



European Union Network for  
the Implementation and Enforcement  
of Environmental Law

# REMAS – IMPEL Requirements of Remas Criteria



## **IMPEL**

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The European Union Network for the Implementation and Enforcement of Environmental Law is an informal network of the environmental authorities of EU Member States, acceding and candidate countries, and Norway. The European Commission is also a member of IMPEL and shares the chairmanship its Plenary Meetings.

The network is commonly known as the IMPEL Network

The expertise and experience of the participants within IMPEL make the network uniquely qualified to work on certain of the technical and regulatory aspects of EU environmental legislation. 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. It promotes the exchange of information and experience and the development of greater consistency of approach in the implementation, application and enforcement of environmental legislation, with special emphasis on Community environmental legislation. It provides a framework for policy makers, environmental inspectors and enforcement officers to exchange ideas, and encourages the development of enforcement structures and best practices.

Information on the IMPEL Network is also available through its web site at:  
<http://europa.eu.int/comm/environment/impel>

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**Document Page:**

<p><b>Title report</b></p> <p>REMAS – IMPEL Requirements of Remas Criteria</p>	<p>Number report: 2004/13</p>
<p><b>Project Manager/Authors</b></p> <p>Project Manager: Martyn Cheesbrough Author: Lindsay Knuckey</p>	<p>Report adopted at IMPEL Plenary Meeting: 30<sup>th</sup> November-2<sup>nd</sup> December 2005, Cardiff,</p>
<p><b>Project Group Members</b></p> <p>See Appendix II.</p>	<p>Number of pages Report: 14 Annexes: 6</p>
<p><b>Executive Summary</b></p> <p>This report has been produced to incorporate IMPEL’s views within the Remas project, and in with particular reference to the development of the ‘Remas Criteria’.</p> <p>The Remas project is co-funded by the EU LIFE-Environment programme, the UK Environment Agency, Scottish Environmental Protection Agency, the Institute of Environmental Management and Assessment and the Irish Environmental Protection Agency. The project aims to reach a consensus on the value of independently certified environmental management system (EMS) to the environmental regulator, and to identify which voluntary compliance measures most effectively protect the environment and why. The ‘Remas Criteria’ are defined as those elements of an EMS that are considered to be key to improving environmental performance and aiding regulation.</p> <p>The aim of this IMPEL project has been to incorporate IMPEL’s views regarding the key issues that should be addressed by the relevant certification and verification bodies when assessing an EMS. These requirements will contribute as the ‘regulator’s view’ into the revision of the Remas Criteria. It is recognised that there are currently several different schemes for assessing and registering an EMS, i.e EMAS and ISO 14001. Some of the requirements listed within this report will already be addressed under some of these schemes. The aim is that the recommendations of this report be incorporated within all schemes.</p> <p>The key suggested areas for attention are:</p> <p><b>Compliance</b> – checks that should be carried out to ensure an EMS can actually help a site achieve compliance;</p> <p><b>Environmental aspects and controls</b> – checks that should be carried out to ensure environmental aspects of a site, and potential impacts of environmental aspects, are fully considered and managed within an EMS;</p> <p><b>Accreditation</b> – recommendations to ensure a more standard approach is adopted regarding the accreditation of those responsible for certifying or verifying EMS.</p> <p>A list of suggested further areas of work is also included for IMPEL’s future consideration.</p>	
<p><b>Disclaimer</b></p> <p>This report on ‘REMAS – IMPEL Requirements of Remas Criteria’ 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.</p>	



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## SUMMARY

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This report has been produced to incorporate IMPEL's views within the Remas project, and with particular reference to the development of the 'Remas Criteria'.

Remas is a €2million project co-funded by the EU LIFE-Environment programme, the UK Environment Agency, Scottish Environmental Protection Agency, the Institute of Environmental Management and Assessment and the Irish Environmental Protection Agency. The project will run over three years, and will involve a Europe-wide study into the benefits of environmental management systems (EMS) in the context of regulation. The project aims to reach a consensus on the value of independently certified environmental management system (EMS) to the environmental regulator, and to identify which voluntary compliance measures most effectively protect the environment and why. The 'Remas Criteria' are defined as those elements of an EMS that are considered to be key to improving environmental performance and aiding regulation.

