

"DOING THE RIGHT THINGS"

IMPEL COMPARISON PROGRAMME

PROJECT REPORT

EUROPEAN UNION NETWORK FOR THE IMPLEMENTATION
AND ENFORCEMENT OF ENVIRONMENTAL LAW (IMPEL)



European Union Network for
the Implementation and Enforcement
of Environmental Law

September 2006

110643/CE6/1D6/000513

Introduction to IMPEL

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 of 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 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 website at:

<http://europa.eu.int/comm/environment/impel>

Title report: IMPEL Comparison Programme; “doing the right things”; project report	Number report: 2006/19
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Project participants: Representatives of organisations involved in prioritising environmental inspections of 25 European Member States (or regions within these Member States) , the European Commission and the IMPEL secretariat.	
Executive summary: This project report presents the main outcomes of the IMPEL Comparison Programme on prioritising environmental inspections, also called “doing the right things”. Within the project, which was carried out between October 2005 and August 2006, 25 European countries participated by means of completing a questionnaire on prioritising environmental inspections, and more in particular about inspection plans and inspection programmes, all within the framework of the “Recommendation for Minimum Criteria on Environmental Inspections”. Representatives of 24 European Countries (or regions within these Member States), the European Commission and the IMPEL Secretariat participated in a three day workshop, in which the outcomes of the questionnaires were discussed in depth, and critical factors were identified which play an important role in the (further development or improvement) of inspection plans and programmes. The Bask country, Poland and the Netherlands presented their system of priority setting as good examples from particular points of view. Out of a number of conclusions the following most important recommendations are proposed, submitted to particular groups: <ul style="list-style-type: none"> ▪ Clarify a number of terms, relevant for priority setting in the framework of the RMCEI (European Commission); ▪ Organise further exchange of experiences and approaches focused on certain indicators and predictors (IMPEL); ▪ Develop a practical guidance/“step-by-step” document for setting up inspection plans and -programmes (IMPEL); ▪ Make governments aware of lacks of and needs in priority setting (National authorities); ▪ Give active feedback to IMPEL and other interested stakeholders in the organisation and progress of the improvement of inspection plans and –programmes (National authorities); ▪ Organise interregional meetings about the subject (National authorities). A full summary is included in the report.	

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.

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A **Compendium** with background information is added as a separate document.

Preface



Dear reader,

The issue of setting priorities is highly relevant to inspection authorities. They have limited resources both in staff and funding. And yet they are expected to perform a range of inspection and enforcement tasks. Moreover, inspection authorities throughout Europe are under strong pressure from their stakeholders – their political leaders, the general public, industry, NGO's and other interest groups - to act in a fair, transparent and accountable way and to work as effective and efficient as possible, without causing unnecessary burdens for those who are inspected. It is therefore of vital importance that they set priorities, that they plan and program their inspection activities and that they give account of how and what they are doing.

This forms indeed a challenge! Many questions need to be answered. What objective factors, criteria and parameters should be taken into account when setting priorities? What are good ways for organising the process of planning and programming? How can the effectiveness of the plans be established? All inspection authorities are trying to find the answers to these questions. But they can learn from each other. They can exchange experiences. They can identify good practices. This is exactly what was done in the IMPEL Comparison Programme "Doing the right things", of which the present report presents the key findings.

Planning and programming of inspections activities is an important element of the European Recommendation on minimum criteria for environmental inspections. The Recommendation was adopted to encourage and support Member States in improving the quality of their inspection activities. The IMPEL-network has a responsibility to make the Recommendation work. The present IMPEL project can also serve as an important contribution to the further implementation and development of the Recommendation.

It was very gratifying that authorities of so many Member States and the European Commission actively participated in the project. Their input was invaluable for making the present project a success! Many thanks for that!

Mr Gerard Wolters
 Inspector General
 Inspectorate of the Ministry of Housing, Spatial Planning and the Environment
 The Netherlands

Summary

About this report

This project report presents the main outcomes of the IMPEL Comparison Programme on prioritising environmental inspections, also called “doing the right things”. Inspecting authorities constantly have to choose between options and have to make choices frequently in planning and execution of their inspection tasks. This happens both on a strategic and organisational, as on operational and individual level. Presumably, most of the inspecting authorities work with a kind of prioritising model. Moreover, countries have to implement the Recommendation of the European Parliament and of the Council of 4 April 2001, providing for minimum criteria for environmental inspections in the Member States (2001/331/EC) (further referred to as RMCEI)¹. Besides, the RMCEI is being reviewed during the execution of this project. The Commission intends to adopt its communication on the review of the Recommendation in Autumn 2006. The output of this project could therefore serve as an important contribution to the review of the RMCEI in relation to inspection plans and –programmes.

Project aims and –set up

The aims of this IMPEL Comparison Programme project were to:

- Explore and analyse similarities and differences in the approach of prioritising environmental inspections by inspecting authorities in IMPEL-Member States;
- Acquire understanding in the way inspecting authorities in IMPEL Member States deal with “options” in their inspection plans and programmes;
- Promote the availability of practical information on the environmental situation and the effectiveness of the policymaking process to the policy-makers;
- Encourage the exchange of experiences.

The project may therefore serve as an important contribution to the further implementation of the aforementioned RMCEI, where the issue of establishing, executing and monitoring of inspection plans and programmes is concerned.

The set up of the project concentrated around a number of phases: preparation phase (invitations for countries to join the project, identification of key organisations), the development, completion and analyses of a questionnaire, a three day workshop in The Netherlands, and a final reporting phase.

