



# **Regional study on the exchange process**

## **Region *Catalonia***



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## **1. Introduction**

The activities in the first part of the project have provided to each project partner the opportunity to interact with different sort of stakeholders at different levels, within their own regions and with stakeholders of other regions and countries. This has led to a learning and capacity building processes that have allowed not only to generate the “Towards EMAS Action Plan” but also to improve and reinforce other aspects that concern the competencies of the partners.

This second part of the Regional Study of the Interreg ENHANCE Project aims to present the main lessons learned from the exchange process that has taken place during the first two years of the project.

## 2. Lessons learnt from the SHM, IM & WS

The activities carried out with local stakeholders and partners in the meetings along Phase 1 of the project, have focused different objectives but one main goal: the determination of the practices susceptible to be adopted in order to improve the regional policy instrument to which the ENHANCE project is directed and to share with other partners our experience and knowledge.

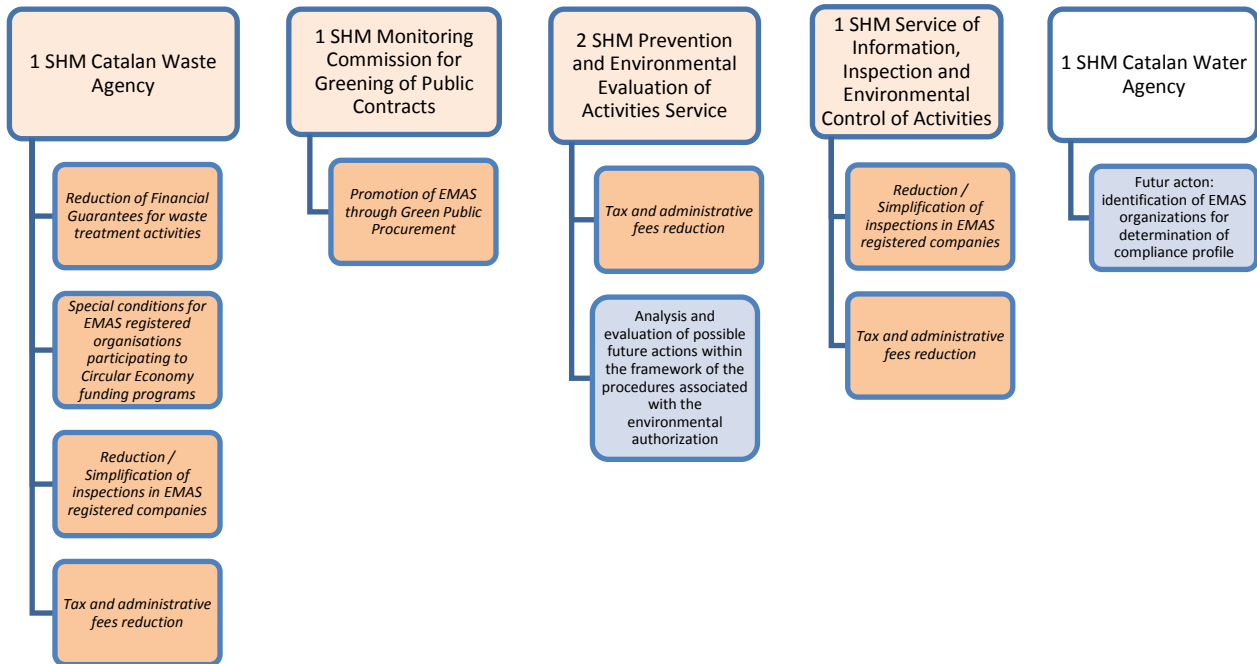
The main features of the policy instrument, are linked to the need of improving the competitiveness of organizations, particularly SMEs considering a specific aspect of innovation: the environmental added value of processes, products and services. This is essential in the competitiveness of SMEs. The development of companies must take into consideration the environmental performance of the organization through a systematic approach, and preferably through the adoption of voluntary schemes recognized at EU level such as EMAS, a voluntary management scheme that offers the opportunity to rethink operations, activities, products and services within the entire economic cycle.