The aim of this IMPEL project has been to incorporate IMPEL's views regarding the key issues that should be addressed by the relevant certification and verification bodies when assessing an EMS. These requirements will contribute as the 'regulator's view' into the revision of the Remas Criteria. It is recognised that there are currently several different schemes for assessing and registering an EMS, i.e EMAS and ISO 14001. Some of the requirements listed within this report will already be addressed under some of these schemes. The aim is that the recommendations of this report be incorporated within all schemes.

The key suggested areas for attention are:

- ***Compliance*** – checks that should be carried out to ensure an EMS can actually help a site achieve compliance;
- ***Environmental aspects and controls*** – checks that should be carried out to ensure environmental aspects of a site, and potential impacts of environmental aspects, are fully considered and managed within an EMS;
- ***Accreditation*** – recommendations to ensure a more standard approach is adopted regarding the accreditation of those responsible for certifying or verifying EMS.

This IMPEL report will input to the revision of the Remas Criteria, during the summer of 2004. The revisions to the criteria will be implemented at a number of sites during 2004/5 in Europe. Following this practical demonstration the criteria will be further reviewed with input from IMPEL.

A number of further tasks were identified within the project working group and are suggested for further consideration by IMPEL, insofar as the tasks are beyond the scope of the current project.



## 1 INTRODUCTION

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This report has been prepared following a meeting held in Prague, Czech Republic, from 15 – 16 March 2004 with members of the IMPEL network. Details of the participants at this meeting are provided in Annex I.

Focussing on the desired *outputs* of an environmental management system (EMS), the meeting was held to identify and discuss the requirements of certification and verification activities that must be carried out to ensure that an EMS delivers improved environmental performance. The conclusions from the meeting were compiled into a report which was then presented as a draft to the IMPEL Cluster 1 group at their meeting in Finnish Lapland on 1 – 2 April 2004. Both the original working group and the Cluster 1 group have been consulted on subsequent drafts of this report.

This work has been undertaken to incorporate the IMPEL network in the development of the ‘Remas Criteria’, a key component of the Remas project. Remas is a €2million project co-funded by the EU LIFE-Environment programme, the UK Environment Agency, Scottish Environmental Protection Agency, the Institute of Environmental Management and Assessment and the Irish Environmental Protection Agency. The project will run over three years, and will involve a Europe-wide study into the benefits of environmental management systems (EMS) in the context of regulation. The project aims to reach a consensus on the value of independently certified EMS to the environmental regulator, and to identify which voluntary compliance measures most effectively protect the environment and why. The findings of the study will then be disseminated to regulators and industry across Europe to help promote the highest standards of environmental management practice.

The ‘Remas Criteria’ are defined as the elements of an environmental management system (EMS) that are considered to be key to improving environmental performance and aiding regulation. These were drafted in November 2003. The Remas consortium considers there to be great value in engaging IMPEL in this work, and an ‘umbrella’ terms of reference for the work was agreed in 2003. The objective of this work is to provide a consensus on the requirements of certification or verification of an EMS to meet regulatory needs.

This final report hereby details the key issues, as identified by IMPEL, that should be addressed by the relevant certification or verification bodies when assessing an EMS. There are also listed some requirements of the process of accrediting organisations with the powers to assess and register/certify an EMS against a particular standard or scheme. There currently exists several different schemes for assessing and registering EMS and some of the requirements listed will be already carried out or addressed under some EMS standards. They are however included here with the aim that they should be incorporated within all systems.

*Accreditation:*

A certification body is authorised or accredited to assess a management system against a particular standard – i.e. accreditation bodies check that certification bodies are capable of providing accredited certification.

