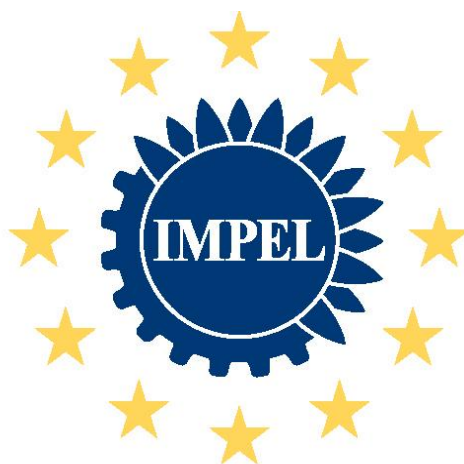# "DOING THE RIGHT THINGS III"

Implementation of the step-by-step guidance book on planning of environmental inspections.

Final report
2008-02

European Union Network for
the Implementation and Enforcement
of Environmental Law

Introduction to IMPEL

The European Union Network for the Implementation and Enforcement of Environmental Law (IMPEL) is an international non-profit association of the environmental authorities of the EU Member States, acceding and candidate countries of the European Union and EEA countries. The association is registered in Belgium and its legal seat is in Bruxelles, Belgium.

IMPEL was set up in 1992 as an informal Network of European regulators and authorities concerned with the implementation and enforcement of environmental law. The Network's objective is to create the necessary impetus in the European Community to make progress on ensuring a more effective application of environmental legislation. The core of the IMPEL activities concerns awareness raising, capacity building and exchange of information and experiences on implementation, enforcement and international enforcement collaboration as well as promoting and supporting the practicability and enforceability of European environmental legislation.

During the previous years IMPEL has developed into a considerable, widely known organisation, being mentioned in a number of EU legislative and policy documents, e.g. the 6th Environment Action Programme and the Recommendation on Minimum Criteria for Environmental Inspections.

The expertise and experience of the participants within IMPEL make the network uniquely qualified to work on both technical and regulatory aspects of EU environmental legislation.

Information on the IMPEL Network is also available through its website at: www.impel.eu

Title report: Doing the right things III Final report on the implementation of the step-by-step guidance book on planning of environmental inspections.	Number report: 2008/02
Project manager: Mr Tony Liebregts, (Netherlands Inspectorate of Housing, Spatial Planning and Environment)	**Report adopted at IMPEL General Assembly: Stockholm December 2009**
Authors: Rob Kramers (InfoMil)	**Number of pages: 45** Report: 15 Annexes: 30

Project team
- Tony Liebregts - project leader (Netherlands)
- Isabel Santana (Portugal)
- Jesus Angel Ocio (Spain)
- David Pugh (UK)
- Alison Simmons (UK)
- Rob Kramers (InfoMil, secretariat)
- Marc du Maine (InfoMil, secretariat)

Executive summary:

This is the final report of "Doing the right things III". The main objective of this project, executed in 2008 and 2009, was to facilitate, support and promote the implementation of the Doing the right things methodology, using the step-by-step guidance book.

Disclaimer:

This report is the result of a project within the IMPEL-Network. The content does not necessarily represent the view of the national administrations or the Commission.

Contents

Summary

This is the final report of "Doing the right things III". The main objective of this project, executed in 2008 and 2009, was to facilitate, support and promote the implementation of the Doing the right things methodology, using the step-by-step guidance book.

Practitioners from 24 IMPEL member countries participated in the workshops and the training sessions. All the objectives were delivered through the products described in the main report. The resulting conclusions led to recommendations for future IMPEL work and follow up activities to be considered by Cluster 1. Whilst managing the project useful lessons were learned which are shared herein.

In general the outcome of this project can be described as: increased knowledge in the IMPEL member countries about the methodology as described in the step-by-step guidance book; in almost all IMPEL member countries a discussion has started on the implementation of the methodology; and a successful implementation of the methodology took place in a number of Inspecting Authorities.

Introduction

Background

In 2001 the European Parliament and the Council adopted the Recommendation providing for minimum criteria for environmental inspections (RMCEI). The purpose of the RMCEI is to strengthen compliance with, and to contribute to a more consistent implementation and enforcement of Community environmental law in all Member States.

The RMCEI establishes guidelines for environmental inspections of installations, other enterprises and facilities whose air emissions, water discharges or waste disposal or recovery activities are subject to authorisation, permit or licensing requirements under Community law ('controlled installations').

All inspecting authorities in the Member States should apply these guidelines. They concern amongst others minimum criteria on establishing and evaluating plans for environmental inspections. Since the adoption of the RMCEI experts within IMPEL have been discussing at several occasions how to implement these planning criteria in the RMCEI.

Doing the right things I

In 2006 the Netherlands (VROM Inspectorate) led the IMPEL Comparison Programme "Doing the right things". One of the main aims of this project was to explore how inspection authorities set priorities with regard to their tasks and activities, being one of the key steps in setting up inspection plans.

An important project recommendation was to develop a practical guide on planning of environmental inspections, that would be sufficiently flexible to accommodate the different needs of the inspection authorities in the IMPEL member countries and at the same time would enable them to comply with the requirements of the RMCEI.

Doing the right things II

This project recommendation was implemented in a succeeding project Doing the right things II, again led by the Netherlands in cooperation with Germany, Hungary, Ireland, Poland, Romania, Spain and Sweden. The project, run in 2007, resulted in a step-by-step guidance book to help practitioners answer the basic questions any inspecting authority has to deal with when setting up an inspection plan. IMPEL Cluster 1 reviewed and endorsed the final draft of the step-by-step guidance book in October 2007

Doing the right things III

During the Doing the right things II project MS emphasised that the use of the guidance book in practice should be further promoted and supported. During the IMPEL plenary in Lisbon the TOR for Doing the right things III was presented and adopted for both phase 1 and 2. This report is the justification of the work that was executed during the last 2 years (2008 – 2009).

In the figure below you can see how the 3 Doing the right things projects relate to each other and to the activities that took place in the different IMPEL Member countries.
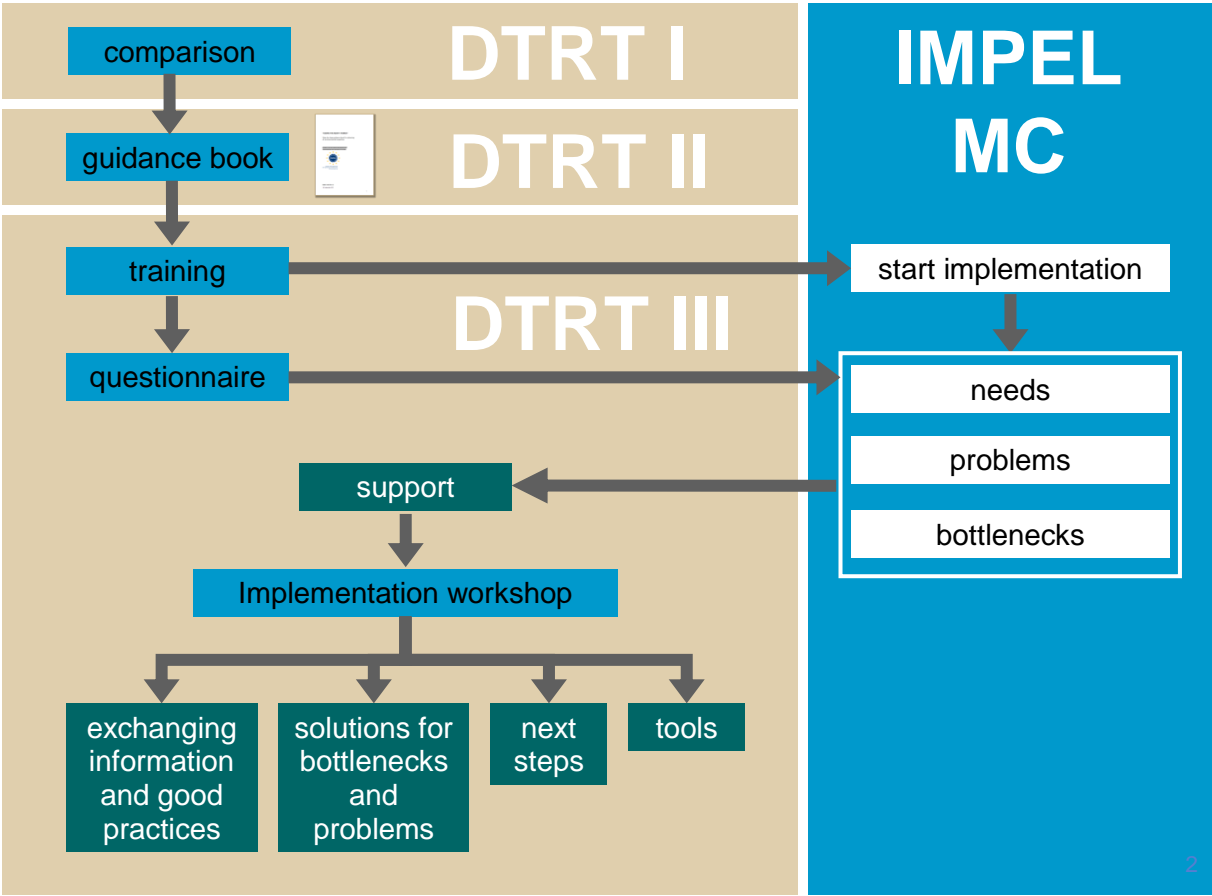
Structure of this report
This report is divided in two parts. Part 1: management and part 2: the results of "Doing the right things III".