Environmental inspections, inspection plans and inspection programmes

Environmental inspections cover the areas as described in the RMCEI, and applies to “...environmental inspections of all industrial installations and other enterprises and facilities, whose air emissions and/or water discharges and/or waste disposal or recovery activities are subject to authorisation, permit and licensing requirements under Community law, without prejudice to specific inspection provisions in existing Community legislation.”

For the purpose of the project, inspection plan and inspection programme refer to two different levels of prioritising environmental inspections: on a strategic level and on operational level:

¹ OJ L 118, Recommendation of the European Parliament and of the Council of 4 April 2001, providing for minimum criteria for environmental inspections in the Member States (2001/331/EC).

- Inspection plans are defined as “a strategic planning document, describing how environmental inspections are prioritised (principles, criteria) and the priorities themselves”;
- Inspection programmes are defined as “an operational planning document describing on the basis of an inspection plan and the priorities laid down herein, when and how environmental inspections will be carried out”. Usually this includes an (indicative) planning of staffing and other resources.

Important project element 1: a questionnaire

A questionnaire, which was completed by representatives of inspecting authorities on national, regional or local level of 24 European countries, contained the most important topics as covered by the RMCEI, as far as prioritising environmental inspections by inspection plans and –programmes is concerned. Three central elements were found to be of special interest:

- Parameters/indicators that influence priority setting, including their weights;
- Specification of “environmental impact” and “-risks”;
- Process, organisation, monitoring and evaluation of inspection plans and – programmes.

Moreover, the individual answers of the questionnaires provided insight into good practices on above mentioned issues.

Important project element 2: a three day workshop

Representatives of 23 European countries, the European Commission and the IMPEL Secretariat participated in a workshop, which was held on 26 – 28 April 2006 in The Netherlands.. The workshop was organised with the aim to reach a high degree of personal interaction. Main workshop outcomes, presented in more detail in chapter 3, were:

- The exchange of practical experiences and insight into the ins and outs of the RMCEI;
- The identification of key elements which play an important role in prioritising environmental inspections;
- The identification of a number of possible future activities;
- The usefulness of the workshop in reaching its aims, as highlighted by all workshop participants.

All workshop participants stressed the usefulness of the workshop in terms of its output and its value for prioritising environmental inspections in their own national context. Awareness has grown about the way in which priorities are set, and which circumstances and conditions play a role within their (national) context. The grey area between inspection plan and –programme faced in practice and ‘theoretically’ described by the RMCEI got a lot of attention.

Furthermore it became clear that many organisations identified a lack of capacity in prioritising and performing environmental inspections. Nevertheless, a lot of energy was mobilised in giving input for the project. The drive and motivation of participants represents, among other things, the need for further clarification of and future work for issues related to prioritising environmental inspections.

Conclusions

Main project output

In general, all aims of the project have been reached. All participants highlighted the usefulness of this project and the information given based on the completed questionnaires and the discussions at the workshop. The awareness has risen that:

- Priority setting has to take place within a specific national context and is depending on many factors, such as administrative structures, legal and cultural aspects, organisation of tasks and competences of organisation involved, and human capacity, budget and qualified personnel. The conclusions of the project resulted in the identification of four key elements (with various indicators, see next paragraph), that can serve as a “checklist” to improve the quality of inspection plans and programmes;
- The difference between inspection plans and inspection programmes, as described in the RMCEI, is not that easy to make in practice; many conclusions and recommendations given are applicable for both. Of importance how these terms are interpreted and applied in different countries is the legislation and instructions that regulate the decisions at and between the involved authorities, decisions at policy level, and at operational level;
- Future activities are needed to improve the (further) practical implementation of the RMCEI, and for improving the quality of existing inspection plans and –programmes.

Essential elements for setting priorities in planning and programming environmental inspections

The following elements are considered as being essential for setting priorities in planning and programming environmental inspections (in random order):

- *Assessing the context* in which the inspection authority has to perform its tasks, such as political goals and commitment (including relevant interests of stakeholders), specific environmental circumstances, targets and priorities, public needs/opinion/complaints (awareness), resources available for the inspection authority, and coordination and cooperation with other authorities;
- *Defining the scope* of all the relevant inspection tasks and activities, such as applicable legislation (either originated from a EU-, national- or regional level) for which the inspection authority is competent to inspect, relevant environmental issues (water, air, safety, etc) for which the inspection authority is competent to inspect, and sectors of industry and types, sizes, numbers and distribution of various installations present in the area in which the inspection authority is competent to inspect;
- *Gathering the information*, needed for setting priorities, such as information on installations/activities (like legal requirements, permit situations, emissions, impact, risk, accidents/incidents, complexity and locations of installation(s), their compliance and performance records, and relevant complaints) and information on the state of and trends in the (ambient) environment;
- *Applying the tools* for setting priorities, like a database for systematical information collection, indicator-based ranking and classification tools, and approaches and methods to generate feedback to evaluate and review plans and programmes.

Recommendations

A number of recommendations are proposed, submitted to particular target groups.

European Commission: further clarification and definition of key terms

A number of key terms, relevant for priority setting in the framework of the RMCEI, should be further defined and clarified, such as: proactive/reactive; routine/non-routine inspections, environmental impact/risks, accidents/incidents; compliance vs. non-

compliance, and plan vs. programme. IMPEL could facilitate this by producing a glossary and guidance document that includes practical examples (see below).