*Environmental Management System (EMS):*

An EMS is part of a company's overall management system that includes 'organisational structure, planning activities, responsibilities, practices, procedures, processes and resources for developing, implementing, achieving, reviewing and maintaining an environmental policy.

There are currently several different schemes that exist for measuring and registering a company's EMS. This includes:

*ISO 14001:* This is an internationally-recognised standard, produced by the International Organisation for Standardisation, that sets out the different elements of an EMS and how they relate to one another.

*EMAS:* The EU-wide Eco-Management and Audit Scheme (EMAS) is a registration scheme (not a standard) and a way for a company to demonstrate its green credentials beyond ISO 14001 accredited certification. EMAS differs from ISO 14001 (and other standards) in that a company must comply with legislation – i.e. assurance must be sought from the regulator.

*Certification:*

The process by which a company's system is assessed for its conformity in relation to an officially recognised standard such as ISO 14001. Certification bodies (companies) perform these external assessments (or audits).

*Conformance:*

The process of checking if a company activity conforms with a particular standard – e.g. the certifier checks conformance to ISO 14001.

*Compliance:*

Full implementation of environmental requirements. Compliance occurs when requirements are met and desired changes are achieved.

*Verifier:*

An environmental verifier is the person (or company) responsible for validating a company's environmental statement in line with EMAS regulations as part of the EMAS registration process.

An EMS should be expected to enable a site or operator to achieve and maintain compliance. In this sense, compliance may be defined as:

‘Full implementation of environmental requirements. Compliance occurs when requirements are met and desired changes are achieved’<sup>1</sup>.

*Prior to certification/verification:*

Through the use of an on site visit, the certifier/verifier should check that a site is compliant, and can demonstrate compliance, by:

- Carrying out a thorough check of legislation applicable to a site, and that any relevant permits are in place. To ensure these checks are accurate, the certifier/verifier must have an adequate knowledge of local, as well as national, laws. The validity of any permits should be checked with particular reference made to the date and issuing body.
- Checking that the operator is able to demonstrate compliance with any applicable permits or general binding rules through the provision of relevant data, for example the results of monitoring carried out with reference to permits. The certifier/verifier should check the validity and accuracy of this evidence.
- Checking that the relevant regulatory body is familiar with the site, and has carried out at least one inspection of the site within the previous three-year period.

The inspecting body should be notified under the following circumstances:

- Where any permit conditions or general binding rules are not being adhered to, including where any emissions exceed specified emission limits;
- Where a site is operating without required permit(s) in place.

*Following certification/verification:*

The EMS should provide for the following:

- Any non-compliance identified, including incidents or complaints, should trigger corrective action by the site that is agreed with the certifier/verifier and notified to the regulator.

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<sup>1</sup> As defined in IMPEL report *Best Practices concerning Training and Qualification for Environmental Inspectors*.

#### 4.1 Identification of environmental aspects

- The certifier/verifier should check for evidence that an operator has carried out a comprehensive review of all environmental aspects, direct and indirect, of a site's activities, products and services. It is recommended that Annex XI of EC EMAS Regulation (No 761/2001) be used as guidance for this process.
- The certifier/verifier should also check any relevant permits and the requirements of any general binding rules for any documented significant environmental aspects, as outlined in Annex XI of EC EMAS Regulation (No 761/2001), and that these are being managed through the EMS.
- Any documented environmental aspects should be linked to appropriate control measures or objectives.
- The certifier/verifier should carry out a walk around the site to look for any visual environmental aspects.
- The certifier/verifier should check that an adequate procedure is in place to review how any changes to a site's activities, products or services may change or create any additional direct or indirect environmental aspects.

##### 4.1.1 Indirect environmental aspects

- The certifier/verifier should check the activities of contractors or suppliers at a site to ensure they are operating in accordance with procedures specified within the EMS, and are not impacting upon the site/company's environmental performance.