In the project management part you will find how the project has been run. The first section (1.1) of this part describes the testing and the training of the "Doing the right things" methodology. The second section (1.2) describes the support given to the implementation. In the last section the lessons learned while managing this project are listed.
In part 2 the results, conclusions and recommendations of the project are addressed.

During the project intermediate reports were written. These reports can be found in the annexes.

Part 1 Project management

This part describes how the project was run, the delivered products and the lessons learned.

1.1 Phase 1 Testing and training

The Terms of Reference for phase 1 were adopted during the IMPEL plenary in Lisbon (end 2007). Phase 1 took place in 2008. During this phase the methodology and the usefulness of the guidance book were tested by experts from five IMPEL member countries. With the feedback of the experts the guidance book was updated. The training that was held in this phase was also based on this feedback.

1.1.1 Objectives

Main objective of this project is to facilitate, support and promote the use of the guidance book in practice. The emphasis in phase 1 was training and education.

The objectives of this phase were:
1. to test the practical use of the guidance book
2. to develop and execute a training programme
3. to develop a web based application of the guidance book
4. to provide the answers to frequently asked questions
5. to develop an enhanced support programme

1.1.2 Time schedule

In the next table you will find the time schedule of phase 1

Action	2008												Executed
	J	F	M	A	M	J	J	A	S	O	N	D	
1st Project team meeting (Portugal)		■											Yes
1st draft of web application			■										Yes
Workshop for experts preparing the exercise of testing the practical use of the guidance book (Portugal)				■									Yes
2nd Project team meeting (During expert workshop in Portugal)				■									Yes
Mid term report summarizing the results of the workshop and amendments of guidance book					■								Yes
Development of training programme						■	■						Yes

3rd Project team meeting (Spain)						■								Yes
2nd draft of web application								■						Yes
4th Project team meeting (UK)								■						Yes
Two Training sessions (The Netherlands)								■	■					Yes
Final version of web application									■					Yes
Evaluation report and recommendations for enhanced support programme										■				Yes

1.1.3 Budget
The total Budget for phase 1 was € 107.200.
The contribution from the Commission was € 65.600
The contribution from the leading Member State was € 41.600

1.1.4 Products
The following products delivered the objectives described in section 1.1.1:
1. A two-day expert workshop that was organised in April 2008 in Portugal. This workshop was held prior to the test to see if the guidance book gives enough information to develop an inspection plan according to the RMCEI. The participants were asked to review their existing inspection plan using the methodology described in the step-by-step guidance book.
2. A brief mid term report summarizing the changes necessary in the step-by-step guidance book. See annex II.
3. An amended step-by-step guidance book.
4. Training material and a training programme developed on the basis of the results of the expert workshop.
5. Two training sessions of three days for a total of 40 participants held in September and October 2008 in The Netherlands.
6. A brief mid-term report summarizing the actions and the needs while implementing the methodology in the IMPEL Member countries. See annex III.
7. An evaluation report of both training sessions. See annex VI.
8. A simple web based navigation tool for all IMPEL Member countries
9. Answers to frequently asked questions[1].

1.2 Phase 2 Implementation
The Terms of Reference were adopted during the IMPEL General Assembly in Ljubljana (mid 2008). Phase 2 took place in 2009. In this phase the enhanced support programme was executed.

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[1] The FAQ's will be available on the new IMPEL website

1.2.1 Objectives

Main objective of this project is to facilitate, support and promote the use of the guidance book in practice. The emphasis in phase 2 was to support the implementation of the guidance book by different inspecting authorities.

The objectives of this phase were:
1. to held an implementation workshop to exchange experiences
2. to develop two complete examples of inspection plans
3. to further provide the answers to frequently asked questions
4. to provide assistance and support within the revision of the IRI scheme to consider options of linking the IRI with the guidance book
5. to report on the results of the project Doing the right things III

1.2.2 Time schedule

In the next table you will find the time schedule of phase 2

Action	2009												Executed
	J	F	M	A	M	J	J	A	S	O	N	D	
1st Project team meeting (Spain)		■											Yes
2nd Project team meeting (Portugal)				■									Yes
Two day Implementation workshop						■							Yes
Development of 2 examples of inspection plans									■	■			Yes
Further development of FAQ's		■	■	■	■	■	■	■	■				Yes
Linking guidance book to IRI				■	■	■	■	■	■	■			Yes
3rd Project team meeting (The Netherlands)										■			Yes
Final report											■		Yes

1.2.3 Budget

The total Budget for phase 2 was € 71.800.
The contribution from the Commission was € 42.000
The contribution from the leading Member State was € 29.800

The actual costs of phase 2 is € 60.316

Products

The objectives described in section 1.2.1. were delivered by the Enhanced support programme. Products are as follows:

1. A mid-term report on the results of the questionnaire. This questionnaire was sent to all the participants of the training session held in phase 1. The outcome of this questionnaire was used as input for the implementation workshop. See annex IV
2. An implementation workshop for exchanging experiences by the practitioners who participated in the training sessions of phase 1 and worked on producing an inspection plan with the help of the guidance book
3. A mid-term report on the working group sessions of the Implementation workshop. See annex V.
4. An evaluation report of the Implementation workshop. See annex VII.
5. The development of two complete examples of inspection plans. These examples include all the steps in the environmental planning cycle (from the guidance book)[2]
6. Linking the guidance book with the IRI by drafting a new IRI questionnaire based on the Environmental Inspection Cycle of Doing the right things.
7. The answers to frequently asked questions[3]
8. This final project report

Role of Project team

The project team was responsible for the planning, the execution and the outcome of this project. This was done by steering the process, advising and giving feedback on the results based on their own experience. Further the project team actively contributed to the preparation, organisation and execution of the workshops and the training sessions.

The project team for phase 1 and 2 consisted out of the following members
- Tony Liebregts - project leader (Netherlands, VROM-Inspectorate)
- Isabel Santana (Portugal, IGAOT)
- Jesus Angel Ocio (Spain, Basque Government)
- David Pugh and Alison Simmons (UK, Environment Agency)
- Rob Kramers (The Netherlands, InfoMil)
- Marc du Maine (The Netherlands, InfoMil)

1.4 What we have learned from managing this project
During the two-year project lessons were learned from both the successes and the areas that could potentially have been improved. The project team selected the following examples to share with the reader of this report.

Multi disciplinary project team
The members of project team (see section 1.3) had different backgrounds and expertise. Therefore the planned activities and products within the project received feedback and advice from different angles.

