of the Liguria Region;
- meetings with public officers;
- meetings with Industrial Associations of Liguria and Representatives of EMAS registered organizations;
- Media appearances.

Monitoring (if appropriate)

- minutes will be done to reports the meetings done;
- monitoring of the early public tenders published by public administrations to see if the inclusion of EMAS ranking will have success.

ACTION 2: Greening public tenders by EMAS, ISO 14001 and Eco-labelling certifications

ACTION 2	
Action	<i>Greening public tenders with EMAS, ISO 14001 and Eco-certifications</i>
Type of action	<i>Green Public Procurement</i>
Voluntary addressed	scheme(s) <i>EMAS, ISO 14001, EU Ecolabel, others</i>

No. assigned in EMAS Joint Database	CAT-4GP
Promoting region	Catalunya, Spain

Lessons Learnt and Background

This action has been selected for the potentiality to spread the EMS and Ecolabel certifications adoption/obtainment in the Ligurian Context. Green Public Procurement are one of the mainly policy instrument chosen by SSSA for the ENHANCE project, inside the Regional Law n. 31 of 13th August 2007: Organisation of the Region for transparency and quality of contracts and concessions. Try to match GPP with Environmental management systems and Ecolabel certification is a challenge and this match could benefit both Public Authorities and private sector in spread the functioning of GPP. In this case, EMS and Ecolabel certification are means of proof for technical solvency or award criteria in tenders. The result expected is a spread of EMS/Ecolabel adoption by firms interesting in public tenders. More in detail, Regional Law n.31/2007 foresees, at the chapter 4, art. 20, a Three-year Action Plan for the Green Purchasing for every Public Authorities over 2.000 inhabitants, aimed at defining an operational program for the introduction of environmental criteria in the procurement procedures for supplies and services. The Plan determines the conversion target at the end of three years of its supplies, in addition to identifying and selecting the sectors of intervention and the relative order of priority. Then, this Plan should define the specific objectives to be achieved in each sector or product category at the end of the three-year period. At art. 21, it is foreseen that contracting authorities have to insert, in calls for tenders and tender specifications for public contracts for works, supplies and services, specific requirements for the integration of environmental aspects into tender procedures. In doing this, contracting authorities may request, among the requisites necessary to prove the technical ability of the competitors, the specific needs of the competing company in the environmental field and/or the indication of the environmental management measures that the operator will apply during the execution of the contract. By the way, public officers in charge of purchasing shall refer to the Community eco-management and audit scheme (EMAS) or to environmental management standards based on relevant European or international standards certified by bodies compliant with Community legislation or relevant European and international standards to certification (EN ISO 14001).

Regarding, for example, the GPP Plan of Liguria Region, the present was released in June 2017 and has for target period the years 2017-2019. In the Plan, it is reported that the number of organizations that are registered EMAS and the number of certified ISO 14.001: 2015 are both n.7. Then, it is clear the role that GPP could have in improving EMAS and ISO adoptions. Within the actions foreseen by the Plan, there are, among the others: internal training addressed to the referents of the regional system and to other local administrations; preparation of operating tools; training for entrepreneurs and businesses. All these activities will benefit from the exchange of practices from the Enhance project.

Description of the action

In the Catalan version of this good practice, there are several benefits for EMAS registration, ISO 14001 certification and other Ecolabel certifications, exposed as follow:

A) EMAS registration, ISO 14001 or other equivalent certifications and other environmental management actions are recognised in order to demonstrate the environmental technical solvency. Its scope must cover the services objects of the tender.

B) General environmental criteria for the accreditation of technical solvency: contractors must demonstrate its technical or professional capacity to manage the environmental aspects related to the scope of the service/contract through an environmental management system such as EMAS, ISO 14001 or equivalent or an environmental policy and environmental procedures to carry out the activities or demonstrated experience in the application of environmental criteria in such activities (this point is especially referred for tourism and waste sectors)

C) Within the award criteria for the procurement of textile products, eco-design criteria incorporated to the products will be considered. Valid eco-design criteria are considered the following:

- UNE 150.301 or ISO 14.006 certification,
- ISO 14.001 certification and / or EMAS registration and the environmental policy which must include eco-design as an objective, or equivalent.

D) General environmental criteria for the accreditation of technical solvency: the company must demonstrate its technical and professional capacity to carry out the environmental activities related to the contract through an environmental management system for the service or supply object of the contract, such as EMAS, ISO 14001 or equivalent or other environmental criteria (Environmental Policy, experience in the application of environmental management measures in maintenance service contracts).

