

LIFE + Environment Policy and Governance

TECHNICAL APPLICATION FORMS

Part B – Objectives and expected results

- All forms in this section may be lengthened, so as to include all essential information.

SUMMARY DESCRIPTION OF THE PROJECT

Project title: BRAVE – Better Regulation Aimed at Valorising EMAS

Project objectives:

The BRAVE project aims at supporting the full integration of EMAS (and of other voluntary certification schemes, such as the EU Ecolabel) in the EU and Member States environmental legislation as a leverage to facilitate its implementation by all the organizations (better regulation) and to remove, reduce, simplify the administrative costs and burdens for the EMAS registered organizations, as well as for companies adopting the EU Ecolabel or other forms of certification recognized according to Art. 45 of EC Regulation 1221/09, as a way to encourage the adoption and dissemination of voluntary environmental certification (regulatory relief).

Better Regulation means that other legal instruments (as Command and Control regulations) are modified so that burdens on organisations participating in EMAS are removed, reduced or simplified with a view to encouraging the efficient operation of markets and raising the level of competitiveness.

Regulatory Relief means that a registered (or certified) organization is considered as being compliant with certain legal requirements relating to the environment laid down in other legal instruments, identified by the competent authorities).

The BRAVE project, more specifically, aims at demonstrating that:

- a “better regulation” in environmental policies is possible if voluntary schemes, as EMAS and the EU Ecolabel, are effectively and proactively used in the development of new legislation (and in the revision of the existing EU Directives and national / regional laws) as a means to support the implementation phase by the front-runner companies and organisations, in such a way to valorise the activities and commitments foreseen by these schemes to comply “more easily” and more efficiently with mandatory requirements;

- these measures are feasible for all the EU member states and practicable at the EU regulatory level with a minimum effort both in policy making (e.g.: drafting new or renovate directives or legislative acts) and in policy implementing (changing permitting procedures, communication flows, control modalities, administrative rules, fee payments, etc. for voluntary certified companies or organisations;

- the adoption of an Environmental Management System, as well as other tools included in the voluntary certification schemes (e.g.: self assessment in Audit, environmental data monitoring for the EU Ecolabel, etc.) can be a strong guarantee that a company is able to comply with environmental legislation, especially in the process of its continuous evolution in time;

- the companies (and organisations) that apply a voluntary certification scheme, such as EMAS, deserve “regulatory relief” and should be incentivised under the administrative point of view (e.g.: permits, controls, etc.) because this can lead to a better and more efficient application of the environmental policy, and even of traditional Command and Control instruments;

- if “better regulation” and “regulatory relief” are implemented as described above, this can yield benefits and advantages both for companies (savings, organisational efficiency, better control and timely adaptation to policy changes) and for public bodies involved in policy making and implementing (time efficiency in managing the procedures, cost savings in control activities, timely communication of environmental data coming from companies, personnel motivation and responsibility, etc.);

- all in all, this can create a virtuous cycle in which companies are strongly incentivised to adopt voluntary schemes by legislation, and voluntary schemes are really capable of supporting registered or certified companies in being compliant with legislation, in the end producing an improvement in their environmental impact.

In order to demonstrate what has been explained above, the BRAVE project foresees the following actions and means.

Actions and means involved:

The project consists of 9 actions: the first two (*Project Management and Monitoring*) dedicated to project management while the others are operative actions.

The action 1 defines partner roles and their responsibilities and the action 2 describes the tools to evaluate the progress achieved by the BRAVE project. During the action 2 will be activated a *Monitoring team* composed by actors which operate in the regions that support the project (Andalusia, Basilicata, Friuli Venezia Giulia, Liguria, Lombardia Toscana, Valencia), an *Internal auditor*, responsible for checking the correspondence between the “state of the art” of the project and the expected results and deliverables and a *Monitoring tool* for assessing the progress of the BRAVE through quantitative indicators.

The action 3 “*Policy making and implementing*” aims at analyzing the Environmental Regulation at European, National and Regional level to search simplification opportunities for the EMAS registered companies. This action also provides the analysis of the state of the art and effectiveness of measures concerning better regulation and regulatory reliefs based on EMAS and on other forms of certification in Europe. This action provides an overview of the existing experiences about regulatory reliefs, incentives or other simplification measures for EMAS registered organizations. The advantages and benefits achieved in other experiences will emerge in this deliverable and may be promoted between companies to encourage the dissemination of EMS.

The aims of the action 4 “*Policy innovation*” is the elaboration of better regulation and regulatory relief proposals. Three kinds of Working Groups, Regional, National and European, will elaborate “better regulation” and “regulatory relief” proposals at the three legislative levels.

Moreover, the BRAVE project foresees the creation of two tools for consultation activities: Regional Consultation Board (RCB) and Project Consultation Board (PCB). These Consultation Boards will guarantee a large sharing of the proposals emerging from the project and the involvement of public authorities and enterprises in the project.

The “better regulation” and “regulatory relief” proposals will be tested during the action 5, “Testing in field”. In this action the project partners will select the proposals to be tested and will identify the Competent Authorities to involve and many companies, identified and involved thanks to the support of their trade associations that signed the support letter for BRAVE.

At the end of this action the partners will revise and adjust the BRAVE proposals in accordance with the results of the testing in field.

The aim of action 6 “*Adoption*” is the implementation of legislative acts and administrative procedures emerging from the BRAVE actions (action 4 and 5). The partners define a methodology to select a set of proposals for “better regulation” and “regulatory relief” to apply at regional and national level.

Through this action will achieve the improvement of the environmental legislation for the EMAS registered organizations and the ECAP aims.

During the action 7, “*Communication and training*” the partners define the “Guidance tool for the EMAS-based regulation and better regulatory relief” for the operative application of better regulation and regulatory relief as identified e.g. in the Action Plan of ECAP or in Inter-institutional agreement on better law-making (2003/C 321/01). The Guidance (on-line on the project web-site) will be useful both for the actors directly involved in the project and for external actors, such as other states or regions.

This action also provides the implementation of a set of training and communication activities (Communication Plan) aimed at diffusing the knowledge about the existing incentives and training how this incentive could be applied.

The action 8, “*Networking with other projects*” aims at identifying previous and present projects on the issues of Better Regulation and Regulatory Relief to find synergies with the BRAVE. The main tool for this action are the e-mail, the web site and the active networking on the project topics.

The “*Dissemination*” (action 9) of project results is one of the most important actions of the project. The main tool to disseminate the BRAVE is the web site, but a lot of communication activities will be implemented. This action provides public conferences, workshops and meetings, local, national and international publication and a project CD-Rom that describes the project activities and its results.

Expected results (outputs and quantified achievements):

The BRAVE project will achieve the following results.

The main expected result is to identify and develop potentially effective measures for Better Regulation and Regulatory Relief, actually implement and adopt some of them in order to test their usefulness and efficiency (and related benefits), with the final aim of setting up tools and training activities to disseminate and spread the "good practices" experimented in the Regions involved in the project.

To better specify the expected outputs, we can quantify them as follows (for further details, see the "expected results section of each Action):

- 1 Regulation analysis including recommendations for considering EMAS registration (and other EU voluntary certifications, as clarified below) in the development of new legislation and revision of existing legislation at national (Italy and Spain) and regional level
- 1 updated Overview of existing experiences dealing with better regulation and regulatory relief, with an in-depth analysis of their level of application and effectiveness
- the constitution of 7 Regional Working Groups, 2 national Working Groups and 1 European Working Group, 7 Regional Consultation Boards: all this for a are aimed to widen as much as possible the definition process and the consensus bases for the proposed measures
- as many European, national, regional EMAS better regulation and regulatory relief proposals as possible (this result cannot be quantified ex ante, but the more the proposals will be, the better for the BRAVE project);
- 1 report that will contain both the "better regulation" and "regulatory relief" proposals related to the existing legislation and permitting procedures, control and inspection procedures, environmental tax and administrative fees reduction and the policy recommendations and proposals to European policy makers for considering EMAS registration under in the development of new legislation and revision of existing legislation;
- a list of at least 35 proposals to be tested in the Regions involved in the BRAVE project, accompanied by a list of the Competent Authorities and private companies available to be involved in the testing phase;
- a report about the results of the testing in field action, containing also the proposals revised on the basis of the results of the testing in-field.
- at least 3 regional proposals adopted (in each region) by the approval of legislative amendments or law proposals, the adoption of which will be communicated to at least 2 ministries to each of the 2 states (Italy and Spain);
- at least 50 new amendments downloadable from the project web-site.
- 1 guidance tool for the EMAS-based regulation and better regulatory relief;
- at least 3 training initiatives to disseminate and sensitise on the use of the guidance tool in each Region involved in the BRAVE project;
- at least 150 "Guidance tool for the EMAS-based regulation and better regulatory relief" downloaded from the project web-site.

Can the project be considered to be a climate change adaptation project? Yes
No

ENVIRONMENTAL PROBLEM TARGETED

The BRAVE project aims to support the full integration of EMAS in EU environmental legislation as a leverage to facilitate the implementation by the single organizations (better regulation) and to remove, reduce, simplify the administrative costs and burdens for the EMAS registered organizations, as well as for companies adopting the EU Ecolabel or other forms of certification recognized according to Art. 44 of EC Regulation 1221/09, as a way to encourage the adoption and dissemination of voluntary environmental certification (regulatory relief).

The Commission, while seeking to increase the levels of compliance among businesses, also works to improve and simplify environmental legislation to facilitate business and institution to meet the legal standards. Over the past few years, European leaders and the Commission have put increasing emphasis on streamlining the EU's regulation in order to increase its effectiveness. A range of initiatives have been launched by the Commission, the European Parliament and the Council to codify, consolidate and simplify existing legislation and to evaluate better the likely economic, social and environmental impacts of new regulatory proposals. Implementing regulations and laws entails costs. Some costs are linked to legal obligations to provide information either to public or private parties. Some legal obligations to provide information have become needlessly time-consuming, excessively complicated or useless. Unnecessary and disproportionate administrative costs may hamper economic activity and/or irritate business, citizens and public authorities. By reducing unnecessary reporting requirements businesses can spend more time on their core activities which may reduce production costs and allow additional investment and innovation, which in turn should improve productivity and overall competitiveness.

Small and medium-sized enterprises (SMEs) traditionally find it harder to comply with the environmental legislation due to the excessively complicated and time-consuming legislation and requirements.

The BRAVE project addresses this problem and it is compliant with the European environmental policy and legislation. In particular BRAVE aims to tackle in the same project the objectives and problems raised by three main European policies and acts:

1. Environmental Compliance Assistance Programme, "ECAP", (COM(2007) 379 final);
2. The EU Better Law-making and Better Regulation policies;
3. The aims of the recent Reg. 1221/2009 (Emas III) related to the better regulation and regulatory relief for the EMAS registered organizations.

I. ECAP Programme

Promoted by European Commission in 2007, the Environmental Compliance Assistance Programme, "ECAP", (COM(2007) 379 final) aims at helping small and medium-sized enterprises (SMEs) to comply with environmental legislation. The Programme was created to increase the level of regulatory compliance among SMEs which in Europe represent the 99% of all enterprises and the 57% of economic value added. Representing such a large percentage of economic activities, SMEs have a significant impact on the environment, especially considering their combined total impact across sectors. A British report estimated that SMEs accounted for the 60% of total carbon dioxide from business in the UK and the commercial and industrial waste from SMEs represent on average the 50% of the total. One of major problem for SMEs is the lack of awareness of their environmental impact and about environmental legislation applicable, so most of them have not introduced any practical measures to reduce their environmental impacts such as the Environmental Management System (EMS), which only 6% of firms have implemented. A survey among Polish SMEs (Polish Environmental Partnership Foundation, 2007) emphasizing that 86% of the interviewees declare that their companies do not have a negative impact on the environment or that the impact was not significant at all. Also where environmental legislation is applicable to SMEs, they tend to presume that they are complying and, as a result, full compliance is often the outcome of external action following an inspection, rather than an on-going process of checking that legal requirements are being met (Fairman & Yapp 2005).

ECAP affirm that one of the main barrier for SMEs to be compliance are the limited financial and human resources/expertise. This aspect is related to the many requirements and deadlines related to the environmental legislation that SMEs have to respect.

A report (Marshall 1998) estimated that SMEs account for the 60% of total carbon dioxide emissions from businesses in the UK and concluded that there is substantial room for improvement in energy efficiency and emissions reductions to be carried out by these companies. Another survey carried out in France showed that SMEs are to be held responsible for the 40-45% of all industrial air emissions, water consumption and energy consumption, as well as for the 60-70% of industrial waste production.

To overcome this situation the ECAP Action Plan identifies 5 priority fields:

- a) *Better Regulation in design and implementation of policies*, to facilitate and minimise the administrative burden of compliance for SMEs and to free their resources for improving compliance;
- b) *More accessible tailor-made environmental management schemes*, to integrate environmental concerns into the core business activities of SMEs in a coherent and cost-effective way
- c) Focused financial assistance and a multi-annual financial programme
- d) Building local environmental expertise for SMEs
- e) Improved communication and more targeted information

According to the first priority changes to the design and operation of legislation can, in some cases, help SMEs to meet their obligations more easily, by making requirements clearer and using simpler ways to achieve the same environmental objectives.

The second priority action of ECAP (More accessible tailor-made environmental management schemes) promotes the implementation of EMSs – Environmental Management Systems suitable for businesses and promotes their dissemination as an effective tool to improve the environmental legal compliance of SMEs. In accordance with ECAP the EMS, such as EMAS, has a more positive influence on the environmental performance of SMEs than a single inspection or compliance check. The experience of many SMEs shows that by implementing an EMS they are able to raise the organizational and management efficiency of the whole company (Biondi et al. 2000) and one of the most effective drives towards EMS implementation is the possibility of using the management tool as a support for pursuing legal compliance.

The BRAVE project aims at introducing and fostering the dissemination of EMAS according to the second priority action of ECAP, through better regulation and regulatory relief initiatives as specified by the first priority of the Programme.

2. EU Better Law-making and Better Regulation policies

The EU better regulation policy aims to improve the regulation, to better design regulation so as to increase the benefits for citizens, and to reinforce the respect and the effectiveness of the rules, and to minimise economic costs - in line with the EU's proportionality and subsidiarity principles.

Regulation is necessary and beneficial for many reasons: to ensure that markets function properly; to create a level playing-field for companies and financial institutions competing in the single market; to protect workers and consumers, health and the environment. At the same time regulation brings costs – for companies, public authorities and citizens – and these must be kept to a minimum. In driving forward the better regulation agenda, the Commission's aim has been to ensure that the regulatory framework helps to stimulate the entrepreneurship and innovation, allows businesses to compete more effectively and to exploit fully the potential of the internal market.

Over the last years, the Commission has made significant progress in implementing its better regulation agenda. To ensure that new legislation and policies are of the highest quality possible, it has rolled out a wide-ranging and ambitious impact assessment system. And together with the Member States, it is developing more efficient and effective approaches to ensuring that Community law is correctly applied. With the COM(2002) 278 the Commission established an "Action Plan" to simplify and improve the regulatory environment. The purpose of this communication from the Commission is to present to the European Council an Action plan introducing "a strategy for further coordinated action to simplify the regulatory environment" in accordance with the mandate issued by the European Council at Lisbon and confirmed at the Stockholm, Laeken and Barcelona summits.

An Inter-institutional Agreement (IIA) on Better Law-Making, signed in December 2003 by the three EU institutions (European Parliament, Council and Commission,) establishes a global strategy for better lawmaking throughout the entire EU legislative process. While recalling the commitments made by the Commission in its Better Regulation Action Plan, the IIA sets out the commitments of Parliament and Council in favor of better lawmaking.

In the COM(2005) 97 "Better Regulation for Growth and Jobs in the European Union" the Commission, among others, encourages Member States to further develop better regulation at their own level, when drafting new national legislation, through simplification of existing national legislation and through improved implementation of EU legislation at national level.

In January 2007 (COM (2007) 23 "Action Programme for Reducing Administrative Burdens in the European Union"), the Commission proposed an ambitious Action Programme to reduce the administrative burdens of existing regulation in the EU. It identified 42 pieces of legislation in 13 priority areas which represent an estimated €115 – 130 billion of administrative costs. On this basis it has put in place a programme to reduce administrative burdens to 25% by 2012, the target endorsed by the European Council in March 2007. Environment is one of the 13 legislation priority areas addressed by the Action Programme. The COM (2007) 23 identified 5 priority legislation acts in the field of environmental legislation that will be taken into account in the BRAVE project:

- Regulation (EC) No 1013/2006 of the European Parliament and of the Council of 14 June 2006 on shipments of waste;
- Directive 2008/1/EC of the European Parliament and of the Council concerning integrated pollution prevention and control (IPPC Directive);
- Waste Electrical and Electronic Equipment (WEEE) Directive 2002/96/EC;
- Directive 2000/53/EC of the European Parliament and of the Council of 18 September 2000 on end-of life vehicles;
- Directive 2003/105/EC of the European Parliament and of the Council of 16 December 2003 amending Council Directive 96/82/EC on the control of major-accident hazards involving dangerous substances

At the end of 2008, the Commission completed a comprehensive screening of the existing stock of EU legislation (Acquis). All major regulatory instruments, in total about 3 600 acts across different policy fields (Environmental legislation included), were examined to determine whether they are up to date or whether there is scope for simplification.

The “Third progress report on the strategy for simplifying the regulatory environment” COM (2009) 15 final, complements the third strategic review of Better Regulation in the European Union and reviews the considerable ground covered since the launch of the strategy, highlights success experiences and maps areas for future simplification action. So far, some 75 out of the 132 simplification initiatives have finalised their legislative process.

3. Regulation 1221/2009 (EMAS III)

A research in 2001 (Hamschmidt, 2001) showed that legal compliance is perceived as a relevant benefit deriving from ISO 14001 certification (59% of the sample). This outcome is supported by the results of the EVER study, carried out on behalf of European Commission, that provided very consistent outcomes, as far as this benefit is concerned (IEFE Bocconi et al. 2005). The interviewed with EMAS registered companies have identified as a important benefit of EMS:

- greater awareness of regulatory requirements (70% of interviewed);
- better compliance (69%);
- better planning of actions for legal and regulatory compliance (67%);

In the last years the interest for EMS (registered EMAS or certified ISO14001) has been increasing and involving a lot of productive sectors. From literature it seems likely that companies which have implemented a standardised EMS are better informed about environmental legislation, better organized to appropriately deal with it and better motivated to do so than other companies (Gabel and Sinclair-Desgagne,1998; Dasgupta et al., 2000). ECAP also follows this approach and suggests that the Public authorities accept a certified EMS as a reliable alternative to checks or inspections. This input could decrease the controls activities for the SMEs encouraging them to adopt SGA and to improve their environmental compliance.

The new Regulation (EC) No 1221/2009 of the European Parliament and of the Council of 25 November 2009 (EMAS III), promotes the same aim of ECAP and requires to adopt better regulation and regulatory relief. First of all, the article 44 states that the European Commission shall consider how registration under EMAS in accordance with this Regulation can be taken into account in the development of new legislation and revision of existing legislation, in particular in the form of regulatory relief (so that a registered organization is considered as being compliant with certain legal requirements relating to the environment laid down in other legal instruments ,identified by the competent authorities), and better regulation (whereby other legal instruments are modified so that burdens on organisations participating in EMAS are removed, reduced or simplified with a view to encouraging the efficient operation of markets and raising the level of competitiveness).

Furthermore, EMAS III include the following indications:

- Introduction to the Reg. 1221/2009 point 13: “The mechanism for establishing an organization’s compliance with all applicable legal requirements relating to the environment should be strengthened in order to enhance the credibility of EMAS and, in particular, to enable Member States *to reduce the administrative burden* of registered organizations by way of *deregulation or regulatory relief*”;

- article 38 (entitled “EMAS and other policies and instruments in the Community”) comma 2: “Without prejudice to Community legislation, notably competition, taxation and State aid legislation, Member States shall, where appropriate, take measures facilitating organizations to become or remain EMAS registered. Those measures may include, inter alia, the following:

- (a) *regulatory relief*, so that a registered organization is considered as being compliant with certain legal requirements relating to the environment laid down in other legal instruments, identified by the competent authorities;

- (b) *better regulation*, whereby other legal instruments are modified so that burdens on organizations participating in EMAS are removed, reduced or simplified with a view to encouraging the efficient operation of markets and raising the level of competitiveness”;

- article 44 (entitled "Integration of EMAS into other policies and instruments in the Community"): "The Commission shall consider how registration under EMAS in accordance with this Regulation can be:

1. taken into account in the development of new legislation and revision of existing legislation, in particular in the form of regulatory relief and better regulation as described in Article 38(2);
2. used as a tool in the context of application and enforcement of legislation;"

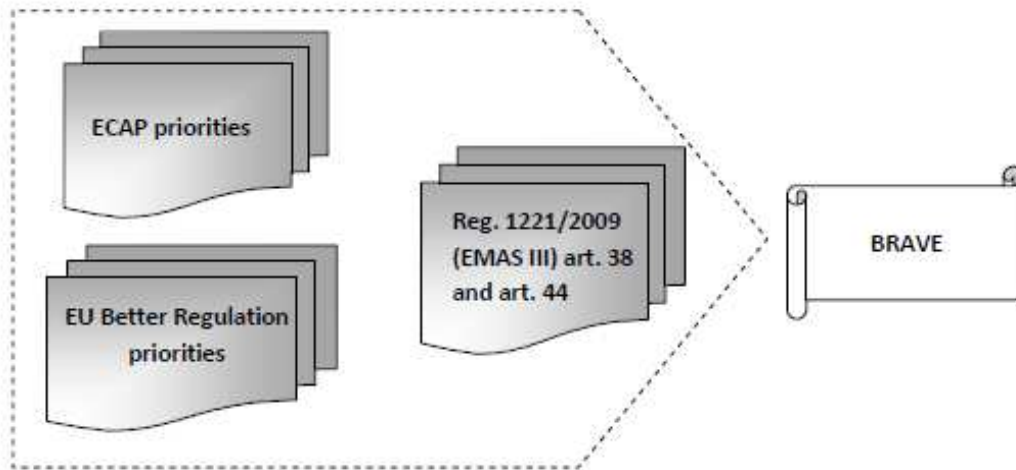


Figure: Graphical representation of the BRAVE projects.

