



**Sant'Anna**  
School of Advanced Studies – Pisa



## **Enhance Workshop**

# **«Environmental Inspections and the role of the EMAS verifier»**

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# Summary

1. Is EMAS part of the national legislation regarding environmental inspections? Is there a difference to the IED?
2. How does the practical implementation of inspections work?
3. What is the difference between EMAS organizations and Non-EMAS organizations regarding environmental inspections? (in theory and in practice)
4. What experiences do EMAS organizations have regarding environmental inspections? (Challenges, benefits, burdens, costs, resources,...)
5. What is the current role of the EMAS verifier regarding environmental inspections?



## **Is EMAS part of the national legislation regarding environmental inspections? Is there a difference to the IED?**

The Directive 2010/75/EU was adopted in Italy 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 Authorization) are defined in an environmental inspection Plan at Regional level, periodically updated by the Region, after consultation with the Ministry of Environment.

- ✓ Yes, the participation of EMAS is a criteria to determine the period between two controls (as IED). But, not only EMAS... (see later)



# The case: Regione Lombardia



Regione Lombardia approved the regional Plan in 2017, in which are indicated:

- the method for determining the frequency of ordinary checks;
- the scheduling of ordinary controls, prepared on a three-year basis by ARPA Lombardia.

Moreover, to ensure the effectiveness of control activities in relation to the environmental risk associated with the operation of installations, indications are provided to support an operational approach based on the preliminary examination of the critical aspects and relevant from an environmental point of view on-the-spot verification activities, aimed primarily at verifying the authorization requirements that affect these aspects.



# Period for ordinary inspections



Based on art.29-decies, p.11-ter (d.lgs. 152/2006), the period between two site checks does not exceed:

- 1 year for installations presenting the highest risks;
- 3 years for installations presenting the lowest risks;
- 6 months for installations for which the previous inspection revealed a serious failure to comply with the conditions authorization.



# Period for ordinary inspections



The period is determined on a systematic assessment carried out by the Region on the environmental risks of the installations concerned, which considers at least:

- a) the potential and real impacts of the installations concerned on human health and the environment, taking into account the levels and types of emissions, the sensitivity of the local environment and the risk of accidents;
- b) the level of compliance with the permit conditions;
- c) the participation of the operator in the Union eco-management and audit scheme (**EMAS**).





# Environmental risk assessment



With the DGR 3151/2015 was approved the application of the "Control Programming Support System" method-SSPC, which allows an environmental risk assessment.

The "ranking" of the installations represents the basis for the planning of the ordinary inspections:

Level of Risk	Period
0 - 5,99	Every 3 years
6 - 7,49	Every 2 years
7,5 - 10	Each year



# The SSPC method



The SSPC is a method based on an algorithm to calculate the environmental risk of an installation.

The SSPC method is based on the identification of parameters assigned to each company and grouped into logical sets, expressing:

- the intrinsic business risk, subdivided in turn into potential and real risk;
- the vulnerability of the territory.

The calculation also includes weighting elements that take into account both the quality of the environment in which the company is operating, the characteristics of the company operator and the management methods.





# The role of EMAS and ISO 14001



Both EMAS and ISO 14001 are weighting elements describing the characteristics of the company (Operator Performance Criteria).

EMAS/ISO 14001	Value
Registered / Certified	-1
Not Registered / Not Certified	0



# Three years ranking of companies



ALLEGATO

## PROGRAMMA DELLE ISPEZIONI ORDINARIE NELLE INSTALLAZIONI SOGGETTE AD A.I.A. PER IL TRIENNIO 2018 – 2020

**Tabella A – programma triennale delle installazioni industriali**

Nell'elenco sono indicate 37 installazioni industriali con vettore pari a 0,00; per tali installazioni non è stato possibile calcolare il vettore in quanto i dati che consentono l'elaborazione del vettore di rischio mediante l'algoritmo di calcolo non sono presenti. Questo caso si presenta ad esempio in installazioni con Decreti AIA di ultima pubblicazione e/o prive della comunicazione dei dati ERPTR 2014 (dati utilizzati per il calcolo del vettore in quanto gli ultimi pubblicati ufficialmente al momento della programmazione). In assenza del vettore di rischio, la periodicità di controllo è stata considerata triennale; all'atto della disponibilità dei dati utili al calcolo del relativo rischio si provvederà ad aggiornare dati e periodicità di controllo.

