



ENHANCE
Interreg Europe

 European Union
European Regional
Development Fund

ENHANCE

EMAS AS A NEST TO HELP AND NURTURE THE CIRCULAR ECONOMY

MARCH/2021

FINAL REPORT

 European Union
European Regional
Development Fund



Project Partners

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**Departament de Territori
i Sostenibilitat**

 **Stockholm
Environment
Institute**

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CZECH ENVIRONMENTAL
INFORMATION
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Pesca y Desarrollo Sostenible

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1. INTRODUCTION

The main goal of this document is to present the results achieved in the ENHANCE Interreg Europe project. On one hand, it summarizes the main activities carried out in the four-year period of the project and links to the specific project's outputs. On the other hand, the report provides a description of the **results obtained in terms of implementation of the action plans and the impact they had on the policy instruments.**

This Final Report also provides valuable information on the lessons learned in the different phases of the project implementation and a possible way forward after the project.

This report reflects the authors' views only and the Interreg Europe programme authorities are not liable for any use that may be made of the information contained therein.

2. OUR PROJECT

This project has been developed within the framework of the [Interreg Europe](#) programme, a specific EU programme that offers opportunities for regional and local public authorities across Europe to share ideas and experience on public policy in practice therefore having a sustainable impact for the territories and their people.

The main objective of this project has been to influence and improve the implementation, through specific action plans, of those regional policy instruments aimed at increasing the efficiency of resources - through the circular economy - and therefore the competitiveness of companies, particularly SMEs.

Organizations, large and Small and Medium-sized enterprises (SMEs) are increasingly aware of the benefits of closing loops by improving resource efficiency: saving material costs, creating competitive advantages and new markets are among the main reasons for organizations to act.

It is in this context that the [UE Eco Management and Audit Scheme](#) (EMAS) has been used as a tool to ensure a systematic improvement in environmental management and, therefore, more efficient business management. Partners have worked jointly in order to exchange experiences and practices on how to better support EMAS registration in their own regions/countries.

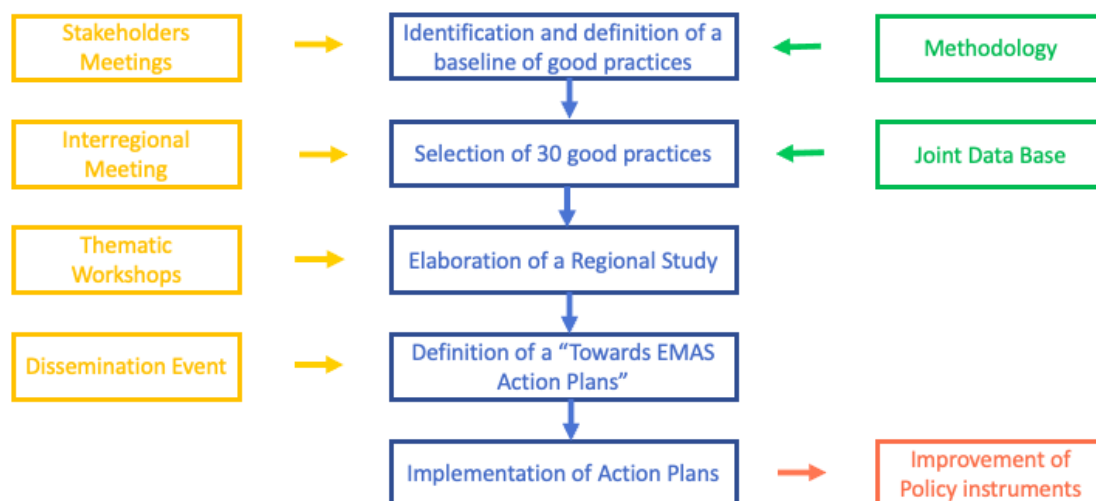
For more information about the how EMAS contributes to the transition to the circular economy, please access to the following [link](#)¹.

This [video](#) prepared within the ENHANCE project provides an overview on how EMAS is linked to circular economy and what was the approach that inspired the project.



¹ The European Commission published in 2017 a [report](#) on EMAS and circular economy.

The following scheme represents the different activities carried out within the project:



For more information about the project, please access to the [project's website](#).

For more information about the outputs of the project, please click on each item:

- [Joint data base of good practices](#)
- [Selection of good practices](#)
- Regional studies
 - Catalonia _ [file_1520855998.pdf](#)
 - Andalusia _ [file_1520853649.pdf](#)
 - Italy _ [file_1520856085.pdf](#)
 - Estonia _ [file_1520856148.pdf](#)
 - Czech Republic _ [file_1520855684.pdf](#)
 - Austria _ [file_1520853735.pdf](#)
- Regional Study on the exchange of experiences
 - Catalonia _ [file_1553094344.pdf](#)
 - Andalusia _ [file_1554818877.pdf](#)
 - Italy _ [file_1553094593.pdf](#)
 - Estonia _ [file_1553094553.pdf](#)
 - Czech Republic _ [file_1553094507.pdf](#)
 - Austria _ [file_1553094426.pdf](#)
- [Towards EMAS Action Plans](#)

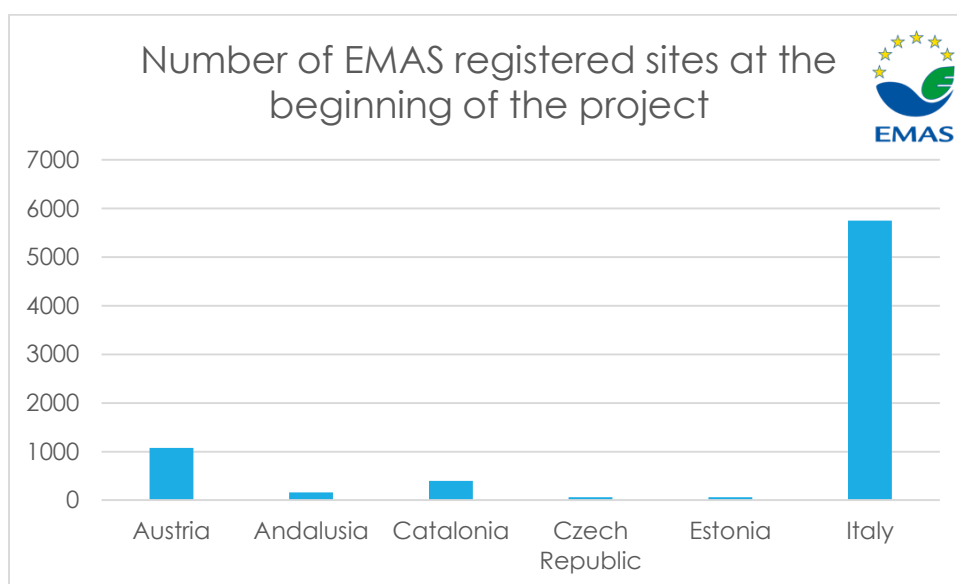
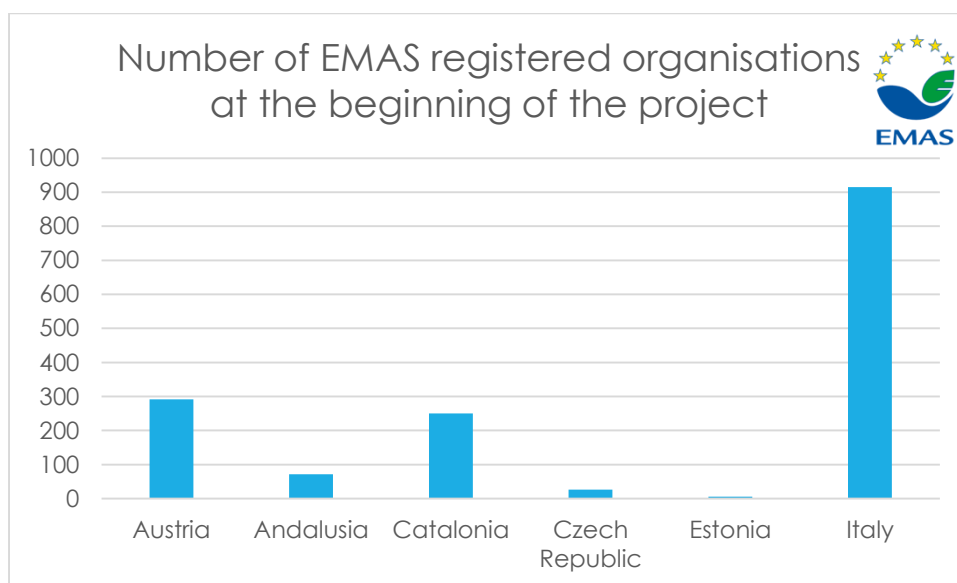
3. THE ACTORS

A. The project partners

Six partners from different EU countries have been involved in the project, the [Ministry of Territory and Sustainability of the Government of Catalonia](#) (MTS) as the lead partner, the [Ministry of Agriculture, Livestock, Fisheries and Sustainable Development of the Regional Government of Andalusia](#) (RGA), [Sant'Anna School of Advanced Studies](#) (SSSA), an education and research institution located in Italy, [Stockholm Environment Institute - Tallinn Centre](#) (SEI), the [Czech Environmental Information Agency](#) (CENIA) and the [Environment Agency Austria](#) (EAA),



The composition of the consortium has considered the geographical distribution of the partners so that there was a good balance between North, Central and South Europe, as well as the presence of countries with greater participation in EMAS and experience in the implementation of regulatory relief and incentives (Italy, Spain and Austria), and other with less (Estonia and Czech Republic).



Within two of the countries with the largest number of EMAS registered organizations, the different internal distribution has also been taken into account, this has been the case in both Spain and Austria. In the first case, two regions have participated, Catalonia, with the highest number of registrations within Spain, and Andalusia, with a lower representation of EMAS organizations

(which was in position n. 6 of the classification by number of registrations). In the case of Austria, the country has an unbalanced distribution of EMAS registrations, with the west of the country presenting the lowest number of registrations. Actually, at the beginning of the project, more than half of all EMAS registrations were located in Lower Austria and in the region of Vienna, whereas Tyrol and Vorarlberg together had only 18 EMAS registrations.