The BRAVE project aims at connecting the approach of Better Regulation policies with the new EMAS Regulation and ECAP priorities, emphasizing the commitment of companies registered EMAS by granting them administrative and economic benefits. Companies' decision whether to join EMAS depends on the net benefits they expect from EMAS participation. Enhancing EMAS, companies are encouraged to implement this tool and improve their environmental regulatory compliance.

STATE OF THE ART AND INNOVATIVE ASPECTS OF THE PROJECT

As mentioned in the previous sections, at the end of 2008 the Commission completed a comprehensive screening of the existing stock of EU legislation (Acquis).

After this screening the Commission draw up a document entitled "Screening of DG Environment's Acquis". In this document, that could be considered the "state of the art" of better regulation initiatives in EU environmental legislations, the Commission highlighted the simplifications already implemented by the Commission in the period 2005-2008, the main instruments emended (Directives, Regulations, etc) and the scope for further simplifications. The document mentions legislative acts that surely will be involved by the BRAVE project activities (at European level or in their national implementing acts), as for example: Council Directive 91/689/EEC on hazardous waste, Council Directive 1999/31/EC on the landfill of waste, European Parliament and Council Directive 94/62/EC on packaging and packaging waste, Directive 2002/95/EC of the European Parliament and of the Council on the restriction of the use of certain hazardous substances in electrical and electronic equipment (RoHS), Directive 2002/96/EC of the European Parliament and of the Council on waste electrical and electronic equipment (WEEE), Directive 2000/60/EC of the European Parliament and of the Council establishing a framework for Community action in the field of water policy, Directive 2003/87/EC of the European Parliament and of the Council establishing a scheme for greenhouse gas emission allowance trading within the Community, Directive 2008/1/EC of the European Parliament and of the Council concerning integrated pollution prevention and control, Directive 2004/42/CE of the European Parliament and of the Council on the limitation of emissions of volatile organic compounds due to the use of organic solvents in certain paints and varnishes and vehicle refinishing products, Council Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment, etc

On the other hand, the Commission included in the new EMAS Regulation some new articles to strengthen both the capacity of the scheme to help organization in the management of the environmental compliance and a simplified access to the registration, especially for SMEs. The participation in EMAS is voluntary, but the new Regulation (EMAS III) aims at encouraging it through the use of simplified procedures for verifying and costs reductions for SMEs. The new Regulation considers EMAS registration as a culmination of a journey towards excellence in the field of environmental management, and states that in comparison of EMAS other forms of certification may represent intermediate steps. In fact, EMAS III continues to be based on the environmental management system introduced by ISO 14001, but complements specifically a distinctive set of requirements, starting by strengthening the mechanism to ensure the compliance with the environmental legislation.

The attention towards this aspect emerges promptly in many aspects of the new Regulation. Article 2, for example, defines the compliance with the regulatory obligations as full implementation of the obligations applicable to the organization being registered, including the requirements contained in the permits. Furthermore, it clarifies that the initial environmental review has to provide not only a comprehensive framework of obligations under applicable law, but also describe how the 'organization works to ensure the compliance. Another new aspect of EMAS III is related to internal audit to be aimed at evaluating the management system in relation to the respect of the environmental laws. For these reasons EMAS III could be considered one of the main important tools to implement ECAP priorities.

Despite the support that an EMS, especially EMAS registered, provides to improving the environmental compliance there are many barriers to its spread that the new Regulation has tried to overcome. Some of these barriers encompass a wide set of factors, ranging from the cost of implementation (and other economic factors) to the lack of support and guidance, from hindrances linked to the institutional framework and the verification/registration process to the lack of market recognition, and so on.

The Commission in the last revision of EMAS Regulation has introduced some simplifications and regulatory relief for reducing the administrative burdens.

The most innovative aspect of the BRAVE project could be considered the attempt to pursue simultaneously the two objectives of Better Regulation, on one side, and of EMAS as a tool to implement ECAP, on the other, in only one initiative.

In some cases the EU Institutions have published acts that foster together the two mentioned objectives. One case is related to the Recommendation of the European Parliament and of the Council of 4 April 2001 n.331 "providing for minimum criteria for environmental inspections in the Member States".

In this Recommendation related to the control and inspection procedures, the section IV states: "Plans for environmental inspections should: (...) take into account relevant available information in relation to specific sites or types of controlled installations, such as reports by operators of controlled installations made to the authorities, self monitoring data, environmental audit information and environmental statements, in particular those produced by controlled installations registered according to the Community eco-management and audit

scheme (EMAS), results of previous inspections and reports of environmental quality monitoring". This Recommendation is far to be fully applied as underlined by the Commission in 2007.

The state of the art in this field highlights that until today there have been few simplifications introduced in inspection activities for the EMAS registered organisation. The Recommendation is currently under review. In this regard, European Commission has contracted COWI/ECORYS to produce a study on the environmental, social, and economic impacts of various options for the further development of the Recommendation. Some of relevant stakeholders involved in this revision phase of the Recommendation by the consultants of the Commission are involved in the BRAVE "Consultation Board" and they are supporting the project with the signing of support letters. The BRAVE project, if cofounded, could be connected with this EU initiative assuring added value by contributing in the achievement the European objectives in this field.

Seeking in EU projects and ECAP best practices database emerges that few international projects have aimed the objectives of BRAVE using the same method and approach. Based on what has been said so far, the BRAVE project appears to be strongly innovative.

More initiatives have been carried out at national level by the national EMAS Competent Bodies or national and regional Governments.

Some of these experiences are already underway in France, Italy, Germany and Spain and led to the spread of EMAS thereby enhancing the level of compliance with environmental legislation.

For example, the Directions Régionale de l'Industrie de la Recherche et de l'Environnement, in France, does take EMAS registration or ISO14001 certification into account by reducing the frequency of reporting requirements for those sites. In Germany, EMAS provides additional advantages, because public bodies provide more information and subsidies to EMAS participants and only grant regulatory relief to EMAS registered companies. In Bavaria companies have signed an agreement with public authorities that promised, among other things, financial support for the application of environment-friendly technologies and to provide a lighter regulatory touch for EMAS registered sites. Other Member States have fostered initiatives in better regulation and regulatory relief to favour EMAS dissemination, but these appears as independent and not adopted in a systematic way.

BRAVE project will be developed in 7 regions of two Member States: Italy and Spain. Today Italy and Spain are the countries with the highest number of EMAS registered companies, after Germany. At June 2010, in Spain there were 1227 EMAS registered organisation and 1035 in Italy.

The regions involved in the project have long promoted the EMS and are planning measures and benefits for companies that have achieved EMAS or ISO 14001.

The Tuscany region has promoted and supported many projects to disseminate environmental certifications and since 2006 has introduced the reduction of a regional tax (IRAP) for companies EMAS registered or ISO 14001 certified. There are 127 organizations EMAS registered in Tuscany in several sectors such as paper production, waste management, tanning, shipping and many others. One of the main Tuscan experience for the dissemination of EMS is the project PIONEER (financed by Life Programme) during which 22 organizations have achieved EMAS registration. In 2008, the Region of Tuscany has co-funded the ECCELSA Life plus project aimed to improve the environmental compliance for SMEs. Since some years the regional Government with the support of SSSUP (Lead Partner) is promoting a Voluntary Agreement among several stakeholders that aims to identify regulatory relief for EMAS organisations. This activity will be valorised in the BRAVE project and could be considered a feasibility study that confirms the interests of Tuscany Region in the aims of the project.

Basilicata is a region in the south of Italy, that covers 9,992 km² and in 2010 had a population of 588.662 inhabitants. The region is divided into two provinces: Potenza and Matera.

In the Region 15 organisations are registered EMAS, whose activities are energy production, supply of services, the food sector, the creation of infrastructure, processing of paper and wood, and education.

The Basilicata region has taken some measures to encourage the diffusion of EMAS, especially among companies operating in the energy sector. These rules have created incentives and benefits for power plants EMAS registered.

Friuli Venezia Giulia has long invested in developing policies for sustainable development. There are 32 organizations registered in EMAS including many municipalities. The Friuli Venezia Giulia region has invested mainly in the development of renewable energy and energy efficiency of buildings but identify the objectives of the project as a priority.

In Liguria there are 27 organizations EMAS registered and many others certified ISO 14001. The region of Liguria has participated in many European projects for sustainable development and to increase the number of EMAS registrations, including the ECCELSA in which it participates with two clusters.

In recent years, Liguria has taken several measures to create benefits for enterprises with EMS and to improve their environmental performances. The most important measure is the introduction of environmental criteria in public contracts in 2007 to reward companies EMAS and ISO 14001.

The Lombardy region has long promoted the dissemination of EMS and benefits for registered companies. In total there are 121 organizations with EMAS registration and many others have the ISO 14001 certification.

The Lombardy Region has conducted a study to perceive the benefits from EMAS companies and their expectations. The region has collaborated with IEFÉ Bocconi and Arpa Lombardia (partners) and industrial association of Lombardy Region (support letter signed) in past activities with similar objectives of BRAVE project. They have identified some simplification opportunities and these could be valorised and implemented during the BRAVE project.

There are 50 organizations EMAS registered in Valencia operating in energy and chemical field. Valencia has built several projects to promote environmental certifications and creating better regulation for companies engaging in environmental improvement. The rules adopted by regional authority have granted many economic benefits for EMAS companies, reducing their taxes and creating incentives to support the implementation of EMS.

In Andalusia there are about 60 registered organisations. In the field of the project, IAT (partner of the project) began in 2009 a study on the "Coordination of the Mechanisms of Regulation Environmental Control and Volunteers" with the aim of analysing, on one hand, the existing interrelation in the requirements established in the rules related to the IPPC Directive and the ones established in the regulations of the Environmental Management Systems, and on the other hand, the activities derived from the IPPC Law and EMAS Regulations which might be coordinated, integrated and/or simplified by the Ministry of Environment of the Regional Government of Andalusia.

Each Regional Government, very important for the adoption phase of BRAVE project, participate to the project as cofounders (Lombardy and Basilicata), signing a support letter (Tuscany, Andalusia, Friuli Venezia Giulia, Liguria) or being partner (CTL-Valencia). Some regions involved (Tuscany, Lombardy, Liguria) are member of CARTESIO Network a network of six Italian Regions supported by SSSUP that promote initiatives in the field of sustainability. Besides some of the partners are involved in common initiatives with similar objectives of the project. This aspect strength the partnership and its capacity to achieve the project objectives. In particular as mentioned d before SSSUP work together Tuscany Regional Government in various initiatives. IEFÉ Bocconi collaborates with ARPA, Lombardy Region and other stakeholders in EMAS and better regulation related initiatives. IAT, CTL and SSSUP are together partners of a project entitled MED-IPPC-NET cofounded by MED Programme and regarding the implementation of IPPC Directive in 7 European Region. IAT have various initiatives with Regional Government of Andalusia. Ambiente Italia collaborates with Basilicata and Friuli Region in activities to favour the EMAS dissemination.

In the two involved Countries some initiatives related to EMAS Better Regulation and Regulatory relief confirm the interest in the objectives of the project.

In Spain the Royal Decree 509/2007, of 20th April, approving the Regulation for the development and enforcement of the Integrated Pollution Prevention and Control Directive (IPPC) considers, among its articles, the possibility that the autonomous communities establish some measures to speed up and simplify the issuing procedures for the granting and renewal of the Integrated Environmental Authorisations, as well as the mechanisms to check the fulfilment of the obligations derived from the Integrated Environmental Authorisations to the installations which apply an Environmental Management System (according to the requirements of the UNE-EN ISO 14001 international standard and/or the EMAS Regulations).

The recent modification of the Royal Decree 509/2009, of 20th April, approving the Regulation for the development and application of the Law 16/2002 on Integrated Pollution Prevention and Control by the Royal Decree 367/2010, of 26th March, amending various regulations in the environment area to bring them into conformity with the Law 25/2009, of 22nd December, amending various laws in line with the Law on Free Access to Service Activities and the Exercise Thereof, obliges the Autonomous Communities to establish some rules to speed up and simplify the granting and renewal of the Integrated Environmental Authorisations permits, as well as the mechanisms for checking the fulfilment of the obligations, derived from them, of the installations which apply an Environmental Management System of EMAS type.

The Spanish law 26/2007 introduce EMAS simplifications in the field of environmental responsibility. At regional level, the Regional Government of Andalusia is applying fiscal deductions to the investments carried out by EMAS registered organisations in infrastructures and equipment intended to the control, prevention and correction of the atmospheric and water pollution.

In Italy the EMAS registered organisations covered by the IPPC Directive benefit of some simplifications. Firstly the Environmental Integrated Authorisation (the permit issued according to the IPPC Directive) expired after 8 years instead of 5. Besides they benefit of a reduction of administrative fees for the permitting procedure and inspection procedures. Another important regulatory relief is foreseen by the Italian Legislative Decree n. 152/2006. The article 212 foresees a reduction of 40% of financial guarantees required to the companies in waste management sector. Thank to this regulatory relief EMAS registered organisations or certified ISO14001 of waste sector can achieve relevant economic savings.

From the described context emerges that some simplification proposals have been just adopted in the past. These initiatives seem to be with not an homogeneous approach and they are not connected the one with the other. Regional Government often carry out single initiatives without coordination. Moreover when the simplification act is adopted often is not fully applied. For example in Italy, where the Competent Authorities for the permitting procedures are the provinces, these bodies have in many cases raised doubts of legal

legitimacy in the adoption of the EMAS-related regulatory simplification. For this reason they didn't apply or propose simplification act to favour EMAS organisations, making the EC policy of Better Regulation completely fail.

Nevertheless, in the very few cases in which simplification is fully applied, it demonstrates to have a relevant influence in the adoption of an Environmental Management Systems. For example, the state of the art of the effectiveness of the mentioned simplification of the article 212 of Italian Legislative Decree n. 152/2006 and regarding the reduction of financial guarantees for the certified companies of waste sector is described in the following table. Italian national Government introduced this simplification in April 2006. The simplification is currently applicable to both Emas and ISO14001 certified organisations.

The table shows the increase of ISO14001 certified organization in waste management sector with respect to the total number of ISO14001 issued certificates.

<i>Economic sector</i>	<i>ISO14001 certified sites in April 2006</i>	<i>ISO14001 certified sites in December 2009</i>	<i>Variation %</i>
All economic sectors	7.962	12.077	+ 51,6%
Waste Management sectors (EA codes 24 and 39)	30	1.766	+ 5786%

Figure: variation of ISO14001 certified sites in management sector in Italy after the introduction of simplification in the Legislative Decree n. 152/2006 (source: www.accredia.it – elaboration of the Authors).

Before the introduction of the simplification there were only 30 sites certified ISO14001 in the waste management sectors. In December 2009 the certified companies of waste management sectors were about 14% of total certified sites. The waste management sector shows a relevant increase respect to the total number of certified sites. Data about EMAS are not available, however we retain the effectiveness of the simplification has been similar to which described in the table.

The state of the art confirm that, if fully applied, better regulation and regulatory relief could really involve the industrial organisations in the adoption of EMAS according to ECAP objectives.

DEMONSTRATION CHARACTER

The BRAVE project is essentially a demonstrative project, insofar as it aims at showing and proving that:

- a “better regulation” in environmental policies is possible if voluntary schemes, as EMAS and the EU Ecolabel, are effectively and proactively used in the development of new legislation (and in the revision of the existing EU Directives and national / regional laws) as a means to support the implementation phase by the front-runner companies and organisations, in such a way to valorise the activities and commitments foreseen by these schemes to comply more easily and more efficiently with the mandatory requirements
- these measures are feasible for all the EU member states and practicable at the EU regulatory level with a minimum effort in policy making (drafting new or renovate directives or legislative acts) and implementing (changing permitting, communication, control, administrative, fee payment modalities for voluntary certified companies or organisations;
- the adoption of an Environmental Management System, as well as other tools included in the voluntary certification schemes (e.g.: self assessment, environmental data monitoring, etc.) can be a strong guarantee that a company is able to comply with environmental legislation in the process of its continuous evolution in time;
- the companies (and organisation) that apply a voluntary certification scheme, as EMAS, deserve “regulatory relief” and should be incentivised under the administrative point of view (e.g.: permits, controls, etc.) because this can lead to a better and more efficient application of the environmental policy;
- if a “better regulation” and a “regulatory relief” are implemented as described above, this can yield benefits and advantages both for companies (savings, organisational efficiency, better control and timely adaptation to policy changes) and for public bodies involved in policy making and implementing (time efficiency in

managing the procedures, cost savings in control activities, timely communication of environmental data coming from companies, personnel motivation and responsibility, etc.);

- all in all, this can create a virtuous cycle in which companies are strongly incentivised to adopt voluntary schemes by legislation, and voluntary schemes really support registered or certified companies in being compliant with legislation, in the end producing an improvement in their environmental impact.

In order to demonstrate what has been explained above, the BRAVE project needs to be able to actively involve many stakeholders in pursuing the same objectives and measure the results that it is going to achieve, especially with reference to the benefits perceived by the economic and institutional system.

First of all, the “demonstration” targets characterizing the BRAVE project necessary imply a high level of involvement of stakeholders (both institutional ones and representatives of enterprises), and the opportunity, after its completion, of evaluating the effects produced in the medium term by the proposed and, more importantly, by the adopted “better regulation” and “regulatory relief” measures. Moreover, these measures represent (as detailed below) benchmarks for other territorial and institutional contexts, fostering the applicability and transferability of the results achieved in the Regions involved in the BRAVE project also in other regions and Member States. Because of this, the communicational and disseminating aspects of the project will be particularly taken care of, as well detailed in the Action 9.

The technical scale of the project can be considered as first full-scale application; the project finds its origin in the contents of articles 38 and 44 of the new EMAS Regulation (Reg. EC 1221/09) and in other strategic policies and programmes promoted by the European Commission (such as the Action Programme for Reducing Administrative Burdens in the European Union, the ECAP – “Small, clean and competitive” Communication, etc.).

During the development of the project, activities and results will be continuously monitored, in order to assure that the objectives and targets foreseen in each action are effective and useful, so to guarantee that they can represent examples of “good practice” in applying a Better Regulation that can be really and easily emulated by other interested actors. In particular, in order to assure a continuous measurement of the results, the performance indicators established in the technical actions will be monitored all along the whole project, and a particular attention will be given to the respect of deadlines and deliverables. In terms of demonstration character of the BRAVE project, in order to evaluate its overall effectiveness, a particular relevance is guaranteed by two specific indicators:

> number of stakeholders (not partner) involved in the project

> number of adopted and experimented amendments in the different territorial contexts (both national and regional/local).

These indicators will measure how much the BRAVE project will succeed in being really demonstrative: i.e. in providing suggestions, benchmarking experiences and indications on “good practice” in applying a “better regulation” to the widest possible number of stakeholder.

At a macro level, the project is coordinated by the Steering Committee, constituted by representatives of each partner and, eventually, other actors involved in the various actions (for example, the stakeholders involved in the technical Action 3 and 4) and the members of CARTESIO Network and in the red EEN. The official meetings of the *Steering Committee* are organized every four months. During these meetings the partners verify the progress of the BRAVE project and validate the methodological choices of the project. The Steering Committee will have the crucial task of evaluating the transferability and the replicability of the proposed measures in territorial and sectoral contexts other than those of the testing experiences carried out in the BRAVE project. The essential aim of this evaluation will be to assess the results achieved by the proposed “better regulation” and “regulatory relief” measures, measure their “demonstration potential” and suggesting to the BRAVE partners some ways and modalities to diffuse these measures to make them a benchmark for all the interested EU institutions, trade associations and stakeholders at large.