The SHM, IM and WS have been developed as follows:



### Stakeholders meetings (SHM):

- Semester 1 & 2 of the project:
  - 1<sup>st</sup> SHM: Presentation and dissemination of the project and scope of the actions defined in the first stage: presentation of good practices for the promotion of EMAS in Catalonia and their positioning at the territorial level.
  - 2<sup>nd</sup> SHM: Collaborative work between the MTS staff assigned to the project and the stakeholders for the determination of best practices, analysis of how they are positioned, barriers found and contributions to overcome them.
- Semester 3 & 4 of the project:
  - In the 3<sup>rd</sup> and 4<sup>th</sup> semester it has been considered more efficient to hold small format meetings exclusively with the stakeholders directly involved in the candidate actions to be included in the **Catalonia EMAS Action Plan**. During these meetings and thanks to the subsequent follow up, it has been possible to identify the actions that for the Action Plan. In this sense, the meetings held with the stakeholders and the actions selected (in orange) to be included in the Action Plan can be found below:



In the 4th semester (November 2018), a plenary session was also carried out with the majority of the stakeholders that have participated in the ENHANCE project, to present the actions that have finally been selected to be included in the Catalonia EMAS action plan.

In this meeting the stakeholders had the opportunity to provide their vision in relation to the strategic nature of some of the actions or good practices, the interest that these good practices may arise in certain types of EMAS organizations or candidates, and how some of these good practices can be extrapolated to other areas or units of competence of the public administration.

Within these activities MTS has learnt about different issues:

- the lack of effectiveness in the communication and information about existing practices and incentives for the promotion of EMAS (see section 3 of this document).
- Face to face meetings or small format meetings with selected stakeholders proved to be more effective at a certain phase of the project rather than the initial plenary sessions. This format has allowed to directly discuss with the involved stakeholder detailed technical aspects of the potential action in order to assess its viability and its impact.
- Involving stakeholders since the beginning has been a key aspect in order to ensure their proactiveness, it has also provided the sense of co-definition of actions, and it'll ensure the availability of the necessary data to evaluate the efficiency of the implementation of the action plan in the second phase.

- It is necessary to show how EMAS can be an efficient tool for SMEs to encourage innovation in the circular economy and why it's an added value that can differentiate them in the market by increasing their competitiveness.



### **Thematic Workshops (WS), Interregional meeting and Dissemination Event (DE1):**

Throughout the entire Phase 1, a series of joint meetings between partners and stakeholders representing each region have been held.

Before the execution of the WSs an **Interregional meeting** was held in Barcelona (June 2017) to present the best practices identified in each region. This International meeting has been a first contact with representatives of other regions and stakeholders in order to learn about their good, how they can be approached, which methodology can be implemented, and how to evaluate the results.

From the second semester of 2017 and during the first semester of 2018, the different **Thematic Workshop (WS)** have been held with the topics previously agreed upon in the partner meetings:

- WS 1 (Barcelona, October 2017): Circular Economy
- WS 2 (Pisa, November 2017): Enhancing the future of EMAS: what a relief!
- WS 3 (Tallinn, February 2018): Green Public Procurement
- WS 4 (Seville, May 2018): Environmental Statement is more than a Declaration, squeeze it and get the most out of it!
- WS 5 (Vienna, June 2018): Environmental Inspections and the role of the EMAS verifier

We have determined the following points as relevant to each WS:

- WS 1: Project partners and stakeholders interacted and discussed good practices for the promotion of EMAS and the implementation of policies and strategies to promote a circular economy model. One of the main lessons learned is that organizations must begin to consider the potential of work in symbiosis, sharing resources with other organizations to optimize and increase their efficiency and at the same time be more competitive.
- WS 2: The workshop has been about simplification and regulatory flexibility, an issue that is playing an important role in the EMAS world and is also a topic of great importance for stakeholders. In the workshop, issues associated with the barriers limiting the impact of EMAS in the EU have been addressed and how regulatory simplification and flexibility and other incentives considered can be implemented. The definition of the Action Plans for each region during the second semester of 2018, will constitute a strong tool to overcome these barriers and obstacles in order to improve the way in which EMAS has the support of

public administrations and the same time as organizations and especially SMEs, adopt EMAS.