Ragione sociale	Comune	Provincia	Codice Ippc	Vettore	Frequenza
frequenza controllo: triennale					
CARCANO ANTONIO	ANDALO VALTELLINO	SO	6.7	0,00	triennale
METALPRINT	VALMADRERA	LC	6.7	0,00	triennale
MENPHIS	CASNATE CON BERNATE	CO	6.7	0,00	triennale
HYDROTECH	MARNATE	VA	4.1H	0,00	triennale
GGM	CODOGNO	LO	5.1A	0,00	triennale
ECHOVIT	VOGHERA	PV	5.5	0,00	triennale
CHEMO BIOSYNTHESIS	CORANA	PV	4.5	0,00	triennale

GEDIT SPA	MONTICHIARI	BS	5.4	5,98	triennale
DISCARICA DI MARIANO COMENSE	MARIANO COMENSE	CO	5.4	5,99	triennale
ECOADDA S.R.L.	CAVENAGO D ADDA	LO	5.4	5,99	triennale
frequenza controllo: biennale					
ECOLOMBARDIA 4 S.P.A.	FILAGO	BG	5.1	6,00	biennale
LINEA AMBIENTE	ROVATO	BS	5.4	6,02	biennale
R.M.B.	POLPENAZZE DEL GARDA	BS	5.1	6,03	biennale

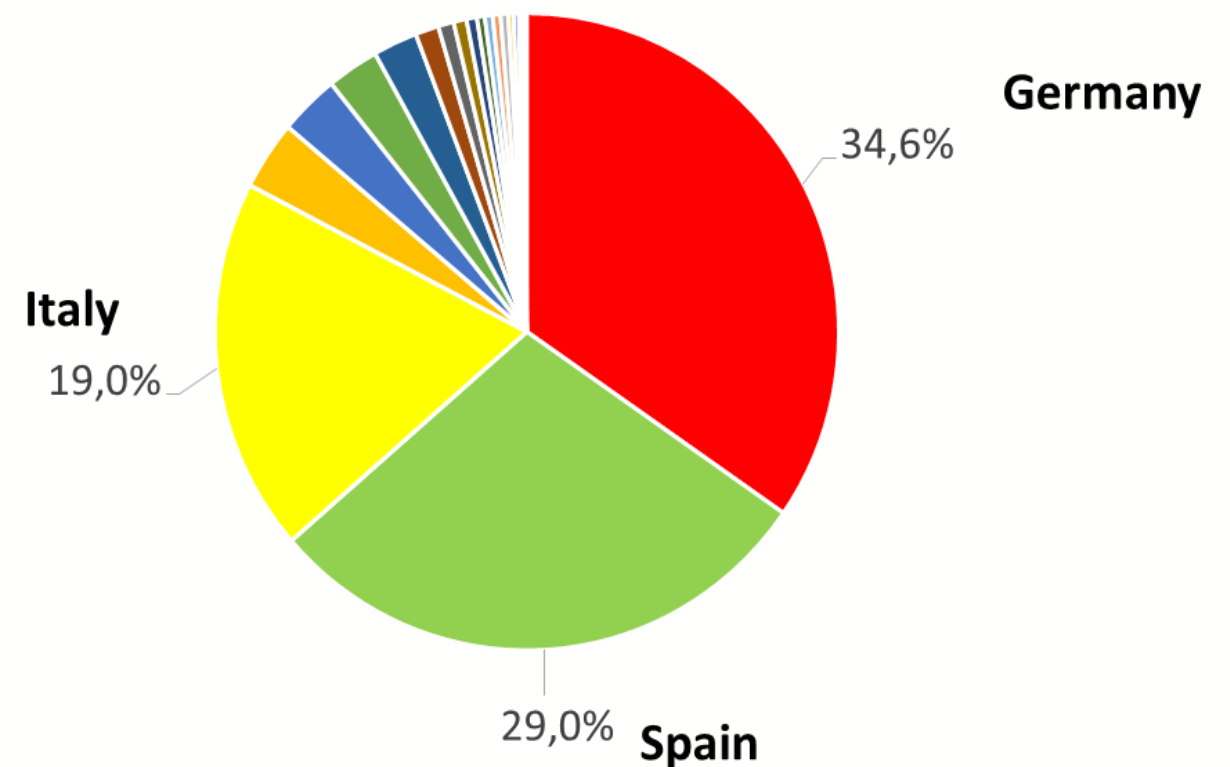
A.S.M.I.A.	MORTARA	PV	5.1	7,37	biennale
INDUSTRIE RIUNITE ODOLESI I.R.O. S.P.A.	ODOLO	BS	2.2	7,45	biennale
ACCIAIERIE VENETE S.P.A.	SAREZZO	BS	2.2	7,47	biennale
frequenza controllo: annuale					
A2A AMBIENTE	CORTEOLONA	PV	5.3	7,54	annuale
ELECTROMETAL SRL	CASTEGNATO	BS	5.1	7,57	annuale
LINEA RETI E IMPIANTI	CREMONA	CR	5.2	7,72	annuale