As for the previous action regarding the GPP, also in this case there will be conducted a preliminary study of feasibility, even if this measure should create less problems of adaptation to the Italian context due to the relevant progress made in 2016 in the National Code for Public Tenders.

Sub-action 2.1: Verifying the feasibility of the Action on the Italian (Ligurian) context

In this phase, SSSA and Liguria Region will assess the feasibility of the Catalan Best practice on the Ligurian context, by a complete study of the national and regional regulatory framework and, if needed, asking competent authorities to express, if possible, a legal position on the recognition of a score to EMS as EMAS and ISO 14001 or Eco-labelling certifications as benefit of relief in public tenders.

Stakeholders involved:

- Liguria Region. If possible, Italian Ministry of Environment.

Time frame

- 1° semester 2019 (expected) but, anyway, until the response of public authorities asked.

Costs

- Not applicable (low)

Funding sources

- Not applicable

Dissemination & Communication strategy or those actions that will be carried out in order to ensure that the regulatory relief/incentive will reach the target:

- website of the Liguria Region: in this phase of assessment, there will be no need of massive communication campaign.

Monitoring (if appropriate)

- reports will be done on the regulatory study and, if done, on the request for a legal opinion addressed to competent authorities.

Sub-action 2.2: EMAS, ISO 14001 and Ecolabel as way to greening public tenders

In this second phase, SSSA and Liguria Region will share with the other stakeholders the results from the previous phase. Consequently, they will work with other public administrations and private stakeholders to promote EMAS, ISO 14001 and Eco-certifications as a tool to proof environmental sustainability criteria in public tenders.

Stakeholders involved:

- Liguria Region;
- Representatives of public institutions (e.g., municipalities, parks, schools);
- Industrial Associations of Liguria;
- Representatives of EMAS registered/ISO 14001 certified organizations.

Time frame

- 2° semester 2019: communication (if sub-action 2.1 will respect the time frame);
- Whole year 2020: communication and monitoring on public tenders.

Costs

- Not applicable (low)

Funding sources

- Not applicable

Dissemination & Communication strategy or those actions that will be carried out in order to ensure that the regulatory relief/incentive will reach the target:

- website of the Liguria Region;
- meetings with public officers;
- meetings with Industrial Associations of Liguria and Representatives of EMAS registered and ISO 14001 certified organizations;
- media appearances.

Monitoring (if appropriate)

- minutes will be done to reports the meetings done;
- monitoring of the early public tenders published by public administrations to see if the inclusion of EMAS/ISO 14001/Eco-certifications in public tenders as means of proof will have success.

ACTION 3: Developing of guidelines and Communication campaign

ACTION 3	
Action	<i>Developing of guidelines and communication campaign</i>
Type of action	<i>Other measures (Green public procurement)</i>
Voluntary addressed scheme(s)	<i>EMAS, Ecolabel certifications</i>
No. assigned in EMAS Joint Database	<i>CAT-4GP (and, partially, CAT-12GP)</i>

Lessons Learnt and Background

During the first two years of the project, several meetings were done with public authorities in Liguria. One of the main evidences revealed was the need for guidelines, especially for EMAS knowledge and Ecolabel certifications. The lack of knowledge could bring public officers dealing with public tender drafting to have problems in recognizing the matching between Environmental management system and EMAS and also between environmental requirements and certifications provided by the applicants.

On the private side, considering the fact that the main stakeholder is public (Liguria Region Institution) and what this one wants to do, Catalunya experience could serve to it. Liguria suffers a critic situation with the low rate of EMAS registered organizations. The main stakeholder (Liguria Region) is committed in doing a campaign addressed to companies, especially medium-little sized, to promote the EMAS registration as a way to obtain relief with public administration regulation and possible benefit and award in public tenders. In doing this, all the possible channels will be used: industrial associations, EMAS existing network, GPP network, etc. Then, within the actions foreseen by the Regional Plan for 2017-2019, released by mandatory prevision of Regional Law 31/2007, there are, among the others: internal training addressed to the referents of the regional system and to other local administrations; preparation of operating tools; training for entrepreneurs and businesses; information and awareness. Regarding this Action, all these activities, especially the first and last one, will benefit from the exchange of practices from the Enhance project. On the subject of the Catalan experience, since some years there is a campaign on EMAS adoption, also with the contribution of no-profit association, like EMAS club. The activity carried on in Catalunya (Cat-12GP), addresses specifically to the industrial waste management sector, it's based on the need to increase collaboration between public administrations and organisations in order to:

- increase the level of knowledge on legal requirements for the organisations;
- understand potential operational problems related to the implementation of those requirements;
- facilitate better performance and compliance.