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[2] The Inspection plan will be available on the new IMPEL website
[3] FAQ's will be available on the new IMPEL website

Active contribution of the project team
The members of the project team actively contributed to all the workshops and training sessions. Furthermore every member hosted one or more project team meetings. The shared ownership of the team members made this project into a real multi national project.

Logical progression
This follow-up project proved to be a logical and worthwhile next step, having produced the step-by-step guidance book.

Annual approach and milestones
Doing the right things III was executed in a time frame of 2 years. This allowed the project team to first work on training and education, the practitioners to start implementing the methodology, and finally for the project team to give extra support to the Inspecting Authorities with their implementation.
The project was further managed using clear milestones. This made it possible to complete each step and celebrate success, stimulating motivation and involvement of all members and participants.

Tight project schedule
Although the time frame was 2 years, the project schedule was very tight.
This tight schedule ensured constant attention to the project by the project team members and the participants.

Action plan
The Terms of Reference were translated into a detailed action plan in which the objectives, responsibilities and tasks were clearly defined. This made sure there was no confusion as to who should do what and when.

External Support (InfoMil)
For the development of materials and logistical arrangements, external support was hired (on contract basis). This made it possible to deliver all the objectives and products defined by the Terms of Reference.

Reimbursement
A travel agency arranged the accommodation for the Implementation workshop that was held in June 2009. This meant all the logistics were in one place and re-imbursement was made with just 1 invoice. It would have been useful if this procedure had been possible for the travel arrangements.

IMPEL Cluster 1
During the project, progress was reported to Cluster 1 on a regular basis by the project leader on a face-to-face basis. This made it possible to get immediate feedback and to discuss the approach and the finalized and upcoming products.

Communication plan

The project team didn't develop a communication plan at the start of the project. The potential influence of this project on "parallel" projects, such as the new EU initiatives like the review of RMCEI and IPPC could have been more effective. Onward communication of the project outcomes is included in the recommendations for future work.

Use of IT tools

During the project IT tools like electronic questionnaires and registration forms and project sites (like Viadesk and Basecamp) could have been used more extensively.

Aligning the project planning with the timetable of IMPEL

Timing of the product development was made difficult because of the scheduling of Cluster meetings, which meant the working time frame was compressed.

Part 2 Outcome

The aim of Part 2 of this report is to connect the products, the results and the experiences of the project with the future work of IMPEL. For that purpose we draw conclusions and set recommendations on a more strategic level. It is important to keep the methodology of "Doing the right things" alive. Keeping it alive, not by running a new project, but by making it part of IMPEL future work. Cluster 1 has an important role.

2.1 Results and conclusions

Besides the products that are mentioned in section 1.1.4 and 1.2.4 the project delivered the following *results*:

- The evaluation of the training sessions showed that the theoretical knowledge of the "Doing the right things" methodology has been increased within the IMPEL member countries. See annex VI.
- We have identified the bottlenecks for implementation and how we can deal with these blockers.
- We have a clear picture of how further implementation of the methodology of Doing the right things in the different IMPEL member countries can be enhanced.
- In almost all IMPEL member countries the guidance book has started a discussion about the need of implementing the methodology.
- Based upon the presentations and the discussions during the implementation workshop successful implementation of the step-by-step guidance book took place in a number of inspection authorities. Nevertheless there was a clear call for extra support by many of the participating IMPEL member countries.

Conclusions

The most important bottlenecks and problems connected to the implementation of the methodology in the step-by-step guidance book can be summarized as a lack of resources, good data, support and experiences. We believe that the solutions mentioned in the tables in annex V (section 2.1 to 2.3) give a very good indication on how to overcome these blockers.

Developing a standard blueprint for an implementation plan was found not to be feasible due to the differences in the decision making mechanisms and organizational structures of the different IMPEL member countries. However the guidance book and the checklist in annex V (section 2.4) provides sufficient direction on how an inspection authority can implement the methodology.

When finalizing the project we realized the usefulness of a communication plan for linking the outcome of this project into other instruments, like the RMCEI and IPPC. A communication plan would also facilitate the dissemination of the results to stakeholders like the European Commission and the European Parliament.

Based on presentation and discussions during the implementation workshop the methodology of the step-by-step guidance book was found to be useful in other areas than IPPC (e.g. water and waste).

2.2 Recommendations for future work of IMPEL

We recommend the uptake of the following new projects under IMPEL with the aim of giving additional support (at different levels) to inspecting authorities in relation to the methodology of Doing the right things:

- Guidance for inspection and communication strategies, defining objectives and targets and guidance for performance monitoring;
- Testing the use of the step-by-step guidance book for TFS;
- Development of an easy and flexible risk assessment tool based on a comparison of good practices, including a definition of a basic set of risk criteria;
- Development of an advanced interactive IT tool that supports planning of environmental inspection.

2.3 Follow up actions

To support the active implementation of the methodology in the step-by-step guidance book it is recommended that IMPEL support and take ownership of the following actions:

- To contact the European Commission officials to discuss the linkage of the DTRT methodology to the obligations mentioned in the recast of the IPPC Directive (Industrial Emissions Directive).
- To establish and facilitate (through the new IMPEL website) a network of experts under the IMPEL network that can advise on the subject "planning of environmental inspections".
- To promote exchange of good practices and make examples available through the new IMPEL website.
- To promote DTRT by developing a promotion package for the National Coordinators, European Commission and the IMPEL member countries and the inspecting authorities' management.
- To promote the use of the step-by-step guidance book with other networks (e.g. ECENA, Technical Working Group for SEVESO inspections, INECE and REPIN).
- To identify further needs to improve the step-by-step guidance book based on the results of future IRI's and changes in the RMCEI.

We recommend that Cluster 1 take the ownership of the follow up actions described above.

Annex I

Checklist Implementation DTRT

General:
- Determine the benefit for the organisation.
- Convince the people that take the decision (management)
- Convince politicians/minister/stakeholders
- Look for potential blockers
- Make sure the change is well-organised including time schedule and deadlines.
- Build a team of people to identify the changes that are needed
- Make people accept the risk base approaches.
- Make the cultural change easy for people, motivating colleagues.
- Make use of communication and negotiating skills.
- Decide who will write the plan
- Make sure everybody know their role.
- Decide if you have more than 1 inspection plan (e.g. 1 per area or 1 per regulatory regime).
- Decide if you have annual or a multi annual inspection plan
- Is translation of documents required
- Ensure good communication with other agencies

Describing the context
- Identify the acts that are applicable (EU, national, regional,..).
- Identify and involve stakeholders.
- Define the scope of your activities.
- Define the scope of the inspection plan.
- List all installations.
- Collect data on human resources.
- Collect data from other.
- If necessary inspect facilities to collect data

Setting priorities
- Define Risk model and criteria
- Begin with a simple risk assessment tool.
- Consult and discuss the methodology with stakeholders.
- Determine the human and financial resources.
- Focus on problematic activities/installations.
- Combine high-risk installations with problematic ones (including TFS activities).
- Decide how stakeholders will be informed on the priorities.
- Consider if activities will be charged (e.g. inspections, invalid complaints).
- Perform the Risk Assessment
- Allocate time for routine and non-routine inspection work.