# What experiences do EMAS organisations have regarding environmental inspections?

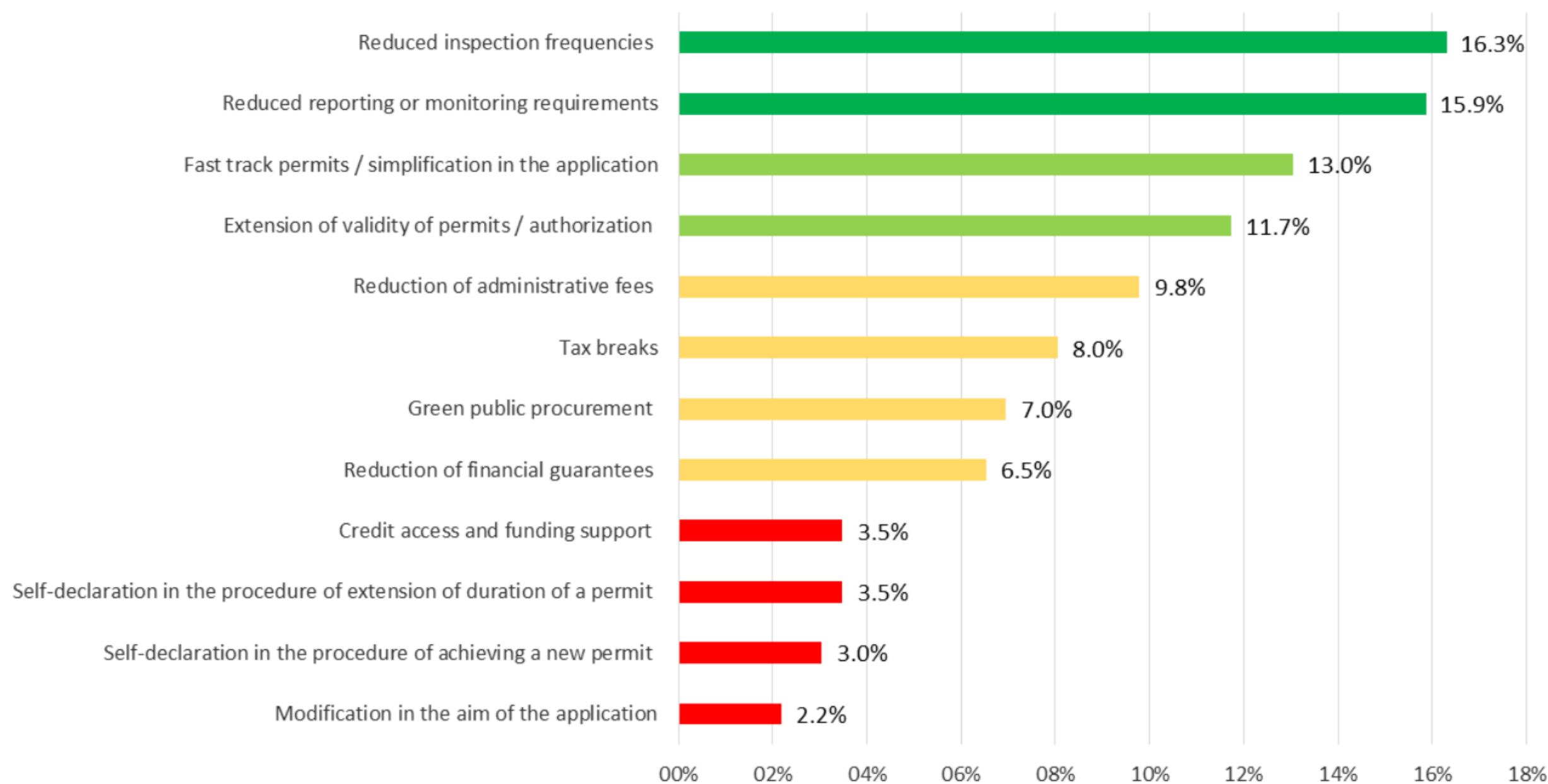


## 742 EMAS-registered organisations



# EMAS and environmental inspections (MS)

Adoption of regulatory relief per typology



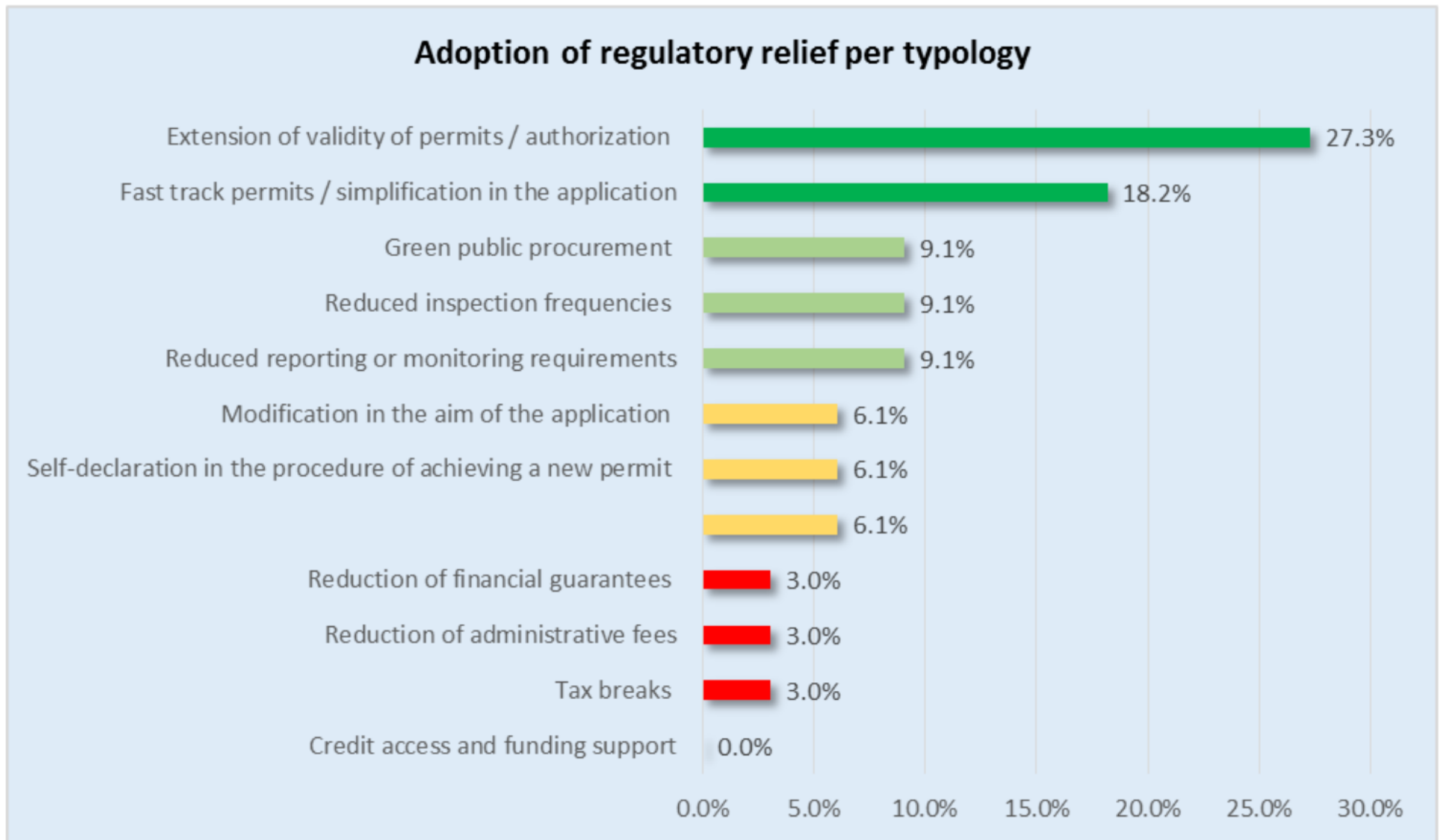
# Regulatory relief in Italy

Number of measures per typology of regulatory relief in Italy