- WS 3: In the WS, experiences of implementing EMAS in the context of green public procurement have been analysed and shared. Based on the examples from Andalusia, Catalonia, Austria, Italy, the Czech Republic and Estonia, a set of recommendations was drafted to enhance EMAS intervention in green public procurement processes. The public administrations with their purchase option have the potential to influence the market of products and services, an important contribution to sustainable consumption and production, promote eco-innovation and the transformation of the market towards a green and competitive economy.
- WS 4: The WS has dealt with the Environmental Declaration and its positioning as a communication tool for the environmental behavior of organizations and the identification of opportunities for improvement in the use of this tool. In this meeting the global vision of the key aspects of communication in relation to environmental declarations has been exposed. Participating partners and agents have shared their experiences, providing knowledge about their communication strategies and opportunities for improvements of different scope, considering, among other alternatives, the valorization of the Environmental Statement as a powerful communication tool in environmental matters of a legal nature or as an added value in the communication strategies of the organizations with their interested parties.
- WS 5: The WS has had a markedly technical nature in terms of environmental inspection and the identification of synergies with the verification of the EMAS system. The meeting has also incorporated an interesting debate in which the benefits to which EMAS companies could opt in the field of environmental inspections have been discussed. Other aspects of interest have also been addressed, such as the possible consideration of EMAS in conclusion 1 of the BAT, consisting of implementing and complying with an environmental management system. A lesson learnt has been the need to obtain data and evidence on environmental performance of EMAS registered organizations in order to overcome barriers from other administrations.

In the WSs, stakeholders from each region have participated, validating with their experiences and contributions, the real situation in which the EMAS organizations are in each work area. This exchange of information has been essential to understand the practices that each region has shared with the other partners and select those potentially transferable that will have to adapt to the regulatory framework of each region, for which it is essential to have the support of local stakeholders.

The learning process has culminated in an International **Dissemination Event** (DE) held in Barcelona (November 2018) in which all the partners have made know their respective action plans, clearly highlighting the transfer flows of experiences and knowledge between the partners, the cooperation interregional and mutual learning

A very interesting aspect of the DE has been to enable the participation of attendees in the assessment of the practices of each region action plan presented and draw very interesting conclusions at the closing of the event. The participation process has allowed the identification of new opportunities to position EMAS as a strategic tool to favor the change towards a circular economy model, but it has also given visibility to how organizations face certain difficulties to approach this process efficiently.

Without a doubt, the joint work carried out during the Phase 1 of the ENHANCE project has increased the impact of the learning process and the training of the different actors involved.

### 3. Interaction and cooperation with stakeholders

Interaction with stakeholders has provided different benefits:

- It has envisaged the relevance of certain aspects related to regulatory relief that were underestimated in the past. **Communication** has appeared as a key aspect when it comes to the implementation of regulatory reliefs. Along the project it has been possible to understand that interested parties are not always aware about the available regulatory relief (particularly SMEs) 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.
- The learning process has positively affected, both the partner and the network of stakeholders. Stakeholders have obtained interesting information and have learnt about the experiences in other regions, but also have had a **better understanding of the level of implementation of certain regulatory reliefs** in our own region.
- The exchange process provided the opportunity to discuss with stakeholders the technical obstacles related to the implementation of specific regulatory reliefs and incentives, and the details of the procedures related to environmental law enforcement of other agencies or administrations. It has contributed to **bridge the gap between the partner (MTS) and other public administrations sat different levels** (same Ministry, other agencies belonging to the same Ministry and local administrations).
- Having had the opportunity to learn about and assess the potential actions and also to participate to the thematic workshops has encouraged the stakeholders and has allowed an **active participation**.