The state of progress will be monitored by a specific Monitoring Team that periodically will examine and assess the state of the art and the progress achieved by the BRAVE project. It will be composed by actors which operate in the Regions that support the project (Andalusia, Basilicata, Friuli Venezia Giulia, Liguria, Lombardia Toscana, Valencia), but participation can be further extended. The Monitoring Team will use, as a support for its activities, a Monitoring Tool for assessing the progress of the BRAVE through quantitative indicators (details in the description of the Action 2, where a list of monitoring performance indicators is furnished). These indicators will be conceived in such a way to measure the effectiveness and the efficiency of the proposed measures, and especially of their capability to achieve the expected results in term of:

- “feasibility” of the measures

- effectiveness on the policy making and implementing

- benefits in terms of cost savings, time optimisation and organisational efficiency
- starting up a “virtuous cycle” that leads to better legal compliance and environmental performance by companies.

From the technical-operative point of view, the BRAVE project foresees the constitution of three kinds of Working Groups (WGs), that will be involved in the elaboration of the proposals. The three working groups will elaborate “better regulation” and “regulatory relief” proposals at the three legislative levels covered by the BRAVE project: European level, national level and regional/local one. Since the project aims to experiment the implementation of legislative simplifications in favour of EMAS registered organisations (as well as other certified companies, as detailed in the actions of the BRAVE project), the involvement of a large number of stakeholders (such as representatives of local authorities, national and international policy makers, representatives of local and national trade associations, environmental protection public agencies, etc.) is crucial. From this point of view the BRAVE project (for details see Action 4.2) foresees to set up two kind of Consultation Boards: Regional Consultation Boards (RCB) and Project Consultation Board (PCB). The Regional Consultation Boards aim to share the simplification proposals that will be drawn up by the Regional Working Groups. The RCB will guarantee that all the local needs according to the themes tackled by the BRAVE project will be considered in the simplification proposals. A large number of external stakeholders (for instance: representatives of the regional Governments, representatives of the local institutions that have the responsibilities of the environmental administrative procedures and in the inspection and control activities, representatives of industrial and trade Associations of the productive sectors, etc.) participate in the RCB. On the other side, the PCB aims to share and approve the simplification proposals elaborated by the National Working Groups and the European Working Group and is characterized by the presence of national and international institutional and private representatives. The continuous sharing of methods, actions and outputs amongst partners of the BRAVE project and other stakeholders represent the most important element oriented to guarantee and monitor the effectiveness of the project.

In a territorial perspective, finally, the BRAVE project has a high level of demonstration power, from three different points of view: European, national and regional/local:

- At *European level* the project gives two levels of information: on one side it gives a picture of the adopted “better regulation” and “regulatory relief” initiatives promoted by the legislation of the European Union (Regulations and Directives); on the other side, in future perspective, the BRAVE project aims to stimulate a better regulation in the environmental field, in respect to existing legislative measures and to those that are being issued.

- At *national level* (in respect to the two involved countries: Italy and Spain), the project aims to establish amendments to the present regulations in order to favor a simplification for EMAS registered enterprises. This element is useful, in the perspective of demonstration character for other countries, from two points of view:

- > methodological: in respect to the adopted steps and tools (in the current state analysis, in the stakeholder involvement process, in the proposals elaboration, in sharing proposals with stakeholders, in their experimentation)

- > pertaining to content: in respect to contents of European acts (in particular the Directives) acknowledged by each country

- At *regional/local level*: the experimented and adopted amendments in the directly involved Regions (and, eventually, in the sub-regional contexts), can be received and adopted also by other countries and territorial departments. The BRAVE experience can represent, from this point of view, a real, practicable and effective example of simplification and improvement of local legislation.

EU ADDED VALUE OF THE PROJECT AND ITS ACTIONS

In 2001, the European Union launched its Sustainable Development Strategy in Gothenburg. A revision of this strategy was adopted in 2009, confirming that "Sustainable development remains a fundamental objective of the EU under the Lisbon Treaty". Within the revision, a more integrated approach to policy making is proposed, based on better regulation (impact assessments) and on the guiding principles for sustainable development (adopted by the European Council of June 2005). These principles include the improvement of the coherence of EU policies by adapting policies to the objectives of sustainable development.

Aiming at a full integration of EMAS into national and local environmental policies, the BRAVE project keeps the spirit of the Gothenburg strategy by improving the coherence of European policies and continuing the process of adapting them to the objectives of sustainable development.

Within this global approach, the project and its actions will contribute to the achievement of European environmental objectives as follows:

BRAVE will support the implementation of the 6th Environmental Action Plan (EAP):

The 6th EAP¹ pursues the full integration of environmental protection requirements into all Community policies and actions and provides the environmental component of the Community's strategy for sustainable development. The strategic approaches established by the EAP to meet the environmental goals include the development of Community legislation and amendment of existing legislation, as well as its effective implementation and enforcement.

BRAVE will contribute to the implementation of the 6th EAP by improving and simplifying the current environmental legislation. In this regard, the four actions related to policy activities (A3, Policy making and implementing; A4, Policy Innovation; A5, Testing in field and A6, Adoption) build on the analysis of the effectiveness of previous experiences in the integration of EMAS into environmental legislation to propose and implement concrete simplification measures that will be tested in the target regions. These actions respond to the need to promote improved standards of permitting, inspection, monitoring and enforcement by Member States, while allowing as well the review of the application of environmental legislation across the EU 1, both of them explicitly identified in the EAP.

Not least, the networking, communication and dissemination actions (A6,A7 & A8) aim to increase the exchange of information on best practices between Member States and raise awareness among the industrial sector (mainly SMEs) on the need to improve compliance of Community rules to meet the environmental objectives agreed by the EU, aspects that are also widely covered by the 6th Environmental Action Plan.

BRAVE will strengthen the implementation of the EU Environmental Technologies Action Plan (ETAP):

Pollution prevention with the use of modern cleaner technologies in industrial sectors is the cornerstone of successful environmental policy certified according to the requirements of Environmental Management Systems. Recent research studies² have analyzed the effects of environmental management systems (EMS) on the adoption of cleaner technologies by the industrial sector, showing that EMS are considered by the surveyed companies as very useful to introduce cleaner technology and that they seem to create better conditions for the implementation of the IPPC Directive for Integrated Pollution Prevention and Control³.

By fostering the implementation of EMAS in EU companies, the BRAVE project will also contribute to the achievement of ETAP goals, helping to overcome existing barriers and promoting the uptake of environmental technologies, not only as a means to ensure compliance with legislation, but also – what is particularly important in the current economic context- as a way to boost their competitiveness.

¹ Sixth EU Environmental Action Plan Decision 1600/2002/EC

² Source: Radonjic G. and Tominc P. (2007) "The role of environmental management system on introduction of new technologies in the metal and chemical/paper/plastics industries", Journal of cleaner production 15:1482-1493.

³ Council Directive 96/61/EC of 24 September 1996 concerning integrated pollution prevention and control

BRAVE actions are aligned with the Environmental Compliance Assistance Programme (ECAP)⁴

Representing around 99% of all enterprises and 57% of the economic value-added, Small and Medium Enterprises (SMEs) account for a significant proportion of economic activity in the EU. It seems therefore clear that, in order to meet both the 6th EAP and the ETAP objectives, particular measures for SMEs need to be designed. The ECAP Programme, adopted in 2007, aims to provide a framework to help SMEs implement European environmental legislation.

BRAVE actions are aligned to the ECAP, mainly as regards the activities planned for:

Better regulation in the design and implementation of policies to minimize the administrative burden of compliance of SMEs, identifying unnecessary costs and seeking to reduce the administrative burden;

Developing more accessible tailor-made environmental management schemes, and

Improved communication and targeted information.

Last, but not least, the support to the implementation of the ECAP is also a priority area of action within the LIFE+ Environment Policy and Governance programme and the national priorities for 2010 of the participating countries (Italy and Spain), as a means to promote effective implementation and enforcement of EC environmental legislation, enhance the knowledge base for environmental policy and improve the environmental performance of SMEs.

Within this context, the BRAVE project aims to be a useful tool to meet the EU environmental objectives. All project actions have been designed taking into account the current needs faced by the EU as far as the environmental compliance is concerned, building on the particular conditions of each country (thinking locally) to deliver results that will be handled from a global perspective, ensuring their transferability and impact at EU scope (acting globally). The project also aims to pursue the objectives of the Better Regulation Strategy (*Third strategic review of Better Regulation in the European Union -COM(2009)15 (28 January 2009)*), connected with the ECAP aims.

Geographical scope and transnational added value.

The proposed consortium is constituted by 7 mutually-independent legal organizations established in 2 EU Member States (Italy and Spain), all of them deeply involved in the protection of the environment, bringing together a strong background both in the field of EU environmental legislation and in environmental management systems, the twofold perspective covered by the BRAVE project.

The need to exchange knowledge and experience among local and regional authorities on regulatory flexibility, on the one hand, together with the relevance of the tackled field (integration of EMAS into environmental legislation) for the whole EU justify the transnational dimension of the project. Partners agree that transnational cooperation is key to meet project goals and ensure its impact at EU scope. In addition, the consortium is committed to achieve transferable results and spread them to a wide number of stakeholders, both during the project and beyond.

Italy and Spain have been selected as initial target countries on the basis of the number of EMAS registered organizations (they account for the largest share of all EU Member States after Germany with a total number of 2262 registered organizations, representing the 50% of EU registered ones), the similarities in their current environmental contexts and the common barriers identified to a better regulation, which will enable the achievement of relevant results for Italy and Spain. In addition, trends in EMAS verification in EU Member States show an ongoing increase in the number of registered sites in both Italy and Spain, therefore the BRAVE project will find in both countries an optimum context for its development.

⁴ COM (2007) 379 final

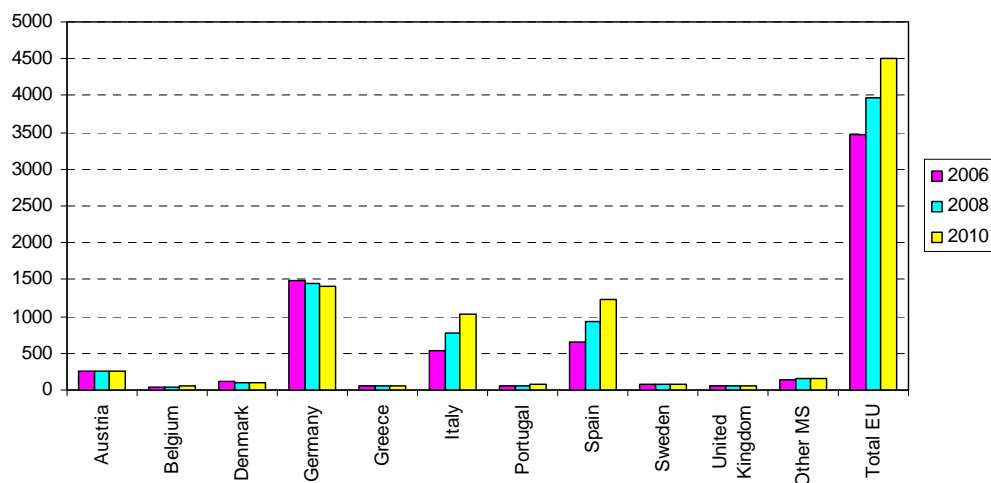


Figure: Trend in EMAS registered organizations in EU Member States 5

Nonetheless, in spite of this initial selection of target countries, BRAVE partners will build on the experience of other EU Member States -such as Denmark, Germany, Austria and Portugal-, ensuring at the same time the transferability of the achieved results to other EU countries out of the initial ones.

Last, but not least, the state of the art shows that the central topic of the project, to achieve a full integration of EMAS into environmental legislation, has been so far mostly tackled by individual regions (e.g. Bavarian Environmental Agreement; OPTIMA project in the region of La Rioja, Spain –funded under the LIFE Programme-; regulatory relieves introduced in France involving the reduction of the frequency of reporting for EMAS and ISO 14001 registered sites) and that joint transnational efforts have not yet been made to progress towards a simplification of the regulatory frameworks.

The BRAVE project arises to provide transferable solutions to the pan-European EMAS context, aiming to represent an effective tool to foster EMAS registrations and to serve as reference for other European countries and regions wishing to adopt better regulatory policies in coordination with the environmental management systems.

⁵ Source: Own production based on EC- EMAS statistics. Data from December 2006, March 2008 and July 2010.

EFFORTS FOR REDUCING THE PROJECT'S "CARBON FOOTPRINT"

The Carbon footprint measures the total emissions of greenhouse gases released by direct or indirect effect of individuals, organizations, events or products. Given the strong environmental component of the BRAVE project, partners are very much committed on the need to ensure that the carbon footprint of the project will remain as low as reasonably possible, always guaranteeing the correct development of the project and that the targeted goals are met.

To this end, a specific role (CO2 Manager) has been designed to follow-up the project carbon footprint and ensure the implementation of actions to minimize it. This role will be performed by IAT, partner organization that is currently very active in the field of Life Cycle Analysis and Carbon Footprint. At the beginning of the project, IAT will develop together with project partners a Methodology for the control and follow-up of the project carbon footprint, whose main steps can be summarized as follows:

1st stage- Development of the CO2 monitoring plan

Identification of all project actions that cause greenhouse gas emissions

Assessment of these actions to select the most relevant ones with the highest reduction potential of their carbon footprint

Design of project indicators to measure the carbon footprint of the selected actions

2nd stage- Implementation of the reduction measures and estimation of project carbon footprint

Analysis and implementation of potential measures that can be implemented to reduce the carbon footprint of the project

Estimation of the carbon footprint derived from each relevant action selected in stage 1, after the implementation of the reduction measures.

3rd stage- Carbon offsetting

The final stage will encompass the analysis of carbon offsetting measures that can be implemented during the project, based on existing initiatives such as OCO2 (<http://www.oco2.com/en/>), CERCO2 (<http://www.ceroco2.org/>) or Climate Care (<http://www.jpmorganclimatecare.com/>), in order to analyze the best options that can be used by partners to compensate for the emissions produced during project life.

The CO2 Manager will coordinate the implementation of the methodology by project partners and guarantee that the reduction measures are taken. An annual CO2 report will be delivered with the results on the carbon footprint achieved in each related period.

Though the proposed methodology will be further developed within project's lifetime, the partnership has already identified some actions that can affect the project carbon footprint, together with possible measures which can be implemented for their reduction. This preliminary analysis is summarized in following table:

Project actions affecting carbon footprint	Potential measures for the reduction of project carbon footprint
Travelling & transport	<p>Minimize the number of project meetings, organizing phone or video conferences when possible</p> <p>Join consortium meetings and other project meetings to reduce the number of trips</p> <p>Foster the use of public transport</p> <p>Selection of hotels close to the meeting places</p>
Accommodation	<p>Selection of hotels certified by environmental management systems</p> <p>Accommodation of all partners in the same hotel to promote transport sharing</p>
Project management and internal communication	<p>Minimize the number of printings</p> <p>Print as "draft" when possible</p> <p>Use of digital media</p> <p>Maximize the use of internet, intranet, e-mails, phone and videoconference as communication means</p> <p>Minimize courier services and use fax when possible</p>
Project events	<p>Green procurement</p> <p>Ensure efficient use of building energy and lighting</p> <p>Have an environmental friendly behaviour in coffee break too</p>
Dissemination material	<p>Use recycled material</p> <p>Publish results in digital versions (USB , DVDs , CDs)</p>

Table: . Project actions affecting carbon footprint and potential measures for their reduction

STAKEHOLDERS INVOLVED AND MAIN TARGET AUDIENCE OF THE PROJECT (OTHER THAN PROJECT PARTICIPANTS)

Besides with the Environmental Compliance Assistance Programme (ECAP) for SMEs (COM(2007) 379 final), the European Commission promoted support for SMEs to improve their environmental legal compliance. The Action Plan of ECAP identifies 5 priority fields, including:

1. *Better Regulation in design and implementation of policies*, to facilitate and minimise the administrative burden of compliance for SMEs and free their resources for improving compliance;
2. *More accessible tailor-made environmental management schemes*, to integrate environmental concerns into the core business activities of SMEs in a coherent and cost-effective way.

The new EMAS Regulation (Reg. 1221/2009) specifies that the Member States shall take measures as regulatory relief and better regulation, to facilitate organisations to become or remain EMAS registered.

Simplification necessitates not only a shared method, but also a shared mindset. All institutions and all states are invited to make contributions to simplify the regulatory environment.

The target groups involved in BRAVE project will be:

- National Institutions of Italy, Spain and other Member States not directly involved in the project, in order to pick out and describe the main success factors in the implementation of the simplification strategy, such as a methodology, inter-institutional cooperation, the increased use of co-regulation (entrusting the achievement of the goals set out in law, for example to the social partners or to non-governmental organizations) and self-regulation (voluntary agreements between private bodies to solve problems by taking commitments between themselves) and simplification at national level. Some ministries (e.g. ministry of environment and territory, ministry of industry and production,...) will be updated on activities and proposals for simplification emerged (mainly those a support of Environmental Management System). This will be done in order to stimulate, also at national level, simplification of bureaucracy and to motivate and facilitate the adoption (or maintenance) of voluntary measures (e.g. EMAS) by the single organizations. Besides, as specified in the action 4, representatives of Ministry of Environment of Italy and Spain and EMAS Competent Bodies of Italy and Spain will be invited to be members of the BRAVE Project Consultation Board;
- Regional and local authorities (also not involved directly in the project) have an essential role to play in Better Regulation as they are responsible for applying and transposing national legislation at local level. Delivery on Better Regulation therefore relies largely on their efforts. For this reason they can support better regulation and regulatory relief and the elimination of unnecessary red tape;
The involvement of some Regions and Provinces is crucial for all actions of the project, also for the more "operative" actions. The Regions and Provinces, in fact, have decided to be significantly involved in the BRAVE project, also in the phase of testing, by involving their departments in the experimental or simulated application of the proposed measures. As the attached support letters show, they are very interested in actively take part and support the BRAVE project, because the aims of the project are totally consistent with the objectives of their environmental policies at the regional level and represent a logical and inevitable prosecution of the policy actions they undertook in the past to sustain the environmental "Better Regulation" (also by developing a set of simplification by those organizations interested or participating in some voluntary environmental management schemes, e.g. EMAS). It is possible to consult many policy acts of these Regions that endorse and support the application of regulatory relief in many environmental policy fields. The Toscana, Lombardia and Liguria Regions are members of CARTESIO Network, a network that pursues exactly the aims that have been translated in the objective of the BRAVE project and that cooperate also with Italian Environment Ministry. The network also includes Emilia Romagna, Lazio and Sardegna Regions that will be involved during the whole project. The interest of the regional Authorities is confirmed by the fact that two of them have decided to be co-funders of BRAVE;
- Intermediary organisations (e.g. entrepreneurial-industrial associations, environmental agencies, centres of research and development) will play an active role in the project. For example,

industrial associations will promote the project among the companies and organizations, by identifying the ones interested in testing the feasibility of the regulatory relief and simplification measures proposed by the BRAVE project. Moreover, centres of research and development will share and exchange their resources and competencies in different fields (economic, legal, communications...). The intermediary role of these organisations within the socio-economic dynamics makes them particularly suitable to share the tools and information (as they have easy access and use) and to exchange the good practices.

- SMEs operating in the territories involved in the project (and even outside them). We would like to involve actively the SMEs, particularly in the initiatives of testing “in-field” the feasibility of the measures of regulatory relief and simplification emerging from the activities of the project. The BRAVE project will provide them with technical tools and shared resources (which will reduce the effort of implementation and maintenance of environmental management systems and will stimulate the exchange of good practice), and by training the managers of the companies involved. From this point of view, the situation of the SMEs will improve as they will be given the opportunity to get acquainted with the strategy and methods to simplify regulation at European, national and local level, while being encouraged to develop environmental management system in their field of business or to testing and comment on the feasibility of the simplification measures (e.g. minimise the administrative burden of compliance, simplify the demonstration of regulatory compliance and management of compliance by EMAS organizations,...). Furthermore, the choice of support instruments (guidelines; collection of information; indicators), will take place in such a way that the specific needs of the SMEs will be taken into consideration, also by aiming at stimulating positive developments for the local economy.
- With regard to civil society organisations, the possibilities for improvement are strongly linked to the economic reality made up of SMEs in the territory and the themes related to local economic growth, to society and environmental protection are homogeneous in their impact and effects. Furthermore, the actors in the area play the part of investors, employees and are members of the civil society. In this respect, communication and awareness raising are aimed at generating important dynamic effects of long term. The incentive to activate actions to support society is only the first step in a continuous and evolutionary process, in a logic of “multiplication of effects”. This strong relationship between interests and stakeholders makes the methodological approach of the BRAVE project particularly apposite. Also organisations related with the local society (like NGOs) will be updated on project activities to improve: awareness of civil society on issues of sustainable development; transparency; dissemination of knowledge on the activities undertaken by SMEs for Environmental Compliance. In addition, activities for communication and training on Environmental Management Systems and compliance with environmental legislation will be coordinated and therefore more efficient.

The changes which the project intends to stimulate by sharing, exchanging and testing knowledge and practices of environmental Better regulation and simplification, will derive from a stable synergy between the actors involved, capable of creating positive externalities for the SMEs and the public authorities involved.

To engage stakeholders in the most effective way, a major role will be played by the groups foreseen by the BRAVE project (e.g Consultation Board, Working Group) through their activities providing periodic meetings, seminars and workshops. These meetings have already gained interest from representatives of institutions, regional authorities and market traders and they will be opened to the widest possible participation of all interested actors of other areas in Europe, aiming at sharing their knowledge and supporting the partner involved in the project.