Taking inspiration from the activity carried on by this partner, SSSA jointly with Liguria Region will work for the development of this action.

Description of the action

This action will follow two steps. The first is the identification of the specific needs of public officers and a way to deliver communication to business sector. This phase has already started with the stakeholder meetings carried on in the fourth semester and will continue during the third year (2019) regarding the identification of specific needs of public officers, but the study of communication plan has not still started. The second phase will be, at the same time, the

distribution of guidelines to public officers to train them to the using of EMAS and Ecolabel certifications in public tenders. On the private side, communication campaign and workshop with business sector will be organized, with the inclusion and participation of industrial associations.

Sub-action 3.1: Identification of specific needs and developing a communication plan

In this phase, SSSA and Liguria Region will identify the specific needs for the guidelines addressed to public officers and start to develop a communication plan.

Stakeholders involved:

- Liguria Region;
- Representatives of public institutions (e.g., municipalities, parks, schools);
- Industrial Associations of Liguria;
- Representatives of EMAS registered/ISO 14001 certified organizations.

Time frame

- 1° year (2019).

Costs

- Not applicable (expected low)

Funding sources

- Not applicable

Dissemination & Communication strategy or those actions that will be carried out in order to ensure that the regulatory relief/incentive will reach the target:

- in this phase of assessment, there will be no need of massive communication campaign;
- indeed, an online survey addressed to private sector could be implemented, to measure the awareness on EMAS and Eco-labelling certifications.

Monitoring (if appropriate)

- reports will be done on the on-going procedure.

Sub-action 3.2: Distribution of guidelines and Communication campaign

In this second phase, SSSA and Liguria Region will start to distribute the guidelines to public officers and start to execute the communication campaign for private sector on EMAS and Eco-labelling certifications.

Stakeholders involved:

- Liguria Region;
- Representatives of public institutions (e.g., municipalities, parks, schools);
- Industrial Associations of Liguria;
- Representatives of EMAS registered organisations.

Time frame

- Whole year 2020.

Costs

- Not applicable

Funding sources

- Not applicable

Dissemination & Communication strategy or those actions that will be carried out in order to ensure that the regulatory relief/incentive will reach the target:

- spreading of guidelines using all the existing channels, including Representatives of voluntary GPP networks such as GPPinfoNET;
- website of the Liguria Region;
- meetings with public officers;
- meetings with Industrial Associations of Liguria and Representatives of EMAS registered organizations;
- Media appearances;
- Other communication campaigns foreseen in the communication plan.

Monitoring (if appropriate)

- minutes will be done to reports the ongoing process;
- online surveys directed to public officers and private sectors will be launched at the end of the second year to test the improvement of knowledge and awareness on the topic.

ACTION 4: Training for public officers involved in public tenders

ACTION 4	
Action	<i>Training for public officers and developing of guidelines</i>
Type of action	<i>Other measures (Green public procurement)</i>
Voluntary scheme(s) addressed	<i>EMAS, Ecolabel certifications</i>
No. assigned in EMAS Joint Database	<i>CAT-4GP</i>
Promoting region	<i>Catalonia, Spain</i>

Lessons Learnt and Background

During the first two years of the project, several meetings were done with public authorities. One of the main evidences revealed was the lack of training of public officers, especially for EMAS knowledge and Ecolabel certifications. The lack of knowledge could bring public officers dealing with public tender drafting to have problems in recognizing the matching between Environmental management system and EMAS and also between environmental requirements and certifications provided by the applicants.

Within the actions foreseen by the Regional Plan for 2017-2019, released by mandatory prevision of Regional Law 31/2007, there are, among the others: internal training addressed to the referents of the regional system and to other local administrations; preparation of operating tools; training for entrepreneurs and businesses; information and awareness. Regarding this Action, all these activities, especially the first and last one, will benefit from the exchange of practices from the Enhance project. Regarding the experience of the partner that inspires this Action, it's important to take into consideration the effect that Catalunya obtained in its context. Catalunya, instead of Italy, has not mandatory prevision for the GPP application but has gained in the last years interesting results, for sure connected also to the action of training made on the public officers.