- Having worked with other interested parties, has forged a **joint process of analysis and reflection** that is probably one of the major legacies of the project. In the case of Catalonia, MTS will maintain the network beyond the project's timeframe. MTS will try inherit the ENHANCE's methodology and continue working with stakeholders.

Generally speaking, it has been useful to involve the majority of the stakeholders, obviously, the cooperation with some of them has been richer than with others, but anyway, in the case of Catalonia new in the network and all of them have provided new inputs and an added value to the activities carried out in the project. The project provided the motivation to study and analyse different perspectives, and some of them generated new actions (for the action plan) or an improvement of procedures already existing in the Region (see section n. 6 of this report).

Regarding the interaction with stakeholders, there's any negative aspect to be underlined.

#### **4. Main lessons learnt from the professionals involved as SH**

The profile of our stakeholders is transversal, including representatives of the local, regional and state public administration, EMAS companies from diverse sectors, certification bodies, verifiers, business associations and consultants, therefore each group of stakeholders has learnt different things in relation to their own level of knowledge and has also contribute by providing different experiences, perspectives and feedback at different stages of the project.

The Directorate-General for Environmental Quality and Climate Change, Ministry of Territory and Sustainability, is the EMAS competent body in Catalonia, therefore it has the capacity to plan, manage and implement the EMAS and other tools related to innovation for the improvement of the environmental performance of processes, products and services. Its attribution of competences guarantees its great capacity to influence the political instrument to which ENHANCE is addressed, but it needs the essential cooperation of other areas of public administration to implement it effectively.

The staff of MTS involved in the project have increased their knowledge and capacities in relation to:

- Legal framework in other regions
- Design of regulatory relief (by comparing own regulatory relief clauses with those of other regions)
- Technical and legal barriers (from the exchange with other colleagues from the same and other regions)
- Better understanding of the needs and expectations of SMEs and other organisations
- More effective communication and dissemination of regulatory reliefs, among others.

The work meetings carried out in the framework of the project have been very useful in general, having focused on those issues that really add value to EMAS and position it as a management tool that ensures the environmental and economic responsibility of the registered organizations and the transparency, as an asset that allows to give visibility to the environmental behavior of the organization for any interested party and society in general.

In the process of analysis and evaluation of the candidate actions to be included in the Catalonia EMAS Action Plan, the stakeholders have influenced in a series of points of interest, some of which are as follows:

→ Think about why some existing EMAS promotion measures are not successful and / or are not known by EMAS organizations so many of this organizations can not apply them.

→ Provide growing clout to EMAS in future modifications of the regulatory framework.

→ The new ISO 14001 is closer to EMAS which can favor the choice of the EMAS system in those organizations that consider the adoption of an environmental management system, it is therefore important to give visibility of the benefits provided by EMAS and that ENHANCE project should strengthens and increase.

→ Keep in mind the costs for the administration linked to the benefits for EMAS organizations.

→ The wording of certain measures associated with regulatory requirements (periodic review of the permits for the exercise of the activity with the renewal of the EMAS Register, simplification of the procedure for obtaining a permit, simplification of the periodic controls to which certain companies are subject , others) can be interpreted in their implementation with a certain difficulty especially by certain local administrations, which hinders in an effective application of the measure by EMAS companies.

→ Consider special conditions for EMAS organizations in order to access to the funding programmes of different public bodies.

## **5. Main lessons learnt from the cooperation with other partners**

ENHANCE project has established mechanisms to **identify synergies** between the participants regions to address issues that may be common and in turn opens the door to considering EMAS within the regulatory framework as a way to improve our own processes.

ENHANCE has created a work environment that has allowed us to know those issues that may be common or similar in different regions, giving us the opportunity to know new ways to approach improvements through **in-depth knowledge of our partners' best practices**. In our case, the identification of references that are already implemented successfully in the partner

regions participating in the project, has helped us to determine new actions that undoubtedly will strengthen the positioning of EMAS especially in SMEs.