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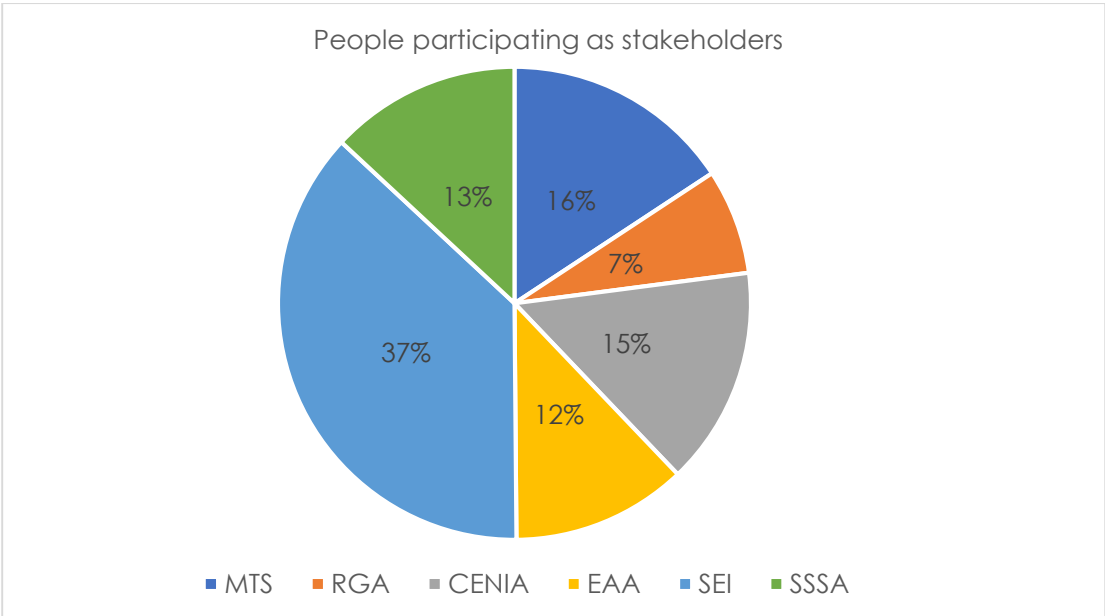
B. The stakeholders

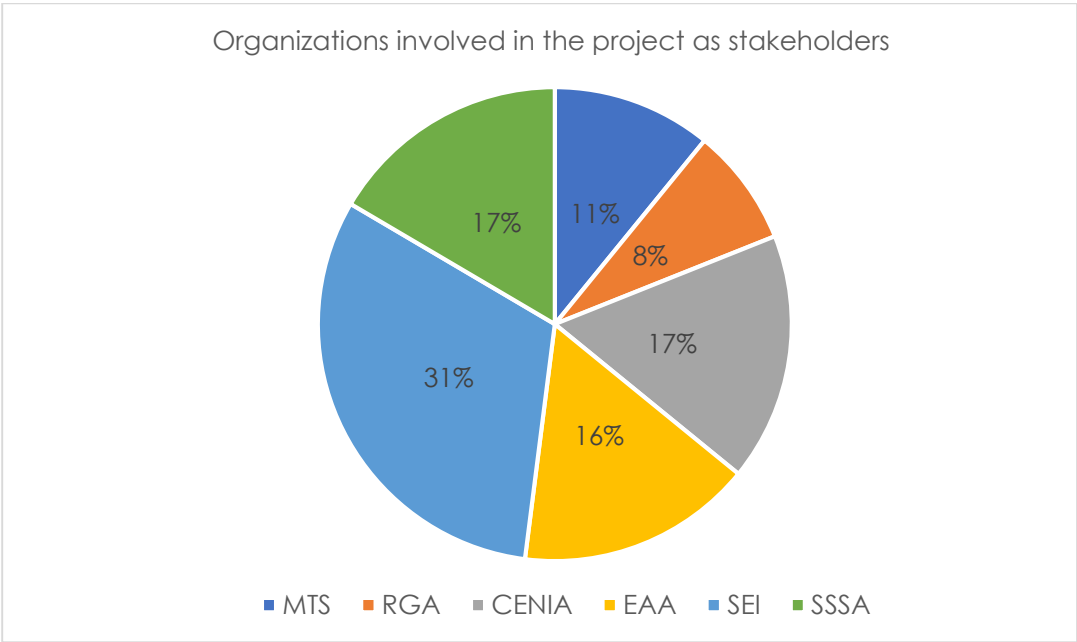
One of the main elements that distinguish projects developed within the framework of Interreg Europe is precisely the involvement of the stakeholders, as it promotes a specific process of innovation with the involvement of relevant stakeholders. On the other hand, it could not be otherwise in the case of a project that must have an impact on enterprises and the business community. For this reason, the project methodology foresees the creation of stakeholder group for each policy instrument.

In the case of the ENHANCE project, each partner has created a stakeholder's group in each region/country and their involvement and active participation has been crucial for the successful development of the project.

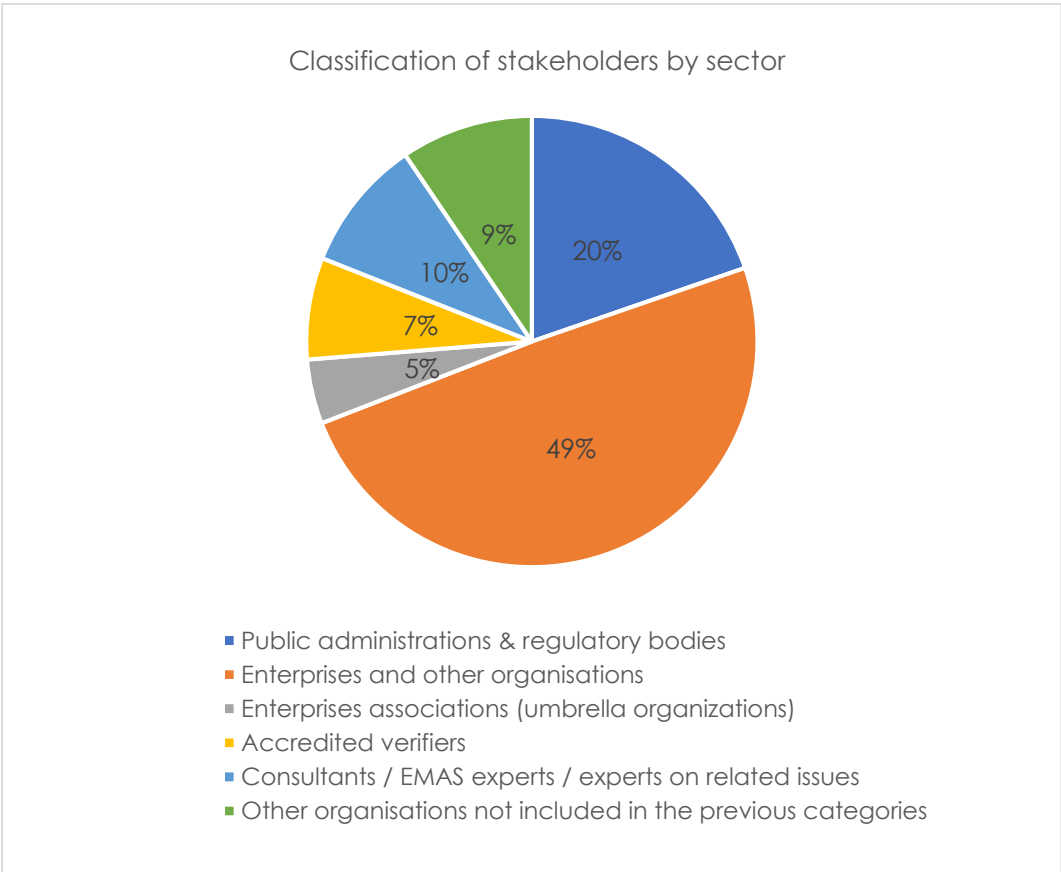


The partners have been able to involve 375 representatives of 248 organizations. The following charts describe the distribution of stakeholders participating to the project per partner and thus it is also representative of each involved region and country.





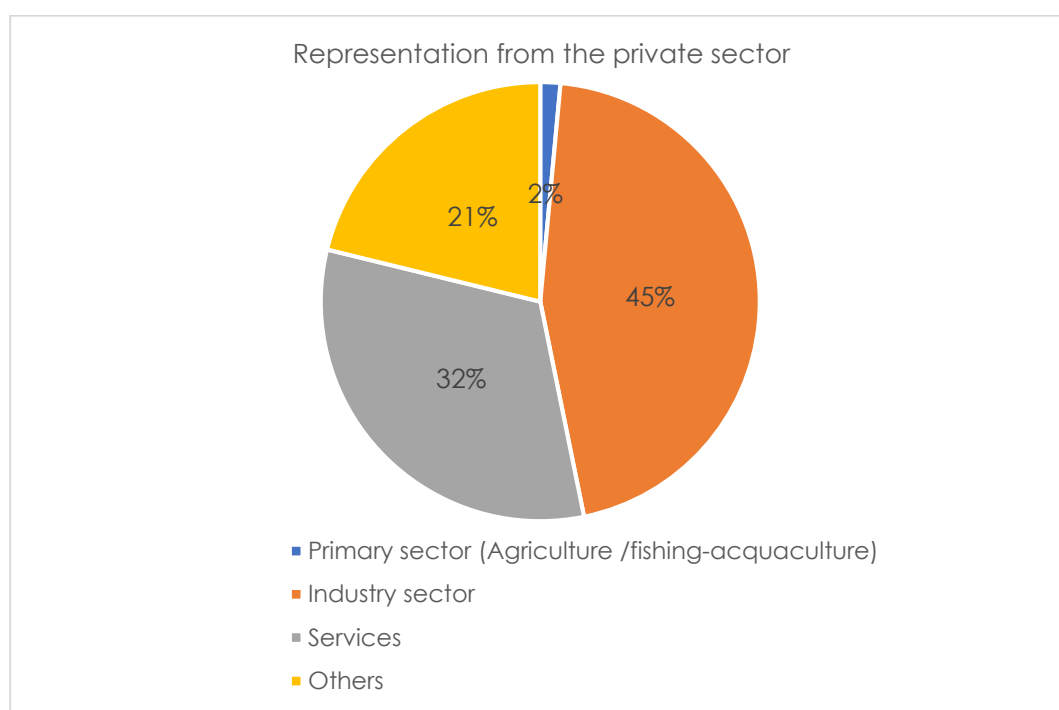
Due to the nature of the project and the policy instruments considered, key stakeholders were public administrations at different levels, enforcement authorities, other administrations involved in the definition of regulations, EMAS registered organizations, non-EMAS registered organizations, EMAS verifiers, enterprises associations, and sectoral associations among others.