Better Regulation, in fact, also has a strong external dimension. In a global market, rules developed elsewhere exert an impact on European business and rules applied in other markets can have implications for imported products and services in the Eu. International cooperation and dialogue is essential — not only to provide high levels of consumer, social and environmental protection — but also from a business perspective. Just as the drive to create the single market in Europe was fuelled in part by the desire of business to eliminate unnecessary small differences in regulations between Member States, international regulatory cooperation is motivated by the desire to reduce and eliminate unnecessary red tape between trading partners.

A wider audience will be reached through the manifold communication activities defined in the Project Management and in the dissemination field.

EXPECTED CONSTRAINTS AND RISKS RELATED TO THE PROJECT IMPLEMENTATION AND HOW THEY WILL BE DEALT WITH (CONTINGENCY PLANNING)

In this section we identify the possible constraints and risks that could have major negative impacts on the implementation of the project. As requested, they are listed in a decreasing order of importance.

1. Some private or public institutions reject the adhesion to the Regional Consultation Boards and Project Consultation Board of the project
 - a) In the BRAVE project preparation phase the partners have explained to the most important stakeholders objectives and actions of the project. Some of them have signed a support letter giving the availability and committing to be a member of the Consultation Boards;
 - b) Better regulation, regulatory relief, dissemination of EMAS are institutional objectives and activities for many public and private institutions, and for this reason they are interested in taking part in the Consultation Boards even without any budget;
 - c) The strong involvement of the Regional Governments could ensure the involvement of the other public and private stakeholders in their eventual substitution;
 - d) A specific document and invitation letter will be prepared to explain separately to the Regional Consultation Boards and to the Project Consultation Board their responsibilities, tasks and benefits of taking part in the project;
2. The industrial associations involved, representing all the private organizations (with and without EMAS), could ask to the partners and Regional Governments to apply the simplification proposals not only to EMAS registered organizations, but to all private companies
 - a) We will confirm them that the resources of BRAVE should be used only to achieve the objectives stated in the project, so for this option is not possible use the activities of the project;
 - b) Regional Governments could involve them in their institutional activities that work on those issues for further simplification
 - c) After the end of the project, they will be able to use some BRAVE simplification proposals for further developments in their institutional activities
3. Change of political leadership in the regional Governments could compromise the adoption of the simplification measures in the regional legislation in accordance with action 6:
 - a) During the project is not foreseen election-phase in almost all the regions involved;
 - b) The aims of the project regarding better regulation and regulatory relief are very interesting for every political party today and strongly connected with European Directives and Recommendation. For this reason we trust that we could involve also an hypothetical new Regional Government;
 - c) The partners will work very closely with technicians. So the work in any case will go on;
 - d) The partners, thanks to the strong contacts with other regional Governments (e.g. regions involved in Cartesio network and red EEN), could decide to involve another interested regions in the testing and adoption phase;
4. A lower number of EMAS registered SMEs could be involved in the action 5, that aims at testing in field the simplification and better regulation proposals
 - a) In the preparation phase of the project we have contacted and involved many of the most relevant trade associations in representation of SMEs located in the regions involved (and operating at the national level). Some of them have signed the BRAVE support letter and therefore committed themselves to involve their associated SMEs in the project. It has to be noted that the project is offering to participating EMAS registered SMEs a really strategic and interesting activity for the adoption of simplification acts by the policy makers;
 - b) Partners have good contacts with EMAS accredited verifiers or consultants that help the industrial companies in the adoption of EMAS registration. We could involve private companies through such kind of subjects;
 - c) Usually the EMAS registered organizations are really available to collaborate with institutions and demonstration project in accordance with EMAS objectives and requirements;

5. The partners don't identify and collect all relevant information and data about simplifications just carried out in other member Countries as foreseen by the action 3 (e.g. due to languages of legislative acts):
 - a) As described in action 3 the project foresees to identify and analyze EMAS better regulation initiatives in the 4 member countries with highest number of registered organizations: Austria, Germany, Portugal, Denmark. IAT have in its staff portuguese-language speakers and so will be able to analyze the environmental legislation of Portugal. IEFE will analyze legislation from Austria and Germany and SSSUP from Denmark. In these last cases (most of all for Denmark legislation) the risk will be overcome by entrusting external experts with the task to collect and translate the collected information;
 - b) The partners will contact in the first phase the national EMAS Competent Body to identify and valorize past activities in the same field;
 - c) The partners will contact the Emas Helpdesk and ECAP managing staff to be sure to collect and identify all the most important data and info;
6. The tool "Guidance tool for the EMAS-based regulation and better regulatory relief" elaborated during the action 7 could be not easy-to-use by the public institutions in their policy and governance activities;
 - a) In order to overcome this problem, we will guarantee the active presence of public institutions in the elaboration of the project's tool. If in the training activities will emerge difficulties in the application, the tool will be adapted to the requests of policy makers
7. The partners could send with delay the technical and financial reports to the project leader.
 - a) Each partner has numerous experiences in managing past and European projects and Life or Life+ projects. However, at the beginning of the project each partner will designate a representative related to the administrative accomplishments. After the nomination, the project leader will organize a specific meeting where will explain to them all the administrative fulfillments foreseen by the Life+ Programme. After this meeting, if a partner will have still difficulties to respect the deadline foreseen by the project, the applicant could ask to that partner to use some financial resources to involve an external expert to help him in the administrative accomplishments. Moreover, the internal auditor of the BRAVE project will monitor the technical reporting activities, as specified in action 1.

The partners have taken into account the risks related to the time planning, budget and definition of the actions. All these aspects have been taken into account thanks to:

- the experiences of all partners in participating and managing European projects (included other Life and Life+ projects);
- the previous and ongoing experiences and projects carried out by the participating partners (e.g. Life + ECCELSA that involves SSSUP, Ambiente Italia, IEFE; Life + ETABETA that involves Ambiente Italia and IAT; MED Programme MED-IPPC-NET that involves IAT, SSSUP, CTL; VII FP BAT4MED that involves IAT and SSSUP;
- the previous and ongoing collaborations between the participating technical partners and the Regional Governments involved

CONTINUATION AND VALORISATION OF THE PROJECT RESULTS AFTER THE END OF THE PROJECT

- Which actions will have to be carried out or continued after the end of the project?

The actions to be carry out after the end of the BRAVE project are designed to ensure the dissemination and replicability of the experiences in other regions and countries, but especially they intend to promote new benefits to the EMAS registered companies.

Four activities that will be implemented after the conclusion of the project are:

1. involvement and training of stakeholders;
2. maintaining of tools for sharing and discussion about simplification for EMAS organizations;
3. maintaining and updating the website;
4. activities under the Life plus program.

One of the objective of the project is the activation of tools to define proposals for simplification of environmental regulation that involve many stakeholders (action 3 Policy making). Thanks to the knowledge and tools built in the BRAVE project on issues of incentives and benefits for EMAS registered companies, these stakeholders will promote and disseminate the results of the project in their territorial contexts and among the categories they have represented (trade association, NGO, SMEs) during the project and after its end and even among local, regional and national authorities. They also will stimulate the public administrations and the government to continue the process of proposing new incentives for EMAS implementation.

Moreover, after the project, we expect that some regional Governments and Competent Authorities involved in the project decide to extend the validity of some simplification and better regulation measures not only for the EMAS registered organizations but to all private companies in order to achieve a bigger audience.

Will be kept active instruments (such as forum on-line) for the discussion among politicians implemented during adoption (action number 6) to maintain a high level of attention on the project issues and to encourage the adoption of the better regulation and simplification measures.

The Website of the project will ensure dissemination of the results of BRAVE, even after the end of the activities. All documents and progresses on proposals for better regulation and simplification will be available on the website, that will be updated for two years after the end of the project, so all the stakeholders will follow the procedure for adopting the rules until its conclusion. The website will also be updated with news and events connected with better regulation and simplification topics and EMAS Regulation changes and application experiences.

The dissemination action provides the "After-Life Communication Plan" that defines the activities to disseminate the methodology and results of the project. It should also be considered that the project is coordinated and carried out by SSSUP. As a training and educational institution, SSSUP will have the possibility to foster the diffusion of the tools and resources developed in the project, by means of the continuous information, sensitisation and training activities that it usually performs with respect to the local industrial and productive systems of SMEs.

- How will this be achieved, what resources will be necessary to carry out these actions?

The activities mentioned above will be carried on through internal or external resources of the subjects involved. The regulatory relief for the voluntary registered organizations will be adopted by public institutions and applied by organizations that have signed the support letter for BRAVE. The trade associations involved and that have signed the support letter, will promote the EMS and the knowledge of the adopted better regulation and simplification measures among companies. The financial sustainability of the mentioned actions is assured by the proper functions of subjects involved in the project. Regions and other public authorities will carry on promoting and improving the activities of better regulation and simplification within their own institutional duties. The trade associations, however, are funded by their associates (companies and/or public authorities) precisely to fulfil these objectives, so they will be able to maintain such a commitment even after the conclusion of the project.

The CARTESIO network (www.retecartesio.it) supports the BRAVE project and dissemination of its results, such as the Red EEN. The CARTESIO network consists of 6 Italian regions (Emilia Romagna, Lazio, Liguria, Lombardia, Sardegna and Toscana) and has long been active on the issues of better regulation and regulatory relief for the voluntary registered organizations. This issue is one of the main aims of the network, that will continue to be promoted and pursued even after the end of the project. In

fact the CARTESIO network is an important means of spreading the project approach in other Italian regions and at the national level, given its representativeness. The Enterprise Europe Network (Red EEN, http://www.enterprise-europe-network.ec.europa.eu/index_en.htm) helps small business to make the most of the European marketplace. It has 572 member organisations across the EU and beyond. They include chambers of commerce and industry, technology centres, universities and development agencies

The CARTESIO network has both internal resources and resources made available by 6 regions which support the BRAVE project, even after its completion. The activities related to the "After-Life Communication Plan" will be carried out by the project partners with internal resources.

All dissemination activities (website, trade fairs participations etc.) will be continued with the resources of the partners.

- To what extent will the results and lessons of the project be actively disseminated after the end of the project to those persons and/or organisations that could best make use of them (please identify these persons/organisations)?

The tools, methodologies and results achieved in the project will be disseminated at three levels:

- 1.local level
- 2.regional and national level
- 3.European level

1.During the project the dissemination activities, the project will involve all the organizations (institutions, and trade associations) that have signed the support letter for BRAVE. Some of these are:

Province of Bergamo
Province of Lucca
Province of Milano
Province of Pistoia
Province of Pordenone
Province of Siena
Andalusian Association of Environmental Enterprises
Assolombarda (Italian entrepreneurial association)
Assocarta (Italian paper predictors association)
Associazione Conciatori (Tanning Association)
AIDO (Trade Association Andalusia)
Environment Sector Group of the Enterprise Europe Network
Spanish association for standardization and certification
National confederation of trade, service and tourism
Entrepreneurial association of Prato.
Unione degli Industriali di Pordenone (trade organization)
Region of Friuli Venezia Giulia
Region of Liguria
Region of Lombardy
Region of Tuscany
Regional Government for Environment of Andalusia
Generalitat Valenciana
Parco Agroalimentare di San Daniele (cluster)
Distretto meccanico di Pordenone
Saggas (company)
Comieco
Confindustria Ceramiche

The dissemination after the project completion will involve local governments (Provinces and Municipalities) and trade associations that have not participated in the BRAVE but are interested in the issues of better regulation through the use of EMSs and the connected benefits for the voluntary registered or certified organizations. Below some provinces and municipalities that have promoted the EMS by projects and communication events, that may therefore be the targets of the dissemination activities:

Diputaci3n de Almeria
Diputaci3n de Cadiz
Diputaci3n de Cordoba
Diputaci3n de Granada
Diputaci3n de Huelva
Diputaci3n de Ja3n
Diputaci3n de M3laga

Diputaci3n de Sevilla
Diputaci3n de Valencia
Municipality of Bologna
Municipality of Ferrara
Municipality of Lucca
Municipality of Pisa
Municipality of Pistoia
Province of Avellino,
Province of Bergamo,
Province of Bologna,
Province of Livorno
Province of Lucca,
Province of Modena,
Province of Reggio Emilia,
Province of Sassuolo,
Province of Siena,
Province of Torino,
Provincia di Viterbo

2. The regions involved in the project will assure the dissemination of the results of the project to other regions interested in the project. In Italy the regions that have already worked to improve the regulations are: Liguria, Lombardia and Toscana. The results of project could be spread in other regions that have already "worked" to improve the number of EMAS registration or ISO 14001 certification.

Some of these regions are as follows:

Campania with 52 EMAS registrations (data ISPRA)

Piemonte (58 EMAS registrations)

Puglia (68 EMAS registrations)

Trentino Alto Adige (72 EMAS registrations)

Veneto (60 EMAS registrations)

The dissemination of the project in regions with a low number of registrations may promote the spread of EMS.

Some of these are:

Abruzzo (30 EMAS registrations)

Calabria (11 EMAS registrations)

Marche (32 EMAS registrations)

Molise (10 EMAS registrations)

Sicilia (30 EMAS registrations)

Umbria (27 EMAS registrations)

Valle d'Aosta (2 EMAS registrations)

The project partner will select at least 5 Italian and 2 Spanish regions where diffuse the project results after the end of the project through specific meetings with the local actors and authorities. They will be listed in the "After-Life Communication Plan".

Moreover, the project results will be disseminated to other EU regions by way of the regional European network in which the Regions involved in the BRAVE project are actively participating. For example: the results and the achievements of the BRAVE project will be presented and discussed within a meeting of the ENCORE network, of which Regione Toscana is an active promoter.

3. Starting from the results of action 2 "Policy making e Policy implementing" the project partners select some experiences of EMAS- based better regulation or regulatory relief in other European countries. Also with action 8 "Networking" we will select European projects about EMS and ECAP. During the project the partners will contact representatives of the more interesting experiences to present the results of the BRAVE project and to promote exchange of methodologies and tools. These actors will continue to be informed on the project and results achieved through the website will remain active for two years after the project.

Moreover, the partners will give their availability to the managing staff of ECAP Programme. Partners will be available to participate in the periodical communication events organized by them to diffuse the implementation of ECAP.

LIFE + Environment Policy and Governance

TECHNICAL APPLICATION FORMS

**Part C – detailed technical description of
the proposed actions**

Important note:

- All calculations and detailed cost breakdowns necessary to justify the cost of each action should be included in the financial forms F. In order to avoid repeating the financial information (with the risk of introducing incoherencies), Part C should only contain financial information not contained in the financial forms.
- All forms in this section may be duplicated, so as to include all essential information.
- Any action that is sub-contracted should be just as clearly described as an action that will be directly carried out by the beneficiaries.

DETAILS OF PROPOSED ACTIONS

ACTION 1: PROJECT MANAGEMENT

Description and Methods employed:

The aim of this action is to coordinate activities between the project partners and manage the progressive development of the BRAVE project. This action, actually, defines the tools and the methodology of the project management.

- The Beneficiary, SSSUP is the reference point among the project partners and the subject in charge of reporting to and communicating with the European Commission, acting as the interface between the project partners and the Commission.

The Beneficiary will keep the European Commission fully informed about the evolution of the project by means of the production and delivery of activity reports, including all relevant information related to the different actions, the monitoring of the project activities according to the system of indicators and the due deliverables.

SSSUP has developed its expertise in project management coordinating other experiences funded by the LIFE program and from other European programs such as Cip-Eco Innovation, INTERREG, FP7.

- SSSUP is responsible for the coordination of administrative and financial aspects with the support of a Financial Manager appointed among its administrative personnel. This person will be selected on the basis of previous experiences in managing European Projects. The Financial Manager will make sure that the methodology of financial accounting and its timing will comply with the requirements established by the EC. The manager will coordinate the financial accounting activities of all the partners and will support the accounting and financial reporting activities of all the partners. Each partner will appoint an internal manager of its financial aspects that will follow the use of resources throughout the BRAVE project duration.

Where required, an independent auditor nominated by the Beneficiary will verify the financial statements provided to the Commission in the final report of the project. This audit should not only verify the respect of national legislation and accounting rules but should also certify that all costs incurred respect the LIFE+ Common Provisions.

Some examples of recent projects managed directly by SSSUP follow:

- ECCELSA, *Environmental Compliance based on Cluster Experiences and Local Sme-oriented Approaches*, LIFE/07/ENV/IT/000515)
- COSMIC, CSR oriented supply-chain management to improve competitiveness in the textile/clothing sector, DG Enterprises and Industry)
- COOPERATE (promoted by DG Enterprise and Industry, in the Mainstreaming CSR among SMEs Programme);
- NEUROBOTICS "The Fusion of Neuroscience and Robotics for Augmenting Human Capabilities" funded by 6th Framework Programme
- SKILLS - multimodal interfaces for capturing and transfer skill funded by 6th Framework Programme
- AGIS - "Towards Harmonization of European Rules and Practices on Right of Defence in Pre-trial Stage. Comparative Study on Member States Rules Aimed to Facilitate Police and Justice Cross-Border Cooperation", promoted by DG Justice, in the AGIS Programme

In many other projects co – financed by the European Commission, SSSUP has participated as partner; just referring to the Life projects, we can mention the following partnerships:

- ROADTIRE (LIFE09ENVGR304) Beneficiary: Aristotle University of Thessaloniki
- LAIKA(LIFE09 ENV/IT/000200) Beneficiary: Municipality of Milano
- PROMISE (INF/IT/000312) Beneficiary: Liguria Region
- PIONEER Project (LIFE03 ENV/IT/421– Beneficiary: Province of Lucca)
- SERCHIO WELLFIR (LIFE04 ENV/IT/000503– Beneficiary: Municipality of Lucca)
- MARRAKEMAS (LIFE04 TCY/MA/000070 - Beneficiary: Conseil de la Ville de Marrakech)

Each partner coordinates one or more actions and ensures the achievement of project's aims. Each partner has the role and responsibility to carry out the foreseen activities in co-operation with the other partners and to assure the compliance with the foreseen timing of activities of the project.

Moreover, each partner is responsible for implementing project activities in each of the participating regions that have signed the support letter or co-financed the project (Andalusia, Basilicata, Friuli Venezia Giulia, Liguria, Lombardia, Toscana, Valencia). So each partner has the role of *Territorial Coordinator* which will guarantee that the activities of the BRAVE are effectively carried out in compliance with the proposal.

The matching between regions and partners are as follows:

- *Andalusia*: IAT
- *Basilicata e Friuli Venezia Giulia*: Ambiente Italia
- *Liguria*: Confindustria Liguria
- *Lombardia*: ARPA Lombardia and IEFE
- *Tuscany*: Scuola Sant'Anna
- *Valencia*: CTL

The main tool for the management of the project is the *Steering Committee* that meets periodically to discuss the progress of the project and define, at strategic and operative level, the approach to be addressed.

The *Steering Committee* is made up of at least one representative from each partner, but may also involve other actors involved in the various actions (for example, the stakeholders involved in the Action 3 and 4) and the members of CARTESIO Network and Red EEN.

The official meetings of the *Steering Committee* are organized every four months by the partner responsible for the action underway, both in Italy and Spain. During these meetings the partners monitor the progress of the BRAVE project and validate the methodological choices of the project, evaluating the results and comparing them with the foreseen activities. During the *Steering Committee* each partner will inform and update the others about the progress of the actions in their own regions and will share the emerging results and encountered drawbacks.

In addition, the project will include regular meetings at the beginning and end of each action to define a detailed plan and specify the methods for carrying out the foreseen activities and to verify what and how has been done in the previous actions. These meetings can be carried out by online conferences and video conferences. The decisions of the *Steering Committee* will be recorded in minutes; reports of the meetings will be sent to all partners by e-mail and they may accept or modify the contents of reports. In addition to the meetings of the Steering Committee, the communication between the partners will be assured by telephonic and skype conferences, and a "community" mail set on SSSUP server, in order to discuss emerging issues and to continually co-ordinate the Actions "in-field"

The Committee's work will be defined in a regulation accepted by all partners; this tool provides assurance on the composition of the Steering Committee, on the decisions making and the validity of the meetings.

Another important tool will be activated in the project is the *Work Plan*, a document prepared annually by Beneficiary that identifies the milestones and the deliverables to be achieved by each action, the official deadlines and internal deadlines. This tool aims at improving the planning of activities and will be progressively upgraded by the beneficiary. During official meetings of the Steering Committee, the *Work Plan* will be presented and shared with the partners to assure the respect of the deadlines of the project.

In each region involved in the BRAVE project (Andalusia, Basilicata, Friuli Venezia Giulia, Lombardia, Liguria, Toscana and Valencia) there will be a *Consultation Board* with the participation of local stakeholders. The aim of this tool is to discuss and share the main outputs of the project and contribute to achieve project's objectives. For instance, the *Consultation Board* will discuss and comment the EMAS- and/or Ecolabel-based better regulation and regulatory relief proposals identified by project partners to submit to the public authorities (Province, Region and national Ministry).