# ISO 14001 and environmental inspections

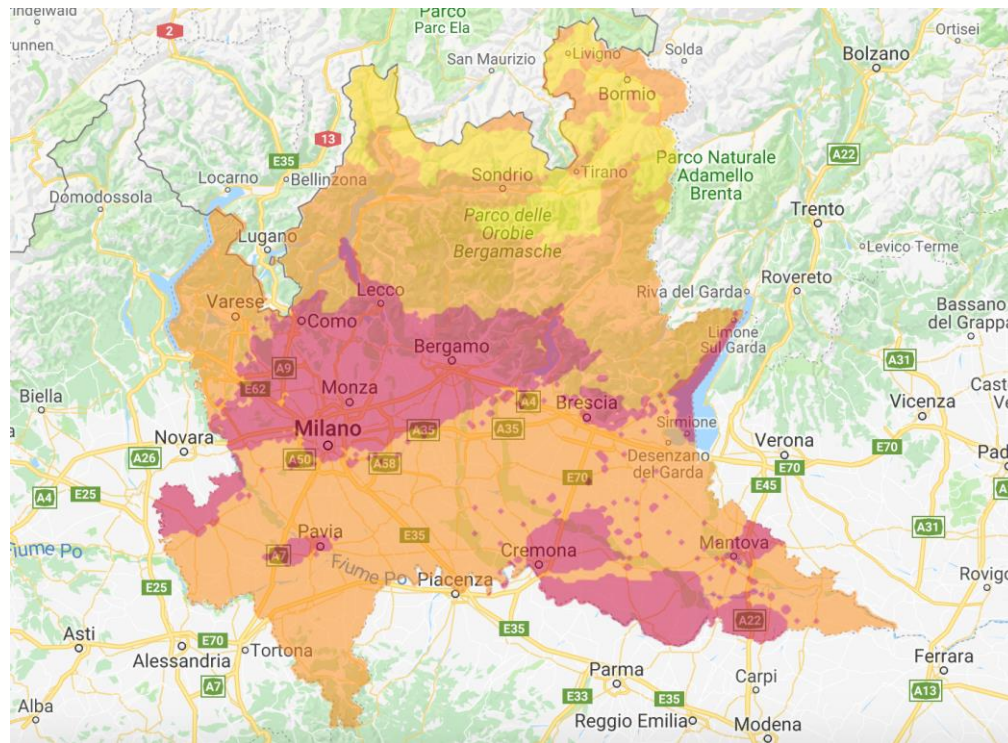




# What is the current role of the EMAS verifier regarding environmental inspections?



None! The regional competent authority is in charge of environmental inspections.



# Conclusions

- ✓ EMAS as a relief for organizations regarding environmental inspections for Italian (and also regional) legislation, but not as other Member States
- ✓ Regione Lombardia adopted a system that is considering EMAS as a factor for reducing the environmental risk assessment
- ✓ Lombardia-EMAS-registered organizations are benefiting of reducing inspections
- ✓ ISO 14001 has the same weight compared to EMAS in Lombardia regional law system
- ✓ Other regions should follow Regione Lombardia



***Thanks for your attention!***

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