Defining objectives and strategies
- Make sure the objectives are linked to the priorities
- Involve national and international legislation and national policy in your objectives
- Consult other authorities in defining your objectives

- Decide about the level of detail you want to define the objectives and targets
- Harmonise the objectives and the strategies.
- Plan adequate time for discussions and to get feedback and approvals.
- Identify if sub-strategies are necessary.
- Make sure if the communication strategy involve all the stakeholders, use all the means to do it (e.g. internet, leaflets).
- Convince high level management how to improve the environment
- Be aware of what is happening in facilities.
- Ensure good communication with ministry, agencies and inspectors.
- Do not define too many objectives.
- Set smart targets

Planning an review
- Make sure the plans are related to the financial and human resources
- Make procedures or implement a quality management systems
- Establish performance indicators and set the conditions for reviewing and revising inspection plans
- Preparing draft plan internal consultation
- Execute the plan
- Make inspection plan available to public

Annex II

Summary of the amendments to the step-by-step guidance book on planning of environmental inspections

Main changes
- Section 1.1: the following text is added to this section to make the use of the guidance book more flexible - "While writing the guidance book the aim was to make it flexible enough **t**o accommodate the needs between the different MS and the needs between national, regional and local level. While at national or regional level all steps within the guidance book can be of equal importance, on local level there are certain aspects of the planning cycle that may not apply. However it should be noted that the less resources an Inspectorate has the more important setting priorities and defining strategies is."
- Annex: a new annex 1 is added (list of abbreviations)

Minor changes:
- Section 3.3: the following text is added for clarification – " While setting priorities the inspecting authority should only take the statutory tasks in to account for which they are responsible."
  Further small textual changes and clarifications have been
- Section 3.4: small textual changes and clarifications have been made
- Section 3.5: the following changes have been made in the input/output box – "Input: The context, risk assessment, priorities, objectives and measurable targets, inspection and communication strategies and the results of performance monitoring."
- Section 4.2: in table 1 the following 2 elements are added - "The environmental outcome the inspecting authority is trying to achieve" and "The inspection resources (financial and human) that are available for the inspecting authority"
  Further in table 1 small changes for clarifications have been made.
- Section 4.3: in table 2 the following 2 elements are added – "(Minimum) frequency of inspections based upon (national) legislation or national or local goals." and "Research on types of industry, objects and spatial planning done by third parties (e.g. Universities, Statistical boards or other Inspectorates)"
  Further in table 2 small changes for clarifications have been made.
- Section 4.4: in table 4 the following 4 elements are added – "Sustainability", "Potential impact (e.g. emissions in case of accidents and incidents)", "An implemented (certified) Environmental Management System" and "Incidents and accidents".
  Further in table 4 and in the text of this section small changes for clarifications have been made.
- Section 4.6: The following correction is made – The word objectives is replaced by targets in the following sentence "Targets should be precise and preferably specified by indicators ... "
  Further small changes for clarifications have been made
- Annex: old annex 1 (list of good practices) is now annex 2. The good practices listed in the sections are removed and placed in this annex.

- The reference in the different sections to the Infomil website is removed and is placed in annex 2 together with the reference to the IMPEL website.

Annex III

Action and needs to implement the guidance book in the IMPEL Member countries

During both training sessions (on the third day) the participants have been asked to express the actions they will take and the needs that have to be fulfilled to successfully implement the guidance book in their MS.

Most of the actions and needs you find in this annex have been mentioned more than once. The lists below give a summary of the answers

Actions:
- Inform management, minister, regional authorities and (local) Inspectorates about the DTRT concept by written report and/or presentations.
- Make top level management aware of the advantages of the DTRT concept
- Discuss the DTRT concept with colleagues by giving briefings, write news articles and arrange unit meetings.
- Raise awareness in own organization, agencies and partner/local Inspectorates by organize a seminar or (regional) workshop
- Change the way of thinking within my organization
- Inform colleagues by written report
- Form a working group and improve the system in our MS based upon the DTRT concept
- Analyse and compare the DTRT concept with our own system. Write a report to our management and ministry to stress the differences and make recommendations for improvements
- Arrange trainings to regional Inspectorates
- Translation of the guidance book.
- Make a summary and simplification of the guidance book
- Test DTRT concept at own facilities
- Implement DTRT concept in 2009 as test phase
- Develop a new inspection plan based upon the DTRT concept
- Set time frame and meetings to approve the new inspection plan based on DTRT concept
- Use information from this training to design a Risk assessment tool for local and national authorities.
- Compare the systems that are used in the different MS
- Study on the guidance book
- Comparison guidance book with our own inspection plan(s)
- Review of existing inspection plan according to the DTRT concept
- Use the risk assessment tools for inspection plan 2009
- Disseminate guidance book in our MS
- Write a proposal how to disseminate the DTRT concept on the different levels within the MS
- Setting up a national IMPEL network to help the implementation / arrange meetings with regional departments to develop a network and exchange experience and information

- Use bilateral / EU projects for implementation / translation and support
- Incorporate the concept into EU projects

Needs:
- Results from working groups /full documentation / training materials / references
- Time / resources / Finances
- Good practices
- Risk Assessment Tools
- Helpdesk
- Permission / support from top level
- Translation of guidance book
- Support from IMPEL
- Change of the structural organization
- Database on IPPC facilities
- Improve management system
- Discussion on type of inspections (e.g. integrated)
- Feed back from the participants of both training sessions in the implementation workshop

Annex IV

Results of questionnaire
(Questionnaire has been sent out for input of the implementation workshop)

Introduction
In September and October 2008 two training sessions have been held in The Netherlands. The aim of this training was to give the participant a good understanding of the methodology of the step-by-step guidance book. As we see the participants as our ambassadors, the overall aim of the training was to help them implement the methodology within their MS.

During the third day of the training session all participants expressed how they would disseminate and implement the methodology of "Doing the right things" in their own MS. They answered the following questions:
1. What is the first thing you will you do on Monday when you are back at the office (related to the project)?
2. What do you need to implement the methodology of DTRT in your MS?
A summary of all the actions and needs can be found in annex 1.

In January 2009 all participants received a questionnaire. The questionnaire is divided in the headings; Action, Results, Bottlenecks, Needs and Implementation Workshop. The questionnaire ends with a box that can be used if the participants have any questions or remarks that didn't fit in the other headings.

The results will be used to prepare and invite participants for the implementation workshop that will be held in June 2009

Summary
Most MS have started to disseminate the methodology of "Doing the right things" in their MS. This is done by written reports, seminars, workshops or presentations. Not all MS will translate the guidance book (either because of finance or need).

In almost all MS the guidance book has started a discussion about the need of implementing the guidance book. Most MS have already taken the first step or have concrete plans about the implementation.

Lack of time, resources, data and support of management were mentioned as bottlenecks and needs for implement the guidance book.

The training sessions in Haarlem and Leiden were mentioned by some of the MS as good structure for the implementation workshop. Most MS asked for the presentation of good practices and experiences.

Abstract of the answers per MS

Austria
It's not necessary to translate the guidance book.
Regional authorities have been informed during a meeting. The authorities took note of this. The regional authorities are responsible for developing the inspection plans. The ministry can only advise about the methodology they use. Collecting good data for the risk assessment will be a challenge.
For 2010/2011 the methodology of the guidance book will be used to try plan inspections
Good practices and comparison with other MS / inspectorates is important for a good implementation. Also standard criteria or values would be very helpful to develop a system
The set-up of the training in Leiden could be used for the implementation workshop.

Bulgaria
The guidance book is already translated
The regional inspectorates have made the inspection plan and schedule for 2009 (unclear if this is according to the guidance book). The ministry have ideas about changing the format of inspection plans. More time and detailed criteria is needed to implement the guidance book.

Croatia
The guidance book will translated end 2009.
Colleagues of the Inspectorate have been informed about the guidance book.
The guidance book is not yet implemented as a whole but some provisions have taken aboard in the annual work plan and programme. The work plan and programme 2009 is already adopted
A detailed comparisment between the guidance book and their own planning system is necessary to see where the bottlenecks are. An EU project will be used to implement the guidance book
Implementation workshop: Practical exercise about ranking, classification and priorities while submitting Annual Work Plan would be useful. Discuss about *Lessons Learned* from different Annual Work Plans, good practise from different MS, make the analysis of particular work plan.

Cyprus
The guidance book will not be translated
Report about the training and the implementation of the guidance book has been sent to colleagues
The limited time that is available for preparing an inspection plan and program is the main bottleneck. More resources are needed to implement the guidance book

Czech Republic
Information about the guidance book is given through a lecture and a written report. Further the guidance book is placed on their website in English and Czech. Head of international relations informed all their bosses and director general. Fundamental chances in their own system are not expected to be necessary.
A bottleneck could be that the inspectors find the guidance book to complicated and too sophisticated.