To control any potential impacts of documented environmental aspects, the following site management procedures and processes should be assessed:

#### 4.2 Documenting environmental improvement

- The certifier/verifier should check for evidence that a site is able to document and provide evidence of environmental progress or improvement. The operator should be asked to provide performance data on an annual basis, which covers the following issues:
  - *The results of samples, analyses, calibrations, examinations, measurements, tests and surveys taken and carried out and any assessment made of such data (these data may already be required as part of an existing authorisation or permit);*
  - *a review of the effectiveness of the management system, including, in particular, a summary of the management programme and its success in meeting the objectives and targets as demonstrated by the measures of performance;*
  - *the future implementation of objectives and targets via management programmes, at least one year ahead.*

### **4.3 Processes**

- The certifier/verifier should check that BAT reference documents have been reviewed and the guidance has been implemented (where available/applicable).

### **4.4 Monitoring**

- The certifier/verifier should request to see evidence that demonstrates that monitoring of emissions, as required under permit conditions, is being carried out. This evidence would take the form of monitoring results and reports.
- If not specified by permits or law, the certifier/verifier should request a site to specify, in agreement with the regulatory body, minimum frequencies and levels of monitoring.
- The certifier/verifier should check that calibration of site monitoring equipment is carried out, and that calibration records are kept.

### **4.5 Competence and training of operators and operational staff**

The certifier/verifier should check that all staff demonstrate awareness and understanding of operating procedures and practices, permit conditions, general binding rules and relevant environmental impacts. In addition to checking staff training records, this may be supported through random interviews held with both operational staff and senior management.

### **4.6 Emergency Provisions**

- The certifier/verifier should check for evidence that:
  - An emergency plan exists;
  - All involved in the plan are aware of it (including any relevant external organisations);
  - The plan is tested at least every three years;
  - The plan covers reasonable probable and improbable environmental impacts of an emergency incident;
  - The plan includes provisions for the use of contractors, (for example for the disposal of hazardous waste to a suitable site).
  - The plan links to other relevant or existing emergency plans (e.g. under requirements of Seveso II).

### **4.7 Maintenance of equipment**

- The certifier/verifier should check for evidence that a maintenance plan exists, and that routine maintenance takes place.

### **4.8 Document retention**

- The certifier/verifier should check that a system is in place at the site for documents to be retained and available for a minimum period of five years.

The process of accrediting certifiers and verifiers of EMS currently differs between schemes. To ensure a more standard approach, IMPEL proposes that:

- Organisations responsible for the accreditation and supervision of verifying and certifying bodies should refer to the IMPEL document 'Best Practices concerning Training and Qualification for Environmental Inspectors', which details best practice and minimum standards for the competencies and training required for environmental inspectors.
- Appropriate guidelines for the accreditation and examination of verifiers/certifiers should be established.
- The relevant regulatory body should be provided with copies of certifiers/verifiers site reports on a regular basis.
- Prior to certification/verification, an initial site audit should be carried out jointly between the certifier/verifier and the site inspector.

This IMPEL report will input to the revision of the Remas Criteria, during the summer of 2004. The revisions to the criteria will be implemented at a number of sites during 2004/5 in Europe. Following this practical demonstration the criteria will be further reviewed with input from IMPEL.

A number of further tasks were identified within the project working group that are suggested below for further consideration by IMPEL, insofar as the tasks are beyond the scope of the current project. These are:

*Guidance for checking management responsibility for an EMS:*

How do we check who holds the ultimate responsibility for an EMS, and their commitment to ensuring the EMS delivers?

*IMPEL cross-reference of IPPC BREFS:*

Identification of the key BREFS for industry sectors, to be used as key guidance for certifiers/verifiers and industry. Perhaps considering also minimum requirements for the translation of these documents.

*Best practice for ensuring consistency throughout the EU on how industry makes environmental performance information available:*

How can we ensure companies consistently make information on environmental performance available to both the regulator and general public?

