European Union Network for
the Implementation and Enforcement
of Environmental Law

IMPEL REVIEW INITIATIVE (IRI)

"A voluntary scheme for reporting and offering advice to environmental authorities"

Report on the IRI that took place in Graz from 14 to 17 June 2016
at the Burg Graz

Draft version 3.0

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IRI Austria	2016/22
Project managers:	**Report adopted at IMPEL General Assembly:**
Tony Liebregts (NL) and Michael Schubert	2 December, 2016, Slovakia
Author:	**Number of pages:**
Rob Kramers and Birna Guttormsdottir	Report: 49
	Annexes: 8

Tony Liebregts (team leader), Rob Kramers (rapporteur), Birna Guttormsdóttir (rapporteur), Horst Büther, Florin Homorean, Martine Blondeel, Lenka Nemcová, Romano Ruggeri

Executive summary:
The IRI took place from 14 to 17 June 2016 in Graz. Besides the interviews that were held at the Burg Graz also a site visit to a Stölzle – Oberglas GmbH facility was undertaken during the IRI.

The scope of the IRI was on environmental inspection at IED installation by the Province of Styria and the competent authority (District Authority). Never the less some conclusions, good practices and opportunities for the developments were also addressed on the permitting process.

The IRI team admired the thorough preparation of the IRI by the colleagues of Styria and their open communication with the team. Although a number of opportunities of developments have been identified the team agreed that all ingredients are in place to be able to comply to the RMCEI and the IED (art 23). Further streamlining of procedures, tasks and legislation would only be needed for a very successful implementation.

The most important opportunities of development are:
- To enhance the role of the Province regarding environmental inspections
- To change the steps and procedures for planning of inspections
- To develop handbooks, guidance and training plan for the coordinators (inspectors)
- To strengthen the role of the coordinator (inspector) regarding the environmental inspections. Let them act more as an inspector than a coordinator

Introduction to IMPEL

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

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

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

The expertise and experience of the participants within IMPEL make the network uniquely qualified to work on both technical and regulatory aspects of EU environmental legislation. Information on the IMPEL Network is also available through its website at www.impel.eu.

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1. Introduction

1.1.   The IRI Scheme

The IRI scheme is a voluntary scheme providing for informal reviews of environmental authorities in IMPEL Member countries. It was set up to implement the European Parliament and Council Recommendation (2001/331/EC) providing for minimum criteria for environmental inspections (RMCEI), where it states:

"Member States should assist each other administratively in operating this Recommendation. The establishment by Member States in cooperation with IMPEL of reporting and advice schemes relating to inspectorates and inspection procedures would help to promote best practice across the Community."

1.2.   Purpose of the IRI

The aims of the IRI are to:

- Provide advice to environmental authorities seeking an external review of their structure, operation or performance by experts from other IMPEL member countries for the purpose of benchmarking and continuous improvement of their organisation;
- Encourage capacity building in environmental authorities in IMPEL member countries;
- Encourage the exchange of experience and collaboration between these authorities on common issues and problems;
- Spread good practice leading to improved quality of the work of environmental authorities and contributing to continuous improvement of quality and consistency of application of environmental law across IMPEL member countries (˝the level playing field˝).

The IRI is an informal review, not an audit process. The IRI is intended to enable the environmental authority and review team to explore how the authority carries out its tasks. It aims at identifying areas of good practice for dissemination together with opportunities to develop existing practice within the authority and authorities in other IMPEL member countries.

1.3.   Scope of the IRI in Austria (Graz)

The IRI uses a questionnaire to review the environmental authority against the requirements of the RMCEI and the IED. The IMPEL ˝Doing the Right Things˝ Guidance Book for planning of environmental inspections has been used to help structure the questionnaire and the review. The Guidance Book was developed to support Inspectorates in implementing the RMCEI and describes the different steps of the Environmental Inspection Cycle pursuant to the RMCEI.

The scope of the IRI in Austria is on the inspection work of the Province and the District Authorities of Styria. The review covered a range of directives including the IED and where relevant any other industrial processes that fall under the RMCEI.