The largest proportion of representatives belong to enterprises and other organizations (49%), followed by public administrations and regulatory bodies (20%) and consultants, EMAS experts and experts in related issues (10%).

Public Administrations and policy makers have been one of the most relevant target groups due to their direct influence in regional policies and their managerial capacity with regard to policy instruments. Involving this target group has been essential in order to guarantee the feasibility of the actions included in the Action Plan as the enforcement and managing authorities, public institutions and agencies at local, regional or national level are those generally bearing the implementation of such actions.

As for the private sector, the industrial sector is the one with the greatest representation (45%).



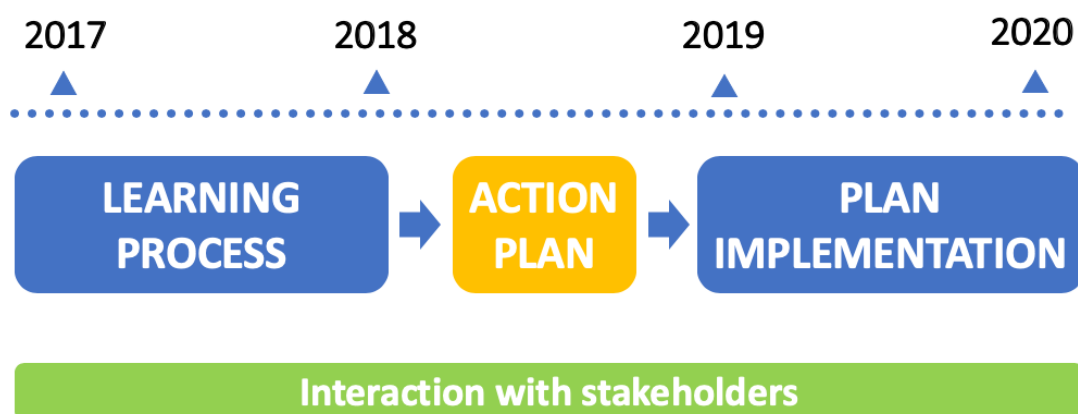
20% of the stakeholders participating to the project were EMAS registered organizations.

Stakeholders have been involved by partners mainly through the:

- Stakeholders meetings
- Thematic workshops
- An interregional meeting
- Disseminations events
- Interreg Europe's Policy Learning Platform
- Face to face meetings
- A constant side by side work.

Due to the coronavirus pandemic in 2019, partners had to adapt the way they have been working with stakeholders, this has been an important constraint, but all partners managed to maintain the strong relationships built with the stakeholders.

The first two years of the project have been very intensive in terms of meetings with the stakeholders because of all the preliminary work to define the action plans. The most relevant stakeholders in charge of implementing the actions adopted in the Action Plans of each partner, have played a very important role throughout the second phase of the project, the implementation of the action plan.



Within the project, stakeholders have had a different role depending on the type of stakeholder.

All stakeholders have contributed to the following tasks:

- Identifying and assessing best practices
- Providing inputs on the needs and expectations taking into account the own regional context
- Contributing with knowledge and expertise
- Evidencing possible contradictions, barriers or problems when modifying regulations or policy instruments
- Facilitating the identification and contact of key people in other stakeholders
- Providing key information and data for the different phases of the project.

In addition, as previously recalled, in the second phase some stakeholders have played a more specific role since some of them have been involved in the implementation of the actions established in the action plans. In these cases, the majority have been other public bodies with the competent authority in the

field of action of the various policies affected by the action plans, since many of the actions were related to regulatory reliefs.

Interacting with stakeholders has been an interesting part of the learning process and has allowed partners to envisage the relevance of communication when it comes to the implementation of regulatory reliefs; from this specific aspect related to the communication, stakeholders in general played a key part since they allowed reaching a greater number of people and organizations potentially interested in the actions and their results.

4. THE ACTION PLANS

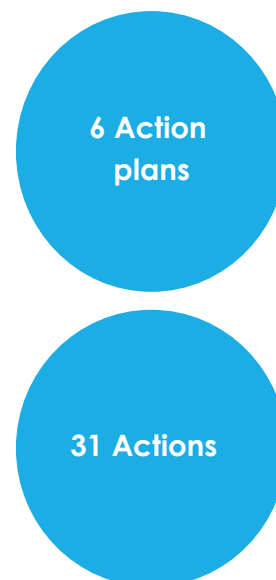
At the end of the 2nd year of the project, each partner has established an action plan with five actions, in the case of SEI in Estonia, their action plan has included six actions. Partners have defined per each action, the sub actions, the related policy instrument and other possible policy instruments affected (and their geographical coverage), the responsible and main features of the policy instrument and the stakeholders involved.

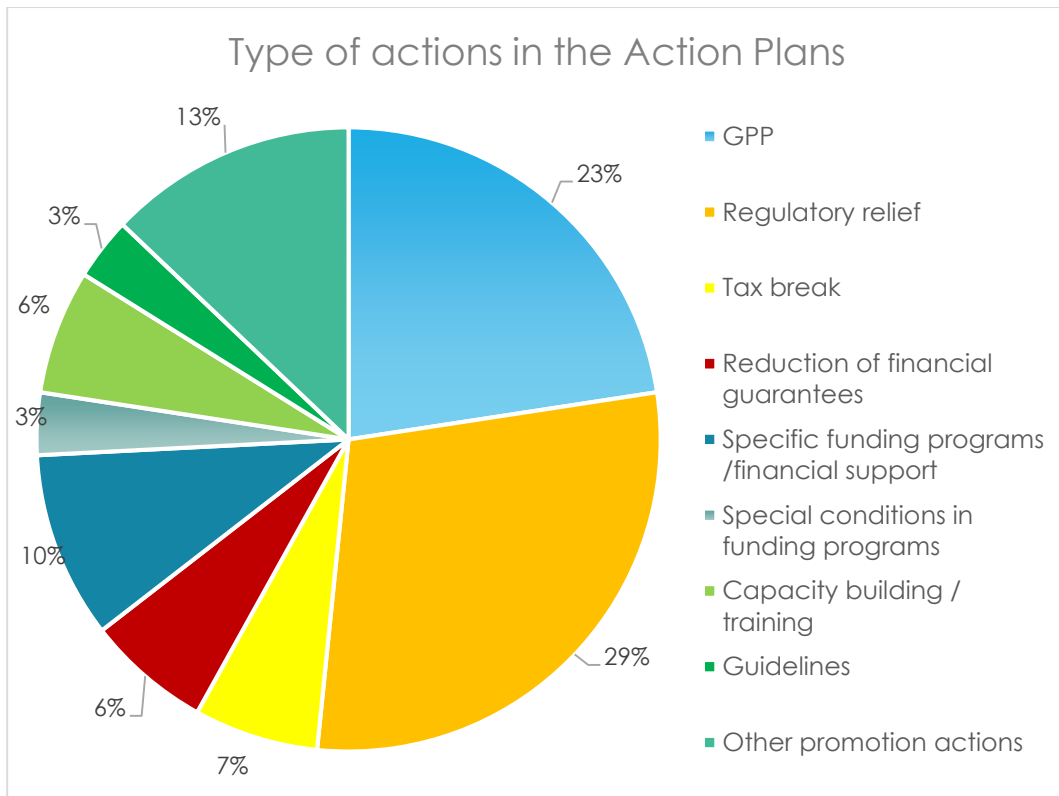
For the purpose of monitoring the implementation of the action plans, partners have also defined the responsible organization for the implementation of each sub action and the deadlines. The implementation of action plans has also included the definition of a specific communication action in order to ensure an effective impact of the actions carried out.

For the purpose of the ENHANCE project the following regulatory reliefs and promotional incentives were taken into account:

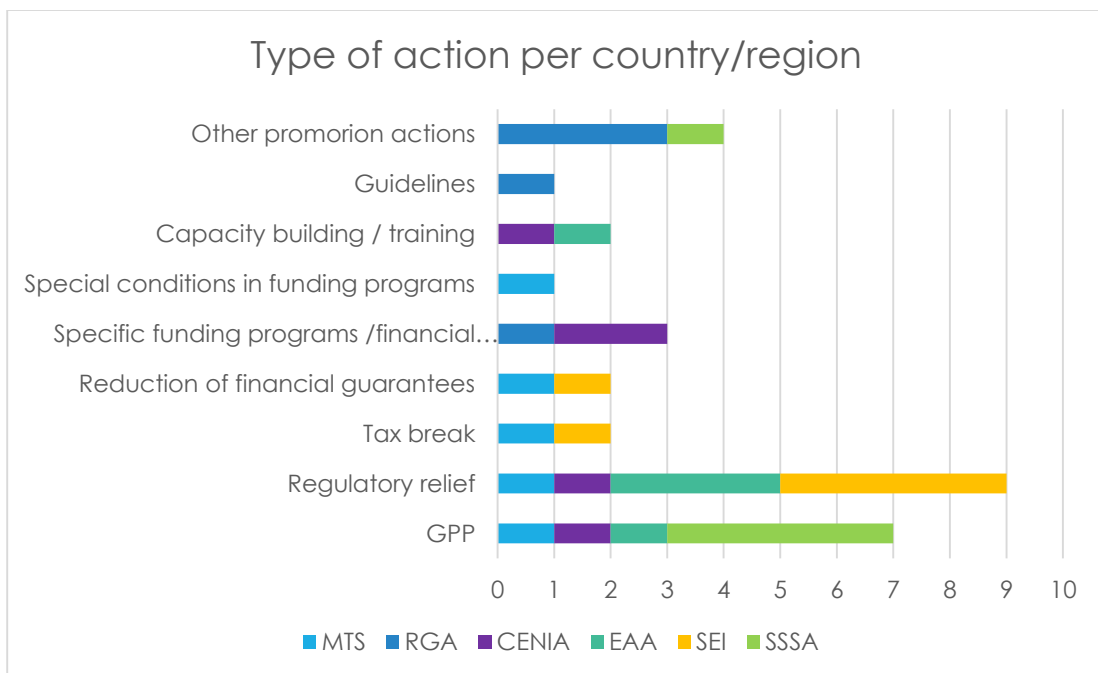
- Fast-track permits/simplification in the application;
- Extension of validity of permits/authorizations;
- Reduced reporting and monitoring requirements;
- Reduced inspections frequencies;
- Self-declaration in the procedure of extension of a permit;
- Self-declaration in the procedure of achieving a new permit;
- Modification in the scope of a permit;
- Green Public Procurement (GPP);
- Credit access and Funding support;
- Tax breaks;
- Reduction of administrative fees;
- Reduction of financial guarantees.