IMPEL: Organisation and further exchange of experiences and approaches

IMPEL could organise further exchange of country experiences and approaches by disseminating information through internet and by organising expert discussions (also via internet). Special attention could be given to the use of (practical and measurable) indicators or predictors (e.g. complexity, location, and performance records of installations; trends in total emissions and environmental quality in a certain area), the use of ranking and classification systems; and the implementation and enforcement of particular directives that include specific inspection needs or obligations. Besides, exchange of experiences and approaches could also be done in bilateral or multilateral way by individual countries or organisations, independent from the IMPEL framework.

IMPEL: Development of a practical guidance/“step-by-step” document

IMPEL could, in close cooperation with the European Commission, other European institutions and national interested parties, take the lead in the development of a practical guidance/step-by-step document for setting up new, or improving existing inspection plans and –programmes. The output of these activities could help to improve the practical implementation of the RMCEI in the Member States, and could serve as an important basis for the upcoming review of the RMCEI as well.

National authorities: Activities on country level

Furthermore, the participants at the workshop suggested that they themselves would (if possible):

- Communicate and discuss the outcomes of this workshop “at home”;
- Make governments aware of lacks of and needs in priority setting;
- Provide relevant information to influence decision makers;
- Organise interregional meetings;
- Use outcomes of the workshop for daily work on planning and programming;
- Provide information to national coordinator and other relevant players;
- Give active feedback to IMPEL and other interested stakeholders in the organisation and progress of the improvement of inspection plans and –programmes.

Following the IMPEL plenary in Pörtlach (Austria, June 2006) a number of countries (Ireland, Sweden, Italy, United Kingdom and The Netherlands) have taken the lead in the development of a programme for projects that IMPEL can carry out to improve the further implementation of the RMCEI. The recommendations on further work described in this project report will be taken into account. Involved Member States planned to send an outline of the programme to the European Commission in the Summer of 2006. The programme has been discussed at the IMPEL Cluster 1 meeting in September (Oxford, United Kingdom), and received a positive reaction.

CHAPTER

1 Introduction

1.1

PROJECT BACKGROUND

The IMPEL Comparison project “doing the right things” is about prioritising environmental inspections. Inspecting authorities constantly have to choose between options and have to make choices frequently in planning and execution of their inspection tasks. This happens both on an strategic and organisational, as on operational and individual level. Presumably, most of the inspecting authorities work with a kind of prioritising model.

Moreover, countries have to implement the Recommendation of the European Parliament and of the Council of 4 April 2004, providing for minimum criteria for environmental inspections in the Member States (2001/331/EC) (further referred to as RMCEI)². One of the reasons for this Recommendation was the “...*establishment of guidelines at community level in order to assist Member States in carrying out inspection tasks, thereby reducing the currently-existing wide disparity among Member States’ inspections*”³. Besides, the RMCEI is being reviewed during the execution of this project; see also paragraph 1.3.

Comparing different prioritising inspection methods can give insight into new ideas and a better understanding. And for those inspecting authorities in Member States that are searching for a basic - or more suitable - method to prioritise, it could bring them useful information to develop new, or improve existing methods. Finally this could result in doing more effective and efficient inspections with the same recourses.

At the plenary IMPEL meeting at Cardiff (30 November - 2 December 2005), the Terms of Reference for the IMPEL project “Comparison Programme, doing the right things” got final approval. The VROM Inspectorate of The Netherlands has taken the initiative to take the lead in this project.

² OJ L 118, Recommendation of the European Parliament and of the Council of 4 April 2001, providing for minimum criteria for environmental inspections in the Member States (2001/331/EC).

³ OJ L 118, 04.04.2001, p. 42.

1.2

PROJECT AIMS AND – SET UP

Project aims

The aims of this IMPEL Comparison Programme project were to:

- Explore and analyse similarities and differences in the approach of prioritising environmental inspections by inspecting authorities in IMPEL-Member States;
- Acquire understanding in the way inspecting authorities in IMPEL Member States deal with “options” in their inspection plans and programmes;
- Promote the availability of practical information on the environmental situation and the effectiveness of the policymaking process to the policy-makers;
- Encourage the exchange of experiences.

The project may therefore serve as an important contribution to the further implementation of the aforementioned RMCEI, where the issue of establishing, executing and monitoring of inspection plans and programmes is concerned.

Project set up

Preparation phase

During a preparation phase, which started in October 2005, European countries were asked, via the national IMPEL coordinators, to participate in the project. They were also asked to identify the most appropriate organisation who deals with prioritising environmental inspections; this because (the organisation and programming of) environmental inspections can be dealt with at state, regional or local level, depending on the specific administrative structure in the countries concerned. Persons were identified which should complete a questionnaire, and could be invited for a three day workshop.

Development, completion and analyses of a questionnaire

A questionnaire was developed, containing various questions on how countries deal with planning, performing and prioritising environmental inspections. The questionnaire was submitted to all organisations/persons that would be invited for the workshop. Completed questionnaires were subsequently analysed and formed the main input for the organisation and the programme of the workshop. Also information needs were identified in this questionnaire, and formed an important basis for the identification of basic programme elements.

Moreover, the analyses of the questionnaires formed an important background document on how countries in general deal with prioritising environmental inspections. Main outcomes of the analyses of all questionnaires are described in chapter 2.