**APPENDIX I**  
**PROJECT TERMS OF REFERENCE**

No	Name of project
	<i>REMAS – IMPEL requirements of remas criteria</i>

### 1. Scope

<b>1.1. Background</b>	<p>The Recommendation on minimum criteria for environmental inspection defines the practical activities to be undertaken within inspection but does not stipulate the organisations that must carry out the work. Article 10 of EMAS places requirements on Member States to avoid duplication of activities that may occur during the implementation of EMAS and environmental legislation. It is therefore possible that a non-government organisation may be the sole body undertaking an activity to demonstrate implementation of environmental legislation, for example during certification of ISO14001 or verification of the EMAS statement.</p> <p>Although there is substantial guidance on certification and verification, there is mounting evidence of inconsistencies between certifiers and verifiers.</p> <p>The remas project is supported by a consortium of the Environment Agency, the Scottish Environmental Protection Agency, the Irish Environmental Protection Agency and the Institute for Environmental Management and Assessment. The objective is to demonstrate the value of a site based industrial EMS – specifically EMAS – in terms of environmental performance and delivery of regulator requirements. The project is part-funded under the EU LIFE Environment programme. The consortium considers there is great value in engaging IMPEL in this work, and an ‘umbrella’ TOR for the work was agreed in December 2002.</p> <p>A requirement of the project is to define ‘remas criteria’ – key requirements that are of value to regulators. Following debate at the Cluster 1 meeting in Prague in September 2003, this TOR further details work for IMPEL during 2004, specifically, the development of a regulators view on the requirements of certification and verification activities that must be carried out, with particular reference to the recommendation on minimum criteria for environmental inspection.</p> <p>Further information on REMAS is available at <a href="http://www.remas.info">www.remas.info</a></p>
<b>1.2. Definition</b>	<ul style="list-style-type: none"> <li>• REMAS criteria – these are the key requirements that are of value to the environmental regulator that are provided by sites operating effectively under the EMAS regulation.</li> <li>• EMS – environmental management system</li> <li>• IPPC – Integrated Pollution Prevention and Control Directive</li> <li>• EMAS – Eco-management and audit scheme</li> <li>• Regulator – any government or government agency organisation responsible for the development and/or implementation of environmental legislation</li> </ul>
<b>1.3. Objective of project</b>	To provide a consensus on the requirements of certification of an EMS and verification of EMAS to meet regulatory needs. This will then be taken into account in the review of the remas criteria in Summer 2004 by the remas project.
<b>1.4. Product(s)</b>	IMPEL report details the regulators requirements of an EMS, certification and verification

### 2. Structure of the project

<b>2.1. Participants</b>	All IMPEL members are welcome to take part in this work. Participation will be confirmed at the remas meeting in Rome prior to the plenary.
<b>2.2. Project team</b>	TBA



<b>2.3. Manager Executor</b>	As project manager for REMAS, Martyn Cheesbrough will also provide the link to the project for IMPEL.
<b>2.4. Reporting arrangements</b>	A first draft of the proposed document will be discussed at the Cluster 1 meeting in April 2004. The first approved document will be presented to the Irish plenary in 2004, together with recommendations for future work.

### 3. Resources required

<b>3.1 Project costs</b>	The REMAS project is valued at over €2 million over years 2002 to 2006. No other funding is envisaged from the IMPEL budget at this stage.
<b>3.2. Fin. from Com.</b>	The Commission will be funding 50% of the project through LIFE III. No other funding is envisaged from the Commission
<b>3.3. Fin. from MS (and any other )</b>	The consortium will fund 50% of the project under LIFE III. No other direct contribution to the project is envisaged from the Member States at this stage. IMPEL members taking part in the seminars and workshops will be responsible for their own travel/accommodation costs, although some support may be available.
<b>3.4. Human</b>	One two day meetings planned in late February or March 2004 with an anticipated resource requirement of 3 days per MS taking part. There will also be the possibility of contributing to the web based discussion groups during the drafting stages of the report