The main actors involved in the *Consultation Board* are representatives of local firms, trade associations, Chambers of Commerce, representatives of regions and local authorities such as Province and Municipalities. The interest in participating in *Consultation Board* was already expressed by several organizations that have signed the support letter for the BRAVE project, committing itself to attend meetings and project activities.

These organizations are:

- Province of Bergamo
- Province of Lucca
- Province of Milano
- Province of Pistoia
- Province Of Pordenone
- Province of Siena

- Andalusia Association of Environmental Enterprises
- Assolombarda (Italian entrepreneurial association)
- Assocarta
- Associazione Conciatori (Tanning Association)
- AIDO (Trade Association Andalusia)
- Environment Sector Group of the Enterprise Europe Network
- Spanish Association for Standardization and Certification
- National confederation of trade, service and tourism
- Entrepreneurial association of Prato.
- Unione degli Industriali di Pordenone (Trade organization)
- Region of Friuli Venezia Giulia
- Region of Liguria
- Region of Lombardy
- Region of Tuscany
- Regional Government for Environment of Andalusia
- Generalitat Valenciana
- Parco agroalimentare di San Daniele
- Distretto Meccanico di Pordenone
- Saggas (company)
- Comieco
- Confindustria Ceramiche

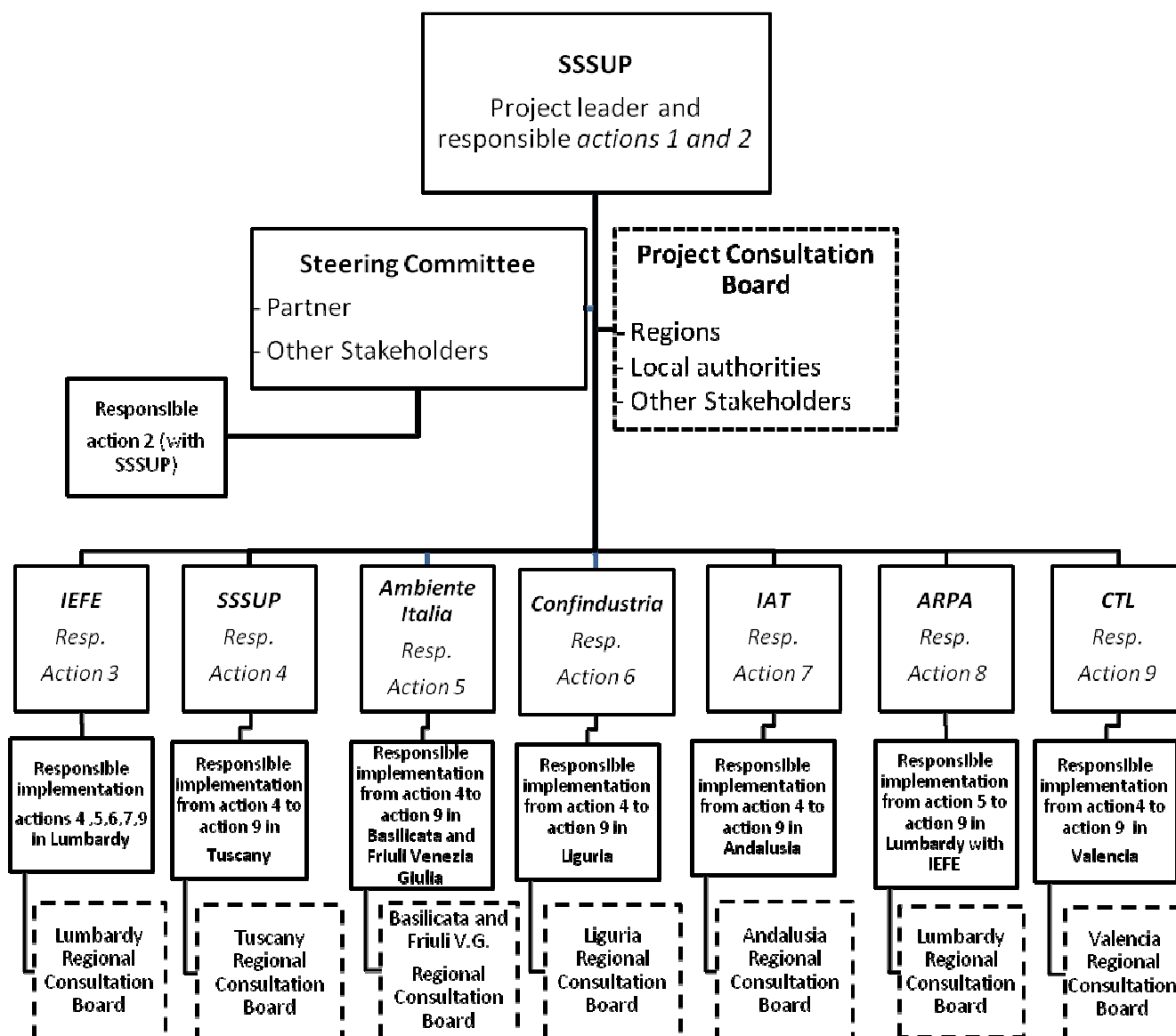
The *Consultation Boards* will be activated in the Action 4. The project foresees to set up two kinds of Consultation Boards: Regional Consultation Board (RCB) and Project Consultation Board (PCB) (for more details see action 4) It gathers periodically and convened by the partner responsible for the implementation of the project in each region (Territorial Coordinator). The results of each local meetings will be communicated to all other partners by regular updating of the website (see action 9) and at least once a year the partners will organize a meeting of all Consultation Board to promote the comparison between stakeholders of different regions and countries.

An exhaustive and detailed sets of reports will be drafted and submitted in order to chronologically describe the relevant activities and achieved results of the project. Four Reports on the state of the art of the project will be produced during the project, with the following time schedule and contents:

- the first report (Inception Report) will be drafted eight months after the beginning of the project; it will contain the results of the kick off meeting (within June 2012)
- the second report (Middle Term Report) will be drafted within May2013. It will include the detailed description of the activity implemented in Italy and Spain in these months.
- the third report (Progress Report) will be drafted within March 2014. This report will describe in detail for each region all the actions planned and carried out in the action 6.
- the fourth report (Final Report) will be drafted within three months from the closing date of the project (within November 2014). This document will contain a short description of all activities carried out during the project and a synthesis of the results of the projects. It will also contain the payment request.

All the documents will be discussed and agreed upon by all the partners before being sent to the European Commission. The following chart describes the roles of each partner.

Organizational Chart BRAVE Project



Beneficiary responsible for implementation

The Beneficiary (Scuola Sant'Anna) will be responsible for the management of the project so as to guarantee to all partners involved an efficient and effective carrying out of the various activities.

The Beneficiary will be the responsible for the financial management of the project and will assure that all the technical and financial documents will be prepared correctly and within the established deadlines.

The Beneficiary appoints the Financial Manager.

The partners will take part in all technical and financial coordinating meetings and guarantee their availability to assist the Beneficiary in the accounting and financial reporting.

Deliverable:

- ✓ Regulation of Steering Committee
- ✓ Final collection of Steering Committee meeting reports.
- ✓ List of members of Consultation Board
- ✓ Inception Report
- ✓ Middle term Report
- ✓ Progress Report
- ✓ Final Report

Indicators of progress

- Number of meetings among partners for the project management (also online)
- Number of regional meetings (meetings of each Consultation Board)
- Number of reports submitted to the EC

ACTION 2 : MONITORING

Description and Methods employed:

The aim of Monitoring action is to measure and document the effectiveness of the project actions as compared to the initial situation, objectives and expected results. This action includes the description of a monitoring tool, indicators and source of checking as appropriate.

The action is based on the implementation of three tools:

1. *The Monitoring Team*
2. *The Monitoring Tool*
3. *The Internal Auditor*

1. The Monitoring Team will examine and assess periodically (at least once every quarter) the state of the art and the progress achieved by the BRAVE project. It is composed by actors which operate in the regions that support the project (Andalusia, Basilicata, Friuli Venezia Giulia, Liguria, Lombardia Toscana, Valencia), but participation can be extended, if required, to representatives of the regions of CARTESIO Network. Therefore, for each region, an expert in the topic of the project will be identified and will participate in meetings and activities of Monitoring Team.

The progress of the project will be verified by means of the following Sources of Verification:

- Participating in the Steering Committee meetings and in the Consultation Board;
- Direct evaluation of the documentation produced by the partners and the other actors involved (e.g.: the components of the Consultation Board);
- Interviews with the actors involved in the project activities (partner, local authorities, components of Consultation Board).

Monitoring Team collects data and information from the project partners through e-mail or telephone interviews. It can also carry out audit on partners, but to reduce the project cost, these activities could be carried out by Italian members of the Monitoring Team on Italian partners (SSSUP, IEFE, Ambiente Italia, Confindustria Liguria) and by Spanish members on Spanish partners (IAT and CTL).

For instance: the members of Tuscany Region can control the activities implemented by Ambiente Italia.

2. Monitoring Team will use, as a support for its activities, a Monitoring Tool for assessing the progress of the BRAVE through quantitative indicators. It is a table to be filled by a team member every quarter which data and information received from all project partners. These will provide information and data to Monitoring Team to draft the Tool with the following information:

- type of action
- Subject liable to the action
- description of the action
- done activities and obtained products
- state of implementation assessment
- progress indicators

This table is divided in 7 columns which contain the information above (action, description etc.) and the progress indicators, in the last column. An "easy to read" symbol shows the respect of the timetable in the column "state of implementation assessment". This tool offers the possibility of rapidly sharing easy to read information among the monitors and the partners, as well as to monitor the state of implementation of corrective actions that should be necessary.

<i>Type of action</i>	<i>Subject liable to the action</i>	<i>Description of the action</i>	<i>Done Activities and obtained Products</i>	<i>State of implementation assessment</i>	<i>Corrective actions</i>	<i>Progress indicators</i>



In time
(state of implementation corrected in time)



Delay (less than a month)



Delay (over a month)

Finally, as concerns the Indicators that will be used as references to assess the effectiveness of the BRAVE project activities, the Monitoring Team will adopt the following:

- on the one hand, the indicators already identified and reported within the description of every Action foreseen in the original proposal;
- on the other hand, some indicators defined *ad-hoc* by the Monitoring Team concerning the satisfaction level, the actual involvement and the degree of participation by all the different actors involved in the project.

Below are some examples of progress indicators:

- Action 1: *number of participants of Steering Committee*
- Action 3: *number of environmental issues selected*
number of rows analyzed
- Action 4: *number of stakeholders involved in the Consultation Board for each region*
number of participants to Consultation Board meetings
- Action 5: *number of interviews*
- Action 6: *number of politicians involved*
- Action 7: *number of stakeholders involved in training activities*
- Action 8: *number of project leader contacted*
- Action 9: *number of web-site visitations*

3. *Internal auditor* is appointed by the Beneficiary among technical personnel of SSSUP not directly involved in the BRAVE project. This person will be selected on the basis of previous experiences in European Projects. The auditor will be responsible for checking the correspondence between the "state of the art" of the project and the expected results and deliverables. The role of the Internal auditor is to ensure that for every action the aims of the project will be achieved as scheduled by the project. If a delay in the realisation of the activities of the project will occur, due to unfavourable conditions external to the partners management control, the internal auditor will meet the partners in order to seek possible ways to overcome these conditions. So the checks of the Internal Auditor also evaluates the effectiveness of corrective actions implemented in case of delays and problems during the project activities.

The Internal Auditor will organized a check with Beneficiary at the end of each action.

The internal auditor will verify the compliance of carried out with planned activities monitoring:

- expected results described at the end of each action
- indicators of progress described at the end of each action
- timetable schedule containing the deadlines of each action
- deliverables and milestones deadlines

The Internal Auditor will draft a report for each verification completed where describes the state of art of the project.

The beneficiary will timely inform the Commission on the causes of the delay and of the foreseen measures established to react to the eventual drawbacks and overcome them.

Beneficiary responsible for implementation

- SSSUP will be responsible and will coordinate all the activities described in this action;
- The Monitoring Team evaluates the state of implementation of the project and will fill the monitoring tool;

- All the partners will help the Monitoring Team and the Beneficiary in the collection of the information to evaluate the BRAVE progress.

Deliverable

- ✓ Monitoring tool
- ✓ List of progress indicators
- ✓ List of Monitoring team members

Indicators of progress

- Number of reports drafted by the Monitoring Team
- Number of *ad-hoc* progress indicators defined and collected by the Monitoring Team
- Number of corrective actions implemented, connected with the results of the monitoring activities
- Number of reports by the Internal Auditor

ACTION 3: Policy making and implementing

The aim of this action is to analyze the state of the art and effectiveness of measures concerning better regulation and regulatory reliefs based on EMAS and on other forms of certification, addressed to organizations at European, national and regional level, and to investigate which are the opportunities to include EMAS-related requirements or measures in European Directives in force, at the stage of their next revision, or at a preparatory stage for new Directives. This action is composed by 3 sub – actions:

3.1 Integration of EMAS into other policies and instruments in the Community

The article 44 of EC Regulation n. 1221/09 (EMAS III) states that the European Commission shall consider how registration under EMAS in accordance with this Regulation can be taken into account in the development of new legislation and revision of existing legislation, in particular in the form of regulatory relief (so that a registered organization is considered as being compliant with certain legal requirements relating to the environment laid down in other legal instruments, identified by the competent authorities), and better regulation (whereby other legal instruments are modified so that burdens on organisations participating in EMAS are removed, reduced or simplified with a view to encouraging the efficient operation of markets and raising the level of competitiveness).

The aim of this sub-action is to provide detailed information and recommendations to European Commission in order to carry out what the article 44 sets.

The sub action will be carried out according to the following steps:

- selection of European Directives both in force or at a preparatory stage that, potentially, could better valorise the requirements of EMAS Regulation in a regulatory relief perspective, and remove the obstacles and difficulties affecting EMAS adopters and potential adopters as identified by many studies (see B2 for some references). In the selection phase, the partners will take into account the contents of “Action Programme for Reducing Administrative Burdens in the European Union” (COM (2007) 23 final). The following European Directive will be surely analyzed: Directive 2008/98/EC of the European Parliament and of the Council on waste, Council Directive 1999/31/EC on the landfill of waste, Directive 2000/76/EC of the European Parliament and of the Council on the incineration of waste, Directive 2003/87/EC of the European Parliament and of the Council establishing a scheme for greenhouse gas emission allowance trading, Directive 2008/1/EC of the European Parliament and of the Council concerning integrated pollution prevention and control, Council Directive 85/337/EEC on the assessment of the effects of certain public and private projects on the environment.
- A particular and specific attention will be paid to those Directives and other regulatory acts by the EC concerning the issues of environmental damages, risk and liability, as in this area the BRAVE partner believe that there is relevant room for improvement in the use of voluntary certification schemes. In detail, the EC Directive 2004/35/EC of the European Parliament and of the Council of 21 April 2004 on environmental liability with regard to the prevention and remedying of environmental damage (Environmental Liability Directive) and the EC Directive 2008/99/EC of the European Parliament and of the Council of 19 November 2008 on the protection of the environment through criminal law will be analysed in depth and the potential connection and synergies with the guarantees provided by voluntary certification (especially EMAS registration) will be emphasised. The idea of the BRAVE partners is that, especially in these Directive, the potential valorisation of EMAS and other forms of voluntary certification is substantially undermined. This is particularly interesting in the light of recent developments of some Member States legislation concerning the “Organisation’s responsibility”. The Italian Government, for example, adopted the Legislative Decree 231/2001 on the ground of which

organisations (e.g.: CEOs) are held liable for offences against society, that is going to include crimes against the environment. In all these Directives and national laws there can be the opportunity to consider the fact the company committing the crime is EMAS or ISO 14001 certification as a favourable condition in assessing and establishing the CEOs level of responsibility

- analysis of selected European Directives focusing on authorization procedures, administrative procedures, periodical requirements, controls, inspection costs, fiscal measures, etc.. and any elements to overcome the above mentioned burdens;
- identification of “milestones” to act in terms of EMAS-based better regulation or regulatory relief;
- costs and benefits analysis both for European Commission, regulatory and implementation public bodies and for the targeted organizations according, for instance to the following criteria: burden addressed, EMAS requirements addressed, financial and organizational, risks, costs of implementation, benefit for organizations, potential effect in terms of adopter satisfactions or increase of registration number, etc.

The analysis will be carried out with reference both to environmental Directives and to the most relevant and potentially effective Directives in other regulatory fields (e.g.: safety, health, ecc.). Moreover, the analysis will also include the EU Ecolabel and other forms of certification (only if covered by the Art.45 of the new EMAS Regulation).

3.2 Overview of the existing experiences and assessment of their effectiveness dealing with regulatory reliefs, incentives or other simplification measures for EMAS registered organizations

The aim of this sub action addresses two main purposes: informing the European Commission about the measures currently enacted and, more importantly, about their effectiveness in Member States with an high number of EMAS-registered organizations and raising the awareness of national authorities about different national practices. This overview will be designed to help government policy and regulatory decisions to become more knowledge-based and empirically grounded, so that incentives and other “better regulation” measures are provided in the most suitable way for each case.

In the last years several measures were adopted by National and Regional Legislators to support EMAS registered organization. In 2004 the report from the Commission to the Council and the European Parliament on incentives for EMAS registered organizations (COM(2004)745) has provided a general overview on measures applied by all those Member States that foresee some sort of external incentives for EMAS-registered organizations. This analysis only provides information on if a measures is foreseen or not, but does not include a description on how the most interesting measures work, operational details on how to develop similar measures or, even more importantly, what kind of achievements these measures produced.

Our analysis aims at deepening this overview for those countries ranked at top positions for number of registered organization (Germany, Spain, Italy, Austria, Denmark and Portugal) and, of utmost importance, to evaluate the effectiveness of such measures. Moreover, a focus on the better regulation measures and incentives adopted at regional level will be carried out for the regional contexts involved on the project.

The first step of this sub-action is to collect information on existing measures adopted at national and regional contexts and in particular on:

- *Regulatory flexibility* including both regulatory relief, conceived as substitution of legal requirements without changes in environmental legislation such as Information required for permits, reduced reporting and monitoring requirements, reduced inspections deregulation, which involves changes in the legislation itself (i.e. self declaration in the procedure of extension of a permission, extension of permit period; fast track permits, modification in the aim of application);
- *Promotional incentives* such as reduction of financial guarantee required for specific activities (i.e. waste management), reduction of administrative fees (i.e. to be paid for administrative procedures), fiscal benefits (i.e. reduction of local tax rate), public procurement, credit access, funding support and technical and information support.

The second step of this sub-action will concern the effectiveness analysis of the identified measures. This analysis is a milestone of this action since it aims at understand whether the identified measures really addressed the foreseen targets and which lessons should be learnt in order to guarantee the effectiveness of similar future initiatives. The activities will be carried out as follows:

- Definition of some “selection criteria” to identify the most suitable measures to undergo effectiveness analysis such as: diffusion, number of potential targets, objective ambition, etc.
- Selection of the most relevant measures whose effectiveness is going to be analyzed
- Identification for each measure of the most suitable method of analysis. These methods could be:
 - *Analysis of the “level of application” of a measure:* for instance: collection of secondary data measuring the extent to which EMAS registered organizations (or other certified companies),

that could benefit of a certain kind of incentive or regulatory relief measure that is adopted in a local context, have used it such as “self declaration” in the procedure of permission extension or modification in the aim of application of a specific regulation (i.e the Regional Law on Environmental Impact Assessment in Liguria Region)

- *Analysis of the achieved results*: for instance, collection of secondary data measuring the effect of a specific measure on the increase of registered EMAS organizations and/or in their ability to comply with environmental legislation (i.e. analysis of the impact of extension of permission length of IPPC authorization on the registered EMAS organizations in the involved sectors);
 - *Awareness analysis*: for instance, by carrying out a survey targeting EMAS adopters and public employees that should apply a certain “better regulation” or “regulatory relief” measure in order to investigate the level of awareness regarding some EMAS incentives;
 - *Satisfaction analysis* in order to, for instance, investigate the appraisal of EMAS adopters, EMAS not adopters and other actors (such as control authorities or public department involved in environmental permission procedure) towards specific “better regulation” or regulatory relief measures.
- Application of the selected approaches and implementation of the analyses that have been planned in the previous steps. It has to be underlined that the different levels of analysis will be applied to all the measures that can be defined as attempts of “better regulation” and “regulatory reliefs” based on EMAS and/or on other forms of voluntary certifications such as those recognized according to Art. ... of EC Regulation 1221/2009 or the EU Ecolabel, whenever these forms are valorized in the identified meassuers. The aim of this phase is to study in depth how the different possible shapes of “better regulation” and “regulatory relief” measures, as foreseen by EMAS III and ECAP Communcation, are already applied, even if with a limited (geographical or sectoral) scope, try to generalize these measures by empowering their positive aspects and benefits (strong points) and make them applicable at a more general level in the EU.

3.3 Analysis of actual and potential opportunities to develop better regulation measures based on (and supporting) EMAS adoption at national and regional level

Similarly to what defined for European Commission in article 44, also article 38 of EC Regulation n. 1221/09 states that Member States, without prejudice to Community legislation, notably competition, taxation and State aid legislation, shall, wherever appropriate, take measures facilitating organisations to become or remain EMAS registered such as regulatory relief and better regulation.