Quality Review

The quality of the project and the report has been the task for the IMPEL plenary and for Cluster 1 from which contact persons for a reference group was organised. The reference group has met at two occasions (Brussels, 31 October 2005, and Stockholm, 9 March 2006) and during the April workshop. The project has been discussed at Cluster 1 meetings, starting with the planning of the ToR and finalising with discussion of the draft report at the Cluster 1 meeting in Oxford, in September 2006.

Workshop

A workshop was organised on 26, 27 and 28 April 2006 in The Netherlands. The workshop was attended by 37 representatives of 23 European countries (or particular regions within these countries), including participation of the IMPEL secretariat and the European Commission/DG ENV. The workshop focussed, among other things, on

exploring and analysing similarities and differences in the (approach of) setting priorities in environmental inspections. The results of the workshop are described in more detail in chapter 3.

Final reporting

During the last phase of the project this project report was written, which contains the overall project results, including conclusions and recommendations for further work. The report is planned to be presented for adoption at the Esbo Plenary Meeting, 6 – 8 December 2006.

1.3

RELATIONSHIP WITH THE (REVIEW OF) RMCEI

Definition of ‘environmental inspections’

An important starting point of the project was the earlier mentioned RMCEI providing minimum criteria for environmental inspections.

When talking about *environmental inspections*, inspections are mentioned which cover the areas as described in the RMCEI. According to article II-1a of the RMCEI, the recommendation applies to “...*environmental inspections of all industrial installations and other enterprises and facilities, whose air emissions and/or water discharges and/or waste disposal or recovery activities are subject to authorisation, permit and licensing requirements under Community law, without prejudice to specific inspection provisions in existing Community legislation.*”

Following the RMCEI, the term *environmental inspections* is understood to be covering a wide range of inspecting activities, including different ways of compliance checking, compliance assistance and promotion and monitoring of environmental impact and performance of controlled installations, and of the effectiveness of environmental inspections.

Working definition of ‘inspection plans’ and ‘inspection programmes’

The key theme of the project is prioritising environmental inspections as defined above. Usually, priority setting is laid down in inspection plans and inspection programmes. The terms *inspection plan* and *inspection programme* are often used with a different meaning, that often leads to confusion. For the purpose of the project, inspection plan and inspection programme refer to two different levels of prioritising environmental inspections: on a strategic level and on operational level. We use therefore the following working definitions.

Working definition “inspection plan”:

A strategic planning document, describing how environmental inspections are prioritised (principles, criteria) and the priorities themselves.

The RMCEI highlights the following important (strategic oriented) elements as part of an inspection plan (article IV, in particular 5-a till 5-d, and 5-f):

- An inspection plan should, as a minimum, define the geographical area which it covers, the applicable time period, provisions on its revision, and give a description of specific sites or types of controlled installations;
- An inspection plan should be produced on the basis of a) EC legal requirements, b) a register of controlled installations, c) a general assessment of major environmental issues and a general appraisal of the state of compliance by the controlled installations within EC legal requirements, and/or d) data from previous inspection activities;
- An inspection plan should be appropriate to the inspection tasks of the relevant authorities, and should take into account available information in relation to specific sites or controlled installations.

Working definition "inspection programme":

An operational planning document describing on the basis of an inspection plan and the priorities laid down herein, when and how environmental inspections will be carried out. Usually this includes an (indicative) planning of staffing and other resources.

The RMCEI highlights as important (operational oriented) elements of an inspection programme (article IV, in particular 5-e and 5-g):

- A description of routine environmental inspections, taken into account environmental risks;
- The frequency of site visits for different types of specified controlled installations;
- An outline of the procedures for non-routine environmental inspections (e.g. accidents, incidents, etc.);
- The coordination between the different inspecting authorities, where relevant.

Review of the RMCEI

According to the provisions of (point IX of) the Recommendation, the Commission should review the operation and effectiveness of the Recommendation, based on the reports of Member States and contributions of IMPEL and the European Environment Agency. The Commission started this review during the execution of this Comparison Programme project, and intends to adopt its communication on the review of the Recommendation in Autumn 2006. The output of this project could therefore serve as an important contribution to the review of the RMCEI in relation to inspection plans and –programmes.

Above mentioned issues were important issues in the questionnaire and the workshop; these outcomes are highlighted in chapter 2 respectively chapter 3.

1.4

ORGANISATION

Project management

The VROM Inspectorate of The Netherlands has taken the lead in this project, and provided its funding. The project management was assisted by consultants from ARCADIS.

Review group

A review group advised the project management during the project, more in particular with respect to the development (contents) of the questionnaire and the organisation (programme) of the workshop. The review group consisted of representatives of Belgium, Denmark and Sweden. The Review group met three times during the project.

National representatives/workshop participants

Representatives of inspectorates of European countries were involved in the completion of the questionnaire, and were invited to take part in the workshop.

Contact information of all persons and organisations involved in this project is included in annex 1.

CHAPTER 2 Outcomes of the questionnaire

2.1 INTRODUCTION

Central question within the project was the way countries deal with the organisation, programming and prioritisation of environmental inspections. An important source of information was gained by the development, completion and analyses of a questionnaire.

The analyses of all completed questionnaires focussed on:

- The general state of the art in how countries deal with prioritising environmental inspections;
- Basic elements for the contents and the programme of the workshop (see chapter 3), including main topics for subgroup discussions;
- Identification of good practices, which could be presented at the workshop;
- Information needs of participants.

A brief summary of the outcomes of this analysis is presented below⁴. A full and detailed description of the individual answers given by all countries, is included in a separate compendium. A simplified and summarised comparison of all completed questionnaires into one overview, is enclosed in annex 2.