### 4. Quality review mechanisms

The REMAS project has specific quality requirements to meet the terms of LIFE Environment. The report will be developed within these requirements. At least 9 Member States will take part in the development of the report. In addition, a first draft of the report will be discussed at the cluster 1 meeting in Finland during April 2004, who will act to ensure the report represents the wider IMPEL network rather than specific Member States.	
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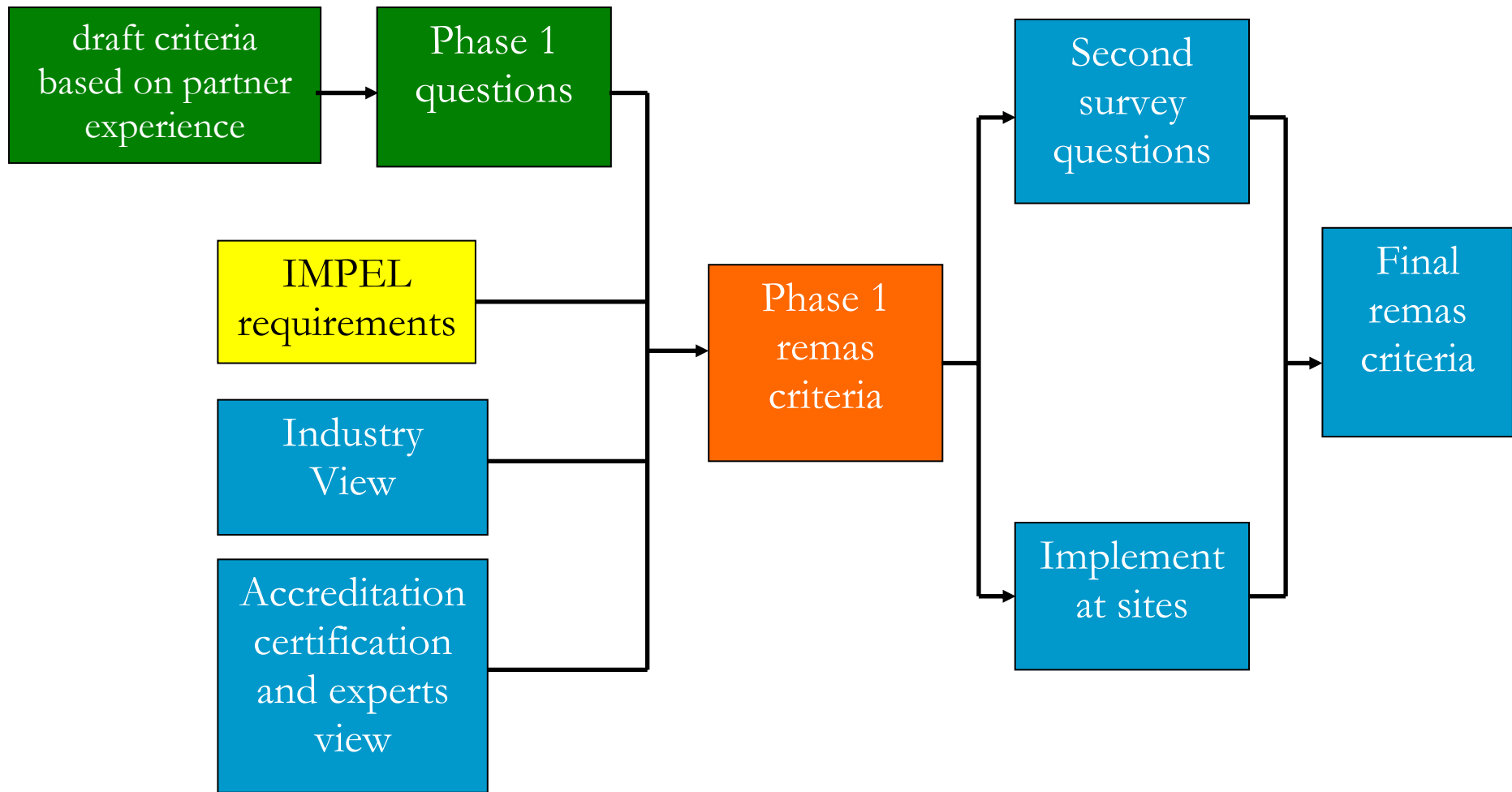
### 5. Legal base