Starting from the information collected in the previous sub action (3.2) a deep analysis of actual and potential opportunities to include measures supporting EMAS adoption will be carried out at national and regional level. The national analysis will particularly (but not exclusively) focus on the Spanish and the Italian context and the regional analysis will focus on regional contexts which are represented by each partner, that is: Andalucia and Valenciana Regions in Spain; Tuscany, Lombardia, Liguria, Friuli Venezia Giulia and Basilicata Regions in Italy.

The approach will be similar to which settled in the sub-action 3.1, that is:

- Selection of most relevant national and regional regulation including Law, legislative decrees, ministry decrees, etc.;
- Analysis of the contents of the selected regulations and legislative acts
- Identification of existing opportunities to introduce better regulation and regulatory relief measures based on (and supporting) EMAS organizations;
- Costs and benefits analysis for the different actors involved and from the different perspectives (economic, administrative, guarantees for the stakeholder, etc.).

Methods employed:

The analysis of the European Directives (sub – action 3.1) and of national and regional regulations (sub action 3.3) will be carried out by focusing on the following “sources”:

- analysis of the European Commission report on Better Regulation, and analysis of previous studies on the obstacles and constraints of EMS adoption according to EMAS scheme; an important source of information will surely be the periodical strategic Review on Better Regulation the simplification rolling programme which progress is summarized in the reports on the strategy for simplifying the regulatory environment.

- collection of legislative acts, regulations or other official documents on environmental protection and other relevant directive where some incentives for EMAS registered organization could provide for;
- direct contacts with regional administrations and with officers in charge of managing the application of the regulatory relief measures

SSSUP will define a scheme of analysis including the tasks for each partners.

The analysis of existing experiences and their effectiveness dealing with EMAS-based better regulation and regulatory relief (sub action 3.2) will be carried out by focusing on the following "sources":

- Analysis of previous studies and academic articles dealing with the incentives for EMAS organizations such as the Report from the Commission on incentives for EMAS registered organizations (Com(2004) 745 Final), the EVER report, regional studies carried out by Lombardy and Tuscany Region, etc.
- collection of legislative acts, regulations or other official documents, at national and regional level, on environmental protection and other relevant directives where incentive for EMAS registered organization could be, theoretically, provided for;
- consultation of relevant stakeholder web site such as DG Environment, National Competent Bodies, National Accreditation Bodies etc,

For each type of measure, an in-depth analysis will be carried out based on key features defined by SSSUP according with the other partners, for example:

- Policy level, geographical dimension (national, regional, local) and time span of the measure implementation;
- Aim of the measures (i.e.: administrative simplification, self certification for permits, substitution of data communication to competent authorities, periodical inspections on a longer span of time, simplified renewal of authorisation, time or financial saving, etc.);
- Actors involved (organizations or sectors to which the measure is addressed,...);
- Institutional framework, organizational setting and the management of the policy instrument
- Requirements and modes of application;
- Economic effort necessary for application;
- Organizational effort necessary for application.

Constraints and assumptions:

The main risk of this action can be identified in the impossibility of obtaining exhaustive information, caused by language problems on experiences carried out in that countries not represented by a partner such as Germany, Austria Portugal and Denmark. This will be overcome to entrusting external experts with the task to collect and translate the collected information.

Beneficiary responsible for implementation:

- IEFE will coordinate all the activities described in this action. In details, it will coordinate the desk research activities provided for in the sub action 3.1, and 3.3 defining guidelines and directives for other partners activities. About the sub action 3.2 IEFE will analyze the existing measures adopted in Denmark and will set, moreover, the approach to be addressed for the effectiveness analysis and coordinate the application of method of analyses. Finally IEFE will coordinate the editing of deliverables of this action and SSSUP will arrange the workshop at Brussels. All the partners will contribute to collect and assess European directives and national EMAS incentive according to the division of labour defined by IEFE. Each partner will be responsible of the analysis at regional level. About the sub action 3.2 IEFE will analyze the existing measures adopted in Denmark, SSSUP in Germany and Austria and IAT in Portugal.

Expected results (quantitative information when possible):

- The main expected result is to identify the opportunities to include measures supporting EMAS adoption in European Directives in force or at a preparatory stage as well as the weaknesses and strengths of existing better regulation and regulatory relief measures for EMAS registered organizations. The Action will also aim to identify the opportunities related to the national and regional legislation. As specified above, the action will also comprise an analysis of measures concerning other forms of certification (as the EU Ecolabel or ISO 14001), which will be eventually identified in the involved regions. The outcomes of this action are the milestones for designing and carrying out the next action in a effective and efficient way.

Deliverables:

- ✓ Policy opportunities for European Policy Maker for considering EMAS registration under in the development of new legislation and revision of existing legislation

- ✓ Regulation analysis and recommendations for considering EMAS registration under in the development of new legislation and revision of existing legislation at national (Italy and Spain) and regional level
- ✓ Overview of existing experiences dealing with incentives and regulatory relief for EMAS registered organizations and their effectiveness

Indicators of progress:

- Number of European directive selected and analyzed
- Number of national and regional regulations selected and analyzed
- Number of incentives for EMAS registered organizations identified in the different context
- Number of incentives whose effectiveness is analyzed
- Number of EMAS adopters, non adopters and Applicant involved in the analysis of effectiveness

ACTION 4: Policy innovation

Some legal obligations to provide documents in order to obtain or renew a permit, or periodical information to competent authorities, or even to provide evidence of compliance subject to inspection of control bodies have become needlessly time-consuming, excessively complicated or useless for many organisations.

The aims of this action is the elaboration of better regulation and regulatory relief proposals grounding on the idea that if an organisation has a voluntary environmental certification, this can help to streamline and simplify the abovementioned processes. The EMAS-based simplification proposals will be developed and shared with a high stakeholder involvement. The proposals will regard the Eu, national and regional level in order to identify concrete ways of improving legislation, simplifying and reducing the connected administrative burdens.

4.1 Working Groups constitution

The objective of this sub-action is the establishment of three kinds of Working Groups (WGs) that will work together on the elaboration of the proposals. The three kinds working groups will elaborate “better regulation” and “regulatory relief” proposals at the three legislative level covered by the BRAVE project: European, national and regional level.

In particular BRAVE foresees to set up the following WGs:

- Regional Working Groups: in each region involved a WG will be established. The aim of the Regional WGs will be the elaboration of proposals at regional and local level. Seven Regional WGs will be set up in the participating regions: Toscana, Lombardia, Liguria, Basilicata, Friuli Venezia Giulia, Andalusia, Valencia. The Regional Working Group will be composed by the partner located in those regions and by a representative of the Regional Government. Ambiente Italia will be part of both Basilicata and Friuli Venezia Giulia WGs, while the other partners will be involved in the WG of own regions: SSSUP (Toscana WG), ARPA & IEFE (Lombardia WG), Confindustria Liguria (Liguria WG), IAT (Andalusia WG), CTL (Valencia WG);
- National Working Groups: the aim of the National WGs will be the elaboration of better regulation and “regulatory relief” proposals regarding the national legislation. Two WGs will be established, the first will work on the Italian legislation, the second will develop simplification proposals related to the Spanish legislation. The Italian partners will be part of the first WG and the Spanish partner will be part of the second WG. SSSUP as Coordinating Beneficiary and responsible of this action will collaborate in both WGs in order to assure the adoption of the same approach and to guarantee collaboration and cross improvement between the two groups;
- Eu-wide Working Group: this WG will elaborate the proposals to introduce in the EU-level legislation as identified in the action 3.1. This WG will be composed by all the BRAVE partners .

The WGs will be operational bodies and will not have sharing objectives at this stage.

4.2 Consultation Boards constitution

The constitution of Consultation Boards will aim to create a body in order to guarantee a large sharing of the proposals emerging from the project. All the Institutions that could be involved by the different proposal concerning simplification, administrative burden reduction, self certification, substitution of requirements, etc. will share these proposals.

The members of the Consultation Boards will be selected among the main important public and private institutions at regional and national level. They will be involved during the action 4.4 through specific meetings.

The BRAVE project foresees to set up two kind of Consultation Board: Regional Consultation Board (RCB) and Project Consultation Board (PCB).

The Regional Consultation Boards will aim to share the simplification proposals that will be drawn up by the Regional Working Groups. The RCB will guarantee that all the local needs according to the themes tackled by the BRAVE project will be considered in the simplification proposals.

For instance, representatives of the regional Governments but also of the local institutions that have the responsibilities of the environmental administrative procedures (e.g. in Italy the Provinces are the Competent Authorities for many permitting procedures like water emissions, noise emissions, IPPC, waste management, etc. and others procedures are in the responsibilities of the Municipalities) and in the inspection and control activities (e.g. regional Department of control and Inspection Institution) will participate in the RCB. On the private side representatives of industrial and trade Associations of the productive sectors with the higher dissemination in the region or representatives of the regional level of these Associations will participate. For instance in Tuscany the industrial Association of Tannery sector of S.Croce Sull'Arno and industrial Association of Textile sector of Prato (see the corresponding support letters) representatives of two of the most important industrial Cluster of SMEs in Europe, or in Andalusia the industrial Association of Ceramic sector could be involved. In each involved region a RCB will be set up, so in total 7 Regional Consultation Boards will be established.

The project foresees to set up one Project Consultation Board (PCB). The PCB will aim to share and approve the simplification proposals elaborated by the National Working Groups and European Working Group. In this board could be involved the following members:

- representatives of Ministry of Environment of Italy and Spain;
- representatives of Regional Governments (included the Regions not directly involved in BRAVE project);
- national industrial and trade Associations;
- representatives EMAS Competent Bodies of Italy and Spain;
- representatives of national and international Institutions;
- local Institutions (e.g. provinces) with particular and innovative experiences in better regulation and regulatory relief;
- etc.

The project partners will coordinate the meeting explaining the simplification proposals to the RCB and PCB but they will be not members. The sharing activity carried out by the Consultation Board, as described in the sub-action 4.4, will include the possibility to modify or define new proposals

4.3 Elaboration of better regulation and regulatory relief proposals

This sub-section aims to draw up the proposals to support the full integration of EMAS in EU environmental legislation (better regulation) and to remove, reduce, simplify the administrative burdens for the registered organisations as a way to encourage the adoption and dissemination (i.e.: regulatory relief).

This sub-action will be based on the results of the Analysis of legislation and of the potential opportunities to include measures to support EMAS adoption identified in the action 3.

The activity will be carried out by the described Working Groups and will regard regional, national and European Legislation.

The National and Regional "better regulation" and "regulatory relief" proposals for EMAS registered organisations could concern:

- *simplification related to the existing legislation and permitting procedures*: extension of the validity of permits, use of EMAS mandatory documents (e.g. Environmental Statement) as official document to obtain or to renew the permit, reduction of the time to obtain the permit, increase of the dimensional level of the scope of environmental legislation (e.g.: increase in the dimension limits to undergo an EIA procedure), reduced reporting requirement using EMAS Environmental Statement, reduction of mandatory documents to submit, use of self-declarations, reductions periodical mandatory requirements, decreasing the monitoring frequencies (e.g. monitoring frequency to assess noise emissions), etc
- *simplification in control and inspection procedures*: reduction of planned inspections and control for EMAS companies, use of data and information contained in the Environmental Statement in substitution of inspections on sites (e.g. use of results of monitoring campaigns), use of results of environmental accredited EMAS verifiers in substitution of public inspection and controls, etc. (according to European Parliament and Council Recommendation 331/2001 about "minimum criteria for environmental inspections in the Member States");
- *environmental tax and administrative costs and burdens reduction*: reduction of administrative fees to obtain environmental permits or a licenses, reduction of administrative fees for inspection and control activities, reduction of local tax rate, reduction of financial guarantees required for specific activities (e.g. permit related to activate a waste management plant).

The WGs will elaborate the proposals through specific activities as meetings with SMEs, interviews in companies and industrial associations and taking into account what the local regional and local institutions have just carried out in the past periods in the same field of the project.

The Eu-wide Working Group will elaborate the simplification proposals related to the EC Directives in force as well as at the preparatory stage. The contents of these proposals will specify:

- the main opportunities in the existing EC Directives and Regulations for implementing incentives for EMAS registered organizations (or for organisation having other voluntary certifications such as the EU Ecolabel or ISO 14001 or other recognised according to Art. 45 of the EMAS III Regulation), to be implemented in their revision process;
- the opportunities to modify the Directive at a preparatory stage;
- the simplifications or administrative burden reductions that could be adopted simply through Commission Decisions or Recommendations;
- suggestions and recommendations for European policy-makers in order to satisfy the provisions of the article 44 of EC Regulation n. 1221/09 (EMAS III);
- strengths and weaknesses of existing incentives for EMAS registered organizations (or for other voluntary certifications, as specified above) and which elements should be taken into account in designing and implementing new and innovative measures.

4.4 Stakeholder consultation and approval

This sub-action aims to carry out a large stakeholder consultation and to approve the advanced proposals. These objectives will be achieved through the involvement of the Regional Consultation Board and Project Consultation Board. In these bodies as described in the sub-action 4.2 will be involved all private and public institutions that play an important role in the legislative, regulatory and control processes tackled by the project. Many of these Institutions have already confirmed in the preparatory phase of the BRAVE project their interest in the project activities and have confirmed their availability to be member of the Consultation Boards (see the annexed support letters).

At the regional level we foresee at least 3 meetings for each involved region between the Working Group and the Regional Consultation Board. To approve the “better regulation” and the “regulatory relief” proposals related to the national legislation, the National Working Group will meet the Project Consultation Board at least 2 times. Also the Eu-level proposals will be shared and approved by the Project Consultation Board through 2 specific meetings.

Before the meetings, the WGs will send to the Consultation Boards a document with the description of the proposals in order to create the conditions to achieve a final decision in the meeting.

In the first meeting the Consultation Boards should not only share and approve the proposals of the Working Groups but could suggest new simplifications proposals.

At the regional level, after the first meeting with the Consultation Boards, will be arranged a plenary meeting with the participation of all Regional Working Groups. This meeting will aim to favour the exchange of experiences carried out in each region.

After the meetings with the Consultation Boards, the Working Groups will modify the proposals on the basis of the comments and suggestions received. In the following meetings the WGs and the Consultation Boards will approve the simplifications proposals.

4.5 Workshop in Brussels

This sub-action aims at improving the results emerged in the previous sub sections by means of a sort of consultation process with the European Commission.

In details, evidence from the analysis of European Directives as well as the emerging proposals will be presented and discussed with European policy makers in order to obtain a preliminary consensus and agreement on the feasibility and usefulness of the identified “regulatory action areas”, before converting them in concrete policy actions at regional level.

In the workshop will be presented and discussed all the “BRAVE proposals” and not only the proposals to apply to European Legislation.

The outcome of the workshop will be used to check the validity of the previous actions and will be summarised in a Report that will be used to plan and carry out the next actions.

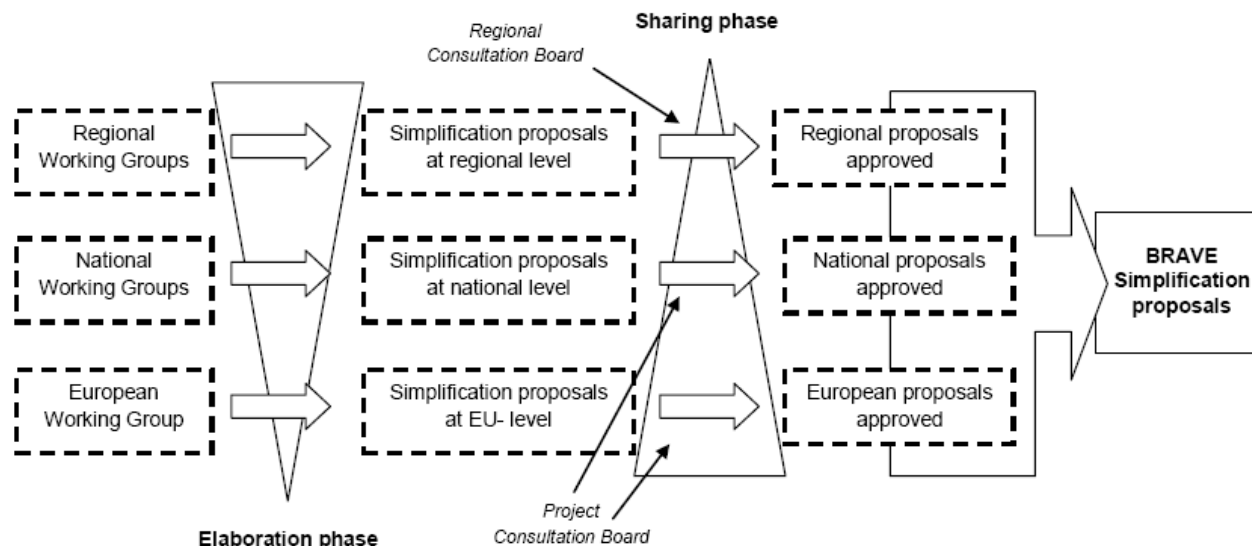


Figure: Graphical presentation of Action 4

Methods employed

The several Working Groups will be established with a specific partners meeting. Before this meeting, each partner will contact the representatives of the Regions that will be part of the Regional Working Groups to confirm their adhesion.

Each Regional Working Group will promote the constitution of the Regional Consultation Board thanks to specific meetings and contact with the local institutions to present them the project objectives and activities. SSSUP as responsible of this action will coordinate the constitution of the Project Consultation Board. In the Constitution of the Consultation Boards the project partners will take into account the Institutions that have confirmed their availability to cover this role with the signing of the support letters. The constitution of each Consultation Board will be formalised in a document that will report the name and roles of each member.

In the sub-section 4.3 the proposals will be elaborated following 5 main approaches:

- the Working Groups will take into account the results of the action 3 and the opportunities to introduce simplifications identified in this phase. If the WGs will retain that some national or local laws has not been in depth investigated in action 3, could examine them during this action in order to be sure to consider all the opportunities;
- specific meetings will be arranged with public institutions that are responsible for the environmental permitting procedures and control activities. The WGs will discuss about the opportunity to introduce regulatory relief according to the three kinds of measures described in the sub action 4.3. These meetings will be the opportunity to meet some institutions that could be involved in the Consultation Board to share, already in this stage, project objectives;
- the collection of opinions and ideas on both “better regulation” and “regulatory relief” will be carried out also by private stakeholders consultation. In particular, interviews are foreseen with industrial associations and other representatives of the industrial and service sectors. Moreover, we will disseminate some questionnaires among the industrial and service companies of each involved regions to understand their expectations in term of better regulation and regulatory relief;
- the best experiences adopted in other regional and national contexts will be taken into account and valorised, enriching and converting them as proposals for other regions and for the national and EU level. We remind that action 3 will aim to analyze not only the experiences of Italy and Spain, but also the experiences in EMAS-based better regulation and regulatory relief of the other member Countries (Germany, Austria, Portugal, Denmark) with the highest number of EMAS registered organisations. In the same way, eventual best practices identified by the action 8 “Networking with other projects” will be considered and valorised.

The sub-action 4.4 about sharing and approval of the BRAVE proposals will be carried out with a high involvement of the Consultation Boards. The project partners and the WGs will assure that the meetings with the Consultation Boards will achieve the fixed results. At least 2 weeks before the meetings, the partners will send the proposals to the members of the Consultation Boards. The minutes of the meetings will record the decisions taken about each “better regulation” and / or “regulatory relief” proposal.

The workshop in Brussels will be arranged by SSSUP. SSSUP will establish preliminary contacts with the officers of the European Commission interested to be involved in the workshop (e.g. Life+ Programme

implementation officers, officers that work on the EMAS issues, ECAP officers, expert groups that developed the EU Better Regulation activities, other representatives of Environment DG or Enterprises DG).

Constraints and assumptions:

Some risks could be connected with this Action. Firstly we could expect that the representatives of the Regional Governments will not take part of Working Groups. This risk seems to be unrealistic for three reasons: each partner have a good contact thank to past collaborations with the Regions (e.g. the Italian partners are members of CARTESIO Network that involve 6 different Italian regions, CTL is part of the Valencia Region, etc), some of the Regions to involve have signed the support letters or are co-funders of BRAVE. Secondly we could risk that private and public institutions will reject the invite to be member of the Consultation Boards. This risk should be avoided thank to the high interest of these institutions in the themes tackled by the project. This interest is confirmed in the several support letters signed by local Authorities (e.g. provinces) and private institution representatives of industrial companies (e.g industrial and trade associations) that will be surely part of the Consultation Boards. The last risk could be related with the sharing phase. In this phase could happen that the Consultation Board doesn't achieve a final decisions about some proposals to approve. This aspect could depend by the different (public and private) interests represented in these consultation bodies. Only in these cases of no-agreement among the members, the project partners, to overcome that situation, will take the final decision as responsible of BRAVE project activities.

Beneficiary responsible for implementation

SSSUP will be responsible for the implementation of this phase. Each partner will coordinate the Regional Working Group and favour the constitution of Regional Consultation Board.

Expected results

The expected results are the following:

- the constitution of seven Regional Working Groups, two national Working Groups and one European Working Group
- the constitution of seven Regional Consultation Boards and one Project
- European, national, regional EMAS better regulation and regulatory relief proposals;
- a report that will contain EMAS simplification proposals related to the existing legislation and permitting procedures, control and inspection procedures, environmental tax and administrative fees reduction;
- large stakeholders involvement in the sharing and approval phase;
- policy recommendations and proposals to European policy makers for considering EMAS registration under in the development of new legislation and revision of existing legislation;
- feedback from European Commission officers as result of the workshop to be held in Brussels.

Deliverable

- ✓ List of the member of of Regional, National and European Working Groups
- ✓ List of the member of Regional and Project Consultation Boards
- ✓ Minutes of the meeting of the Consultation Boards with the decision about the simplification proposals
- ✓ Report with the list of the simplification proposals shared by the Consultation Boards
- ✓ Report about the workshop held in Brussels

Indicators of progress

- number of members of each Consultation Board;
- number of meetings of Working Groups;
- number of meetings and interviews carried out with public and private institution to elaborate the simplification proposals;
- number of simplification proposals related to the existing legislation and permitting procedures;
- number of simplification proposals related to inspection and control activities;
- number of simplification proposals related to environmental tax and administrative fees reduction;
- number of meetings of the Regional Consultation Board;
- number of meetings of Project Consultation Board.

ACTION 5: Testing in field

This action aims to test the “better regulation” and “regulatory relief” proposals assessing their feasibility and their cost-effective for both organizations and institutions.

In order to achieve operational and far-reaching results, this Action and the next one (Adoption) will concern the regional proposals and the national proposals that will involve immediate changes (possible and able to yield effects in the time-span of the project) in the regulatory processes, permitting procedures, control activities, administrative procedures (fees, documentation, etc.) mostly at the regional and local level. Moreover, the BRAVE project will simulate what would happen if the proposed changes to the EU Directives that will emerge as shared proposals are effectively implemented. This would be done by simulating the time, costs, efforts of a procedure in the conventional and current way and, symmetrically, in the way that a modification or integration of the EC Directive would allow.

5.1 Selection of simplification proposals to test

In this sub-action the project partners will select the “better regulation” and “regulatory relief” proposals to be tested. The partners will develop some selection criteria in order to identify the proposals to test. These evaluation criteria will be drafted on the basis of the following 5 classes:

1. *Environmental relevance*: the partners will analyze the proposals identifying the measures (incentives, simplifications, etc.) that could have the highest positive impact on the environment also in terms of EMAS adoptions;
2. *Environmental legal compliance*: according to this class of criteria the partners will identify the proposals that will help the companies, most of all the SMEs, to be compliant with environmental legislation (according to ECAP objectives);
3. *Eco-innovation*: with this criteria the project partners will select the proposed measures (i.e.: simplifications, incentives, streamlining of permits processes, self declaration of compliance for certified organisations, etc.) that could involve the companies in the adoption of environmental technologies and techniques (e.g. simplifications in IPPC legislation and permitting procedures to favour the adoption of BAT);
4. *Coherence with European and National objectives and priorities*: the partners will take into account the simplifications proposals connected with the Eu priorities (e.g. priorities identified by COM(2005) 97 final “Better Regulation for Growth and Jobs in the European Union” and COM(2009) 15 final “Third strategic review of Better Regulation in the European Union”) or National priorities in the field of better regulation and regulatory relief;
5. *Importance for private and public stakeholders*: the partners will assess according to this criteria through the involvement of Regional Consultation Boards.

This sub-action foresees to select at least 5 (five) proposals for each involved region (in total at least 35 proposals). The selected proposals to test should cover each class of incentive and/or simplification measures mentioned in the sub-action 4.3, i.e.: simplification related to the existing legislation and permitting procedures, simplification in control and inspection procedures, environmental tax and administrative fees reduction.

5.2 Identification of Competent Authorities to involve in the testing activities

On the basis of the selected proposals, in this sub-action the partners will identify the Competent Authorities to involve in the testing in field phase. The partners will contact the Competent Authorities responsible of the permitting procedures or of the control and inspection activities in order to involve them in the next sub-action. Many of these institutions (Regional Governments, Provinces, Municipalities, Inspection and control Agencies, etc) will be already involved in the Regional Consultation Boards mentioned in the action 4. Besides some of them have signed the support letters of the BRAVE project, in which they already committed to make their officers available to devote time and to provide support to the project in applying the “better regulation” or “regulatory relief” proposals that will emerge as most interesting to be tested from the previous phases. This is a key commitment for the project, because the support of those administrations or public bodies that are operationally responsible to manage the interested procedures (e.g.: they release the permits to be simplified for EMAS registered companies) will guarantee an effective, practical and “ready to disseminate” experimental application.

5.3 Testing in field

This sub-action aims to assess the feasibility of the BRAVE proposals through the involvement of all private and public actors that are connected with the proposal.

The test in field will be carried out on every better regulation and regulatory relief proposal selected in the sub-action 5.1 and will foresee a report that will contain the results of the activities.

This sub-action will take place in each Region involved in the project (Tuscany, Lombardia, Basilicata, Friuli Venezia Giulia, Liguria, Andalusia, Valencia).

The sub-action foresees, for each proposal to test, the following actions to assess its feasibility and effectiveness:

- *Regulatory and administrative feasibility*: according to this activity, the partners will assess how the proposed measure (simplification, incentive, self-declaration or self certification, reduction in fees,

etc.) will impact on the regulatory (e.g.: changes in requirements, rules and/or control or measurement methodologies) and administrative (changes in procedures, operational implementation, control modalities, documents to be submitted, timing in the release of permits, etc.) processes. To achieve this result, for instance, the partners will involve the Competent Authorities responsible for the permitting procedure connected with an eventual simplification proposal to test it on a sample-organisation that requires a permit. The partners will carry out simulation of the new permitting procedure according to the new measures introduced and a report will be drafted where strengths and weaknesses in the proposal implementation will be explained and clarified;

- *technical feasibility*: the partner will assess all technical information and data that are needed to implement the proposal. An example of this feasibility study could be related to the valorising of results of EMAS monitoring activity to reduce the number and frequency of public inspections. In this case, the BRAVE partner should identify with the Control Authority which kind of data the companies should send (e.g. chemical analysis of air emissions) and the characteristics of these info and data (e.g. chemical analysis carried out by a laboratory accredited in accordance with ISO17025 standard);
- *economic and organisational impact*: the partners will assess costs and efforts, on one side, and savings and benefits, on the other side, for both Competent Authorities and private companies. This activity will aim to identify the proposals with the highest economic and organisational relevance. The economic impact will include not only the financial aspects but also the time of internal human resources or external consultants spared with the simplification. It will regard also the identification of hypothetical measures to adopt by the public Authorities to balance the decrease of financial revenue from EMAS registered organisations that benefit from the “regulatory relief” (e.g. increasing the administrative fees for polluters in accordance with Polluters Pays Principle).

All the selected “better regulation” and “regulatory relief” proposals will be assessed according to the described feasibility actions. The partner will summarize the results in a report. The report will be very important for the activities foreseen in the next action 6 (Adoption) and action 7 (Communication and training).

5.4 Feedback

The partner will valorise the “lesson learnt” in this action. In particular in this sub-action the partners will revise and adjust the BRAVE proposals in accordance with the results of the testing in field. The modifications will regard not only the tested proposals but also the other similar proposals that could be connected with and influence by the results of the testing (e.g.: an improvement to all the permitting-related proposal coming from a test in-field of a specific simplification concerning IPPC Directive).

Methods employed

The partners will select the proposals to test according to the method and criteria mentioned in the sub-action 5.1. A common methodology for the selection will be drawn up on the basis of those criteria and the same methodology will be applied to all proposals.

The partners will involve the Competent Authorities for the testing phase thanks to the participation or support of the regional Governments. Besides, many of these Competent Authorities will be already involved in the Consultation Boards constituted in the action 4.

The test in field sub-action will be developed with the same method in all the involved Regions in order to have comparable results among them. The method will be based on the mentioned three classes (Regulatory and administrative feasibility, technical feasibility, economic and organisational impact) and the partners will draw up a detailed report of the result. To evaluate the economic impact will be taken into account the costs/benefits methodologies described in the literature or applied in other Life or Life+ projects.

Constraints and assumptions:

The main risk could be related to the involvement of the EMAS registered private companies (most of all SMEs) in the simulation of new permitting procedures in accordance with the simplification proposals. In fact, these companies will be not part of the Regional Consultation Boards because in these bodies will participate their representatives (industrial and trade associations). The BRAVE partners will overcome this risk thanks to: the involvement of the industrial associations that will contact and select EMAS registered companies, the fact that the theme tackled by the project is really interesting for the EMAS companies, the involvement of EMAS Competent bodies or EMAS accredited verifiers (involved in the Project Consultation Board) to contact the companies. Moreover, it has to be considered that all the industrial and trade association that signed the support letter for the BRAVE project have already taken a strong commitment to identify the associated companies (members of the association) that are more interested in the “better regulation” and “regulatory relief” opportunities for EMAS registered organisations or other certified companies (e.g.: with the EU Ecolabel). The commitment undertaken by many important Trade Associations among the sectors and

territories where EMAS is most diffused (see for example Assocatra – national paper producers association, or Assolombarda – industrial association of the Milan area) will guarantee that many companies, and among them some SMEs, that will be available for the testing in-field will be surely retrieved and involved. On the other hand we do not consider a risk the participation of Competent Authorities in this action. These subjects will be already involved in the Consultation Boards during the action 4 and so will confirm their availability for the testing in field phase.

Beneficiary responsible for implementation

Ambiente Italia will assure the coordination of this Action.

All the partners will contribute to the activities of the action according to the division of labour defined by Ambiente Italia. Each partner will be responsible of the testing activity at regional level.

Expected results

The expected results are the following:

- a methodology to select the simplifications proposal to test;
- a list of at least 35 simplification proposals to test in the involved regions;
- a list of the Competent Authorities and private companies to involve in the testing phase;
- a report about the results of the testing in field action;
- an updated version of the Report that contains the simplification proposals revised on the basis of the results of this action.

Deliverable

- ✓ Methodology to select the simplification proposals
- ✓ List of the simplification proposals selected
- ✓ List of the Competent Authorities and private companies involved in the testing in field phase
- ✓ Report about the results of the testing in field phase
- ✓ Updated version of the Report that contains the simplification proposals revised on the basis of the results of this action

Indicators of progress

- number of criteria included in the methodology to select the simplification proposals to test;
- number of Competent Authorities involved in the testing in field phase;
- number of private companies involved in the testing in field phase;
- number of meetings carried out with Competent Authorities to test the better regulation and regulatory relief proposals.

ACTION 6. Adoption

The current action is characterized by the development and the implementation of legislative acts and administrative procedures in the two participating countries (Italy and Spain). The aim of the action is an effective implementation of most relevant measures, among those previously identified and tested in field by the stakeholders involved in the project.

In this action a significant effort will be made by the involved regional and local governments to effectively contribute to the achievement of the objectives of the BRAVE project e.g. changes to existing regional legislation in order to achieve a “better regulation” by means of Emas and to provide a “regulatory relief” that really simplifies legal compliance to the voluntarily certified organisations.

The activities of this action are, in other words, the “final step” of the experimentation phase of the project (see Action 5). The activities will be carried out in different sub actions, in particular:

6.1 Selection of the proposals

Starting from the results emerged in the previous action, the objective of this sub-action is to identify and select a set of proposals for “better regulation” and “regulatory relief” at regional and national level, that will be consistently emended in the next sub-action.

The selection procedure will be performed through a methodology based on:

- The Analysis of the legislation and of the potential opportunities to develop “better regulation” and “regulatory relief” measures (as identified in Action 3);
- Evaluation of the timescale for the implementation of this measures (the measures that can provide results achievable in a shorter time will be preferred);
- The evaluation criteria identified in sub-action 5.1;

- Evidence emerged from the Action 5_Testing in field;
- Organizational and financial cost of implementation;
- Coherence with European recommendations and indications, e.g. we will prefer the proposals compatible with the "[Third progress report on the strategy for simplifying the regulatory environment](#)" of the European Commission as updated in 2009 or compatible with the Commission Legislative and Work Programme 2009 (COM(2008)712) or with the requests for cooperation (of the European Commission) for the review of some Recommendations (e.g. Recommendation 2001/331/EC);
- Potential effect on EMAS diffusion and on overcoming the drawbacks identified in the literature.

The selection of the proposals will concern:

- Existing legislation and permitting procedures;
- Procedures of control and inspection;
- Reduction of environmental tax and administrative fees.

The methodology will be shared between the Italian and Spanish Working Groups, both regional and national (see Sub-Action 4.1). The final selection of the BRAVE proposals will be taken during a meeting organized in Italy or Spain at the presence of the Regional and National Working Groups. The final selection will be decided according with the Consultation Boards.

6.2 Preparation of amendments

The sub-action, on the basis of the previous ones, mainly aims at converting the proposals in legislative amendments to regional laws (Andalucía and Valencia Region in Spain; Toscana, Lombardia, Liguria, Friuli and Basilicata in Italy), national laws and EU Directives. The proposed innovation to the current legislation or regulatory framework will be carried out through the recasting of existing acts or by means of new legislative proposals, whilst maintaining the substance of Community policies.

The editing of amendments and innovation proposals for supporting "better regulation" and introducing "regulatory reliefs" will concern, for instance:

- Existing legislation and permitting procedures (e.g. extension of the validity and longer duration of permits for EMAS registered companies, reduced reporting requirement using EMAS Environmental Statement, reduction of the time to obtain the permit,...) ;
- Procedures of control and inspections (use of data and info contained in the Environmental Statement in substitution of inspection on site, use of results of environmental accredited EMAS verifiers in substitution of public control,...);
- Reduction of environmental tax and administrative fees (reduction of local tax rate, reduction of financial guarantees required for specific environmental compliance activities, such as landscape and soil restoration..).

Before the submission of the proposals for the adoption, each partners will collect the amendments and innovative legislation texts prepared in his/her own region. As a final step of this sub-action we will organize a meeting between the Regional Working Groups to share and approve the outputs, before starting the next action.

6.3 Adoption of amendments and developments of legislative proposals

This final action represents a fundamental step of the path of the whole project. This action, in fact, represents the approval process of the "better regulation" and "regulatory relief" measures studied and, in some cases, tested in field. The proposed amendments and innovative legislation or regulation texts (sub-action 6.2) will be presented to the Regional political bodies responsible directly for the adoption or for the submission to higher institutional levels (i.e.: national or EU), in each Region involved directly in the project.

Amendments or regional law proposals, if adopted, will after the official publication, be disseminated through the BRAVE project site and will be used to create a toolkit that will be communicated and disseminated with the activities of the next action.

Regarding the amendments for the national laws, they will be presented during a seminar that will involved Italian and Spanish parliamentarians.

Methods employed:

According with the Environmental Compliance Assistance Programme (ECAP) for SMEs (COM(2007) 379 final), the European Commission promoted support for SMEs to improve their environmental legal compliance. Each partner will deem the priority fields of the Action Plan of the ECAP as a milestone for guaranteeing the factual and proactive implementation of environmental policy and introduce measures for simplification, incentives, reliefs and other codifications for businesses.

In order to carry out this action and achieve the very pragmatical objective of the adoption of amendments and the development of official law proposals, a particular attention will be paid to the “in field” results of the previous action (Action 5). Very important in all the action is the interest and active involvement of Regional administrations, as well as the support of the BRAVE partners in the creation of a valid methodology of selection of the proposals. The selection of proposals will be made according to the abovementioned criteria (6.1) and will be based on a wide and deep involvement of Consultation Boards, in particular of Regions’ members.

The sub –action 6.2 will be carried out starting from the analysis of governmental procedures for legislative process. The regional departments will be actively involved in the drafting and editing phase and a number of ad-hoc meetings will be organized with regional politicians.

Constraints and assumptions:

The main risk of this action can be identified in the capability to make to political actors participate actively and have them act in a short time. The partners of the project will ensure a continued interest in action progress and an active involvement of the interested subjects, also through seminars and meetings.

Another possible risk is the insufficient adoption of amendments. To avoid this risk partners will engage in creating a strong methodology and an active involvement of Regions and regional / national parliamentarians.

Beneficiary responsible for implementation:

- Confindustria will have the responsibility of coordinating and managing the activities described in this action;
- The activities in each region will be coordinated by the partner responsible of the interested Region with the support of representatives of the regional governments.

Expected results:

The expected results are the following

- 1 methodological tool for the proposals’ selection;
- At least 1 general meeting with all partners and the representatives of the regional governments;
- At least 3 regional proposals adopted (in each region) by the approval of legislative amendments;
- Written communication of the adoption of simplification at regional level, to at least 2 ministries to each of the 2 states (Italy and Spain);
- At least 50 new amendments downloadable from the project web-site.

Deliverables:

- ✓ Methodological tool for the selection of the proposal of simplifications;
- ✓ List of submitted proposal;
- ✓ List of approved amendments.

Indicators of progress

- Number of submitted proposal;
- Number of approved proposal;
- Number of download of adopted amendments;
- Number of stakeholders involved in the workshops;
- Number of communications at ministries.

ACTION 7 Communication and training

The diffusion of formal EMS such as EMAS (or other certifications such as the EU Ecolabel) between SMEs and their effective implementation have encountered, during these years, several difficulties. These difficulties are often due to the absence or lack of knowledge of incentives applicable.

For these reasons, we will set and carry out several communication, training and sensitization activities and develop ad hoc tool for policy-makers, local actors and SMEs in order to explain and diffuse the knowledge of incentives, regulatory reliefs and other simplification measures for EMAS registered organizations and for other voluntarily certified organisations, and provide a complete, effective and “easy to use” guidance for their conception, development and application at the operational level. This action is made up by 4 sub – actions.

7.1. Creation of the “Guidance tool for the EMAS-based regulation and better regulatory relief”

The aim of this sub-action is to lay the groundwork for the creation of a common guidance tool that will subsequently be distributed to policy-makers, local actors and SMEs.

This sub-action will foresee the collection and rationalisation of the outcomes of the whole project (mainly from operational actions, from 3 to 6), in the 2 Member states directly involved (Italy and Spain).

On the basis of the results of the project, the partners will make proposals for the creation of a guidance tool that highlights the strategic approach of the BRAVE project to some priorities of the Action Plan of ECAP and that facilitates and supports the adoption of better regulation and regulatory relief at different levels.

The methodology for the creation of the support tool, a sort of guideline of simplification, will be shared by the project partners and will be designed on 4 levels:

- *EU level:* framework of priority fields of the European Commission regarding the environmental legal compliance of SMEs and their adoption of EMS. The guideline will focus on the amendments to the Directives already adopted in order to support their adoption at national level. Will also be briefly listed some of the future simplifications provided at Europe level in order to guide the studies of national institutions on possible future amendments;
- *National Level:* the section will be devoted to the possible ways to develop regulatory measures and framework laws in the context of better regulation (e.g. to enhance the credibility and the usefulness of EMAS as a policy tool) and regulatory relief (e.g. to minimise the administrative burden for EMAS registered SMEs) at national level;
- *Regional level:* the section will be dedicated to explain how to introduce simplifications on regional law (e.g. rates and timing for the controls in the EMAS registered SMEs, environmental impact assessment);
- *Local level:* The final section provides an explanation of how to implement regulatory measures or administrative simplification to existing legislation, also to develop a greater proximity to the entrepreneurial and productive local systems.

We will also foresee the involvement of all the interested parties. This involvement will be guaranteed by a virtual forum on-line on the BRAVE web site, where the drafts of the tool will be available for consultation. The partners and the Regions involved in the project will widely diffuse (by using their considerable mailing lists and also with the support of CARTESIO Network) an invitation to stakeholders and interested parties to consult the website and submit their inputs for the improvement of the methodology for the guidance tool. The final version of the tool will be consistently emended and integrated according to the inputs collected from the interested parties.

The partners of the BRAVE project, in their Member states and Regions, will carry out a consultation process with relevant stakeholders, in order to present and discuss the practical Guidance tool with a range of institutional actors, experts and practitioners to obtain a wider consensus and agreement on the feasibility and usefulness of the tool, before divulging the final version. The consultation process will be carried out by organising a meeting, in one of the region involved, with the most relevant stakeholders at the national, regional and local levels.

This document will be approved by all the partners of the BRAVE project during a meeting that we will organise in Italy or Spain. It should represent the methodological guideline for the operative application of better regulation and regulatory relief as identified e.g. in the Action Plan of ECAP or in Inter-institutional agreement on better law-making (2003/C 321/01) and it will contain the methodological steps to be undertaken at the different levels.

The Guidance will be useful both for the actors directly involved in the project and for external actors, such as other states or regions. This fact is due to the potential replicability of the experience conducted in Italy and Spain through the BRAVE project. This sub-action can be viewed in relation to action 8 (Networking with other project) because the guidance tool will be a good base for those who will undertake in the future similar experience in field of better regulation and regulatory relief.

The Guidance tool will be disseminated by means of instruments described in Action 9 (Dissemination).