Description of the action

This action will follow two steps. The first is the identification of the specific needs of public officers. This phase has already started with the stakeholder meetings carried on in the fourth semester and will continue during the third year (2019). The second phase will be the organization of meetings and workshop to train them to the using of EMAS and Ecolabel certifications in public tenders.

The implementation of this action will not require a high legislative effort to be adopted as it has not legal references. The costs associated with the implementation of this measure could be totally recovered by the benefits associated with the promotion of EMAS and other Eco-Labeling certifications.

Sub-action 4.1: Identification of the specific need of public officers

As anticipated, this phase is already on going and it is supposed to end within the next year.

Stakeholders involved:

- Liguria Region;
- Representatives of public institutions (e.g., municipalities, parks, schools).
- Other partners of the project, to be inspired and follow their situation in overcoming the barriers to learning of GPP.

Time frame

- 1° year (2019).

Costs

- Not applicable

Funding sources

- Not applicable

Dissemination & Communication strategy or those actions that will be carried out in order to ensure that the regulatory relief/incentive will reach the target:

- in this phase of assessment, there will be no need of massive communication campaign.

Monitoring (if appropriate)

- reports will be done on the specific needs of training and the experience of the partners.

Sub-action 4.2: Organization and Execution of training sessions

In this phase, training sessions will be organized with the participation of both Liguria Region officers and SSSA researchers.

Stakeholders involved:

- Liguria Region;
- Representatives of public institutions (e.g., municipalities, parks, schools).

Time frame

- From 2° semester of year 2019 to end of 2020

Costs

- Not applicable (quite low - transports)

Funding sources

- Not applicable

Dissemination & Communication strategy or those actions that will be carried out in order to ensure that the regulatory relief/incentive will reach the target:

- website of the Liguria Region;
- workshops and meetings with public officers with training sessions on EMAS and Ecolabel certifications.

Monitoring (if appropriate)

- reports will be done on meetings and workshop carried on;
- new public tenders published will be monitored to measure improvements;
- an online survey will be launched at the end of the second year to test the improvement of knowledge.

ACTION 5: Reduction of the inspection frequency for EMAS-registered organizations in the industrial Emissions Directive (IED) framework

ACTION 5	
Action	<i>Reduction of the inspection frequency for EMAS-registered organisations in the industrial Emissions Directive (IED) framework</i>
Type of action	<i>Reduction inspection frequency</i>
Voluntary addressed scheme(s)	EMAS
No. assigned in EMAS Joint Database	AND-1GP
Promoting region	<i>Andalusia, Spain</i>

Lessons Learnt and Background

One good practice that SSSA wants to replicate in the Ligurian context is strictly related one of the workshops organized during the period of exchanging of practices. In Vienna, the ENHANCE partners presented the situation regarding the role of the EMAS verifier within the EU Emission Directive framework. The Italian situation in the field is heterogenous and Regions moved in

different ways, because the national law promotes Regions to adopt their own plan. Lombardy, as an example, recognized to EMAS registered organizations reliefs for the period between two controls, even if the relief is the same for ISO 14001 certified organizations too.

Considering that the provisions in the field of Green Public Procurement are sometimes overlapping and that in Italy the regulatory state of the art is more advanced in comparison with the average of other States, SSSA, in collaboration with Liguria Region officers, decide to try to push adoption of EMAS also by another side, with an intervention in a way to ease the activity of companies with high-impact plants. So, in prevision of a future change of the policy instrument more related to the comprehensive concept of Circular Economy, this Action is going in the direction of a regulatory framework able to manage multiple aspects of EMAS promotion.

Description of the action

For the renewal, updating and/or review of environmental permits, the operators should submit to the competent authority the documentation necessary in each case and it shall be accompanied, if appropriate, by a visit to the facilities in order to check the appropriate implementation of new environmental requirements.

In the event that these facilities also have a certified EMS, they are subject to verification activities by an Environmental Verifier in order to check compliance with the requirements laid down by the EMS, such as the requirements related to environmental performance and the applicable legal requirements, including requirements and terms established in the environmental permits. These verification activities include actions like documentation analysis, staff interviews and visits to the facilities, so that the renewal, updating and/or review procedure of environmental permits for those facilities with an EMS certified according to the International Standard ISO 14001 or the European EMAS Regulation could be simplified or speed up, provided that they submit annually the Environmental Statement, duly validated by an Environmental Verifier. Additionally, the period of validity of environmental permits could be extended for these facilities.