<b>5.1. Directive/Regulation/ Decision</b>	Regulation (EC) No 761/2001 ... allowing voluntary participation by organisations in a Community Eco-management and audit scheme (EMAS)  Recommendation providing for minimum criteria for environmental inspections in the Member States 2001/331/EC
<b>5.2. Article and description</b>	Article 10.2 – Member States should consider how registration under EMAS in accordance with this Regulation may be taken into account in the implementation and enforcement of environmental legislation in order to avoid unnecessary duplication of effort by both organisations and competent enforcement authorities.

### 6. Project planning

<b>6.1. Approval</b>	The final draft will be presented to the IMPEL plenary in Ireland for adoption.
<b>(6.2. Fin. Contributions)</b>	Budgets for the REMAS project can be obtained from REMAS project manager. No financial contribution is required through IMPEL budgets.
<b>6.3. Start</b>	January 2004.





*Diagram detailing the development and revision of remas criteria in the remas project between 2003 and 2005. This IMPEL TOR refers to the development of the document in yellow. Items in green are complete as at November 2003.*



**APPENDIX II**  
**PARTICIPANTS TO MEETING HELD IN PRAGUE, 15 – 16 MARCH 2004**

<b>COUNTRY</b>	<b>NAME</b>	<b>ORGANISATION</b>
<b>Czech Republic</b>	Mr Pavel Šremer	Czech Environmental Inspectorate
	Mr Ivo Trojan	Czech Environmental Inspectorate
	Mr Pavel Růžička	Czech EMAS Agency
<b>Germany</b>	Dr. Matthias Weigand	Bayerisches Staatsministerium für Landesentwicklung und Umweltfragen
<b>Ireland</b>	Mary Gurrie	Environmental Protection Agency
<b>Slovak Republic</b>	Mr. Andrej Racik	Environmental Agency
<b>Spain (Galicia)</b>	Ms Chiqui Barrecheuren Beltran	Ministry of Environment of the Galician Government.
<b>United Kingdom</b>	Martyn Cheesbrough	Environment Agency of England & Wales
	Lindsay Knuckey	Environment Agency of England & Wales

## **APPENDIX III**

### **Guidance available (at date of publication)**

#### **ISO 14001**

Guidance available from:

ISO Central Secretariat

1, rue de Varembé, Case postale 56

CH-1211 Geneva 20, Switzerland

*Telephone* +41 22 749 01 11; *Fax* +41 22 733 34 30

Web address: <http://www.iso.ch/iso/en/ISOOnline.frontpage>

#### **EMAS legislative texts**

Available at:

[http://www.europa.eu.int/comm/environment/emas/documents/legislative\\_en.htm](http://www.europa.eu.int/comm/environment/emas/documents/legislative_en.htm)

- **EMAS Regulation**

Regulation (EC) No 761/2001 of the European Parliament and of the Council of 19 March 2001 allowing voluntary participation by organisations in a Community eco-management and audit scheme (EMAS).

- **European Commission Decision**

Decision (EC) No 681/2001 of 7 September 2001 on guidance for the implementation of Regulation (EC) No 761/2001 of the European Parliament and of the Council allowing voluntary participation by organisations in a Community eco-management and audit scheme.

- **European Commission Recommendation**

Recommendation (EC) 680/2001 of 7 September on guidance for the implementation of Regulation (EC) No 761/2001 (7/9/2001) of the European Parliament and of the Council allowing voluntary participation by organisations in a Community eco-management and audit scheme.