ENHANCE project has undoubtedly been a springboard to activate those actions and involve all the necessary stakeholders for the implementation to be effective. The lessons learned from the **interregional cooperation** between the project partners and the **knowledge** acquired in the process of **exchange of experiences** are generating the definition of the "Catalonia EMAS Action Plan", which is aimed at improving the positioning of EMAS in Catalonia being a reference tool for the implementation of efficient processes in the use of resources and favouring the transition towards a circular economy model.

ENHANCE has allowed us to promote a number of actions planned to be developed by the Ministry of Territory and Sustainability but not exempt from difficulties. The interregional cooperation has been key for structuring the EMAS action plan that will be implemented in Catalonia encouraging the introduction of incentives for organizations, especially SMEs, that adopting **good environmental practices through EMAS**, promoting eco-innovation within a systematic approach. This means activating the collaboration between different Public Authorities and other stakeholders to guarantee the effective implementation of the action plan and increase the percentage of SMEs with EMAS registration. ENHANCE is **facilitating collaboration between different public administration** units involved in the implementation of the actions included in the Catalonia EMAS action plan.

Also, Interreg Europe through the Policy Learning Platform and giving us the opportunity to be part of the community of regional policymakers, is allowing us to know other working models and how processes are being addressed to improve regional development policy instruments.

## 6. Other lessons learnt and actions to be implemented

The learning and exchange process between the different partners and the interaction and cooperation with stakeholders have not only served to define new actions (included in the "Towards EMAS Action Plan", it also gave the opportunity to analyse the existing regulatory reliefs and incentives in the region, and has already identified potential improvements.

**1** Thanks to the stakeholders' group, colleagues from other MTS competent administrative units have already proposed improvements to internal procedures and methodologies, for example in the case of **the environmental risk assessment related to the Industrial Emissions Directive (IED)**.

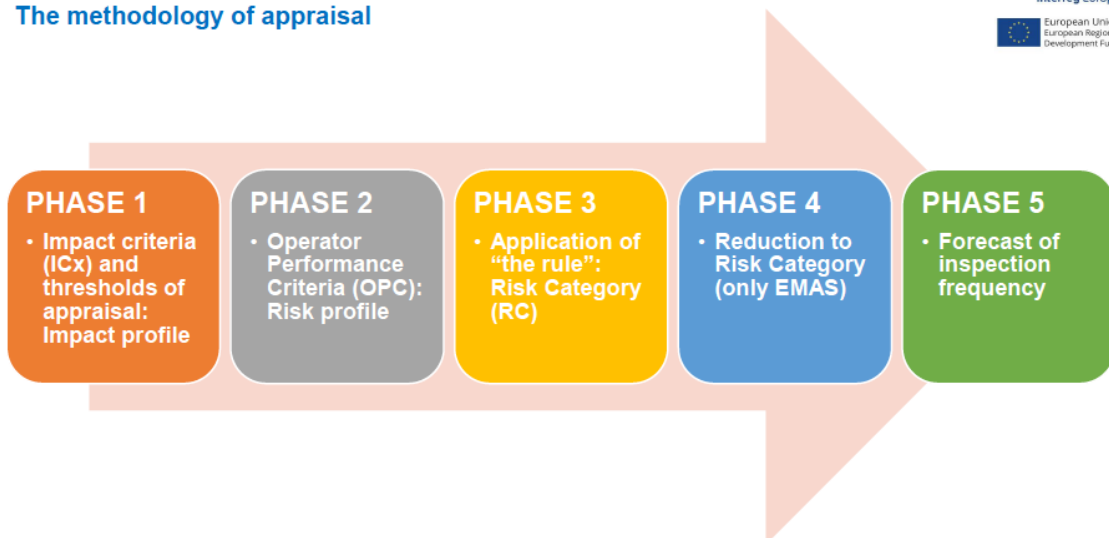
In this specific case, some stakeholders (mainly organisations) have had the opportunity to provide their feedback on how the risk assessment was affecting them and how little impact EMAS was having on it. Actually, this regulatory relief was not having the expected results in terms of:

- Benefits for EMAS registered organisations and specifically SMEs (cost reduction, reduction of time-consuming activities, etc.)
- Attractiveness of EMAS for non-registered organisations affected by the IED.