According to the following chart that provides an overview of the different actions undertaken by all partners, it can be appreciated that regulatory relief and green public procurement (GPP) have been the categories with the majority of planned actions (29% and 23% respectively).

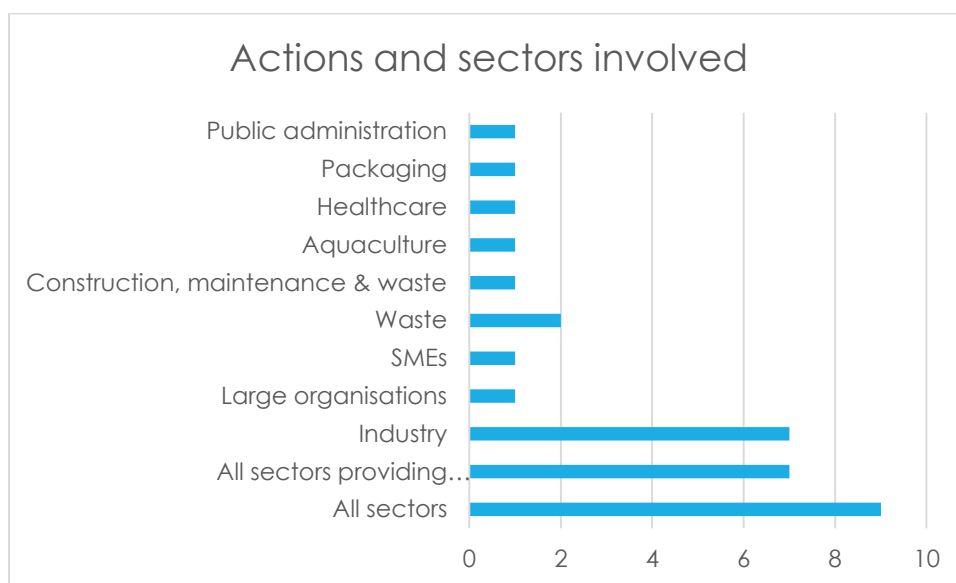




This chart instead, describes the selection made by each partner in relation to the different types of actions. Whereas MTS and CENIA have a wider distribution of their actions within the different types, the rest of partners have adopted a more focused approach, SSSA has defined four actions related to GPP, SEI and EEA bet for actions related to regulatory relief (4 and 3 respectively), and lastly, RGA has included 3 actions related to other type of promotional actions.



Most of the actions are transversal in nature and therefore apply to all or several sectors of economic activity (9 actions) or in a slightly more specific way to companies that provide products and services to public administrations (7 actions). But there are also actions specifically focused in the industry sector (7 actions, one of which linked to the Environmental Impact Assessment procedure) or in the waste sector (2), and single actions addressed to the construction, maintenance and waste sector, aquaculture, healthcare, organizations operating in the packaging sector and public administration.



The majority of actions have been successfully implemented, but due to the coronavirus pandemic, some actions faced delays in their implementation, and two of them will not be able to be implemented at the moment.

The following table describes the status of implementation of the actions in December 2020:

| MTS | |
|---|--------|
| ACTION 1: Reduction of Financial Guarantees for waste treatment activities | Yellow |
| ACTION 2: Special conditions for EMAS registered organizations participating to Circular Economy funding programs | Green |
| ACTION 3: Promotion of EMAS through Green Public Procurement | Yellow |
| ACTION 4: Reduction/Simplification of inspections in EMAS registered companies | Green |
| ACTION 5: Tax and administrative fees reduction | Green |
| RGA | |
| ACTION 1: Search and launching of financial support for EMAS promotion among SMEs in Andalusia | Green |
| ACTION 2: Dissemination and promotion of the Guideline for EMAS implementation in health sector (Hospitals, Clinics and Health Centres) developed by Andalusian Service on Health | Red |
| ACTION 3: Development of a Prospective Study for the launching of an EMAS Club in Andalusia | Green |
| ACTION 4: Development of proposals for EMAS Public Recognition | Green |
| ACTION 5: Development of dissemination and visibility activities for EMAS register in Andalusia | Green |

| CENIA | |
|---|--------|
| ACTION 1: Reduced frequency of environmental inspections | Green |
| ACTION 2: Green public procurement (GPP) | Green |
| ACTION 3: Funding for improving resource efficiency in SMEs | Red |
| ACTION 4: Credit access and funding support | Green |
| ACTION 5: Training of public authorities | Yellow |
| EAA | |
| ACTION 1: Green Public Procurement – EMAS as award criterion in the tendering process for the construction, maintenance and waste management sector | Green |
| ACTION 2: Environmental Impact Assessment – Analysis of Thresholds | Green |
| ACTION 3: Energy Audit – integration of EMAS into Energy Efficiency law | Green |
| ACTION 4: Training of Public Authorities | Green |
| ACTION 5: Environmental Inspections – Using Synergies between EMAS verification and environmental inspections | Green |
| SEI | |
| ACTION 1: Reduction of financial guarantees for EMAS registered companies | Green |
| ACTION 2: Exemption of environmental charges (taxes) | Yellow |
| ACTION 3: Simplification of the environmental permit application | Green |
| ACTION 4: Reduced reporting requirement | Green |
| ACTION 5: Reduced inspection requirement | Green |
| ACTION 6: Relief on energy audit requirement | Green |
| SSSA | |
| Action 1: EMAS as a mean to obtain high ranking in public tenders | Green |
| Action 2: Greening public tenders by EMAS, ISO 14001 and Eco-labelling certifications | Green |
| Action 3: Developing of guidelines and Communication campaign | Green |
| Action 4: Training for public officers involved in public tenders | Green |
| Action 5: Reduction of the inspection frequency for EMAS-registered organizations in the industrial Emissions Directive (IED) framework | Yellow |

| |
|---|
| Action implemented |
| Action still finalizing activities |
| Actions delayed according to plan |

In the case of Andalusia, two actions have been directly affected by COVID-19. First among has been the “Dissemination and promotion of the Guideline for EMAS implementation in Health sector”. This sector is the most affected by COVID-19. Therefore, this action has been paralyzed until further notice provided by Andalusian Service on Health (S.A.S.).

The other action was the launching of the Call for grants to implement and/or maintain EMAS Scheme among SMEs in Andalusia. Unlike the above action, this action has not been paralyzed, but delayed. The proposal of the Call was prepared at time by the Directorate General on Environmental Quality and Climate Change (DGCACC), however the Public Consultation period (first step in the granting process) was paralyzed by Covid-19 from March to June 2020, which has meant a delay in the process for launching the Call.

In Estonia, two actions have been partly implemented due to COVID-19. Under the action” Exemption of environmental charges (taxes)” an analysis was

carried out to identify the companies that could be subject to the exemption. The results show that the companies paying up to 2.000€ environmental charges annually are potentially subject to exemption from environmental charges. However, the final implementation of this action and making the changes in tax-related legal requirements requires cooperation between various ministries and authorities, which has not been possible due to COVID-19. The government priorities have changed due to corona crisis and in addition, all tax related changes have been put on hold due to COVID-19.

Another action "Simplification of the environmental permit application" was not possible to be implemented because current permit application system (data needed) is not compatible with the data in the EMAS statement. Nonetheless, it has been decided that EMAS organisations will be given a "golden card" so that their permit applications will be given a priority. This would fasten the environmental permit application process for EMAS organisations. Relevant legal steps are still to be made. The environmental permit system is under the authority of the Environmental Board. However, as the Environmental Board will merge with Environmental Inspectorate as of 1st January 2021, the development of golden card system is postponed to after the merge. The overall timeline of this process will partly be determined also by the COVID-19 crisis as this has slowed down decisions in the authorities.

5. RESULTS

A. Andalusia

The preservation of natural areas, the promotion of clean energies, the support of the circular economy to reduce the unsustainable consumption of resources, etc. are some of the commitments of the “Green Revolution” promoted by the RGA. All these commitments are key to combat the effects of climate change in Andalusia which, with a negative impact on the economy and on people's lives, must also be faced in solidarity way.



In Andalusia there are several public and private initiatives aimed at improving and conserving the environment and stopping the consequences derived from the climate change. For this, the RGA wants to give an added value and reward the effort, commitment and entrepreneurial labour of Andalusian society., encouraging companies, scientists, Administrations, Associations, Foundations, etc. to play a strong and active role in the Green Revolution and in the fight against climate change in Andalusia.

For its part, the EMAS Scheme is recognized at European level as one of the main to move towards a Circular Economy model. In this sense, the DGCACC, responsible for the planning, direction and execution of the EMAS inscriptions, decides to undertake actions to give a public testimony of recognition to the labour that EMAS-registered organizations are doing in order to preserve, protect and disseminate the environmental values in Andalusia.