Regarding the good practice in force in Andalusia, as in Italy, the regulatory framework is both national and regional.

In Spain, the Spanish Royal Decree 815/2013 adopted IED into the Spanish legal system. “The Competent Body should take into account that for those EMAS registered installations, the compliance with control obligations derived from this scheme may be used for the effective fulfilment of the control obligations derived from the implementation of this Royal Decree”. In accordance with the competencies of the Autonomous Communities to devise additional environmental legislation, some competent environmental Autonomous Community bodies have already integrated EMAS Regulation into their specific regulations regarding integrated pollution prevention and control. Among them, Andalusia, through Law GICA (Law 7/2007) and Decree 5/2012. In particular, the first Additional Provision of the Decree establishes that: “In relation to those activities or installations implementing an Environmental Management System externally

certified under EMAS or ISO 14001, the Regional Government for the Environment will set up rules to simplify the monitoring mechanisms to comply with the obligations derived from the IEA and to process the corresponding IEA application or modification, and successive renewals”.

The BENEFITS are reducing the administrative burdens and costs associated with the updating of the IEA, as well as speeding up the regulatory environmental controls. The expected benefits of these simplifications are:

For the operator of the facility:

- Greater confidence with regard to Public Administrations as they recognise EMS the basis of the EMAS Regulation as an instrument which ensures that the facility now meets and will meet in the future the legal environmental requirements applying to it;
- Improving coordination between audit activities included in the IEA Monitoring Plans and audit activities developed within the framework of Environmental Verifications on the basis of the EMAS Regulation requirements.

For the Competent Body:

- Improving the efficiency of verification processes in the updating of the IEA based on the improvements included in the conclusions on BAT;
- Improving the European position in relation to the EMAS Regulation;
- Improving the efficiency of monitoring activities through a more efficient use of available resources for inspection activities by directing them to those less committed facilities on a voluntary basis in the compliance with the applicable environmental legislation;
- Ensuring environmental information on the facilities’ environmental performance is proven and validated by third parties.

In Italy, the Directive 2010/75/EU was adopted in with integrations of D.Lgs. 152/2006, by D.Lgs. 4 marzo 2014, n. 46. Article 29-decies, p. 11-bis, establishes that ordinary and extraordinary inspection activities at installations subject to A.I.A. (Environmental Integrated Autorization) are defined in an environmental inspection Plan at Regional level, periodically updated by the Region, after consultation with the Ministry of Environment.

Sub-action 5.1: Preliminary study on the Ligurian context and analysis of the sectors where the measure is needed

In this phase, a study of the regulatory framework will be conducted and an analysis of the sector where the prevision could be feasible will be done.

Stakeholders involved:

- Liguria Region;
- Industrial Associations of Liguria;
- Representatives of EMAS registered organisations;
- Representatives of EMAS requirements verifiers (e.g. Certiquality, Rina, etc);
- Representatives of the EMAS Competent Body of Italy.

Time frame

- First year (2019)

Costs

- Not applicable

Funding sources

- Not applicable

Dissemination & Communication strategy or those actions that will be carried out in order to ensure that the regulatory relief/incentive will reach the target:

- website of the Liguria Region for communication of start of the procedure;
- seminars with target groups of firms representatives of stakeholder mentioned;
- survey to measure the interest in different sectors.

Monitoring (if appropriate)

- reports will be done on meetings and workshop carried on

Sub-action 5.2: Proposal to the competent authorities in charge of regulation

In this case, after the preliminary study conducted in the first phase, meeting with the competent authorities to discuss the regulatory improvements will be done. If the proposal will be accepted, private stakeholders will be meet for dissemination goals.

Stakeholders involved:

- Liguria Region;
- Industrial Associations of Liguria;
- Representatives of EMAS registered organisations;
- Representatives of EMAS requirements verifiers (e.g. Certiquality, Rina, etc);
- Representatives of the EMAS Competent Body of Italy.

Time frame

- Second year (2020)

Costs

- Not applicable

Funding sources

- Not applicable

Dissemination & Communication strategy or those actions that will be carried out in order to ensure that the regulatory relief/incentive will reach the target:

- website of the Liguria Region for progress of start of the procedure;
- meetings with competent authorities;

Monitoring (if appropriate)

- periodically reports will be done on the progress of the implementation of the good practice in the Ligurian context.

DECLARATION OF RESPONSIBILITY

SIGNATURE OF THE RESPONSIBLE	
Date	
Signature	
Stam of the organisation (if available)	