The competent authority has then analysed the available data and proposed an improvement of the procedure considering the evidences collected.

On the basis of the current system (see chart), the Service of Information, Inspection and Environmental Control of Activities has added an extra favourable condition: EMAS is again considered before the end of the methodology together with the results of the last inspection in order to influence the final risk assessment. If the organisation is EMAS registered and the last inspection’s report was satisfactory or appropriate, then the organisation will benefit from an extra risk reduction (-1 level) that affects positively the frequency of the inspections.

**The Environmental Inspection Programme  
The methodology of appraisal**



In relation to the impact of this improved regulatory relief the current data shows that 656 industrial sites, waste management sites and waste landfills are affected by the environmental inspections’ programs (livestock farmers excluded). Only 7% are EMAS registered, 33% is ISO 14001 certified and 60% has no EMS, therefore potentially, 391 organisations could improve their environmental performance by adopting a systematic approach in environmental management (EMAS / ISO 14001) and 218 ISO 1001 certified organisations could upgrade to EMAS.

	IED	No IED	Total
<b>EMAS</b>	46	1	<b>47</b>
<b>ISO 14001</b>	217	1	<b>218</b>
<b>No EMS</b>	302	89	<b>391</b>
<b>Total</b>	<b>565</b>	<b>91</b>	<b>656</b>

Considering the outputs of the last inspections, 144 sites could have benefit from the “reduction” of the level of risk inspections if they were EMAS registered.

2 Another improvement that has followed the interaction within ENHANCE, has been carried within the specific **funding programmes for the implementation of environmental management systems** established by the Directorate-General for Environmental Quality and Climate Change from Ministry of Territory and Sustainability. The 2018 call has been modified as follows:

- It only provided financial support for EMAS
- It also provided a specific support for the EMAS renovation in order to reduce the related auditing and validating costs.

3 Another output from the exchange process was the need of improving the communication and dissemination of the implemented or to be implemented good practices. The Directorate-General for Environmental Quality and Climate Change from Ministry of Territory and Sustainability is working with colleagues from other units in order to implement a better communication strategy based on direct and explicit communication within the resolutions adopted by the public administration, formal communications, and other means.

Moreover, within the ENHANCE project all partners have agreed to modify the Action Plan and include a specific section for the communication and dissemination of the actions to be adopted in the following two years.

## 7. Conclusions

The **collective learning and the cooperation** that generated within **ENHANCE** project, has been a very enriching experience. Working with our local stakeholders and with colleagues from other European regions on matters of common interest, opens the way to understand the functioning of other territories of the EU and establishes links for joint work and future cooperation. Deepen in common issues and looking for references for potential improvement in our region, has allowed us to propose improvements in our region.

Certainly, our Region has been able to obtain more inputs from those regions that were more advance in the implementation of EMAS (Italy and Austria) and the others, but we all have in common similar barriers and the debate always provided interesting perspectives of the same problem.

The process has allowed us to learn not only from the good practices, identifying the weaknesses of those regulatory reliefs that some of the partners have implemented in the past but have not had the expected impact will also prevent us from doing the same mistakes. It has also helped to self-evaluate certain actions and define ways to improve those mechanisms that do not quite work well at all. This valuable knowledge will certainly help to define better future actions and strategies and to reinforce all the work that has been already done in the past.

ENHANCE has certainly contributed to define how to improve current practices for the promotion of EMAS, has allowed us to work on aspects related to fast track and regulatory relief, green public procurement, and technical and financial support among others and will provide us a good knowledge base for the activities foreseen in the following two years.

The durability of ENHANCE's results must be guaranteed by improving our regional policies and by keeping in touch with the stakeholders (as a network), both of them will certainly contribute to a better governance of EMAS through its full integration into regional and national legal frameworks.