To achieve the objectives set on this these environmental priorities in Andalusia (Green Revolution), a collaboration and association between SMEs and the Administration has been necessary. At this respect, the DGCACC foresees the improvement, promotion and development of voluntary instruments (EMAS among others) in SMEs as a key element for improving their environmental performance, for the sustainability of the production system and for generation green jobs. In order to guarantee sustained results and a more efficient implementation, 3 Policy Instruments need to be improved in order to encourage organizations to adopt systematically good environmental practices, as well as to foster collaboration among public authorities and other stakeholders to guarantee a successful implementation of EMAS and other voluntary schemes by SMEs.

In this sense, the wide consultation activities in which public and private authorities were involved to discuss about how to support the EMAS scheme has contributed to creating a positive environment and awareness around these PIs. Within the constitution of Andalusian SHG, a wide number of SHs (such as control authorities, trade organizations, companies' verifiers) have cooperated to identify regulatory reliefs and/or promotional incentives supporting EMAS companies in implementing and/or maintaining the certification.

The set of measures on promotional incentives, in this case, evaluated within the SHG in Andalusia grounded on the idea that if an organization has an EMAS registration this is sufficient for providing higher score, simplifying administrative procedures, improving public recognition and trust, etc.

Thus, EMAS has been considered by the RGA as a pillar of the Circular Economy Policy, and thanks to the crucial boost given by the ENHANCE Project to its implementation in Andalusia, we can say that EMAS-registered organizations are one step closer to circular economy as they can monitor their processes and thus constantly reduce their environmental impacts.

The actions carried out in the framework of ENHANCE Action Plan in Andalusia in support of the EMAS adoption have already contributed to increasing policy makers' awareness about how to support (often without additional financial efforts) the uptake of one of the most important environmental policy instruments based on a voluntary approach.

The impact of the Action Plan in the Policy Instrument is strongly related to the fact that the organizations that have implemented EMAS have already taken an important first step towards achieving a Circular. Their knowledge of resource consumption and environmental impact enables them to implement measures that optimize the use of their resources in line with circular economy principles. EMAS has an important role to play in helping public and private organizations unlock the potential of the circular economy and in helping use its resources more efficiently, supporting these IPs, which, among its priorities EMAS is considered an enabler to stimulate the improving the competitiveness, development of innovative techniques, greening the economy and reducing costs in the longer term.

In this sense, 3 performance indicators have been defined by the RGA to measure the influence of the actions adopted in the framework of ENHANCE project. In general, 75 EMAS-registered organizations have received these non-financial grants, while all actions adopted in the framework of the Action Plan

are focused on and aimed at these organizations, providing them promotional incentives.

It is worth emphasising that not only these indicators connected to the number of organisations benefiting from these actions show the impact and influence on our IPs, but also the number and type of actions adopted for the first time in Andalusia.

These actions and their respective results and impacts are described below.

Public Recognition of EMAS registration

Regarding the 24th Edition of Environmental Awards, all organizations were susceptible to submit their candidacy for any of the five categories established in the Regulatory Bases (approved by [Order of 6th April 2020](#)). Thus, 75 EMAS-registered organizations have been able to receive a higher score, thus obtaining an extra added value compare with non EMAS candidates.

On the other hand, as another merit of Public Recognition, EMAS has been mentioned in the agenda of several Public Events. Thus, all EMAS-registered organizations have been able to benefit from the sense of EMAS Community provided by high officers from the Directorate General on Environmental Quality and Climate Change (DGCACC).

#ConEMASTodosGanamos campaign

#ConEMASTodosGanamos is an EMAS Visibility Campaign developed and launched by the DGCACC in the framework of the EMAS Dissemination Strategy for Andalusia to promote EMAS Registration through Social Media, Press Releases, EMAS Help Desk. Additionally, several dissemination materials (4 videos, 2 static and dynamic infographics, 3 gifs for social media, 1 roll-up and 1 brochure about EMAS benefits and procedure in Andalusia) were developed and made available to all EMAS-registered organizations in the website of the RGA, then all EMAS-registered organizations have been able to benefit and make use of this communication toolkit in their own communication media. However, the RGA has not real data on how many of them used (or will use) the materials. Only 4 EMAS-registered organizations have published the campaign in their respective websites and a lot of retweets have been made by our key Stakeholders.

Proposals for the EMAS inclusion in the grants for the Sustainable Development of Marine Aquaculture in Andalusia.

Two proposals have been done by the DGCACC and approved by the Directorate General on Fisheries and Aquaculture (DGFA) for EMAS promotion among aquaculture sector, one of key sectors in the Region:

- Proposal of non-exclusive character for the lines of grants for EMAS implementation with other lines of grants for improvements in productive processes within the Call for grants for Sustainable Development of marine aquaculture sector in Andalusia; and
- Proposal for inclusion of EMAS as an award criterion (higher score) for the Lines of grants a), b), c), d) y g) within the Call of grants for Sustainable Development of marine aquaculture sector in Andalusia.

In this sense, there are three EMAS-registered organizations from the aquaculture sector in Andalusia that are susceptible to benefit, if appropriate, from the inclusion of EMAS Registration in the grants for the Sustainable Development of Marine Aquaculture in Andalusia, receiving a higher score simply for the fact of having EMAS Registration for any of the lines of grants a), b), c), d) y g). Additionally, other 7 companies from the aquaculture sector are susceptible to benefit from this inclusion of EMAS, but, in this case, for the lines of grants e) and f) simply for the fact of having another Management System, such as ISO14001, Global GAP, ISO22000, etc.

EMAS Club in Andalusia

A Prospective Study for launching of an EMAS Club in Andalusia has been developed by the DGCACC. In the framework of this study, a Final Report with the main achieved conclusions is foreseen in order to promote its establishment by all EMAS-registered organizations. Thus, all EMAS-registered organizations are susceptible to join the EMAS Club in Andalusia and thus benefiting from its services and advantages.

B. Austria

Green Public Procurement

Adding EMAS to green public procurement regulations can be a very good incentive for organisations to implement EMAS. Austria saw this in the case of cleaning services: the number of cleaning services with EMAS increased from 2 to 20 registrations.



Thanks to the stakeholder workshop with GPP experts from different organisations and public procurement officers in November 2018, recommendations for technical specifications and awarding criteria were added to the Austrian Action Plan for Green Public Procurement, which includes the following new requirements:

- For the waste sector – The contractor for waste collection services must have implemented an environmental quality assurance system. The verification document can be now an environmental statement.
- For the construction, maintenance sector–EMAS organizations are higher rated in the awarding process than ISO organizations (EMAS organizations receive 100% of the available points, ISO organizations only 80%).

The Action Plan for Green Public Procurement is currently under revision and will be published at the end of October 2020.

Environmental Impact Assessment (EIA) and EMAS – possible links and reliefs for EMAS organisations

The EAA learned from the Italian colleagues that there could be a possible link between EMAS and the Environmental Impact Assessment. An analysis of how to achieve a synergy of these two instruments has been done by means of a master thesis. Within this thesis, a survey among EMAS organisations led to the following conclusions. A full applicability of the Italian measures is not possible in Austria. On one hand the costs that have been reduced in Italy do not exist in Austria, on the other hand Austrian threshold values are already considered comparatively high (Austria has been already criticized by EU Commission) and therefore Austria won't risk any treaty violation proceedings.

According to the thesis, the implementation of specific reliefs for EMAS organisations in the EIA scheme could be as follows:

- Better consideration of EMAS documentation (statement, audit report) especially in the case of plant adaptations of companies that participate in EMAS
- EMAS environmental statement could replace the climate and energy concept.

Consideration of EMAS in the Austrian Energy Efficiency Law

The Austrian Energy Efficiency Law is the national implementation of the EU directive. However, the goal was a similar approach as in Germany. In Germany, the environment statement counts as the energy audit report. In Austria, an external or internal audit still has to be done besides the environmental statement. There are no time savings for competent authorities or for the EMAS organisations. Thus, there are no real advantages for EMAS, ISO14001 and 50001 companies in relation to the Austrian Energy Efficiency law.

Therefore, an analysis of the German adaption of the Energy Efficiency Law was carried out. The analysis looked at the Energiedienstleistungsgesetz §8 in comparison to §9 of the Austrian Energy Efficiency Law and highlighted a possible approach in Austria. This gap analysis was translated and sent out to other member states e.g. Poland.

An informal survey on the current implementation in Austrian EMAS companies was conducted. Also EMAS companies emailed the responsible bodies with improvement requests. All of these actions led to a discussion with experts from the responsible bodies regarding the future of the Austrian Energy Efficiency Act.

A new legislative proposal is ready, but not yet under assessment.

Training and information of Public Authorities about EMAS

The recognition of EMAS often depends on the competent authorities. The more the authorities trust in the EMAS system, the better the cooperation with EMAS companies will work. Therefore, EAA put a focus on the training and information of public authorities within the ENHANCE project.

A one-day training schedule for the federal academy of public administration on the national level was drafted. Vienna was selected

as a pilot region for the first trainings. In the future, trainings will be expanded to the rest of Austria.

Originally, the first training was planned for May, due to the coronavirus crisis the training had to be postponed. The new date is already fixed and the training program for the seminar on December 10 was prepared.

Moreover, a leaflet, informing all competent authorities about EMAS, was sent out to 150 authorities.

In the new government program of 2020, public institutions are required to introduce environmental management systems ("comprehensive introduction of environmental management systems in the state sector"), EAA is expecting more registrations in the public sector in future.

Environmental Inspections – Using Synergies between EMAS verification and environmental inspections

As Environmental Inspectors are needed to promote EMAS, they should be better informed about EMAS. There should also be communication channels between inspectors and EMAS verifiers. EMAS audit reports and the full inspection reports should be exchanged among them. This should lead to less effort for EMAS companies (less internal costs/resources). Thus, training schedules for environmental inspectors were drafted. However, due to the corona crisis the trainings had to be postponed.

Another focus was put on the BAT Documents with implementing decisions regarding environmental management, as these implementing decisions can be met with EMAS. A common letter to the JRC was sent regarding the integration of EMAS in the BREF and BAT conclusions and implementing decisions. As a result, the JRC has decided that there will be a reference to EMAS in the future. This reference was already integrated in BAT / BREF conclusions for waste incineration and food & beverages.

Since the beginning of the ENHANCE project Austria got 39 new EMAS organisations with 127 sites in Austria. Seven of these registrations (almost 18%) with 20 sites are located in western Austria, the area targeted by the EAA within the ENHANCE project.