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Germany
Guidance book will not be translated
Introduction of the guidance book at the meeting of the national IMPEL coordinators. Discussion about the implementation in other German States. Agreements about the implementation of the guidance book within their organization and with the ministry to run a pilot (Oct 2008). The results will be reported to other inspection offices in their own states and to the national coordinators.
Development of risk based tool and filling in the data of 700 installations. Implementation of the methodology in their own handbook. Inspection plans will be published on Internet.
Possible bottlenecks: too much work to implement the guidance book.
Implementation workshop: short presentations of the participants about their achievements so far. Discussion of needs and bottlenecks and how to solve. Discussion of the inspection planning process with special emphasise on the different kinds of inspections.

Denmark
The guidance book will not be translated.
Use the guidance book and the Portuguese risk assessment tool as inspiration when planning and prioritising. Gathering the already available necessary data into one document.
Convincing our department to use the methodology in the guidance book. The methodology "might" be part of the quality management system.
Results of working according to the guidance book is that inspectors are more focused on what their tasks are and what is important, meaning less distraction from other issues. Further it will easier to inform stakeholders about their work and make clear to politicians what the problems are the inspectorate is facing (resources)
Bottlenecks: resources and time
Implementation workshop: All the representatives present their national goals regarding the implementation. Disseminate this on forehand so it will be possible to organize working group accordingly. The implementation workshop should be as concrete as possible so it directly helps the implementation. For example each participants will produce a detailed action plan with deadlines
Further presentations of good practices of implementing the guidance book would be good starting point. Denmark volunteers to do a presentation about the tool that is developed.

Spain
The guidance book has been translated into Spanish.
Informed colleagues by written report (summary of concept) and presentation. Improved own schedule by using the guidance book. Introduced chances in their new computer system so it will be possible to use some criteria for prioritising inspections. Final objective is to make more chances following the guidance book.
Made a proposal for inspection plan 2010 by following the guidance book.
Bottleneck: developing a risk assessment tool for only water while guidance book refers to IPPC. Culture could be bottleneck (making chances in an organization)
There is a need for more trainings like the DTRT3 training in Haarlem/Leiden. Further a need to get support from high management.

France
Written report to IMPEL coordinator and presentation for local level
Introduction of good ideas of guidance book in the French inspection organization.
Try to organize a pilot in a region.
Needs: diagram with all the steps of the guidance book, technical support ? and translation of the guidance book.
Implementation workshop: presentation of participants how objectives are defined. Create a network of expertise ?

The Netherlands
Update the "identification of the scope".
Guidance book is translated in Dutch
Implementation workshop: presentation of good practices

Poland
The guidance book is translated in Polish
A new system of planning has been implemented as part of a Polish – Norwegian project *(unclear if this is based on the guidance book)* The system is now tested in 2 regions
Bottlenecks: human resources and the lack of good practices
Implementation workshop: good examples of planning using the guidance book for example for :
    a) making better quality of the surface water
    b) making better quality of the air
    c) taking care of noise
    d) management of waste
    e) preventing serious accidents.

Portugal
The guidance book will be translated in Portuguese
Presentation for high management on the methodology of the guidance book. Management gave approval for the implementation
Development of a risk assessment tool and filling it with data. Review of the tool will be done through the IRI in Sept 2009. Inspection plans for 2010 will be based on this new tool.
The objectives for the inspection plan 2009 are based upon the methodology of the guidance book
Bottlenecks: describing smart targets and performance indicators. Extra resources are needed for filling in the database. Describing the state of the environment is difficult. Costs for translation of the guidance book. Support within the organization with collecting information.
Needs: Good practices on objectives and targets (through IMPEL). The establish a network of experts related to the guidance book.
Implementation workshop: presentations of participants about the implementation of the guidance book in their MS. Parallel workshop about identified problems and their solutions. Reporting back to plenary session.

Sweden
Guidance book has already been translated.
Reported experiences of training to national coordinator and EPA

Informed colleagues and management and local authorities of country by half-day seminar.
Writing an article about the method to be published in the Swedish EPA magazine.

Romania
The guidance book will be translated in Romanian.
Informing management of organization by written report on the training. Sharing methodology of training with colleagues from other inspectorates by workshops.
A risk based methodology inspired by the guidance book: by establishing a workshop to define the risk criteria, ranking the controlled installations (for national and regional level) and allocation of the resources.
Bottleneck: defining the risk criteria, gap of data to perform the risk assessment.
Needs: good practices on risk assessments provided by the DTRT team; better risk criteria and software for the risk assessment.
Implementation workshop should be structured similar to the training sessions.

Slovenia
Inform management about the DTRT concept by written report and/or presentations. Change the way of thinking within my organization
develop a new planning strategy based on DTRT, prepare a new inspection plan and Improve software for planning
Bottlenecks: culture problem (chances), time, lack in communication
Implementation workshop: each MS prepares a presentation, after this discussion.

Turkey
Informed management about the training and prepared a report
Translation of the guidance book in Turkish will take place
To organize training sessions and disseminate guidance book to the provinces.
Guidance book will help to organize a good planning system and develop good inspection plans.
To consider a legal base for this issue
Time, financial resources, data support from high level are needed to implement the guidance book.

UK
Discussed methodology with head of section and got agreement to implement the methodology.
Appointed a consultant to give advice which of available risk/compliance assessment methodologies would be best. To use recommended methodology to carry out risk assessment of IPPC installations
Set targets and objectives and revise existing inspection plan & schedule. Revise protocols/working instructions for inspections' procedure and content reflecting guidance book methodology. Carry out inspections according to revised plan/schedule and protocols (UK – N-Ireland)
The Agency are currently reviewing an existing system (UK – Sepa)
Bottlenecks: Time and no agreement from operators.

Annex V

Feedback of the Working group sessions Implementation workshop
(Lisbon 24 – 26 June 2009)

1. Introduction Working Groups
During the second and the third day of the implementation workshop, working group sessions have been held. For each session 4 parallel groups have been formed.

The overall aim of the working groups was:
- To give solutions to the identified bottlenecks when bringing DTRT into practice.
- To exchange information and good practices
- To see what has to be developed for bringing DTRT into practice
- To give support to practical planning issues
- To develop an implementation plan for bringing DTRT into practice

First session (25 June, 10:30 – 12:30)
The aim of these working groups was to discuss the practical implementation issues / problems concerning the different planning steps
Working group 1 and 2 - setting priorities and risk assessment
Working group 3 - defining objectives
Working group 4 - defining strategies

Second session (25 June, 14:30 – 16:30)
The aim of these working groups was to come with practical solutions for the problems that were addressed in the morning session and the already identified bottlenecks from the questionnaire.
Working group 1, 2, 3 and 4 all work on the same topic

Third session (26 June, 09:45 – 11:45)
The aim of these working groups was twofold. Two groups discussed what has to be done to make sure the support of the implementation of Doing the right things will be sustainable (in "next steps"), and two groups discussed the development of a blue prints for an implementation plan.
Working group 1 and 2 – next steps
Working group 3 and 4 – Implementation planning

In section 2 of this report the results of the discussions in the working groups are given. In section 3 the conclusions and recommendations that can be drawn from these results are addressed. In the annex you will find the presentations that have been given by the working groups.

2. Results of the working groups

The identified bottlenecks and the accompanying solutions for setting priorities, defining objectives and defining strategies, can be found in the tables in section 2.1, 2.2 and 2.3. In section 2.4 a checklist is given for the implementation of the step-by-step guidance book and in section 2.5 the recommendations for further support with the implementation ("the Next steps") can be found.