1.4.   Structure

A pre-review meeting was held in Graz from 22 to 24 February in which details for the Review were discussed. The meeting comprised the team leader, one of the rapporteurs and the hosts.

The review itself took place at the Burg Graz office in Graz from 14 to 17 June 2016. The preliminary findings were presented to the representative of the Regional Minister and directors of Styria on the 16th of June. The Review was structured according to the revised IRI questionnaire developed

by the IRI review project during 2009. The IRI Review team consisted of 8 different IMPEL member countries.

Table 1: Austrian IRI Review Team

Name	Role	Organisation	Country
Tony Liebregts	Team Leader	Ministry of Infrastructure and the Environment / Inspectorate	Netherlands
Rob Kramers	Rapporteur	Ministry of Infrastructure and the Environment / Rijkswaterstaat	Netherlands
Birna Guttormsdóttir	Rapporteur	Environmental Agency	Iceland
Horst Büther	Team member	Regional Government, Cologne	Germany
Florin Homorean	Team member	National Environmental Guard	Romania
Martine Blondeel	Team member	Flemish Government	Belgium
Lenka Nemcová	Team member	Czech Environmental Inspectorate	Czech Republic
Romano Ruggeri	Team member	Sardinian Regional Environmental Protection Agency	Italy
Michael Schubert	Team member	Amt der Steiermärkischen Landesregierung	Austria

2. Part A – Regulatory framework of environmental protection in Austria / Styria.

In this part the organisations of the authorities, the relevant legislation it complies with and relationships with the public, operators, government and other countries are described.

2.1. Introduction
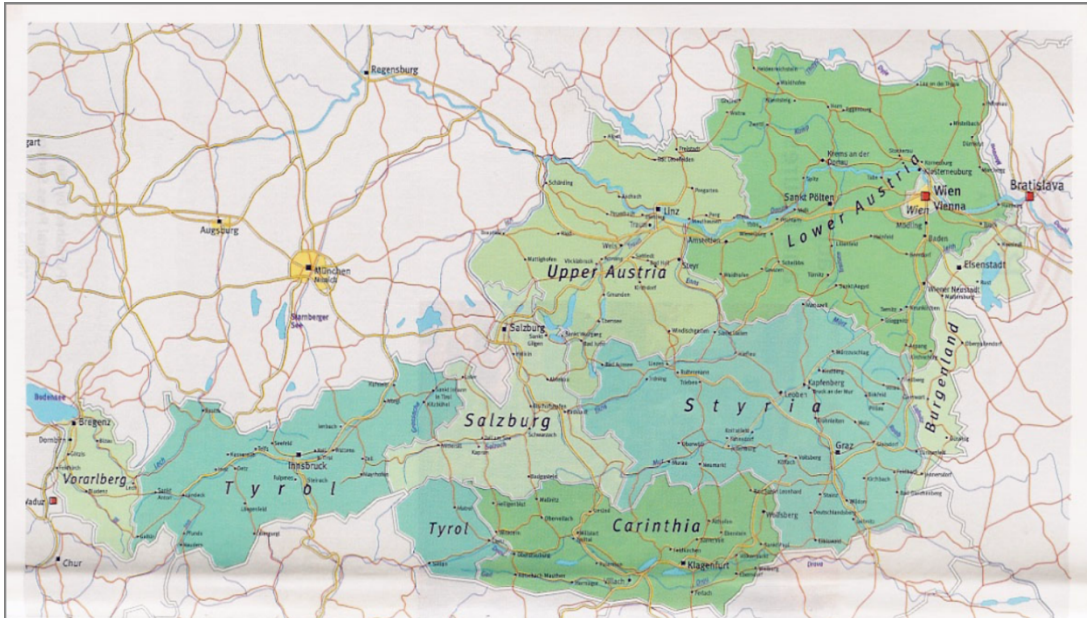
Austria, officially the Republic of Austria, is a federal republic and a landlocked country of over 8.5 million people in Central Europe. It is bordered by the Czech Republic and Germany to the north, Hungary and Slovakia to the east, Slovenia and Italy to the south, and Switzerland and Liechtenstein to the west. The territory of Austria covers 83,879 square kilometres and has an alpine climate. Austria's terrain is highly mountainous, lying within the Alps. Only 32% of the country is below 500 meters, and its highest point is 3,798 meters (12,461 ft). Austrian German in its standard form is the country's official language. Other local official languages are Hungarian, Burgenland Croatian, and Slovene.