2.2 INSPECTING AUTHORITIES

One of the starting questions covered the general tasks and competences of the participating authorities, aiming to get insight into the context in which priority setting by the authorities is organised in practice. From the 24 individual organisations/countries which completed the questionnaire, 15 have their jurisdiction on national level, 8 on regional level, and 1 on local administrative level.

⁴ The summary in this chapter does not have any statistical value; it's sole purpose was to facilitate the discussions at the workshop and to gain insight into the way countries deal with prioritising environmental inspections. It should be noticed that the answers to the questionnaire only reflect the practices of the particular authority that completed the questionnaire, and does not necessarily apply to the whole country where the authority is located. All presented information does not necessarily represent the view of the national administrations or the Commission, and has therefore no legal status.

Scope of, and main environmental tasks

The scope of environmental tasks varies from licensing and monitoring of industrial installations, to the supervision of “lower” administrative organisations, and from environment to housing and spatial planning issues. Main tasks in inspections are concerned with (IPPC and other) installations and related environmental tasks such as waste, drinking water, noise, air and soil pollution. A number of organisations focus also on other environmental related issues, such as water, forestry, fishery, nature, agriculture, genetic modified organisms and/or biodiversity.

Number of staff

The number of staff varies from 4 till 2000 people. These numbers don’t allow for a comparison between authorities, because their working areas, tasks and competences (permitting/enforcement, and in some cases other environmental responsibilities) and the general industrialised level of the country or region in question differ significantly.

Relationships with superior authorities

Also the relationship with superior authorities differs, and depends to a large extent on the national contexts in which inspection organisations operate. Most national authorities operate directly under a Ministry of Environment and provide support to other regional and/or local enforcement authorities. Environmental inspection tasks may also be more or less detailed regulated by parliamentary and/or governmental legislation/instructions. Regional authorities can work under supervision of and/or frameworks given by national authorities, but can have autonomous tasks in inspection plans and programmes as well.

2.3

INSPECTION PLANS

The next cluster of questions dealt with the development of inspection plans (if any), their time frame and scope, criteria used, coordination and cooperation with other authorities, public reporting, the use of a plan as management tool, and the evaluation of the effectiveness of inspection plans and their revision.

Existence, time frame and scope of inspection plans

Almost all countries concerned have inspection plans.

The time frame of inspection plans varies from 1 year (for most plans) to 4 or 5 years. There are also inspections plans which are unlimited in time.

The scope of the plans is mostly limited to installations which fall under the IPPC directive, Seveso II legislation and (other) installations covered by the RMCEI, but may also focus on installations which fall under national legislation, covering more than RMCEI. Furthermore, inspection plans focus on companies which are part of the specific tasks and competences of the organisation concerned. The way in which inspection activities are classified, differs as well:

- The focus in inspection plans is often on re-active actions, which are mostly based on complaints or other “external” signals;
- A few countries formulate specific percentages of unexpected inspections in their inspection plans;
- Some plans contain pro-active actions like compliance promotion and creating partnerships;
- Another chosen classification is routine inspections, special inspections and non-routine inspections.

Criteria

Criteria that are often used, are risks, the size of installations, the number of complaints, the state of the local environment, the compliance level of (industrial) sectors, national guidelines, local criteria, self monitoring data of industries and political choices.

Coordination and cooperation with other organisations

Coordination and cooperation in drafting inspection plans with other authorities is often carried out; on the same administrative level with other inspectorates, as with other administrative levels as well. Sometimes support and priorities within priority setting is given by the minister or the regional governor. In few circumstances public meetings are organised, to gain input from the general public.

Public reporting

Public reporting of inspection plans is mostly done on a voluntary basis and in a passive way, by means of internet, press releases or annual reports for decision makers, and by access to the public of information and documents when asked for.

Inspection plans, used as management tool

In most of the cases inspection plans are used as a management tool for planning financial resources, human capacity, exchange of knowledge and to collect data tools. Also inspection plans are used in “internal” negotiations about financial and human capacity issues. In particular circumstances inspection plans are being used as a guideline or general framework for regional inspectorates.

Evaluating the effectiveness and revision of inspection plans

The effectiveness of inspection plans is measured in very different ways, mostly by counting the number of inspections that have been carried out, or the percentage of (non-)compliance of (industrial) sectors. In some cases organisations monitor trends in emissions and risk reductions as an instrument for evaluating its effectiveness.

The revision of an inspection plan in response to changing legislation is not often an explicit obligation. On the other hand, inspection plans are earmarked as ‘flexible’ in order to cover new or changing legislation.

2.4**INSPECTION PROGRAMMES**

A number of questions dealt with the ins and outs of inspection programmes, like criteria uses, how it is prepared, its scope and its time frame.

Existence and criteria used

Almost all countries have inspection programmes, and in most circumstances the same criteria are used as in priority setting in inspection plans.

Preparation of inspection programme

The preparation of an inspection programme is mostly done by the own organisation; in some cases it must comply with general terms as specified in inspection plans and/or is drafted in close collaboration with other (regional or local) authorities.

Scope and time frame

The scope of an inspection programme has a huge diversity and depends on the national administrative context and the tasks of the organisation involved. The time frame of a inspection programme varies also to a large extent: from a few days until (mostly) one year.

2.5

INFORMATION NEEDS

The last part of the questionnaire focussed on the information needs of countries, dealing with prioritising environmental inspections. Widespread there is a need for well defined indicators, parameters, (hardware and software) models and good practises.

Also mentioned are lacks of recourses and qualified people, and adequate tools and reliable criteria to evaluate the efficiency of inspection plans and programmes. And last but not least, historical databases and the demand for more coordination between involved authorities are mentioned as important information needs.

CHAPTER 3 Outcomes of the workshop

3.1 INTRODUCTION

This chapter contains the main outcomes of a workshop, which was held on 26 – 28 April 2006, in the “Efteling Hotel”, Kaatsheuvel (near Tilburg), The Netherlands.

Questionnaire as important basis for the programme

To organise a workshop that matches best with the practices and experiences of the Member States and their information needs, the earlier conducted questionnaires formed an important basis for the development of the workshop programme.

The outcomes of the analyses of the questionnaires made clear the need for information in the field of:

- Parameters/indicators that influence priority setting, including their weights;
- Specification of “environmental impact” and “-risks”;
- Process, organisation, monitoring and evaluation of inspection plans and – programmes.

Moreover, the individual answers of the questionnaires provided insight into good practices on above mentioned issues that could be presented at the workshop.

Interactive workshop!

The project management of the IMPEL Comparison Programme aimed to organise not a standard, passive “conference”, but an active one that keeps its momentum and has a high degree of personal interaction. That has been the main motivation for choosing a workshop with presentations and discussion groups. This active approach was also one of the main principles in the development of the questionnaire. Participants at the workshop were asked in a very early stage of the project to think about the way priorities are set in their country, by fulfilling the questionnaire. The outcomes of the analyses of the questionnaire gave these countries the opportunity to specify their presentations to the abovementioned themes in more detail, also in relation to the identified information needs.

3.2

WORKSHOP PARTICIPANTS

Representatives of 24 European countries, the European Commission and the IMPEL Secretariat participated in the workshop.



Photo 3.1 Participants at the workshop

In total, 37 participants attended the workshop, representing (regions within):

- Austria
- Belgium
- Cyprus
- Czech Republic
- Denmark
- Estonia
- France
- Germany
- Greece
- Hungary
- Italy
- Latvia
- Lithuania
- The Netherlands
- Norway
- Poland
- Portugal
- Slovakia
- Slovenia
- Spain
- Sweden
- Sweden
- Turkey
- United Kingdom
- IMPEL–secretariat
- European Commission

Detailed contact information of workshop participants is included in annex 1.

3.3

THE WORKSHOP PROGRAMME IN BIRD VIEW

Exchange of practical experiences

Before the real active part of the workshop started (the discussions in subgroups), information exchange took place by means of presentations. Several countries presented practical experiences with priority setting in general, and more in particular related to:

- The definition of environmental risks in the framework of priority setting, by a representative of the Environment and Regional Planning Department, Basque Government, Spain;
- Parameters that influence priority setting in inspection plans and programmes, by a representative of the Chief Inspectorate for Environmental Protection, Poland;
- The organisation, monitoring and evaluation of (the effectiveness of) inspection plans and –programmes, by a representative of the Inspectorate of the Ministry of Housing, Spatial Planning and the Environment, The Netherlands.

The questionnaire showed that these issues turned out to be the most interested ones, also

based on information needs of participants. Moreover, the participation of a representative of the European Commission gave them the opportunity to get input from “working floor level”, and to hear practical experiences with the implementation of the RMCEI.



Photo 3.2 Presentation of country's experiences

Discussions in smaller groups

With the information of other organisations in mind, participants discussed in subgroups a number of key issues that were identified as major items in prioritising environmental inspections. This was a chance for participants to compare elements of priority setting of environmental inspections in more detail, mainly focussing on the issues as identified earlier. In many groups it became clear that this issue is standing in ‘child shoes’. Participants found out the importance of exchanging (in beginning) practical information about prioritising in this phase. For example, the information need on the practical implementation of inspection plans and –programmes was strongly noticeable.



Photo 3.3 Subgroup discussion

‘Cooperation does not work without faces’

One of the main principles in the development of the workshop programme was to shorten the distance between all participants, also in order to promote information exchange on practical issues with respect to prioritising environmental inspections. Getting to know each other and to understand the context in which prioritisation takes place was an important issue for the workshop. In doing so, representatives involved knew the faces behind all names, which has lowered the threshold for future contacts.

Agreement on conclusions

Finally, the workshop ended with the presentation and (subgroup) discussion on the draft workshop conclusions and recommendations for further work.

3.4**MAIN WORKSHOP OUTCOMES**

The workshop produced insights and information on the practices dealt with in the participating organisations and their countries. Main outcomes can be summarised into the following topics:

Practical experiences and insight into the ins and outs of the RMCEI

The workshop provided information on practical experiences of various countries in prioritising environmental inspections, and gave insight into the ins and outs of the RMCEI, more in particular regarding inspection plans and -programmes. Generally speaking, there was a high need for practical information on these issues and the way various countries are dealing with this. Not only the presentation of good practices, but also the discussions in subgroups, gained questions and clarifications on aspects, such as:

- Definitions of terms as ‘environmental impact’, ‘risks’ and ‘environmental indicators’;
- Tasks and responsibilities in priority setting within their context;
- Practical tools and databases for planning environmental inspections and their relationships with recourses, such as human capacity, finances and knowledge;
- Organisational aspects of drafting and evaluating inspection plans and programmes, also with respect to cooperation with other organisations (e.g. on state, regional and/or local level).

Identification of key elements in prioritising environmental inspections

Four issues were identified during the workshop, which can be earmarked as key elements in prioritising environmental inspections:

- *Assessing the context* in which the inspection authority has to perform its tasks;
- *Defining the scope* of all the relevant inspection tasks and activities;
- *Gathering the information*, needed for setting priorities;
- *Applying the tools* for setting priorities.

These key issues are elaborated in more detail in chapter 4 of this report.

Identification of main future activities

A number of future activities were identified related to the improvement of (the quality of) inspection plans and programmes, as described by the RMCEI. Besides, a number of issues were highlighted that should be points of attention the current review of the RMCEI (like further clarification of terms).

Main future activities, formulated as recommendations, are described in more detail in chapter 4.

Workshop evaluation

The workshop was evaluated by all participants during the last day.

Main outcomes related to the content of the discussed items were:

- All participants assessed the results of the workshop as (very) adequate;
- Information has been gained on the ins and outs of inspection plans and programmes, their differences, bottlenecks in the practical implementation of the RMCEI, and practical examples and experiences of various European countries. Moreover, common understanding has been gained on the items covered by the RMCEI;
- Personal contacts were found to be important, also for future and/or bilateral exchange of information;
- Also mentioned was the need for further clarification and definition of key terms, used in prioritising environmental inspections as required by the RMCEI.

SOME PERSONAL REACTIONS

"The subjects of inspection plans, risk assessment and evaluations of inspections are important and obviously of great interest. I was surprised that there was so much interest among the participants in discussing the different planning systems from the countries. It was interesting to learn about other countries approach and there was clearly a need for further discussions on the subjects".

Mr Bjørn Bjørnstad, Norwegian Pollution Control Authority (SFT), Norway

"The IMPEL workshop at the Efteling was very interesting and a good base for further tasks in my daily work".

Ms Heidemarie Math, Staatliches Umweltamt Itzehoe, Germany

CHAPTER

4 Conclusions and recommendations

4.1

INTRODUCTION

This chapter contains the conclusions and recommendations, which are mainly based on the outcomes of the discussions at the workshop (chapter 3) and, consequently, the results of the completed questionnaires (chapter 2). As clarified earlier, the questionnaire and the programme & content of the workshop were designed in an interactive way, in order to reach a high degree of information exchange, and to achieve the overall aims of the Comparison Programme.

Comparison of differences gave insight into national circumstances and settings

In general it can be said that awareness has grown about the way in which priorities are set, and which circumstances and conditions play a role within their (national) context. Even more, consciousness has risen about what these circumstances and conditions are in the different countries. Thanks to the comparison between these differences and information exchange on this, the grey area between inspection plan and –programme faced in practice and ‘theoretically’ described by the RMCEI got a lot of attention. Information on various aspects of priority setting in the countries involved is enclosed in annex 2 and the attached, separate compendium. Within the framework of this project it was not possible to gain a “European wide” and full ‘scientific’ insight into all aspects of priority setting.

Motivated participants mobilised energy for future activities

Many organisations involved identified a lack of capacity in prioritising and performing environmental inspections. Nevertheless, a lot of energy was mobilised in giving answers on the questionnaire, and during the workshop. The drive and motivation of participants represents, among other things, the need for further clarification of and future work for issues related to prioritising environmental inspections.

In the next paragraphs project conclusions and recommendations will be discussed in more detail.

4.2

CONCLUSIONS***Main project output***

In general, all aims of the project have been reached. All participants highlighted the usefulness of this project and the information given based on the completed questionnaires and the discussions at the workshop. The awareness has risen that:

- Priority setting has to take place within a specific national context and is depending on many factors, such as administrative structures, legal and cultural aspects,

- organisation of tasks and competences of organisation involved, and human capacity, budget and qualified personnel. The conclusions of the project resulted in the identification of four key elements (with various indicators, see next paragraph), that can serve as a “checklist” to improve the quality of inspection plans and programmes;
- The difference between inspection plans and inspection programmes, as described in the RMCEI, is not that easy to make in practice; many conclusions and recommendations given are applicable for both;
 - Future activities are needed to improve the (further) practical implementation of the RMCEI, and for improving the quality of existing inspection plans and –programmes.

Essential elements for setting priorities in planning and programming environmental inspections

The following elements were considered as being essential for setting priorities in planning and programming environmental inspections (in random order):

- *Assessing the context* in which the inspection authority has to perform its tasks;
- *Defining the scope* of all the relevant inspection tasks and activities;
- *Gathering the information*, needed for setting priorities;
- *Applying the tools* for setting priorities.

It was emphasised that these elements should be seen as key points of reference that can help guide the process of setting priorities, and do not represent so much a model or standard approach.

1. Assessing the context

Within the element “*assessing the context in which the inspection authority has to perform its tasks*”, the following aspects were found to be of importance for priority setting on national/regional scale:

- Political goals and commitment, including relevant interests of stakeholders;
- Specific environmental circumstances, targets and priorities;
- Public needs/opinion/complaints (awareness);
- Resources available for the inspection authority;
- Coordination and cooperation with other authorities;
- Quality of requirements in legislation or permits;
- Changes in legislation that need to be implemented and the context in which this should be done on national scale from a legal point of view;
- Sector-specific issues/ needs (expertise, attitude, culture, compliance behaviour and economics of (industrial) target groups).

2. Defining the scope

Concerning the element of “*defining the scope of all the relevant inspection tasks and activities*”, the following subject matters were found to be of importance for priority setting in inspection plans and programmes:

- Applicable legislation, either originated from a EU-, national- or regional level, against which the inspection authority is competent to inspect;
- Obligations to inspect, laid down in specific legislation;
- Relevant environmental issues (water, air, safety, etc) for which the inspection authority is competent to inspect;
- Sectors of industry and types, sizes, numbers and distribution of various installations present in the area in which the inspection authority is competent to inspect ;

- Presence of (large numbers of) SME-facilities (Small and Medium sized Enterprises) in the area in which the inspection authority is competent to inspect;
- Types of inspection activities (control, compliance promotion, education, information transfer etc) to be covered in plans or programmes.

3. *Gathering the information*

With regard to the element “*gathering information needed for setting priorities*” the following information was found to be highly relevant:

- Information on installations/activities, such as information on:
 - Legal requirements, permit situation;
 - Emissions, impact, risk, accidents/incidents;
 - Complexity of installation(s);
 - Location of installation(s);
 - Compliance record;
 - Performance record (e.g. self monitoring and reporting, safety management systems, EMS (Environmental Management Systems), audits, experiences of inspection authorities);
 - Relevant complaints;
 - Sectoral characteristics of installations;
 - Feedback and evaluation of past inspections;
- Information on the state of and trends in the (ambient) environment.

4. *Applying the tools*

Concerning the element “*applying the tools for setting priorities*”, the tools below were found to be of essential importance in prioritising environmental inspections:

- Database for systematical information collection which:
 - Contains an inventory of all environmental hazardous installations;
 - Contains an integrated set of environmental data with regard to these installations;
 - Is filled with data from different sources like permits, inspection reports, complaints, self-monitoring, assessments;
 - Is accessible to all authorities;
- Indicator-based ranking and classification tools (OPRA a.o.; Operator and Pollution Risk Appraisal). When developing and applying these tools special attention should be given to:
 - Responsibilities and roles of different players (e.g. different competent (inspection) authorities, industry, third party bodies carrying out assessments, general public);
 - The involvement of the inspectors on the ground;
 - Whether these tools can be used for both individual and sectoral assessments;
 - Whether these tools can be used for both large/complex and smaller/less complex installations;
- Approaches and methods to generate feedback to evaluate and review plans and programmes.

4.3

RECOMMENDATIONS

The recommendations below are addressed to various stakeholders involved: European Commission, IMPEL, and the national authorities involved (unilateral, or bilateral with other countries).

European Commission: further clarification and definition of key terms

Key terms, relevant for priority setting in the framework of the RMCEI, should be further defined and clarified, such as:

- Proactive/reactive; routine/ non-routine inspections;
- Environmental impact/risks;
- Accidents/incidents;
- Compliance vs. non-compliance;
- Plan vs. programme.

IMPEL could facilitate this by producing a glossary and guidance document that includes practical examples (see below).

IMPEL: Organisation and further exchange of experiences and approaches

IMPEL could organise further exchange of country experiences and approaches by disseminating information through internet and by organising expert discussions (also via internet), especially with reference to:

- Use of (practical and measurable) indicators or predictors (e.g. complexity, location, and performance records of installations; trends in total emissions and environmental quality in a certain area);
- Use of ranking and classification systems;
- Implementation and enforcement of particular directives that include specific inspection needs or obligations.

Besides, exchange of experiences and approached could also be done in bilateral or multilateral way by individual organisations, independent from the IMPEL framework.

IMPEL: Development of a practical guidance/“step-by-step” document

Furthermore, workshop participants saw a clear need for IMPEL to develop a practical guidance/step-by-step document for setting up new, or improving existing inspection plans and –programmes. These activities could be carried out by IMPEL, in close cooperation with the European Commission, other European institutions and national interested parties. The results of these activities could help to improve the practical implementation of the RMCEI in the Member States, and could serve as an important basis for the upcoming review of the RMCEI as well.

National authorities: Activities on country level

The participants at the workshop suggested furthermore that they themselves would:

- Communicate and discuss the outcomes of this workshop “at home”;
- Make governments aware of lacks of and needs in priority setting;
- Provide relevant information to influence decision makers;
- Organise interregional meetings;
- Use outcomes of the workshop for daily work on planning and programming;
- Provide information to national coordinator and other relevant players;
- Give active feedback to IMPEL and other interested stakeholders in the organisation and progress of the improvement of inspection plans and –programmes.

4.4

ACTION PROGRAMME FUTURE ACTIVITIES

The general outcomes of the (workshop of) the Comparison Programme so far were discussed at the workshop during the IMPEL plenary meeting in Pörtlach, Austria, on 31 May - 2 June 2006, on IMPEL's role in the review of the RMCEI. A number of countries (Ireland, Sweden, Italy, United Kingdom and The Netherlands) have taken the lead in the development of a programme for projects that IMPEL can carry out to improve the further implementation of the RMCEI. The recommendations on further work described in this project report will be taken into account. Involved Member States planned to send an outline of the programme to the European Commission in the Summer of 2006. The programme has been discussed at the IMPEL Cluster 1 meeting in September (Oxford, United Kingdom), and received a positive reaction.

ANNEX 1

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ANNEX 2

Summarised comparison

Notes

Based on the outcomes and analyses of the completed questionnaires, a summarised and simplified comparison was made into one overview. This overview contains the information of all questions per country, or – in some cases – represents information from particular regions within these countries, e.g. like Austria, Germany and Italy.

It should be mentioned that the overview is summarised and simplified; detailed information is enclosed in a separate compendium with this report.

The overview has therefore no legal status.