2.1 Setting priorities

Problems	Solutions
Time: Setting priorities is time consuming.	Only the initial filling is time consuming. After this make sure the database is updated on an ongoing basis.
Data: Lack of available and reliable data. Difficult to exchange information with partners.	Design database in away that only relevant information has to be captured. Organize or formalize the co-ordinating with other authorities or agencies. Share information and resources with other authorities and agencies. Make the output available to inspectors. Implement a Quality Management System.
Resources: Lack of available and qualified staff.	Look for innovative ways to obtain staff or the use of existing staff (e.g. students for updating databases) Develop standard Training packages for inspectors (enforcement staff) Standardising procedures and development of Inspection Protocols for enforcement staff.
Support, awareness and interest Lack of support because of knowledge or interest from management, politics and colleagues. Lack of support because of culture problems	Nominate a co-ordinator in your organisation. Show transparency in the structure and the use of the methodology. Educate all the stakeholders (management /budget holders/ permit holders)
Tools: Lack of good practices. Availability and complexity of tools.	Design a simple risk assessment, to be used in combination with inspector knowledge.
Risk criteria: Lack of availability and the subjectivity of data regarding: - compliance history. - complains.	- Classify the level of significance (could be done by legislation, guidelines or from management) - Take only into account the complaints

	that imply actions towards operator
- emissions.	- Use available data. Don't use risk criteria that make it too complicated
- location.	- See solution emissions and co-operate with other authorities
- inspectors' opinion and state of installation.	- Guidelines (or sub-criteria) to evaluate those aspects
- contaminated sites.	- Only take this criteria if you have the data

2.2 Defining objectives

Problems	Solutions
Definitions Clarification is needed, what is exactly the difference of objectives, targets, and performance indicators.	Give clarification of the definitions by showing good and bad examples Give further training on the use of the Guidance book.
Support Getting approval from the stakeholders (e.g. managers, colleagues) when using this methodology (objectives on outcome) is time consuming.	Show examples of success of environmental improvement Show efficient use of time by setting good objectives and targets. Identify and involve stakeholders in the process of setting objectives and targets
Data Lack of good data (like state on the environment) to define objectives on outcome.	Co-operation and coordination with other authorities and environmental quality networks to get good data.
Resources Lack of capacity (good and qualified staff) to execute the work.	Prioritise objectives, accept that we cannot do everything. Combine planned inspections with reactive inspections (complaints)
Guidance Experience is lacking to use outcome instead of output objectives No input from strategic or national level to define objectives on outcome Difficult to define objectives that can be used to monitor and show the successes of inspections.	Make use of good practices, good examples and experiences how priorities can be linked to objectives. Try to take part as an inspection authority in the strategic national level planning. Execute specific studies to estimate the contributions of activities / installations to the environment. Execute projects that are targeted to solve environmental problems as air quality Start with defining known and less complicated indicators of activity and move to output and then to outcome. Accept uncertainties on the estimation of the contribution of inspection work to the outcomes and outputs

	Choose motivating indicators

2.3 Defining strategies

Problems	Solutions
Legal status Importance of strategy is measured by its legal status	Introduce the strategies in EU recommendation(s) / directive(s).
Linking strategies It is difficult to link your strategy with the strategies and inspection plans of other organisations (e.g. local authority sets own inspection numbers).	Encourage networking between colleagues of different units and organisations. Share systems that are used. Coordinate your strategies with partner organisations.
Support / awareness / interests There is no support from higher management and operators. Lack of awareness (or interest) from management and staff of the importance of strategies Authorities think they do not benefit from preventive actions. The Public Prosecutor thinks environment is less important.	Explain in advance why measures are taken. Place measures on internet. Set-up meetings with operators. Make use of real time indicators (e.g. continuous monitoring). Let public know about actions that are taken. Give press releases. Prosecutor only for environment
Resources Lack of finances and staff. No money for compliance assistance	Promote DTRT in your organisation. Make use of own website to promote compliance behaviour Bring high-level representatives together. Make use of networks, benchmarking / ranking Promote EMAS, this will help to lower risk level
Guidance Lack of experience to define strategies	Make good practices available, make use of real examples, invest time end money Include example communication plan in the Guidance book

2.4 Implementation plan
Two working groups discussed the blue print for an implementation plan. Within the discussions this seemed not to be possible since the inspection authorities in the different Member countries differ too much for each other. However they did manage to set-up a checklist, which can be used while making an implementation plan, or while writing the inspection plan itself. This list is added in Annex I of this report and can be seen as complementary to table 1 and 2 in the step-by step guidance book.

2.5 Next steps

Two working groups formulated recommendations for actions to be taken (next steps) to further support the implementation of the step-by-step guidance book by the different inspection authority

- Start a lobby with the European Commission to align the DTRT methodology to the obligations mentioned in the recast of the IPPC directive (Industrial Emissions Directive).
- Provide more guidance on performance monitoring.
- Establish a Network of planning experts of under IMPEL.
- Give assistance / support for the implementation of DTRT in the different MS.
- Start a new DTRT IV project to review the implementation in the different MS.
- Broaden the scope of the guidance book.
- Collect more good practices and make these available.
- Make comparison of the tools easier.
- Promote DTRT by developing a promotion package for the National Coordinators
- Promote the IRI
- Link to other instruments and networks (link DTRT to the IRI and to networks like ECENA and SEVESO network)
- Develop an interactive tool (on internet) to support the planning cycle.

3. Conclusions and recommendations

Conclusions

Based upon the presentations and the discussions during the workshop successful implementation of the step-by-step guidance book took place in a number of inspection authorities. Never the less there was a clear call for extra support.

The most important bottlenecks and problems connected to the implementation of the step-by-step guidance book can be summarized as a lack of resources, good data, support and experiences. We believe that the solutions mentioned in the tables in section 2.1 to 2.3 give a very good indication how to overcome these blockers.

To develop a standard blueprint for an implementation plan seems not to be feasible. The checklist (section 2.4) with considerations and actions gives an inspection authority extra support in the implementation of the step-by-step guidance book.

Recommendations

The development new projects under IMPEL with the aim of giving extra support to inspecting authorities. New project ideas are: guidance for performance monitoring; broaden the scope of the guidance book; development of an easy risk assessment tool; development of an advanced interactive IT tool that supports planning of environmental inspection; defining standard set of risk criteria; development of promotion packages for the implementation of the methodology and for the IRI.

To establish and facilitate a new network of experts under the IMPEL network that can give expert advice on the subject "planning of environmental inspections".

Collect more good practices and make them available for inspecting authorities.

To link DTRT to the IRI.

4. Presentations of the working groups

Working group 1 (first and second session)

In the first session ("Setting priorities") the working group exchange information and practices and identify the problems that are faced when setting priorities and implement a risk assessment tool. In the second session the working group looked for solutions on the identified problems from the first sessions and the bottlenecks that were addressed in the questionnaire. This section reports on the feedback of the 2 sessions.

Bottlenecks
- Political support
- Acceptance/ support from colleagues
- Time
- Available Resources
- Staff experience/qualifications
- Lack of data/reliability of data
- Lack of Data & IT Solutions
- Geography

Solutions - setting priorities & risk assessment
- Educating all the stakeholders (Management/budget holders/ permit holders)
- Nominating Co-ordinator
- Simple RA model to be used in combination with inspector knowledge
- Information Systems - Database design (capture relevant information)
- Standardising procedures/transparency
- Standard Training for Enforcement Staff
- Inspection Protocols for Enforcement Staff
- Updating database ongoing basis
- Regular review meetings/progress reports Static vs. Dynamic Plan
- Co-ordinating with other Agencies - Sharing info/resources
- Innovative ways to obtain staff/use of existing staff (students updating databases/Stagaire programmes)
- Inspections should be outcome based rather than focussing on output
- Defining inspection types: Desk top vs. inspection based on RA/compliance history/inspectors experience
- Targeted Campaigns (blitz on certain business types – mail shots vs. inspections)
- Target geographical area

Working group 2 (first and second session)

In the first session (Setting priorities") the working group exchange information and practices and identify the problems that are faced when setting priorities and implement a risk assessment tool. In the second session the working group looked for solutions on the identified problems from the first sessions and the bottlenecks that were addressed in the questionnaire. This section reports on the feedback of the 2 sessions.