The Political System

Austria is a democratic republic. The Federal President of Austria is the supreme representative of the state. He represents the Republic abroad in addition to other duties (acting as Supreme Commander of the Austrian Armed Forces, appointing the Federal Government as well as high-ranking officials of the provinces and concluding international agreements, etc.).

The legislative body of Austria is the Parliament, which consists of two houses, the National Council (National Rat) and the Federal Council (Bundesrat). The Federal Government is headed by the Federal Chancellor who conducts governmental affairs with the assistance of the Vice-Chancellor, federal cabinet ministers and state undersecretaries.

The Austrian Federal Government
The Cabinet is entrusted with the highest administrative duties of the Republic of Austria. The Cabinet is composed of the Federal Chancellor, the Vice-Chancellor and the other Federal Ministers. As a collegiate branch of government it executes only those duties which have been expressly entrusted to it by law (or upon decree by the Federal President). All other governmental duties reside with the ministers of the responsible ministry. The Cabinet's most important constitutional responsibility is its function to pass bills. The Cabinet passes resolutions unanimously. There is no majority decision making. Each province is administered by its own government, headed by a provincial Governor (Landeshauptmann/Landeshauptfrau). Austria is a member of the European Union since 1995.

9 Bundesländer (Federate States, Provinces) Governments
Administration in the *Länder* (provinces, or federate states) is the duty of the state governments, the *Landesregierungen*.
A federal state government consists of the governor (*Landeshauptmann* or *Landeshauptfrau*), his deputies and other government members (*Landesräte*). The governor represents the province. Before taking office, the governor is sworn in on the Federal Constitution by the Federal President, the other members of the regional government by the governor.
A governor of the "Bundesland" (Province) has basically no authority over the other government members on matters concerning the "Bundesland" (Province). On matters of importance to the "Bundesland", the Provincial government makes decisions as a collegiate body.
As regards the governors function in the indirect federal administration, the Landeshauptmann acts as the administrative authority, bound on the one hand by instructions from the federal ministers, and authorized on the other, gives also instructions to the other government members.

Landtag (Federate State Parliament)
The *Landtag* exercises the federate states legislative powers. The members of the Landtag are elected by all female and male residents of the state who are eligible to vote in an equal, direct, secret and personal election. Legislation of a state must be passed by the Landtag and then certified, countersigned and published in the state gazette by the governor. In the event of a state law requiring the co-operation of federal bodies in order to be implemented, the federal government must give its approval. Immediately after legislation has been passed by the Landtag and before it can be published, the governor must notify the federal chancellery thereof. The Federal President is empowered to dissolve any Landtag at the instigation of the federal government and with the consent of the Bundesrat. This dissolution may, however, be carried out only once for the same reason.
In the case of Vienna, which is the national capital and a federate state at the same time, the city council also serves as the Landtag, the city senate as the state government, and the mayor as the Landeshauptmann/frau.

Responsibilities of the Austrian Federal Government
The distribution of government responsibilities between the Federation and the Provinces is determined by the **Federal Constitution**. It allocates the powers for legislation, jurisdiction and administration and sets the institutional and organizational framework. The Federal Constitution enumerates the competences for legislation and execution of the Federation. All competences not explicitly transferred to the federal level belong to the competences of the Provinces. For example: culture, social care, nature protection, hunting, building, land use planning, construction code.

There is **no comprehensive environmental code**. Environmental provisions are therefore spread out in numerous laws and regulations on the Federal and the Provincial level. On Federal level the main environmental issues are part of: trade and industry, water management, traffic and infrastructure, mining, forestry, water, waste, air quality, public health and IEA.