C. Catalonia

Reduction of Financial Guarantees for waste treatment activities

The registration of a waste management activity in the Catalan General Register of Waste Contractors requires a financial guarantee. This financial guarantee is currently set out in a specific document that applies to organizations managing hazardous waste and / or non-hazardous waste. From a legal point of view, it has been identified the need to link the procedure for calculating the financial guarantee to a new decree on waste management procedures. At the date of the present report, the decree is being processed. The new decree must justify the criteria applied for the calculation of the amounts, the reasons and the principles in case of the reduction of the financial guarantee.



The joint work between the Waste Agency of Catalonia and the Directorate-General for Environmental Quality and Climate Change, has made possible to work for to include EMAS in the new Decree, as a criterion to apply special conditions for the determination of the financial guarantee. Despite the efforts made, due to the health crisis, urgent structural and organizational measures have been adopted that affect the establishment of the financial guarantee, and that make non-hazardous waste management activities permanently exempt from the bond.

Since it has not been possible to entirely implement this action, it is not possible to report on its impact on waste sector, but it has important implications in terms of the promotion of EMAS. Waste sector in Catalonia is made up of 1,178 companies, of which 97% are SMEs, which operate within the industrial, municipal and construction waste areas. The potential impact of the action and the chain effect that can be caused from the perspective of EMAS, could particularly influence SMEs as they represent a very high percentage of the sector. This action can have an indirect impact on other sectors as waste sector is the provider of all industrial activities and a large number of service activities.

EMAS and Circular economy funding programmes

Catalonia adopted a specific action in order to provide special conditions for EMAS registered organizations participating to Circular Economy funding programs managed by the Waste Agency of Catalonia. The process included the proposal of new criteria for the scoring system and its technical and legal assessment to finally modify the terms of reference of the affected funding programmes. The Waste Agency of Catalonia approved the proposal and it

was successfully included in the following call for proposals and published in the Official Journal in may/2019.

It affected four funding programmes for projects related to:

- the promotion of the circular economy
- the prevention, preparation for reuse and recycling of industrial waste
- prevention and preparation for reuse of municipal waste
- the promotion of selective collection of municipal waste.

This action aimed both at boosting the presence of SMEs in the promotion of circular economy and at strengthening the link with environmental management as the basis for sound global and competitive business management.

The following table provides information on the applications received and the share of EMAS registered organizations:

| Funding programme | Prevention, preparation for reuse and recycling of industrial waste | Prevention and preparation for reuse of municipal waste | Promotion of the selective collection of municipal waste | Promotion of the circular economy |
|---|---|---|--|-----------------------------------|
| Total applications | 64 | 103 | 10* | 150 (81*) |
| Applications from EMAS registered organisations | 8 | 5 | 0 | 9 |
| Total Subsidies granted | 55 | 24 | 7 | 94 |
| Subsidies granted EMAS organizations | 8 | 2 | - | 9 |

(*) the data regards those applications within the funding programme where EMAS was considered.

In 2020, the consideration of EMAS as an evaluation criterion has been consolidated in the grants and has also been added to other funding programmes regarding the research and experimental development of waste treatment plants. The call of the funding programme considers the application of business associations, which may lead to an increase in the EMAS register and act as a reference for other associations.

In addition, the Waste Agency of Catalonia and the Agency for Business Competitiveness of the Catalan Government (ACCIÓ) are collaborating to promote projects in the Circular Economy and Waste through specific funding programmes. The EMAS registration has also been introduced as an evaluation criterion in these grants.

The inclusion of EMAS in the aforementioned programmes, confirms a consolidation of its consideration in coherence with the obligations that will be established by the future Law on Waste and Resources of Catalonia, in terms of efficiency in the use of resources. This is an important step and a recognition of the ability of EMAS to address this model change in an orderly and efficient manner. Moreover, this may cause a replication effect on other organizations along the value chain of the waste sector, a sector that has a strong presence

in Catalonia. The current scenario, resulting from the health crisis, is driving the green and circular economy as a post-pandemic recovery lever. We can say that, the consideration of EMAS, is an important step given that it is a sector with a clear growing trend and that, with the integration of suitable management tools to address circularity such as EMAS, it will generate economic, social and environmental value.

Promotion of EMAS through Green Public Procurement

The tasks of this action could not be totally implemented according to the deadlines set out in the Action Plan, due to the debate generated by the assumption that EMAS may not prevail over other EMS within public procurement procedures.

The action considered the elaboration of a Guide for the promotion of EMAS in public procurement. The preparation of the Guide has evaluated the experiences of partners from Austria and Italy and the sectoral reference document on best environmental management practices for the public administration sector in the framework of the EMAS Regulation, which considers introducing EMAS as an award criterion in public tenders for the acquisition of goods, services and construction works.

Given the above-mentioned debate, the Guide is being legally reviewed and awaiting the resolution of certain issues related to the following:

- Legal feasibility of EMAS prevailing over other EMS in public procurement
- Implementation of an EMS as a requirement for the contractor.

The Guide aims to promote through public procurement the need for companies to implement EMAS as a very useful tool to encourage the transition to a circular economic model, and provide public buyers with a tool that will make it easier for them to incorporate the management of environmental aspects associated with certain contracts.

The Guide is expected to be approved in the first half of 2021, after that period will be possible to carry out a quantitative assessment of the impact of the action on public procurement.

Reduction/simplification of inspections in EMAS registered companies

This action has been developed through two different entities, the Waste Agency of Catalonia and the Service of Information, Inspection and Environmental Control of Activities of the Directorate-General for Environmental Quality and Climate Change (DGQACC).

The proposal to simplify the regime for waste inspections in EMAS-accredited companies is based on the fact that these companies have assumed an environmental responsibility that should ensure a continuous improvement of

their environmental performance. Before taking action, it has been necessary to justify and demonstrate its feasibility. The stages developed have been:

- Modification of the waste inspectors check list and collection of data on the level of compliance of organisations (EMAS/ISO 14001/no EMS)
- Creation of a register with the results of the inspections.
- Analysis of the data to evaluate the satisfactory compliance of EMAS companies.

An evaluation was made of the data obtained during 1 year out of a total of 578 inspections, 131 of which were carried out on waste producers or waste managers with an EMAS or ISO 14001 or both. The results have reported in a satisfactory manner the EMAS company profile. On the basis of these results, an analysis will be made of the feasibility of implementing measures to simplify the inspection regime for EMAS companies, taking into account the regulatory framework, the type of establishment and other factors.

Since 2018 the Service of Information, Inspection and Environmental Control of Activities within the framework of the ENHANCE project, considers EMAS as a criterion for determining the frequency of inspections. Considering this background, now it's being evaluated the potential use of the Environmental Statement in the framework of integrated environmental inspections. During the inspections carried out in 2020, it was planned to test the feasibility of the action but due to the health crisis it has not been possible to carry out. The action will be taken up again in 2021. Moreover, it has been raised the training inspectors in the use of Environmental Statements.

Tax and administrative fees reduction

This action required a study to analyse the administrative fees that could be potentially reduced with a view to modify the law on fiscal, administrative, financial and public sector measures. Finally, law 5/2020, of April 29th, was published integrating the following package of measures for EMAS organizations:

| | |
|---|-------|
| Taxes related to procedures for the environmental authorization | - 75% |
| Fees for conducting on-site inspections and preparing the report for activities with a high potential environmental impact, and covered by the environmental impact assessment and environmental authorization regime | - 75% |
| Fees for greenhouse gas emission authorization applications under the EU Emissions Trading Scheme | - 50% |

With the pandemic and the resulting economic crisis, the Government of Catalonia has adopted the application of bonuses of 100% of the fees issued within the scope of the Waste Agency of Catalonia competences for all companies.

D. Czech Republic

Reduced inspection frequencies

Through this action, CENIA achieved an agreement with the Ministry of the Environment and Czech Environmental Inspectorate (CEI), to update the part of the Internal matrix (Internal Risk Assessment Framework), which CEI uses as a guide for the inspections, and specifically the part which includes the inspection frequencies is the one that has been modified. Newly frequency of CEI inspections are extended by one year for EMAS registered companies, if there isn't any high-risk potential. CEI is now using the updated version of the matrix, which is friendlier to EMAS registered companies. This matrix is a document which sets the exact rules inspectors must follow during inspections within the implementation of the national Act. No. 76/2002. Thus, this new matrix influences the application of that specific law. In the 2020, 2 EMAS registered organizations have been assessed with a new procedure, both renewed their registration successfully.



EMAS Funding support

This action is under the competence of the Ministry of Industry and Trade as they manage a program to support the energy savings in organizations (EFEKT Program, for the Support of Energy Savings for the Period 2017-2021). Within this program, there's a part which includes support, among other things, for the introduction of a form of energy management system, which also applies to the EMAS system. The subsidy specifically concerns the creation of documents, the organization (definition of processes, responsibilities, flows, information, etc.), the preparation of systems for monitoring and evaluation of energy consumption. The funding support does not apply to the verification or the certification process, but it is assumed that once the system is implemented, it will meet the requirements set by ČSN EN 50001 or the EMAS environmental management and audit system. This subsidy began in the year 2017 and since that time, 36 projects on environmental management have been supported from 40 applications. The overall amount of subsidy was 380 thousand EUROS. This subsidy could be given to the companies with EMAS, who renewed their registration, and also to the companies with ISO14001, that is why it is very difficult to define a clear pattern of this funding support. Never the less, this action hasn't raised the number of new EMAS - registered companies yet.

Education programs for the public authorities

An NGO with which CENIA is collaborating, has created the textbook which is oriented very wide spread through all basic environmental topics. In the near future, the methodology sheet, which is geared towards GPP, specifically how

to apply EMAS in green public procurement should be published. Moreover, a set of the brochures with basic fact sheet will be issued. Unfortunately, due the corona – crisis, the works are delayed. The authorities responsible for this program is now evaluating actual situation, and probably there will be an effort to move the program to the online environment. The effort is to use tools as a webinar, videos and e-learning platforms. Hopefully soon the action will start generating positive impacts in the way public authorities work.