General problems and solutions
Consistency and quality of data and combination of different databases
- Exchange information with other environmental authorities (MoU, protocols,…)
- Complexity of the system (risk criteria)
  - Get the right balance between the level of complexity (detail) and the availability of the data
  - The extra effort has to be worthwhile in the final outcome
- Culture issues (from subjective to objective)
  - Communicating, motivating and explaining

Important Risk Criteria
- Categories of IPPC installations
- SEVESO installations
- Compliance history
- Number of accidents / Incidents
- Complaints
- Emissions
- EMS
- Inspectors opinion
- Location
- State of the installation
- Size and complexity
- Contaminated Sites
- Hazardous substances
- Waste Management

Most Important Risk Criteria
- Categories of IPPC Installations
- Compliance history
- Emissions
- Location
- Size and Complexity

Problems / Solutions related to Risk Criteria
- Compliance history
  - Classify the level of significance (could be done by legislation, guidelines or from management)
- Complaints
  - Take only into account the complaints that imply actions towards operator
- Emissions
  - Use available data. Don't use risk criteria that make it too complicated
- Location
  - See emissions and co-operate with other authorities
- Inspectors opinion and State of installation
  - Guidelines (or sub-criteria) to evaluate those aspects
- Contaminated sites
  - Only take this criteria if you have the data

Working group 3 (first and second session)
In the first session ("Defining objectives") the working group exchange information and practices and identify the problems that are faced when defining objectives. In the second session the working group looked for solutions on the identified problems and the bottlenecks that were addressed in the first session and in the questionnaire.
This section reports on the feedback of the 2 sessions.

Bottleneck
Using all the same meaning for:
- Objectives
- Targets
- Performance indicators (there is an IMPEL project

Solutions
- Clarification of definitions (good and bad examples, list,..
- Training on the Guidance
- Experience on planning
- Starting from low objectives to high ones

Example
Review of definitions and examples of the guidance book

Bottleneck
- Availability of information
- From strategic level
- Setting priorities

Solutions
- Taking part in strategic level planning
- Coordination with other authorities
- Matching the setting of priorities to the objectives and linking them with outcomes

Example
UK linking of objectives to strategic goals

Bottleneck
- Using environmental outcomes for objectives and targets: difficulty in setting the specific contribution of the sources to problems and the inspection in reduction of this contribution

Solutions
- Coordination with environment quality networks
- Specific studies to estimate the contributions

Example
Working on inspection project orientated to solve environmental problems as air

quality

Bottleneck
- Time consuming process to set and get the "approval" of stakeholders (management, service, inspectors, public, operators, etc.)

Solutions
- Show examples of success of environmental improvement and/or saving time by good objectives and targets setting.
- Identify and involve stakeholders in the process of setting objectives and targets
- Take the time to do it

Example
- UK planning timing

Bottleneck
- Monitoring success:
- Identifying the appropriate performance indicators
- Identifying and providing the methods to monitor

Solutions
- Good practices/experience
- Starting from known and low complicated indicators of activity and move to output and then to outcome
- Accept uncertainty on the estimate of contribution of inspection work to the outcomes and outputs
- Choose motivating indicators

Example
Increase on collection of dangerous waste

Bottleneck
- Lack of qualified human resources

Solutions
- Prioritising objectives (accept that we can not do everything)
- Combine planned inspections with reactive inspections (complaints)

Working group 4 (first and second session)
In the first session ("Defining strategies") the working group exchange information and practices and identify the problems that are faced when defining strategies. In the second session the working group looked for solutions on the identified problems and the bottlenecks that were addressed in the first session and in the questionnaire.
This section reports on the feedback of the 2 sessions.

General issues
Problem: Links between strategies and plans
Solution: Encourage networking between colleagues, one organisation, offering same system we use

Problem: Strategy not in law, not important?
Solution: New IPPC directive, questionnaire should be send to "higher" level

Problem: Local authority sets own inspection numbers
Solution: Make inspection plan, make RA transparent

Problem: Money, resources
Solution: Promote DTRT

Problem: Data quality (own inspectors)
Solution: Output also available to inspectors

Problem: Data quality (operators)
Solution: Prepare guidelines, website, new requirements help and older legislation penalise, direct data entry operators in database (check by mail), audit the consultants

Problem: Authorities think do not benefit preventive actions
Solution: Use of performance indicators, use analyses of data website (real time indicators) maybe IMPEL project

Communication issues
Problem: Data systems do not link
Solution: Define data needs before implementing plan

Problem: Lack of interest in plan?
Solution: Measure interest in the Internet, set up meetings with operators, New IPPC directive, Brochures

Problem: Operators not happy
Solution: Aarhus, explain why and in advance

Problem: What and how communicate is not clear
Solution: Include example communication plan in the GB

Inspection issues
Problem: To many complaints
Solution: Pay tax, right receive back. Complaint in writing (and send to operator) Brochures

Problem: No money for Compliance assistance
Solution: Good use of information of own website, IMPEL good practices, bring representatives together, making use of exciting networks, benchmarking / ranking, EMAS will help to get lower risk level

Other issues
Problem: No smart targets?
Solution: Exchange good practices, make use of reel examples, and invest time end money

Problem: Pressure to meet targets may influence the results.
Solution: Good data systems to set the targets

Problem: Links with other agencies (planning, building)
Solution: Quality Management System, providing advice on the subjects you need to be involved, good communication and procedures.

Problem: What we do is unknown
Solution: Let public know about this meeting, press release

Problem: Prosecutor thinks environment is less important.
Solution: Prosecutor only for environment

Working group 1 (third session)
In the third session ("Next steps") the working group explored what we should do to keep "Doing the right things" alive. What steps should be taken to give the inspection authorities support in the implementation of the guidance book after the project is finalised
This section reports on the feedback of this session.

- IMPEL Influence the Commission – Revision of IPPC Directive to include DTRT
- MS Lobby Commissioners/Politicians re importance of DTRT and environmental inspections
- Guidance on a communication strategy
- Development of a Network among MS to continue to share the experiences of rolling out DTRT
- Roll out DTRT national/regional and local level
- Within MS – roll out training/information sessions with support of IMPEL
- Scope of guidance needs to be extended beyond RMCEI & IPPC licensing to include all environmental inspections
- Provide Examples of inspection plans for different levels (National, regional and local) from various countries
- Link DTRT with Environmental Management System/Quality Management System duplication between these systems)
- Making MS aware of IRI process and encouraging them to use it or similar
- Promotion of IMPEL
- DTRT IV – reviewing roll out of DTRT among MS

Working group 2 (third session)
In the third session ("Next steps") the working group explored what we should do to keep "Doing the right things" alive. What steps should be taken to give the inspection authorities support in the implementation of the guidance book after the project is finalised
This section reports on the feedback of this session.

1. Development of (software) tools to support implementation
    - Comparison of existing Risk Assessment tools.
    - Make the RA tools available.

- Interactive website to develop an inspection plan
  Including all necessary checklists and formats
2. Examples for performance monitoring
3. Promotion package for the National Coordinators.
   - Brochure should stress the linkage with the RMCEI, identify the benefits of the methodology and point out the ways to overcome possible bottlenecks.
   - Good Examples
- Broaden the Scope to other EU Regulation (SEVESO, REACH) and updating the Guidance Book according to the enlarged scope and to the new RMCEI
- Network of experts (Network of International Planning Experts – NIPE)
  - Preferably with the trainees of DTRT III (appointed as the NCP)
  - Give input to an Internet Forum on environmental planning.
  - Provide practical support to assist IMPEL members to implement DTRT (like helpdesk)
  - Give support to do trainings in the IMPEL members countries (develop training package and make use of the DTRT 3 trainees)
  - Organize a trainer the trainer sessions to support the training in IMPEL member countries
- Further linking of the IRI with DTRT (new questionnaire)
- Linking with other networks
  - ECENA, TWG2 (SEVESO)
- Develop new TORs to run the previous actions

Working group 3 (third session)
In the third session ("implementation plan") the working group developed a list of actions that can be helpful for an inspection authority when implementing the guidance book.
This section reports on the feedback of this session.

"Change in the way we do things"

- Persuade people who take the decision (management?)
- Look for potential blockers
- Change has to be well organised including time schedule, deadlines, …
- Team of people to identify the changes needed
- Make people to work and accept the risk base approaches
- Make the cultural change easy for people motivating colleagues
(progressive, case studies within the organisation, celebrating success, ..
- Communication and negotiating skills
- Communication is important
- What is important to us?
- What is going to help us?