There is **no single environmental Inspection body**. The Environmental Inspection Authority is mainly the "District Authority" or the Provincial Governor (for waste sites)

Organisation of the ministry of agriculture, forestry, environment and water management

MINISTERIUM FÜR EIN LEBENSWERTES ÖSTERREICH
Federal Minister ANDRÄ RUPPRECHTER
Head of Minister's Office: ESTERL
Secretary-General — MANG

- **CENTRAL DEPARTMENT EU COORDINATION** — HENNIG*
  - EUC-A EU Coordination Agriculture — BAUER
  - EUC-E EU Coordination Environment — FREYTAG-RIGLER
- **CENTRAL LEGAL SERVICE** — JÄGER
  - LS 1 General Legal Affairs — ZAUNER
  - LS 2 Legal Services and Law Coord. — BLAUENSTEINER
  - LS 3 Coordination for Parliament and the Council of Ministers — WIESINGER-ARTHOLD
- AUDITING — FINZ
- CITIZENS SERVICE — FISCHER

Chief Executive Department — MANG	DIRECTORATE-GENERAL I — Environment and Climate — LIEBEL	DIRECTORATE-GENERAL II — Agriculture and Rural Development — LINDNER	DIRECTORATE-GENERAL III — Forestry — MANNSBERGER	DIRECTORATE-GENERAL IV — Water Management — SCHIMON	DIRECTORATE-GENERAL V — Waste Management, Chemicals Policy and Environm. Technology — HOLZER
CED 1 Staff — SIEBER	**I/1** IPPC and Environmental Assessment — PETEK	**II/1** General Division Agricultural Policy and Data Management — SCHWAIGER*	**III/1** Forest Policy and Forest Information — GSCHWANDTL	**IV/1** Water Legislation and Water Economics — VOGL	**V/1** Company-related Waste Regulations, Waste Shipment and Waste Control — GLASEL
CED 5 Communication and Service — WISEK* (STEINER-OSTERMANN)	**I/6** General Coordination of Nuclear Affairs — MOLIN	**II/6** Animal Products — BLAAS*	**III/4** Forest Area Planning and Sustainable Forest Resource Development — SCHIMA	**IV/5** Plant-related Water Management — MÜLLER-RECHBERGER	**V/5** Chemicals Policy and Biocides — JAKL
CED 2 Human Resources Strategy & Development and Administrative Innovation — BOHUSLAV-DRUG	**I/2** Energy Policy and Economic Policy — SCHUSTER	**II/2** Coordination Rural Development and Fisheries Fund — HOPFNER	**III/2** Forestry Education, Subsidies and Research — NÖBAUER	**IV/2** Implementation of Water Legislation — EDER-PAIER*	**V/2** Waste and Contaminated Sites Legislation — WOLFSLEHNER
CED 6 Basic ICT Affairs and ICT Management — KRICKL	**I/7** Radiation Protection — KARG	**II/7** Fruit, Vegetables, Wine, Special Crops — JABOREK	**III/5** Torrent and Avalanche Control — PATEK	**IV/6** Flood Control Management — STIEFELMEYER	**V/6** Prevention, Recovery and Assessment of Waste — HOCHHOLDINGER
CED 3 Budget — UNGER	**I/3** Environmental Aid Policy, Sustainability, Biodiversity — TERTSCHNIG	**II/3** Agri-Environment, Mountain Farmers a. Less-Favoured Areas, Organic Farming — WEBER-HAJSZAN	**III/3** Legal Policy in Forestry and Forestry Legislation — KAISER	**IV/3** National and International Water Management — FENZ	**V/3** Waste Management Planning, Waste Treatment and Remediation of Contaminated Sites — FERTH
CED 7 Central Services — BAUER	**I/8** National Parks/ Nature Conservation & Species Protection — ZACHERL-DRAXLER	**II/8** Agricultural Value Chain and Nutrition — RITZINGER		**IV/7** Water Management in Residential Areas — BREINDL	**V/7** Environmental Protection at Company Level and Technology — TSCHULIK
CED 4 Schools, Teaching and Research Centres — SCHEURINGER	**I/4** Climate and Air Quality — HOJESKY	**II/4** Direct Payments & IACS — REEH*		**IV/4** Water Balance — GODINA	**V/4** EDM Programme Environment — MOCHTY
CED 8 Research and Development — FUHRMANN	**I/9** International Environmental Affairs — MORE	**II/9** Education, Innovation, Local Development and Cooperation — ROSENWIRTH*			
	I/5 Mobility, Transport, Noise — THALER	**II/5** Plant Products — STANGL			
		II/10 International Agriculture and Trade Policy — KUCERA			

Interim head of the unit. As of June 2015
FEDERAL MINISTRY OF AGRICULTURE, FORESTRY, ENVIRONMENT AND WATER MANAGEMENT — bmlfuw.gv.at

Execution of laws in Austria is either performed by **administrative bodies** or by **courts.** Courts mainly deal with civil and criminal law (the Penalty Act also contains provisions on crimes against the environment). Juridical review of administrative decisions is done by the Administrative Court and by the Constitutional Court.

The **Federal Republic of Austria** is divided into **9 Bundesländer** (federate states Provinces). These federate states are then divided into **districts** and **statutory cities**. Districts are subdivided into **municipalities** (statutory Cities have the competencies otherwise granted to both districts and municipalities). The federate states (Bundesländer) are **not mere administrative** divisions but **have some legislative authority** distinct from the federal government, e.g. in matters of culture, social care, youth and nature protection, hunting, building, and zoning ordinances.

The federal principle
- Provides for the **sharing of tasks** - **legislative, executive & financial** - between the 9 Austrian. Provinces on the one hand and the federal government on the other
- It is therefore in **contrast with the centralist form of organisation**, where the legislative & executive powers are reserved to the central government.
- In legal terms the federal principle is enshrined in the **Federal Constitution**

The federal system in Austria is characterised by the following elements:
- The federal state and the provinces have **legislative bodies** of their own
- They have **executive organs** of their own
- The federal provinces participate indirectly in the administrative activities of the federal state
  →"**indirect administration** of federal law by provincial administrative authorities "
- The federal state and the provinces have their **own systems of financial management**, i.e. budgets of their own, and they may levy taxes and rates in their own right.

2.2. Legislation

Federal Legislation
The main legislative authority for trade and industry, traffic and infrastructure (electricity, gas- and oil pipelines), mining, forestry, water, EIA, waste, clean air, public health, domestic animal protection.

Provincial Legislation
The main legislative authority for nature protection, landscape, physical planning, construction + heating, energy, farming, hunting, fishery, waste collection, water supply and sewage.

Overview Environmental Administrative Structure of Austria:

Federal Parliament	→	Fed. Government Fed. Chancellor			Provincial Administration↓
		Fed. Administration			
Federal Ministry of Agriculture, Forestry, Environment and Watermanagement	**Federal Ministry of Science, Research and Economy**	**Federal Ministry of Transport, Innovation and Technology**	**Federal Ministry of Health**	**Municipalities (Gemeinden)**	**Provincial Government District Authorities**
competent for: • Federal Env. Policy • Air quality • Waste, EDM • Chemicals • EIA • Fundings • Water Managem. • Forestry • Pesticides • Radiation protection • Coordination of nuclear policy ↓(support) **UBA Environmental Agency** **Environmental inspection plan**	competent for: • Trade and Industry • Mining • Energy **Accordance with Environmental inspection plan**	competent for: • Traffic • Transport of dangerous goods • Gene technology	competent for: • Gene technology • Radiation Protection (human health) • Drinking and Bathing Water • Quality • Product safety • Occupational health and safety, worker protection	Direct responsibility. for: • Local Traffic Police • Undue Noise • Local Building Inspection • Fire Inspection • Permitting of Building Licences • Urban Planning Delegated Fed. competence for: • Water supply Service system • Communal Waste Collection	responsible for: • Land use Planning • Construction Codes • Nature Protecting and Landscape • Animal and Species Protection • National Parks • Fishing and Hunting • IPPC under provincial law • Environmental Inspection Schedule • **non-hazardous waste** • **IPPC under provincial Law** • **District Authorities: Enforcement and competent authority for environmental inspection.**