- **European Commission Recommendation**

Commission Recommendation 2003/532/EC of 10 July 2003 on guidance for the implementation of Regulation (EC) No 761/2001 of the European Parliament and of the Council allowing voluntary participation by organisations in a Community eco-management and audit scheme (EMAS) concerning the selection and use of environmental performance indicators

#### **IMPEL reports**

Best Practices concerning Training and Qualification for Environmental Inspectors:

[http://www.europa.eu.int/comm/environment/impel/environmental\\_inspectors.htm](http://www.europa.eu.int/comm/environment/impel/environmental_inspectors.htm)

#### **The Remas project**

[www.remas.info](http://www.remas.info)

#### **Best available technique reference notes (BREFS)**

<http://eippcb.jrc.es/>

## Published IMPEL reports

Available at: <http://www.europa.eu.int/comm/environment/impel/reports.htm#minimum>

- Management Reference Book for Environmental Inspectorates (*Nov 2003*)
- Lessons learnt from accidents – Seminar held in Bordeaux 2002 (*Nov 2003*)
- IRI Spain (*Nov 2003*)
- IRI France (*Nov 2003*)
- IRI the Netherlands (*May 2003*)
- Best Practices concerning Training and Qualification for Environmental Inspectors (*March 2003*)
- IMPEL Guidance Document on the Point VIII of the Recommendation of the European Parliament and of the Council of 4 April 2001 providing for minimum criteria for environmental inspections (*Dec 2002*)
- IRI Ireland (*Dec 2002*)
- IRI Belgium (*Dec 2002*)
- Report on Lessons Learnt from accidents, Seminar held in Reims, 2001 (*Dec 2002*)
- IMPEL Review Initiative (IRI): Phase 3: Testing of the Review Scheme: 1st Review: Mannheim, Baden Württemberg, Germany, 15-19 October 2001 (*Dec 2001*)
- IMPEL Review Initiative (IRI) Phase 2: Assessment and test of Questionnaire and Guidance (*June 2001*)
- Report on Lessons Learnt from Accidents, Seminar held in Lyon 2000 (*Dec 2000*)
- IMPEL Reference Book for Environmental Inspection (*Jun 1999*)
- Report on Lessons Learnt from Accidents, Seminar held in Lyon 1999 (*Dec 1999*)
- Minimum Criteria for Inspections
  - General Principles (*Nov 1997*)
  - Frequency of Inspections (*Dec 1998*)
  - Operator Self-Monitoring (*Dec 1998*)
  - Planning and Reporting of Inspections (*Jun 1999*)
- Reports related to permitting, monitoring and the 6<sup>th</sup> EAP in a wider sense
- Better Legislation Initiative (*Nov 2003*)
- Olive Oil Project (*Nov 2003*)
- Implementing Article 10 of the SEA Directive 2001/42/EC (*Feb 2003*)
- Finnish report on energy efficiency in environmental permits (*Dec 2002*)
- Finnish Comparison Programme II - Self-monitoring and electronic reporting, pulp and paper production (*Dec 2002*)

- General Binding Rules (*June 2001*)
- Dutch Comparison Programme (*June 2001*)
- Integrated pollution control, compliance and enforcement of EU Environmental legislation to Industries (IPPC and non IPPC) of the food production/processing sector (*June 2001*)
- Best Practice in Compliance Monitoring (*June 2001*)
- Criminal Enforcement of Environmental Law in the European Union (*Dec 2000*)
- The Changes in Industrial Operations (*Dec 2000*)
- IMPEL Workshop on Integrated Permitting (*Dec 2000*)
- Finnish Comparison Programme (*Dec 2000*)
- Diffuse VOC Emissions (*Dec 2000*)
- IMPEL Workshop on the use of Chlorinated Hydrocarbons (CHC) in Industrial Plants (*Dec 2000*)
- Fact Sheet for Printers (*May 2000*)
- Complaint procedures and Access to Justice for citizens and NGOs in the field of the environment within the European Union (*May 2000*)
- Report on the Interrelationship between IPPC, EIA and SEVESO Directives and EMAS Regulation (*Dec 1998*)
- Report of a Workshop on Licensing and Enforcement Practices in a Cement Plant using Alternative Fuel (*Dec 1998*)