E. Estonia

Reduction of financial guarantees for EMAS registered companies

An amendment to the Waste Act (§ 98³) has exempted EMAS registered companies from a warranty or financial guarantee related to waste depositing since the beginning of this year. This measure has given a very strong impetus to the implementation of EMAS, especially in the sector related to waste management and the circular economy. Today, most of the major waste management companies in Estonia (7 companies out of 10 major waste management companies) have started to implement EMAS. As a result, it can be expected that the number of EMAS registrations among business organizations will increase this year in Estonia more than 5 times.



Relief on energy audit requirement

Thanks to this action, large EMAS-registered companies are exempted from carrying out energy audits under the EU's Energy Efficiency Directive. This relief has received positive feedback from quite a number of companies and thus can be expected to be an additional incentive for enterprises to implement EMAS. For example, one of the largest hospitals in Estonia (Tartu University Hospital) mentioned that this measure was one of the incentives that supported their decision to implement EMAS.

Reduced inspection requirement

A study was carried out to analyse the compatibility of EMAS audits and environmental inspections. The results showed that the inspection requirement can be reduced if EMAS verifiers carry out their audits by applying approach and procedure that is harmonised with the inspection check. To support that process a check list was created for EMAS auditors to make sure that they check the same aspects as in the environmental inspection when they check legal compliance.

Reduced reporting requirement

It was decided to implement the initial action idea in a slightly narrower context i.e. packaging waste reporting. It means that EMAS certified producers (enterprises who put packaged goods to the market) have exemption from the packaging related self-monitoring/auditing and reporting obligation. Relevant amendments have been drafted both in Waste Act and Packaging Act, which are expected to be adopted in 2021.

Two actions (reduction of environmental charges and simplification of environmental permit process) have not been completely implemented as the government priorities have changed due to COVID-19.

F. Italy

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

Even if the COVID19 emergency has altered the programs, the activity of SSSA on Actions n.1 and 2 of Action Plan has gone on.



Confirming this, Liguria Region has officially mentioned and recognized ENHANCE in its deliberation n.341/2020 of 24/04/2020. In the same document, Liguria Region has also stated the willingness to continue to develop synergies coming from ENHANCE with SSSA for the future activities – that means an influence also on the next Three-years GPP Plan that will be developed at the end of 2020.

Regional event

On September 15th, SSSA has organized the Interreg Europe ENHANCE Regional Dissemination Event to share with its main stakeholders the activity and the results of ENHANCE Towards EMAS Action Plan. In this occasion, apart from the presentation of results obtained since now, Environmental Certifications and their role in supporting Circular Economy and Green Deal was presented and a specific focus was made on the State of the art of GPP in Italy (Simone Ricotta, ARPA Toscana). These two speeches were appreciated by the audience because GPP is a topic that is increasing its attention by both policymakers and companies and Environmental Certifications are a tool that can boost both Circular Economy and Green Deal EU policies (see previous paragraph). Around 30 people were connected during the event and more were pre-registered.

Training for public officers

Regarding Action n.4, a dedicated event took place on November 26th –online – to train public officers. This was the occasion also to have a follow-up in respect to the analysis done during 2018 and was still on the path of increasing awareness.

The event was organized jointly by SSSA and Liguria Region and has seen more than 70 subscribers and more than 40 active participants, all in representation of the stakeholders reached during the last years by SSSA and Liguria Region during ENHANCE development. The speakers talked about Environmental Certifications (including EMAS) in supporting the GPP, in the view of supporting EU Circular Economy policies and Green New Deal plan. In that occasion, some updates were done on the new Three years plan of Liguria Region on GPP (the

subsequent policy instrument of the one targeted by ENHANCE), besides some news about the last choices of EU policymakers on EMAS and Circular Economy. At the end of the event (2hours) a debate was stimulated between the participants. Major issues emerged were the difficulties by public officers dealing with GPP in facing the drafting of tenders and the need for more training on the Eco-certifications and their role in supporting their daily job, including EMAS. Nevertheless, a quite an unexpected enthusiasm accompanied the theme of GPP, that is generating great interest in PAs. At the event were connected public officers from the whole Italian territory, and a short presentation on the Guidelines developed for Action n.3 was done, enlarging the possible spread of that document in the whole PA public officers' environment.

G. Results and output project indicators

The results indicators are direct effects resulting from the project and the production of its outputs. They represent the changes generated by the project and measure the number of policy changes resulting.

| Result Indicators | Target | Achieved |
|---|---------|----------|
| Number of Growth & Jobs or ETC programmes addressed by the project where measures inspired by the project will be implemented. Policy instruments addressed with structural funds link * | 4 | 0 |
| Number of other regional policy instruments where measures inspired by the cooperation were implemented in the field tackled by the project. | 2 | 11 |
| Amount of Structural Funds (from Growth & Jobs and/ or ETC) influenced by the project in the field tackled by the project (in EUR)** | 820.000 | 0 |
| Amount of other funds influenced by the project in the field tackled by the project (in EUR) ** | 230.000 | 17.122 |

* This indicator is related to Structural Funds programmes and measures the number of operational programmes or cooperation programmes that are influenced thanks to the project.

** These indicators measure the amount in euros that was directly influenced by the change introduced by the project. In the ENHANCE project not all policy changes have required financial resources.

The outputs indicators are the tangible deliverables of the project which contribute to the results. They directly derive from the activities carried out in the project. The following table summarises the main output project indicators and their level of achievement.

| Output Indicators | Target | Achieved |
|---|--------|----------|
| Methodology to assess the feasibility of good practices on supporting EMAS reg. | 1 | 1 |
| Best practices in EMAS Joint Database | 60 | 63 |
| Regional Studies | 6 | 6 |
| Partner meetings | 7 | 12 |
| Thematic workshops | 5 | 5 |
| Stakeholder Meetings | 30 | 30 |
| Interregional meeting | 1 | 1 |
| Regional Studies on the exchange process | 6 | 6 |
| Toward EMAS Action Plans | 6 | 6 |
| Dissemination events | 2 | 7 |
| Newsletters | 4 | 4 |
| Appearances in media | 48 | 89 |
| Stakeholder Groups formally set up | 6 | 6 |
| Practices transferred | 30 | 30 |
| Public officers and professionals who build up their skills and capacities due to their participation in interregional cooperation activities (only persons actively involved in the exchange of experience process)*** | 300 | 73 |

*** The value reported under this indicator correspond to the number of people who answered positively to the survey question related to increased professional capacity.

In the project, 24 Good practices on supporting EMAS has been identified and validated by the validated by the Policy Learning Platform experts. This 24 Good Practices, as indicated in section 2 of the report, are available on a specific section of the project website,

<https://www.interregeurope.eu/enhance/good-practices/>

The 24 Good Practices has proved to be successful in a region and are of potential interest to other regions. Of these 24 GPs, 11 have been included in the good practice database of the Policy Learning Platform, a collection of 'expert-validated' good practices available at the following link:

www.interregeurope.eu/policylearning/good-practices/

H. Indicators related to the specific policy instruments

The following table summarises the indicators related to each policy instrument and their level of achievement. Policy instruments that do not have a specific performance value, is because it has not been possible to measure efficiently the indicators that can validate how the project has influenced that policy instrument. In case that the project succeeded in influencing another policy instrument, at least one performance indicator has been defined which informs us of the performance of that instrument. The indicators tell us whether the performance of a regional instrument has improved as a result of the project's actions and consequently of interregional cooperation. The indicators are specific to each regional policy instrument. They tell us about the beneficiaries that are better off thanks of the influence of the project on that regional instrument.

| Policy instrument – Catalonia | Self-defined performance indicator | Target | Achieved |
|---|--|--------|-----------|
| <i>Policy instrument 1a Catalonia</i> ERDF operational programme (op) 2014-2020 in Catalonia | % of EMAS-registered SMEs benefiting from the instrument that have reduced and/or simplified their administrative cost and burdens | 10 | n/a |
| <i>Policy instrument 1b Catalonia</i> Budget Law of the Government of Catalonia for 2020 | Number of EMAS companies that have benefited from the tax and administrative fees reduction | 50 | 47 |
| <i>Policy instrument 1c Catalonia</i> Grants to non-profit organisations, universities, companies and local authorities. Waste Agency of Catalonia | Number of Subsidies granted to EMAS organizations | 23 | 25 |
| | Number of Subsidies granted to EMAS SMEs organizations | 16 | 19 |

n/a: Data non available in project time frame / n/i: Non-predefined indicator

| Policy instrument – Andalusia | Self-defined performance indicator | Target | Achieved |
|--|--|--------|-----------|
| <i>Policy Instrument 2a Andalusia</i> ERDF operational programme (op) 2014-2020 in Andalusia | % of EMAS-registered SMEs benefiting from the instrument that have reduced and/or simplified their administrative cost and burdens | 10 | n/a |
| <i>Policy instrument 2b Andalusia</i> Regulatory Bases on Environmental Awards in Andalusia | No. of companies that receive non-financial grant for their registration in EMAS | 72 | 75 |
| <i>Policy instrument 2c Andalusia</i> Andalusian Strategy for Sustainable Development of Marine Aquaculture | No. of companies from aquaculture sector that receive non-financial grant for their registration in EMAS | 3 | 9 |
| <i>Policy instrument 2d Andalusia</i> Budget of the DGCACC in Andalusia | No. of measures for EMAS promotion included in the Budget of DGCACC | 1 | 2 |

n/a: Data non available in project time frame / n/i: Non-predefined indicator

| Policy instrument – Italy | Self-defined performance indicator | Target | Achieved |
|---|---|--------|----------|
| <i>Policy instrument 3a Italy</i> Regional Law n. 31 of 13th August 2007: Organisation of the Region for transparency and quality of contracts and concessions | % of regional procurement procedures that include a reference to EMAS | 20 | n/a |
| <i>Policy instrument 3b Italy</i> Three Years Regional Plan of Liguria Region on Green Public Procurement | % of tenders with the presence of EMAS as criteria | 20 | 30 |

n/a: Data non available in project time frame / n/i: Non-predefined indicator

| Policy instrument – Estonia | Self-defined performance indicator | Target | Achieved |
|--|--|--------|----------|
| <i>Policy instrument 4a Estonia</i> Operational Programme for Cohesion Policy Funds 2014-2020 | % of EMAS-registered SMEs benefiting from the instrument and have increased their resource and energy efficiency | 15 | n/a |
| <i>Policy instrument 4b Estonia</i> Waste Act | Number of new EMAS companies | 1 | 2 |
| | Number of companies in the process of implementing EMAS | 2 | 6 |
| <i>Policy instrument 4c Estonia</i> Energy Sector Organisation Act | Number of large companies in the process of implementing EMAS | 1 | 1 |

n/a: Data non available in project time frame / n/i: Non-predefined indicator

| Policy instrument – Czech Republic | Self-defined performance indicator | Target | Achieved |
|--|---|--------|----------|
| <i>Policy instrument 5a Czech Republic</i> Government Resolution dated 19 June 2002, N. 651 - National program EMAS | Number of national strategic documents that include a reference to EMAS | 20 | 9 |
| <i>Policy instrument 5b Czech Republic</i> State Environmental Policy of the Czech Republic 2030 | Non-predefined indicator in 2020 | n/i | n/a |

n/a: Data non available in project time frame / n/i: Non-predefined indicator

| Policy instrument – Austria | Self-defined performance indicator | Target | Achieved |
|---|---|--------|-----------|
| <i>Policy instrument 6a Austria</i> ERDF operational programme (op) 2014-2020 in Austria | More EMAS registrations in West Austria within the next 4 years | 15 | 32 |
| <i>Policy instrument 6b Austria</i> Austria Industry Act | no indicator defined for 2020 | n/i | n/a |

n/a: Data non available in project time frame / n/i: Non-predefined indicator

6. LESSONS LEARNT

Working side by side for four years with partners from different countries and stakeholders of various kinds is undoubtedly an enriching process from different perspectives, both at the level of organizations and with each professional involved. We want to share our top lessons with other EMAS competent bodies and public bodies across Europe, the following paragraphs summarize what the partners consider general issues that can be transferred to similar projects in other EU member states and regions:

Our stakeholders are our best allies



It is very difficult, if not impossible, to be successful on improving a policy instrument without engaging the stakeholders. In the case of the ENHANCE project, the process of designing and implementing a regulatory relief or incentive is very complex as the regulatory

relief/incentive:

- should be attractive to stakeholders and really provide them with an added value
- be technical, economically and legally viable
- should be well integrated in the context and framework of the policy instrument
- be consistent with other policy instruments
- may regard different public bodies at different levels.

The involvement of stakeholders not only allows to have a wide perspective of the previous mentioned points, it also gives the sense of a common project to all the parties and thus, increase the capacity of implementation and the desired results. Not all stakeholders are active and willing to collaborate, but involving them since the beginning increases the level of acceptancy of the proposed changes.

Communicating a regulatory relief/incentive for companies is as important as creating it



Thanks to the close work carried on with stakeholders, partners were able to understand the relevance of communication when it comes to the implementation of regulatory reliefs; surprisingly interested parties are not always aware about them and therefore its deployment can be limited. In addition, if companies are not informed effectively about the existing incentives, public administrations also lose the potential dissemination effect that business-to-business interaction can have.

Public bodies usually disseminate regulatory reliefs and incentives through the policy instrument itself or through their webpages and newsletters. These three ways do not necessarily reach the target audience. In the first case, the policy instrument has many other information so the incentive or regulatory relief can be blurred between the various legal requirements, and sometimes, the incentive may be included in a policy instrument not related to environmental issues, for example reduction of fees or tax breaks in a tax law that sometimes is out of the scan carried out by enterprises.

On the other hand, the information on the web page is a "passive" mechanism and implies that the potential interested party is the one who seeks the information and is able to find it.

Lastly, companies receive a lot of newsletters and could overlook information about the incentive or regulatory relief.

Some ways that could enhance the communication impact of a new regulatory relief could be:

- Its presentation within specific webinars, conferences and other events
- Meetings with EMAS registered organizations and non-EMAS organizations, as well as with accredited verifiers, consultants and other organizations that could contribute to spread the word
- Sectorial communication through the enterprise associations, sectoral federations, etc.
- Articles, interviews in specialized magazines (better if you can involve one of the organizations that have already benefited from a regulatory relief and explain its experience)
- Social networks
- And of course, the peer-to-peer communication that must always be promoted.

We learn from both successes and failures



One of the positive aspects of the project is that partners and stakeholders have been able to discuss various adopted practices, not only those that have worked, but also those that have not generated the expected results in the past. This has helped us to see the possible failures, barriers and key elements of a certain context that affect the correct implementation of a regulatory relief or can prevent a change in a policy instrument. Furthermore, not all measures are adapted in the same way to each region or country, so this debate has helped each partner to better inquire the starting elements of their own reality.

To build trust you have to generate knowledge

4

One of the main barriers for the implementation of regulatory relief is the reluctance of some public bodies to recognize voluntary schemes. Different partners have faced a similar situation in their countries, there's a lack of both credibility and knowledge on EMAS among certain enforcement authorities nevertheless the number of EMAS registrations in each country. In order to overcome this situation, partners have worked on the design and implementation of actions related to training, capacity building and other actions addressed to provide a better knowledge on EMAS, the mechanism behind this scheme and also the performance of EMAS registered organizations.

Both, Austria and Czech Republic has designed actions that pursue at increasing the knowledge of EMAS among public officers as a way to build trust in it. From another perspective, Catalonia implemented a specific action aimed at collecting and analyzing detailed information about inspected organizations and Environmental Management Systems (EMS) in order to obtain evidence on how EMAS and non EMAS organizations perform on waste management. Persuading other public bodies to include regulatory reliefs is simpler if there's available data about the level of performance between organizations with different environmental management systems or without any system.

Lastly, also Italy implemented a training action, in this case specifically addressed to public officers involved in GPP.

Working at the local level with a look at Europe

5

The ENHANCE project has confirmed one of the issues that was already being discussed between various competent bodies, if EMAS is not included in the policy instruments at the European level, it is even more difficult to do so at the state or regional level. Its therefore crucial to act at EU level in order to be sure that the EU ecomanagement and audit scheme is systematically considered within the development of new directives, regulations or initiatives, or the review of those already existing and finally include EMAS in those that can offer an added value for organizations and the public administration. In this sense, stakeholders could have an increased impact at EU level if they were better informed and coordinated in order to provide feedback and request EU institutions to promote EMAS within the European policy instruments. Moreover, experience show that incentives targeted to companies must include a clear financial gain for the companies. That is the most effective for companies as they are pragmatic and profit oriented, and this issue should be considered when providing feedback at EU level.

EMAS, symbol of responsibility, transparency and commitment



EMAS registration endorses the responsibility with the Sustainable Development it is a brand for responsible and committed organizations.

Buying products and services from EMAS-registered companies contribute to the Sustainable Development and Circular Economy. Furthermore, EMAS provides transparency, while the organizations communicate real and reliable environmental information. EMAS is not a simple logotype, it is a guarantee of commitment with the Environment in a responsible and respectable way and ensures that organizations comply with all environmental legal requirements.

7. WHAT'S NEXT?

Having worked with other interested parties, has bound a joint process of analysis and reflection that **is probably one of the major legacies of the project**. It is expected that each partner can maintain the network beyond the project timeframe as a way of working that allows progress in policies and processes.

Catalonia continues to work with its stakeholders and in particular with the Waste Agency of Catalonia and the Service of Information, Inspection and Environmental Control of Activities of the Directorate-General for Environmental Quality and Climate Change (DGQACC). The project has strengthened relations with these two units of the administration and will continue the collaboration initiated for the recognition of EMAS-registered organizations in the field of inspection. Moreover, the inclusion of EMAS in the scoring criteria of the Catalan Waste Agency's subsidies for the promotion of the circular economy has been consolidated.

The DGQACC is also working to promote EMAS in the field of public procurement. A first step has been the development of the "Guide for the promotion of EMAS in public procurement", which is expected to be approved in the first half of 2021.

In Italy, SSSA is really committed with its main stakeholder Liguria Region to go on working on the Environmental Certifications enhancement (including EMAS) and on the GPP tool to spread the Eco-certifications adoption and to green the private market, through the activity of Public Authority. The staffs from the two organizations are already working on a possible continuation for the collaboration on the topics mentioned. Moreover, SSSA was already mentioned in by LR officers in public events as a partner to discuss with the next Three-year Regional Action Plan on GPP, that, indeed, is the consequent policy instrument of the one stressed by ENHANCE activities.

In Estonia the collaboration will continue with the established network mainly via Estonian Association of Environmental Management (EKJA) that brings together both enterprises (including EMAS registered organizations), EMAS verifiers and environmental management consultants. This cooperation has been an integral part of ENHANCE project. There will also be a continuation of the cooperation between EKJA and Estonian Ministry of the Environment (as a policy-maker), which is based on the voluntary agreement that includes

participation in the development of measures and activities for supporting EMAS implementation in Estonia.

Besides the actions included in the action plan, Estonia has already initiated a new measure based on the best practices of Austria and others that involve enhancing the knowledge and competences to implement EMAS, especially in the public sector. It has been decided that during 2021 a training series will be carried in particular to the public sector on how to implement EMAS.

The Czech Republic will definitely maintain the set communication. As it turned out, the stakeholders consider it as a useful to be involved to the whole process and also be informed about the news in this area.

Another future development from the project is to continue collaborating among the partners in order to **monitor EU initiatives and revision of directives in order to have an effective influence at EU level**. In this way, partners will be able to overcome one of the barriers identified within the project.

Partners will exploit the results of interregional cooperation and make them available to a wider audience of regional policy stakeholders for example the group of EMAS CB and others. In the case of Estonia, SEI has an agreement with Estonian Competence Body (Environmental Agency) and Estonian Ministry of the Environment to continue with the promotion of EMAS and developing additional measures that support EMAS registered companies.

Project partners, are willing to continue to meet and discuss about potential common future initiatives and to have the opportunity to work again on the broad topic of Environmental Certifications and Green Public Procurement as tools to develop Circular Economy.