7.2 Communication process

In each Region, the Consultation Boards will be assisted by the BRAVE partners to develop a communication process facing up to the relevant incentives for EMAS-registered organizations available in the region.

This sub-action could therefore be implemented as a set of communication activities aimed at diffusing the knowledge about the existing incentives and training how this incentive could be applied.

In particular in each Region, a *Communication Plan* will be developed; it will contain, at least, the following information:

- Type of incentive available in the region;
- tools selected in the region for the communication process and actions planned for their use;
- time scheduling for the planned actions;
- stakeholders and target – groups considered relevant (e.g. EMAS adopters, not adopters, public employees involved in the application of incentives);

- responsibilities and roles involved.

At least 5 actions for each Plan will be carried out, These actions could include:

- Seminar and meetings;
- Brochure for specific incentives or target;
- Article in technical magazines;
- Workshops;
- Training initiatives.

A very important elements of the communication plan will be certainly training initiatives.

In each Region, the BRAVE partners will organize internal training activities for:

- The 7 Regions and the provinces directly involved in the actions of the project,
- SMEs operating in the territory involved in the project,
- Representatives of industrial associations,
- Organisations related with the local society,
- EMAS adopters.

These training initiatives will focus on technical aspects concerning, for example:

- the environmental priorities and the corresponding simplifications analysed and adopted during the whole project;
- the methodologies for the implementation of the "*Guidance tool for the EMAS-based regulation and better regulatory relief*" at every considered levels;
- the key-elements of the "*Guidance tool*" and ways and operational solutions for an effective implementation;
- the opportunities introduced by the adopted simplifications.

7.3 External Communication

The activities of this sub-action are related to the reproducibility of the methodological path in other States and Regions.

The aim of the sub action is the identification of other national and regional contexts where the process of EMAS-based regulation and regulatory reliefs is not strongly developed, in order to communicate and share the path taken through the project and the real opportunities that have emerged from it.

To do this, each region involved in the project will select at least another region, external to the project (giving priority to the less advanced in terms of number of EMAS registration or simplifications adopted), and will contact by e-mail a representative of this selected context to provide a brief description of the project and disseminate the "*Guidance tool for the EMAS-based regulation and better regulatory relief*".

The external regions will also invited to participate, if interested, in the final conference. We will make aware other subjects about the opportunity to utilize the tool and to promote the diffusion of EMS and to improve the quality of new initiatives of regulation.

Methods employed:

The "*Guidance tool for the EMAS-based regulation and better regulatory relief*" (sub – action 7.1) will be carried out by focusing on the following "sources" and will basically rely on the following key steps:

- ✓ collection of the most relevant and effective outcomes of the project realised in Italy and Spain;
- ✓ Elaboration of a common methodology between the partner of the project for the creation of the Guidance tool;
- ✓ Elaboration of a draft of the tool;
- ✓ Contacts with the stakeholders to obtain a wider consensus and agreement on the feasibility and usefulness of the tool;
- ✓ Large dissemination of the final version of the guidance tool.

The training & communication initiatives (sub-action 7.2) will be organized in each region involved in the project and will allow interaction between the organizers and participants. The organizers should be supported by paper means (laws, amendments) or computer (slides).

The replicability (sub-action 7.3) of the results achieved in Italian and Spanish regions involved in the project will be ensured through direct contact with representatives of other regions and through the dissemination of the Guidance tool.

Constraints and assumptions:

The main risk of this action can be identified in the difficulties of setting up really useful tool and tailored to the needs of the different subjects and levels considered.. For this reasons we will guarantee the active presence and involvement of different stakeholders during the phase of creation of the tool. Other risks of this action could be identified in the capability to include a great number of subjects in the training initiatives, the difficulties of organize really useful training initiatives and the low interest from other regions. However the proposed objections, comments and suggestions for improvement will be noted by the partners and will be used in future initiatives.

Beneficiary responsible for implementation:

- The IAT will have the responsibility of coordinating and managing the activities described in this action;
- The other partners will support IAT in the creation of the drafts of the Guidance tool;
- The activities in each region will be coordinated by the partner responsible of the interested Region with the support of representatives of the regional governments.

Expected results:

The expected results are the following

- Guidance tool for the EMAS-based regulation and better regulatory relief;
- At least 7 external regions contacted by e-mail;
- 1 Communication Plan for each region;
- At least 5 carried out initiatives included in the Plan;
- At least 3 training initiatives in each region involved;
- A large involvement of stakeholders in each training initiatives (at least 10 subject in any initiative);
- At least 150 "Guidance tool for the EMAS-based regulation and better regulatory relief" downloaded from the project web-site.

Deliverables:

- ✓ "Guidance tool for the EMAS-based regulation and better regulatory relief" manual;
- ✓ List of external regions contacted by each region involved in the project;
- ✓ Communication Plan for each region;
- ✓ Synthesis of communication & training initiatives carried out in each region.

Indicators of progress

- Number of objections, comments and suggestions collected on the forum on-line
- Number of Guidance tool handed out by the project partner
- Number of download of Guidance tool from the project site
- Number of stakeholders involved in the workshops
- Number of training initiatives organized in each region
- Number of stakeholders involved in the training initiatives

ACTION 8: Networking with other projects

This action aims at identifying previous and present projects on the issues of Better Regulation and Regulatory Relief, in order to identify methodologies and tools that can be integrated and promoted in BRAVE activities. The activities of this action will enable to share experiences with other related projects and networks and to find synergies.

To develop this task, from the beginning of the project the partners will work on the identification of related International networks, forums, and projects.

This action is linked to research activities that will be carried out in action 3 to describe the European scene (scenario) and the existing experiences on the topics of the BRAVE project (such as ECAP, EMAS, regulatory relief and simplification). Through this research, the projects financed by Life plus program and other programs of European Commission (Cip-Eco Innovation, Seventh Framework Programme) over the past 5 years will be studied and evaluated.

Methods employed

Through databases (set of data) of the funding programmes of EU we will identified other projects that have connection with the BRAVE. In addition to web pages of major Community programs, both national and communitarian (European) databases will be also used. Therefore, the partners will analyze reports and studies on the issues of the project to identify relevant experiences promoted by the European Commission.

Moreover, each partner will identify the projects financed by EU funds directly involving each participating regions. The network will be identified on the basis of their topics.

Every project will be assessed by several indicators:

- project aims;
- stakeholders involved in the project;
- tools and methodologies implemented;
- project' results (only for projects completed).

The projects will be selected according to the usefulness and possibility of integration with the actions of the BRAVE. In order to select these projects, their contents will be analysed and subjects potentially interested in BRAVE will be contacted.

The presence of tools and methodologies applicable to the BRAVE in one or more projects identified will provide their analysis and the ability to integrate the activities planned in the BRAVE.

After this first phase, a list of projects and networks selected and the references to contact to initiate an exchange of experiences will be carried out.

This action includes participation in international, national and regional networks of public and private subjects committed in sustainable development actions to widely present and diffuse the results of the BRAVE project.

ARPA, that coordinates the action, will contact the networks identified and beneficiaries of projects to present BRAVE and try to build up synergies that can enhance the results of the project

A mailing list will guarantee a continuous updating of current experiences; through this tool the BRAVE results will be effectively disseminated among relevant stakeholders and with a high degree of interest in the Better Regulation, Regulatory Relief, EMAS and ECAP.

Where possible partners will organize ad hoc meetings with the beneficiaries of other projects to discuss possible synergies and problems encountered; these meetings could be organized also through conferences online. All actors involved in networking activities will be invited to attend the middle term and final conferences and the annual meeting of Consultation Board.

Constraints and assumptions:

The main risk of this action may be reflected in the difficulties of coordinating many actors representatives of various projects. For this reason we will activate all the necessary tools to ensure exchange of information with these parties.

Beneficiary responsible for implementation

ARPA is the coordinator of this action, but all partners contribute to the creation of a network about BRAVE project topics.

Expected results:

- The expected results are the following:
- Selection of at least 5 European projects
- Creation of a mailing list with actors involved in the other projects
- 2 meetings with beneficiaries of other projects

Deliverable

- ✓ List of selected projects and network

Indicators of progress:

- Number of projects selected
- Number of actors contacted
- Number of beneficiaries of other projects involved in each meeting
- Participation of project partners to other networks

ACTION 9: Dissemination

Description and Methods employed

The action aim is to promote and disseminate the results of each action at a local, national and international level. Dissemination of project results will be one of the most important actions of the project and will be carried out during and after the BRAVE project duration. The LIFE Logo shall always appear on all documents realized, on the website and on the other project outcomes disseminated.

Dissemination and communication will be carried out during the whole time-span of the BRAVE project; a detail plan of the foreseen initiatives follows:

9.1 Website

It's the most important instrument for communication and dissemination activities.

The Beneficiary (SSSUP) will realise a website dedicated to the project which will be the crossroad of official document's transmissions and communications. The website will contain a description of the project and its aim and actions; it will be updated periodically with the progress of BRAVE. In the website will be published the main methodological tools and the deliverables completed at the end of each actions or sub-actions.

This website will be linked by each partner's Home Page. In the website there will be a forum for the project stakeholder that will support the activities to discuss and share the simplification proposals that will emerge during the actions 4 (*Policy Innovation*).

A section of the website will be dedicated to photographs and articles about the project.

In the "reserved area" of the website will be published all technical documents and confidential that only partners can access.

The website will be made the Italian, Spanish and English and will be online within the first 4 months of project and maintained for at least 2 years after the end of the project.

9.2 Communication Plans

During the action 7 the project partners will develop a Communication Plan for each region to disseminate the project results among local authorities, trade association, SMEs and other stakeholders. This tool will be implemented at the end of the action 5, when they will finalize the proposals for simplification; these activities will encourage the adoption process (action 6) by the institutions.

Moreover the communication activities of this sub-action aim at supporting the dissemination of Environmental Management System and the benefits related to them.

Through the Communication Plan the project results will be disseminated effectively at local level encouraging businesses to achieve EMAS registration.

To develop the Communication Plan will be implemented in every region a survey to gauge the level of knowledge of environmental management systems and related benefits between companies. The partners will share the methodology to apply the survey.

Partners define a minimum number of activities to be achieved, including:

- Participation at local or regional event;
- Organization of workshop or meetings for specific target groups;
- Organization of training activities.

Each partner can identify a Communication Manager, also outside partnership, which will work on the development of the project's Communication Plan.

9.3 Notice boards

Notice boards describing the BRAVE project shall be displayed at strategic places accessible to the public (for examples they'll be showed in the offices of all partners and all Regions involved in the project).

We will write the notice boards in English, Italian and Spanish.

The LIFE Logo shall always appear on them.

9.4 Workshops and meetings

The main communications activities will be conducted in operational actions (from action 3 to action 7).

During the action 4, Policy innovation, will be organized meetings for Consultation Board that will involve not only the actors who signed the support letter, but all stakeholder identified by partners as relevant to the achievement of project aims. The BRAVE project will also include a workshop in Brussels at the end of action 4 to present and share the guidance tool for the EMAS-based regulation and better regulatory relief. The event will involve representatives of the European Commission and trade association of the SMEs.

9.5 BRAVE project's CD – Rom

Production of an operative CD-Rom aimed at the diffusion of project results and the guidance tool for the EMAS-based regulation and better regulatory relief (at least 1.000 copies).

The CD-Rom will include:

- A brief description of the project;
- The main deliverables of the project;
- The guidance tool for the EMAS-based regulation and better regulatory relief.

The CD-Rom will be produced within the conclusion of the project and it will be distributed to all the participants to the final conference and to all stakeholders involved in the operative actions.

9.6 Public conferences

The BRAVE project foresees the organization of two conferences: a Middle Term Conference and the Final Conference.

At least two events are foreseen:

1. Middle - term conference (at the end of the fourth action: April 2013) to present the state of the art of the project; it will be organized by one of partners and in one of countries involved in the project.
2. Final Conference (at the end of the project: within September 2014) to show the final results of the project and to present the guidance tool for the EMAS-based regulation and better regulatory relief also to other stakeholders; it will be organized directly at the Beneficiary's. In this occasion the layman's report and the CD – Rom will be officially diffused. To this conference a representative of European Commission will be invited.

Participation in the Conference will be provided by direct invitation, through the mass media, through the official website and through the information channels of the partners.

Besides the partners will publish at least two articles regarding the project results. These articles will be submitted to international academic Conferences with the publication of Conference proceedings. With these events the partners will achieve specific target groups (Universities and research centres) that could be interested in the results and the approach of the project.

9.7 Layman's Report

The layman's report describing the activities and outcomes of the project will be prepared in Italian, English and Spanish; it will be produced in paper and electronic format at the end of the project and it will be available on the BRAVE website.

The layman's report will be published before the final conference and at least 1.000 copies will be printed.

9.8 Publications

Publications will be implemented at local, national, and international level.

Periodic articles will be published on local newspapers and local TV to inform the communities about the BRAVE progress. Press releases will also be sent to national newspapers also specialised in environmental topic.

Altogether there will be three publications each year.

The international dissemination includes the participation in a international conference (on project topic) to present a paper about the BRAVE project; the paper will show the main results of the project and the potential benefits for EMAS companies.

Furthermore, another paper on the project will be sent to an international journal for publication.

These actions will help disseminate the project on specialized channels to which many interested stakeholders can access.

9.9 After – Life Communication Plan

Preparation of an "After-LIFE Communication Plan". At the end of the project a set-of-documents will be prepared and put on the website to assure and plan the dissemination and presentation of the outcomes of the project. The project partners will continue to participate in trade fairs regarding sustainability matters (Terra Futura in Florence, Energetica in Rome etc.)

Amongst the actions that will be planned there will be the updating of the website after the project.

Methods employed

The creation of the BRAVE website will follow international standards of W3C that guarantee the accessibility to the website even by persons with disabilities.

In order to carry out the Communication Plan of each region, by a methodological point of view, each partner will follow the guidelines provided by the ISO standard 14063, concerning environmental external communication, which is judged by the BRAVE partners as a potentially effective reference also at the territorial level.

Beneficiary responsible for implementation:

CTL will coordinate all measures described in this action with support of other partners.

Expected results

- We will to promote every relevant outcome and assure its public and detailed accessibility

Deliverables

- ✓ Communication Plan for each region (action 7)
- ✓ Copy of BRAVE Project CD – Rom
- ✓ Synthesis of arguments of the Middle – Term conference
- ✓ Synthesis of arguments of the Final conference
- ✓ Copy of Layman's Report
- ✓ Index of publications on newspapers and magazines
- ✓ After life Communication Plan

Indicators of progress:

- number of website contacts
- number of notice boards displayed
- number of CD-Rom delivered
- number of subjects participating to conferences
- number of communication activities for each region
- number of subjects participating to communication activities in the regions (Communication Plans)
- number of published layman's reports
- number of issued publications

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DELIVERABLE PRODUCTS OF THE PROJECT

Name of the Deliverable	Code of the associated action	Deadline
Monitoring tool	2	30/11/2011
List of progress indicators	2	30/11/2011
List of Monitoring team members	2	30/11/2011
Regulation of Steering Committee	1	30/12/2011
Policy opportunities for European Policy Maker	3	30/04/2012
Regulation analysis and recommendations for considering EMAS registration	3	30/05/2012
Overview of existing experiences dealing with incentives and regulatory relief for EMAS registered organizations	3	30/05/2012
List of Projects selected	8	30/05/2012
List of the member of of Regional, National and European Working Groups	4	30/06/2012
List of members of Consultation Board	1	30/07/2012
List of the member of Regional and Project Consultation Boards	4	30/09/2012
Minutes of the meeting of the Consultation Boards with the decision about the simplification proposals	4	28/02/2013
Report with the list of the simplification proposals shared by the Consultation Boards	4	28/02/2013
Methodology to select the simplification proposals	5	28/02/2013
Report about the workshop held in Brussels	4	30/04/2013
Synthesis of arguments of the Middle – Term conference	9	30/04/2013
List of the simplification proposals selected	5	30/05/2013
List of the Competent Authorities and private companies involved in the testing in field phase	5	30/06/2013
Methodological tool for the selection of the proposal of simplifications	6	30/10/2013
Report about the results of the testing in field phase	5	30/12/2013
Updated version of the Report that contains the simplification proposals revised on the basis of the results of this action	5	30/12/2013
List of submitted proposal	6	30/01/2014
Communication Plan for each Region	7	30/01/2014
“Guidance tool for the EMAS-based regulation and better regulatory relief” manual	7	30/04/2014
List of approved amendments	6	30/05/2014

Name of the Deliverable	Code of the associated action	Deadline
Final collection of Steering Committee meeting reports	1	30/06/2014
BRAVE Project CD – Rom	9	30/07/2014
List of external regions contacted by each region involved in the project	7	30/08/2014
Synthesis of communication & training initiatives carried out in each region	7	30/09/2014
Index of publications on newspapers and magazines	9	30/09/2014
Copy of Layman's Report	9	30/09/2014
After Life Communication Plan	9	30/09/2014
Synthesis of arguments of the Final conference	9	30/09/2014

MILESTONES OF THE PROJECT

Name of the Milestone	Code of the associated action	Deadline
Steering Committee Meeting	1	30/10/2011
Steering committee	2	30/11/2011
Steering committee	3	30/11/2011
Steering committee	9	30/11/2011
1 st Report of Monitoring Team	2	30/01/2012
Approval of the Monitoring tool	2	30/01/2012
Approval of ad-hoc progress indicators drafted by the Monitoring Team	2	30/01/2012
Nomination Internal Auditor	2	30/01/2012
Analysis of EMAS Integration into European policies and instruments	3	30/01/2012
Identification of incentives for EMAS registered organizations at national and regional levels	3	30/01/2012
Analysis of effectiveness of incentives for EMAS registered organizations	3	30/03/2012
2 nd Report of Monitoring Team	2	30/03/2012
Steering committee	4	30/04/2012
Steering committee	8	30/04/2012

Drafting of Inception Report	1	30/04/2012
Analysis of EMAS Integration into European policies and instruments	3	30/05/2012
Constitution of Regional, National and European Working Groups	4	30/05/2012
Steering Committee	3	30/05/2012
3 rd Report of Monitoring Team	2	30/06/2012
Mailing-list activation	8	30/07/2012
1 st Annual meeting of Consultation Board	1	30/08/2012
Constitution of Regional and Project Consultation Boards	4	30/08/2012
4 th Report of Monitoring Team	2	30/09/2012
First list of simplification proposals	4	30/10/2012
5 th Report of Monitoring Team	2	30/12/2012
Approval of simplification proposals by the Consultation Boards	4	30/01/2013
Steering committee	5	30/01/2013
Elaboration of the methodology to select the simplification proposals	5	28/02/2013
Workshop in Brussels	4	30/03/2013
6 th Report of Monitoring Team	2	30/03/2013
1 st Meeting with beneficiaries of other projects	8	30/03/2013
Middle term Conference	9	30/03/2013
Drafting of Middle Term Report	1	30/03/2013
Identification of Competent Authorities and private companies to involve	5	30/04/2013
7 th Report of Monitoring Team	2	30/06/2013
Steering committee	6	30/06/2013
2 nd Annual meeting of Consultation Board	1	30/07/2013
Steering Committee	4	30/08/2013
8 th Report of Monitoring Team	2	30/09/2013
Definition of a methodological tool for the selection of the proposal of simplifications	6	30/09/2013

End of testing in field phase	5	30/11/2013
Revision of the Report that contains the simplification proposals	5	30/12/2013
Steering Committee	5	30/12/2013
9 th Report of Monitoring Team	2	30/12/2013
Drafts of the amendments	6	30/01/2014
Drafting of Progress Report	1	30/01/2014
Steering committee	7	28/02/2014
Meetings with national parliamentarians	6	30/03/2014
10 th Report of Monitoring Team	2	30/03/2014
Draft of Communication Plan	7	30/03/2014
Draft of the "Guidance tool for the EMAS-based regulation and better regulatory relief"	7	30/04/2014
Steering Committee	6	30/04/2014
Mailing-list of representatives of external regions that will be contacted	7	30/05/2014
Approval of proposals	6	30/05/2014
11 th Report of Monitoring Team	2	30/06/2014
Final meeting of Consultation Board	1	30/07/2014
2 nd Meeting with beneficiaries of other projects	8	30/08/2014
Training initiatives	7	30/08/2014
Steering Committee	1	30/09/2014
Drafting of Final Report	1	30/09/2014
Steering Committee	2	30/09/2014
12 th Report of Monitoring Team	2	30/09/2014
Steering Committee	7	30/09/2014
Steering Committee	8	30/09/2014
Steering Committee	9	30/09/2014
Final Conference	9	30/09/2014

ACTIVITY REPORTS FORESEEN

Please indicate the deadlines for the following reports:

- Inception Report (to be delivered within 9 months after the project start);
- Progress Reports n°1, n°2 etc. (if any; to ensure that the delay between consecutive reports does not exceed 18 months);
- Mid-term Report with payment request (only for project longer than 24 months)
- Final Report with payment request (to be delivered within 3 months after the end of the project)

Type of report	Deadline
Inception Report	30/06/2012
Middle Term Report	30/05/2013
Progress Report	30/03/2014
Final report	30/11/2014