Describing the context
  a Who will write the plan?
  b What kind of act (EU, national, regional,..
  c Identify and involve stakeholders
  d Staff/inspectors training
  e What will be the scope?
  f What are the available resources (human and financial)?
  g What is the benefit for the organisation?

h The order of implementation
i Convince politicians/minister/stakeholders
j Does each person know their role? Organisation strategy, background may be already by different people
k Will we have more than one inspection plan (one per area, one per regulatory regime,…)?
l Translation requirements

Setting priorities
a Begin with a simple tool
b Inform and discuss with stakeholders e.g. consultation
c Human and financial resources
d Risk assessment tools we need more examples. We have just one applying to all installations (IPPC or not). Guidance book do not make a clear separation of installations
e Focus on problematic activities/installations
f Combine high risk installations with problematic ones (including TFS activities) Matching priorities and objectives
g How will we inform relevant others? Internet, other techniques
h Consider linking with charging

Defining objectives and strategies
SMART
a National and international legislation
b Input from other authorities (air quality, water quality,..)
c Human and financial resources
d Establish the level of the organisations in the definition of objectives and targets
e Should be establish the level which will be defining the objectives and targets
f Make a procedure (who, what, how,. may be a decision tree)
g Begin in high level management
h Necessary discussion and feedback from different levels
i Harmonisation is critical
j Adequate time to get approvals, feedback and "buying in"
k Identify if sub-strategies are necessary
l Does communication strategy involve all the stakeholders, use all the means to do it (internet, leaflets, …)

Planning an review
a Plans needs to be related with financial and human resources
b Make a procedure (Quality systems)
c Shall we have annual or multi annual programme? Frequency of reviews and procedure to do it
d Set conditions for plan revision (who, what changes,…)
e Performance indicators for review and revision
f Consider the time for reactive work (complaints, accidents, etc.

Working group 4 (third session)
In the third session ("implementation plan") the working group developed a list of actions that can be helpful for an inspection authority when implementing the guidance book.
This section reports on the feedback of this session.

1A Describing the context
Action to be done
- List all installations
- Define the scope of inspections (Integrated)
- Define Risk model and criteria
- Collect data (Human resources, up to data and good quality)
- Collecting data from other agency (Protocol, up to data and good quality)
- Good communication with other agencies (Early meeting, Explain why we need
- Agree action plan together
- Define time scale of the plan (One year or more)
- May need to plan for HR (recruitment to keep the plan maintained)
- Long term planning
- Know I.T.(technical) needs to budget
- Understand I.T. requirements of the inspectors
- Create single database

1B Setting priorities
Action to be done
- Discuss with top management who is responsible
- Discuss with the Ministry (follow the plan, define benefits) Amend existing work plan
- Do Risk Assessment
- Need working group
- Preparing draft plan internal consultation
- Decide if change to law.
- Inspect facilities on list to collect data
- Define ratio planned/unplanned.

1C Defining objectives
Action to be done (II)
- Convince Top management how to improve environment
- Be aware of what is happening in facilities
- Good communication with ministry, agencies, inspectors.
- Not to many.
- Set smart targets

1D Planning and review
Action to be done
- Set up I.T. system
- Prepare specific and simple guideline
- Database??
- Algorithm (calculate No inspections)??
- Publish the general plan

- Execute the plan
- Set up I.T. system
- Prepare specific and simple guideline
- Single database??
- Algorithm (calculate no. inspections)??
- Publish the general plan
- Execute the plan
- Prepare schedule
- Periodic evaluation
- Set up reporting arrangements
- Update database
- Assess plan against objectives (Master of the plan)

Were should we start
- Discuss with the Ministry or Top authority (follow the plan, define benefits)
- Scope of the plan and list of installations
- Risk assessment, data collection
- Calculate inspections, define how long inspections should take

Annex VI

Evaluation of first training session
(22 to 24 September 2008)

I. Arrangements and logistics

Please rate the following by placing a mark in the appropriate column	☹ Poor 1	Below average 2	☺ Average 3	Above average 4	☺ Good 5
Accommodation and catering			3	4	12
Accessibility of the training location				1	18
Advanced notification about the training		1	1	7	9
General evaluation of the arrangements				5	13

II. Content

Please rate the following by placing a mark in the appropriate column	☹ Poor 1	Below average 2	☺ Average 3	Above average 4	☺ Good 5
Scope and depth of the training program				9	9
Quality of the overheads and visual aids			1	8	11
Quality of facilitator's presentations				8	10
Speed of sessions			4	7	8
Possibility to ask questions and present your views				3	11
I feel that I am able to disseminate the methodology within my own MS		1	3	8	6

III. Coaches

Please rate the following by placing a mark in the appropriate column	☹ Poor 1	Below average 2	☺ Average 3	Above average 4	☺ Good 5
Level of skill and expertise of the coach				2	15
Clarity of the coach's interventions				2	15
Appropriateness of methods and approach suggested				6	11

Evaluation of second training session
(13 to 15 October2008)

I. Arrangements and logistics

Please rate the following by placing a mark in the appropriate column	☹ Poor 1	Below average 2	☺ Average 3	Above average 4	☺ Good 5
Accommodation and catering	1	2	7	5	5
Accessibility of the training location		1		8	10
Advanced notification about the training		1	3	9	7
General evaluation of the arrangements			2	13	4

II. Content

Please rate the following by placing a mark in the appropriate column	☹ Poor 1	Below average 2	☺ Average 3	Above average 4	☺ Good 5
Scope and depth of the training program			1	12	8
Quality of the overheads and visual aids			3	8	10
Quality of facilitator's presentations			1	7	13
Speed of sessions			2	9	10
Possibility to ask questions and present your views			1	3	17
I feel that I am able to disseminate the methodology within my own MS			2	10	9

III. Coaches

Please rate the following by placing a mark in the appropriate column	☹ Poor 1	Below average 2	☺ Average 3	Above average 4	☺ Good 5
Level of skill and expertise of the coach				7	12
Clarity of the coach's interventions			1	7	11
Appropriateness of methods and approach suggested			1	7	11

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Annex VII

Evaluation workshop of Implementation workshop

I. Arrangements and logistics

Please rate the following by placing a mark in the appropriate column	☹ Poor 1	Below average 2	☺ Average 3	Above average 4	☺ Good 5
Accommodation and catering				6	15
Accessibility of the workshop location				5	15
Advanced notification about the training				5	14
General evaluation of the arrangements				5	15

II. Content

Please rate the following by placing a mark in the appropriate column	☹ Poor 1	Below average 2	☺ Average 3	Above average 4	☺ Good 5
Scope and depth of the introduction (Day 1)				10	9
Quality of the overheads and visual aids			1	8	10
Speed of the sessions on Day 1			1	10	8
Possibility to ask questions and present your presentations				6	13
I feel that I am able to implement the methodology within my own organisation			3	10	5

III. Workshops

Round 1 (Day 2)

Please rate the following by placing a mark in the appropriate column	☹ Poor 1	Below average 2	☺ Average 3	Above average 4	☺ Good 5
The presentations were helpful for the discussions			2	6	11
Scope and depth of the workshop			2	7	11
Speed of the workshop			2	9	8
The workshop meets my expectations			3	6	10

Round 2 (Day 2)

Please rate the following by placing a mark in the appropriate column	☹ Poor 1	Below average 2	☺ Average 3	Above average 4	☺ Good 5
The presentations were helpful for the discussions			2	5	13
Scope and depth of the workshop			2	7	11
Speed of the workshop			1	9	9
The workshop meets my expectations			3	6	11

Round 3 (Day 3)

Please rate the following by placing a mark in the appropriate column	☹ Poor 1	Below average 2	☺ Average 3	Above average 4	☺ Good 5
The presentations were helpful for the discussions			3	7	9
Scope and depth of the workshop			2	7	10
Speed of the workshop			1	9	7
The workshop meets my expectations			2	5	12