Lines of Administration:

1. **Direct Federal Administration**:
   Permitting and inspection is done directly by the federal level e.g. under the Mining Code by the Federal Ministry of Science, Research and Energy or the Occupational Health and Safety Act.
2. **Indirect Federal Administration:**
   Is the provincial administration of federal laws e.g. permitting and **inspection** of **installations under federal laws** e.g. the trade and industry code and the waste management act (this is the main part for inspection of IPPC installations ~ 90%).

Federal Ministry **of Labour, Social Affairs and Consumer Protection:**

- Workers and consumer's protection

Federal Environmental Agency (UBA GesmbH) is a technical agency to provide advice to the minister and to do research and monitoring and environmental data management, EDM operation.

Provincial (Bundesländer) Administration:

Permitting and inspection of installations under the (Bundesländer) provincial IPPC laws (e.g. farmsteads poultries and intensive rearing of animals) by the provincial authorities. This accounts for ca 10% of all IED installations

Examples of the main Austrian environmental regulations:

- Environmental Impact Assessment Act 2000
- Environmental Information Act and Ordinance
- Industrial code
- Industrial Accident Ordinance
- Federal Waste Management Act 2002
- 9 Waste Management Acts of the Provinces
- Air Pollution Act for Boiler Facilities
- Air Pollution Impact Act
- Waste Register Ordinance
- Water Act and more than 35 regulations on emissions to water
- Clean-up of Contaminated Sites Law
- Directive on Funding Clean-Up of Contaminated Sites 2008
- Forest Act
- Chemicals Act
- Chemicals Ordinance
- Public Administration Criminal Law
- Criminal Act
- Ozone Act
- Federal Act on a System for Trading Allowances
- Environmental Subsidies Act
- Mineral Resources Act
- Federal Environment Liability Act
- Noise Protection Act and Ordinance
- 9 IPPC and Seveso Installations Acts
- 9 Building Acts of the provinces
- 9 Nature Conservation laws of the Provinces
- 9 Land Use Planning acts of the Provinces and
- Fishery and hunting laws of the provinces

2.3. Environmental policy

The current topics for the environment are:

- Climate change
  - Climate + Energy Strategy, Climate Law
  - Emission Trading for CO_2
  - National Action Plan for Renewable Energy
  - Strategy for Adaption to Climate Change
- Anti-Nuclear-Policy
- Traffic and Transport
  - bio fuels, road pricing, alternative mobility (k:a:m)
- Air Pollution
  - Air Quality and NEC Directives implementation
  - Precautionary Principle – ELV based on BAT
- Chemicals
  - Implementation of REACH
- Biodiversity
  - 6 national parks, ca. 30% protected areas
  - implementation of FFH Directive
- Green Jobs

2.4. Implementation of the IED directive

The IED is not implemented in one **"Comprehensive Environmental Code"** but instead implemented in several acts**:**

1. On the federal level:
   - The Industrial Code
     - For Commercial installations (not only IPPC/IE)
     - Protection of employees/neighbours against risks for health, life, noise, odour;
     - emissions to air limited according to BAT
     - For IE-installations: as in Art. 11 IED
   - The Waste Management Act
     - For waste treatment facilities (not only IPPC/IE)
     - Protection of employees/neighbours against risks for health, life, noise, odour ;
     - emissions of pollutants limited according to BAT
     - For IE installations: as in art 11 IED
   - The Mining (Mineral Resources)Act
     - At the moment no IE-installations exist in this field
   - Air Pollution Act for Boiler Facilities
     - For steam boilers and gas turbines (> 50 MW)
     - Protection of employees/neighbours against risks for health, life, noise, odour ; emissions of pollutants limited according to BAT
     - For IE-installations: as in Art. 11 IED
   - Air Pollution Impact Act (air quality act)
     - Waste water plants and agriculture plants
   - The Water Act
     - