

**ENHANCE**  
Interreg Europe



# Towards EMAS Action Plan

Austria

Document carried out by PP *Partner 6: Environment Agency Austria*

*Austria, 16 April 2019*

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## INTRODUCTION

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

## GENERAL INFORMATION

<b>Project:</b>	ENHANCE	
<b>Partner organisation:</b>	Environment Agency Austria Partner 6	
<b>Other partner organisations involved (if relevant):</b>	Ministry of Territory and Sustainability, Government of Catalonia Partner 1 Andalusian Institute of Technology partner 2 Sant'Anna School of Advanced Studies Partner 3 Stockholm Environment Institute Tallinn Centre Partner 4 CENIA - Czech Environmental Information Agency Partner 5	
<b>Country:</b>	AUSTRIA	
<b>NUTS2 region:</b>	Vienna	
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## POLICY CONTEXT

[Please fill this section with the information included in section B.2.1 of proposal]

<p>The Action Plan aims to impact:</p>	<p><i>[mark with a cross the valid option]</i></p> <p><input checked="" type="checkbox"/> Investment for Growth and Jobs programme</p> <p><input type="checkbox"/> European Territorial Cooperation programme</p> <p><input type="checkbox"/> Other regional development policy instrument (please insert the name):</p>
<p>Name of the Policy Instrument addressed:</p>	<p><i>ERDF OPERATIONAL PROGRAMME (OP) 2014-2020 IN AUSTRIA:</i></p> <p><i>Priority axis A2: Enhancing the regional competitiveness of SMEs</i></p> <p><i>Investment Priority (IP) 3d - Supporting SMEs' capability to grow in regional, national and international markets and to be engaged in innovation processes.</i></p> <p><i>Section 11: Horizontal principles: 11.1. Sustainable Development</i></p>
<p>Geographical coverage of the Policy Instrument:</p>	<p><i>Regional</i></p>
<p>Responsible for the Policy Instrument:</p>	<p><i>Federal Ministry of Tourism and Sustainability</i></p>
<p>Main features of the Policy Instrument:</p>	<p><i>The Austrian OP contributes to the strategic priorities of the European Regional Policy for the economic development and the Cohesion Policy, whose reference framework is determined by the Europe 2020 Strategy for smart, sustainable and inclusive growth. Smart growth is related to the Specific Objective "Enhancing the competitiveness of SMEs as a basis for growth of companies". Target groups are SMEs in the production, tourism and service sector. Special attention is given to projects of companies which provide products and services making a contribution to energy efficiency and climate change reduction. According to an EC study, EMAS has a positive influence on competitiveness and stimulates organisational and process innovations. As per section 11 of the OP all public subsidies and grants in Austria should take into account aspects of sustainable development. Currently, all applicants receive a questionnaire to fill out. It is intended to create more awareness for the topic of</i></p>

	<p><i>"Sustainable Development". In the questionnaire information about the existence of EMAS and other voluntary instruments is retrieved. EMAS is also integrated into the selection criteria for all subsidies and is also widely available as a criterion, i.e. an EMAS implementation achieves extra points in the project evaluation. To achieve the specific objective of enhancing the competitiveness of SMEs, subsidies should encourage SMEs more to adopt systematically good environmental practices, like EMAS.</i></p>
<p><b>Stakeholders involved:</b></p>	<p><i>Representatives of the EMAS Competent Body • Representatives of the EMAS Competent • Representatives of Ministries • Representatives of national industrial and trade associations • Representatives of EMAS-registered organisations. • Representatives of local institutions (e.g., provinces or municipalities) EMAS verifiers and consultants</i></p>
<p><b>Any other relevant information (if relevant):</b></p>	<p><i>The Goal of the policy instrument is to support SMEs' capability to grow in regional, national and international markets and to be engaged in innovation processes. One focus of the policy instrument is sustainable development. EMAS is an important tool to enhance sustainable development in organisations and the economy. EMAS is a management system that leads to sustainable improvements in different areas of organisations. Those improvements are a competitive advantage for organisations and thus lead to innovative processes and to growth in regional, national and international markets. Therefore, implementing EMAS should be a strategic choice for organisations wishing to reach growth and innovation.</i></p> <p><i>To facilitate this strategic choice and to minimize barriers of implementation while at the same time promoting sustainable development within organisations, it is essential to foster EMAS in Austria. This action plan addresses several barriers of implementation as well as regulatory reliefs needed to incentivise and motivate organisations to implement EMAS. As all of the actions support sustainable development and lead to a competitive advantage for the organisations, all of the actions support the policy instrument.</i></p>

## DETAILS OF THE ACTIONS ENVISAGED

### *ACTION 1: Green Public Procurement – EMAS as Award criterion in the tendering process of construction, maintenance and Waste management sector*

<b>Action</b>	<i>Consideration of EMAS as Award criterion the public procurement process of the construction, maintenance and Waste management sector</i>
<b>Type of action</b>	<i>Regulatory relief</i>
<b>Voluntary scheme(s) addressed</b>	<i>EMAS</i>
<b>No. assigned in EMAS Joint Database</b>	<i>CAT-4GP</i>
<b>Promoting region</b>	<i>AUSTRIA</i>

#### Lessons Learnt

- Background:** The action is based on the Catalonian Good Practice: Resolution of the Government of Catalonia, of 11th October, 2005 on measures to promote the greening of public procurement of the Generalitat of Catalonia and public companies and entities that are affiliated or related.  
 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.

**Description of the action** EMAS should be considered in the public procurement tendering of the construction, maintenance and waste management sector. To include EMAS in the technical solvency might be too difficult - it might be better to look at the award criteria. Already existing actions for addressing the construction, maintenance and waste management sector in public procurement by the BMNT (Ministry of sustainability and tourism) should be considered. Within the construction sector there should be a focus not only on residential construction, but on all public procurement activities. As EMAS has higher requirements (f.e. Environmental reporting) EMAS should receive a better recognition as ISO 14001 in the tendering processes related to these sectors.

- Stakeholders involved:** Federal Procurement Agency (BBG, "Bundesbeschaffung GmbH"), Chamber of Commerce, Federal Ministry of Sustainability and Tourism, Federal Ministry for Digital and Economic Affairs, Asfinag, BIG ("Federal Agency for State Property Management), Municipal Department 22 - Environmental Protection in Vienna (MA 22), Development Agencies (municipalities and state), "Burghauptmannschaft Österreich"
- Time frame:** The overall action has a deadline until 30.06.2020. The sub-actions 1.1. and 1.2. have a shorter deadline until 30.6.2019.
- Costs:** there won't be any relevant expenditure except personnel resources

- **Funding sources:** contract with Ministry of Sustainability and Tourism
- **Dissemination & Communication** the information should be spread out as information via Chamber of Commerce and via tendering institutions (eg. BBG, Asfinag, etc.)
- **Monitoring:** The implementation of this action can be monitored by the means of number of tenders which considers EMAS as award criterion.

**Sub-action 1.1:** Discussion with legal experts and experts from the ministry about possibilities to integrate EMAS better and more often in tenders. Drafting recommendations for technical specifications and awarding criteria.

- **Stakeholders involved:** procurement experts from BMNT (Federal Ministry of Sustainability and Tourism) and Federal Procurement Agency (BBG, "Bundesbeschaffung GmbH"), Angelika Tisch (Austrian Action Plan for Sustainable Public Procurement, Federal Agency for State Property Management, BIG (Mr. Winfried Lahme), MA 22 (Thomas Hruschka, coordinator for sustainability, City of Vienna)
- **Time frame:** from 01.01.2019 until 30.6.2019.
- **Costs:** there won't be any relevant expenditure except personnel resources
- **Funding sources:** contract with Ministry of Sustainability and Tourism
- **Dissemination & Communication** the information should be spread out as information via Chamber of Commerce and via tendering institutions (eg. BBG, Asfinag, etc.)
- **Monitoring:** Minutes of the Discussion, Draft of recommendations

**Sub-action 1.2:** Information of Public Procurement Officers regarding the integration of EMAS in tenders.

- **Stakeholders involved:** Public Procurement Officers at BBG and other tendering institutions
- **Time frame:** from 01.01.2019 until 30.6.2019.
- **Costs:** there won't be any relevant expenditure except personnel resources
- **Funding sources:** contract with Ministry of Sustainability and Tourism
- **Dissemination & Communication** the information should be spread out as information via Chamber of Commerce and via tendering institutions (eg. BBG, Asfinag, etc.)
- **Monitoring:** number of informed Public Procurement Officers



**ACTION 2: Environmental Impact Assessment – Analysis of Thresholds**

<b>Action</b>	<i>Consideration of EMAS within the process of assessment of the EIA (Environmental Impact Assessment)</i>
<b>Type of action</b>	<i>Regulatory relief</i>
<b>Voluntary scheme(s) addressed</b>	<i>EMAS</i>
<b>No. assigned in EMAS Joint Database</b>	<i>IT-2GP</i>
<b>Promoting region</b>	<i>Italy</i>

**Lessons Learnt**

- **Background:** Within the projects under EIA, the Region Emilia Romagna and Marche decided to award those plants having in place an environmental management system such as those having EMAS or ISO 14001, recognizing reduced environmental risks and better management of the environmental impacts also in case of extension or transformation of projects.

**Description of the action:** The relevant Austrian legislation including relevant thresholds should be analysed. The environmental statement could be used to cover parts of the declaration which has to be provided by the project operators. Research regarding consideration of EMAS by relevant authorities could be done by means of a possible master thesis. One output could be recommendations for implementation of specific reliefs for EMAS organisations in the EIA (Environmental Impact Assessment) scheme.

- **Stakeholders involved:** EIA (Environmental Impact Assessment) experts of Federal Environment Agency Austria, relevant authorities.
- **Time frame:** 01.01.2019 - 30.06.2020
- **Costs:** there won't be any relevant expenditure except personnel resources
- **Funding sources:** none
- **Dissemination & Communication:** Publication will take place via EMAS channels, there could be a finalised recommendation document if integration in legal documents is possible.
- **Monitoring** could take place via feedback from EMAS organisations that are considered by the EIA (Environmental Impact Assessment) scheme

### ACTION 3: Energy Audit – integration of EMAS into Energy Efficiency law

Action	Energy Audit – integration of EMAS into the Energy Efficiency Law
Type of action	Reduced reporting and monitoring requirements
Voluntary scheme(s) addressed	EMAS
No. assigned in EMAS Joint Database	CZE – 2GP
Promoting region	Czech Republic

#### Lessons Learnt

- Background :** 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 environmental 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, at the moment there are no real advantages for EMAS, ISO14001 and 50001 companies in relation to the Austrian Energy Efficiency law. Now the chances for reducing reporting and monitoring obligations are higher, as the Ministry for Sustainability and Tourism now is the competent ministry for energy affairs.

**Description of the action** Organisations with EMAS are exempt from the obligation to carry out an energy audit every 4 years. The environmental statement counts as the energy audit report. In 2020 there will be a possible revision of the law. This is an opportunity to prepare recommendations and a basis for the revision now.

- Stakeholders involved:** Ministry of Sustainability and Tourism, experts of EMAS unit, German Ministry of Environment, German EMAS organisations
- Time frame:** until the next revision of the Austrian Energy Efficiency Law, possible in 2020
- Costs:** personal resources of the EMAS Unit in the Ministry of Sustainability and Tourism, no costs for the master student doing the analysis
- Dissemination & Communication:** Publication of the revised law in the Bundesgesetzblatt
- Monitoring:** finalised law includes further reliefs for EMAS organisations

**Sub-Action 3.1.:** An Analysis of the German adaption of the Energy Efficiency Law will be carried out. The analysis will look at the Energiedienstleistungsgesetz §8 in comparison to §9 of the Austrian Energy Efficiency Law. Furthermore, the actual implementation of the law and best practices will be analysed. EMAS organisations in Germany affected by the law will be interviewed. The analysis will be done through a Master Thesis.

- **Stakeholders involved:** German Ministry of Environment, German EMAS organisations
- **Time frame:** end of 2019
- **Costs:** personal resources for the supervision of the master student
- **Dissemination & Communication:** final Master Thesis
- **Monitoring:** final Master Thesis

**Sub-Action 3.2.:** After the Analysis of the German adaption of the Energy Efficiency Law, a discussion with experts of the relevant Ministry (Energy Department of the Ministry of Sustainability and Tourism) regarding the future of the Austrian Energy Efficiency Law will be organised.

- **Stakeholders involved:** Ministry of Sustainability and Tourism (Jürgen Schneider), Energy Department of the Ministry of Sustainability and Tourism (Losch)
- **Time frame:** Beginning of 2020, after the Analysis of Sub-Action 3.1. is completed
- **Costs:** personal resources of the EMAS Unit and the Energy Department of the Ministry of Sustainability and Tourism,
- **Dissemination & Communication:** Publication of the revised law in the Bundesgesetzblatt
- **Monitoring:** Minutes of the discussion meeting

**Sub-Action 3.3.:** EMAS experts will provide the Energy Department of the Ministry of Sustainability and Tourism with basis information for the revision of the law.

- **Stakeholders involved:** Energy Department of the Ministry of Sustainability and Tourism, experts of EMAS unit of the Ministry of Sustainability and Tourism
- **Time frame:** Spring 2020, after Sub – Action 3.2. is completed
- **Costs:** personal resources of the EMAS Unit in the Ministry of Sustainability and Tourism
- **Dissemination & Communication:** Document with basis information for the revision of the Austrian Energy Efficiency Law
- **Monitoring:** Document with basis information for the revision of the Austrian Energy Efficiency Law is completed

#### ACTION 4: *Training of Public Authorities*

Action	<i>Training of Public Authorities</i>
Type of action	<i>Promotion/information activity</i>
Voluntary scheme(s) addressed	<i>EMAS</i>
No. assigned in EMAS Joint Database	<i>AU-6GP</i>
Promoting region	<i>Austria</i>

#### Lessons Learnt

**Background** Authorities are rarely informed about EMAS, therefore there are no synergies between inspections and audits. Also, the actual implementation of regulatory reliefs is difficult if the relevant authorities do not know and do not trust EMAS.

This measure would be a very good opportunity to inform authorities about EMAS.

#### Description of the action

Public authorities are important stakeholders. With better informed authorities we hope to get a better relation between EMAS companies and authorities. Shorter inspections onsite will be a result, because the authorities accept the work of EMAS verifiers.

The action is based on the need to increase collaboration between public administrations and EMAS in order to:

- increase the level of knowledge of EMAS and it's legal requirements
  - understand potential operational problems related to the implementation of those requirements
  - facilitate better performance and compliance
  - Public administrators have their own academy for trainings and education. To reach the public administrators, the goal is to integrate EMAS in their trainings at the federal academy.
- **Stakeholders involved** relevant authorities, federal academy of public administration, EMAS experts, institutional governments, enforcement authorities
  - **Time frame** 01.01.2019 – 30.06.2020
  - **Costs** only personal resources for trainings; leaflets will be only electronically
  - **Dissemination & Communication** preparation of adapted training schedules regarding EMAS to provide information for the authorities eg. leaflets, best practices, presentations for the trainings. Trainings will be at the academy or in different authorities, also for environmental inspectors

- **Monitoring** by number of trainings, number of trained and informed public authority officers regarding EMAS

**Sub-action 4.1.:** An analysis regarding the schedule and program of the federal academy of public administration schedule will be carried out. The focus will be put on possible synergies with EMAS.

- **Stakeholders involved** federal academy of public administration, EMAS experts
- **Time frame** 01.01.2019 – 30.03.2018
- **Costs** personnel costs for the research
- **Funding sources** contract with Ministry of Sustainability and Tourism, EMAS Unit
- **Dissemination & Communication:** Report including the analysis findings
- **Monitoring:** final report including the analysis findings

**Sub-action 4.2.:** Based on the findings of Sub-Action 4.1. adapted training schedules for the federal academy of public administration will be implemented. Information needed for the preparation of Sub-Action 4.3. will be researched (such as Best Practises etc.)

- **Stakeholders involved** federal academy of public administration, EMAS experts
- **Time frame** 30.03.2019 – 30.06.2019
- **Costs** : personnel ressources
- **Funding sources** contract with Ministry of Sustainability and Tourism, EMAS Unit
- **Dissemination & Communication:** adapted training schedules will be published
- **Monitoring:** adapted training schedule

**Sub-action 4.3.:** The federal academy of public administration will be provided with information eg. leaflets, best practices and presentations about EMAS and regulatory reliefs in regard with EMAS. In this actions the information will be prepared and distributed.

- **Stakeholders involved** federal academy of public administration, EMAS experts
- **Time frame** 30.06.2019 – 31.12.2019
- **Costs:** personnel ressources
- **Funding sources** contract with Ministry of Sustainability and Tourism, EMAS Unit
- **Dissemination & Communication:** leaflets, best practices and presentations
- **Monitoring:** number of leaflets, best practices and presentations

**Sub-action 4.4.:** Trainings will be started in the Western Austrian region as a pilot project

- **Stakeholders involved:** relevant authorities, federal academy of public administration, EMAS experts, institutional governments, enforcement authorities
- **Time frame:** 01.01.2020 - 30.6.2020
- **Costs:** personnel resources of EMAS Unit in the Ministry of Sustainability and Tourism and EMAS Team Environmental Agency Austria
- **Funding sources:** contract with Ministry of Sustainability and Tourism, EMAS Unit

- **Dissemination & Communication:** leaflets, information about best practices, presentations for trainings
- **Monitoring:** number of trainings using EMAS information, number of trained and informed public administrators regarding EMAS

**ACTION 5: Environmental Inspections – Using Synergies between EMAS verification and environmental inspections**

<b>Action</b>	<i>Environmental Inspections – Using Synergies between EMAS verification and environmental inspections</i>
<b>Type of action</b>	<i>Reduced reporting and monitoring requirements</i>
<b>Voluntary scheme(s) addressed</b>	<i>EMAS</i>
<b>No. assigned in EMAS Joint Database</b>	<i>AND-6GP-ADD</i>
<b>Promoting region</b>	<i>Andalusia</i>

**Lessons Learnt**

- **Background:** In Austria, there is currently no communication between EMAS verifiers and environmental inspectors therefore no synergies between them are used at the moment. However, one outcome of our stakeholder workshop in Vienna was: Synergies between different inspections (such as EMAS audits and environmental inspections) should be used. Environmental Inspectors should promote EMAS, but at the moment they are not well informed about EMAS.

**Description of the action:** 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). The action will also focus on the BAT Documents with implementing decisions regarding environmental management (eg. life stock - Intensivtierhaltung), as these implementing decisions can be met with EMAS.

- **Stakeholders involved:** inspectors, verifiers, Ministry of Sustainability and Tourism Department: Plant-related Environmental Protection, Environmental Assessment & Air Pollution Control and EMAS Unit, Ulf Steuber - Land Steiermark
- **Time frame** finished by 30.06.2020
- **Costs**
- **Funding sources** contract with Ministry of Sustainability and Tourism, EMAS Unit
- **Dissemination & Communication** preparation of adapted training schedules regarding EMAS to provide information for the inspectors eg. leaflets, best practices, presentations for the trainings. Trainings will be at the academy or in different authorities, also for environmental inspectors
- **Monitoring:** number of trainings, number of number of trained and informed inspectors regarding EMAS

**Sub-Action 5.1.:** An analysis regarding the current BAT Documents implementing decisions and the schedule and programm of special trainings for inspectors will be carried out. The analysis will also focus on synergies between EMAS verification and environmental inspections

- **Stakeholders involved:** Ministry of Sustainability and Tourism Department: Plant-related Environmental Protection, Environmental Assessment & Air Pollution Control and EMAS Unit, Ulf Steuber
- **Time frame:** 1.1.2019 - 30.6.2019
- **Costs:** personnel resources of EMAS Unit in the Ministry of Sustainability and Tourism and EMAS Team Environmental Agency Austria
- **Funding sources** contract with Ministry of Sustainability and Tourism, EMAS Unit
- **Dissemination & Communication:** Report including the analysis findings
- **Monitoring:** final report including the analysis findings

**Sub-Action 5.2.:** Based on the findings of Sub-Action 5.1. adapted training schedules for environmental inspectors including the synergies between EMAS verification and environmental inspections will be implemented. Information needed for the preparation of Sub-Action 5.3. will be studied (such as Best Practises etc.)

- **Stakeholders involved:** Ministry of Sustainability and Tourism Department: Plant-related Environmental Protection, Environmental Assessment & Air Pollution Control and EMAS Unit
- **Time frame:** 30.6.2019 - 31.12.2019
- **Costs:** personnel resources of EMAS Unit in the Ministry of Sustainability and Tourism and EMAS Team Environmental Agency Austria
- **Funding sources** contract with Ministry of Sustainability and Tourism, EMAS Unit
- **Dissemination & Communication:** adapted training schedules will be published
- **Monitoring:** adapted training schedule

**Sub-Action 5.3.:** Environmental inspection trainers and environmental inspectors will be provided with information eg. leaflets, best practices and presentations about the synergies between EMAS verification and environmental inspections. In these actions the information will be prepared and distributed.

- **Stakeholders involved:** Ministry of Sustainability and Tourism Department: Plant-related Environmental Protection, Environmental Assessment & Air Pollution Control and EMAS Unit, inspectors and trainers
- **Time frame:** 30.6.2019 - 30.6.2020
- **Costs:** personnel resources of EMAS Unit in the Ministry of Sustainability and Tourism and EMAS Team Environmental Agency Austria
- **Funding sources:** contract with Ministry of Sustainability and Tourism, EMAS Unit
- **Dissemination & Communication:** leaflets, information about best practices, presentations for trainings



## DECLARATION OF RESPONSABILITY

<b>Date</b>	17.4.2019
<b>Signature</b>	Andreas Tschulik 
<b>Stamp of the organisation (if available)</b>	<b>Bundesministerium für Nachhaltigkeit und Tourismus</b> Abt. V/7 A-1010 Wien, Stubenbastei 5

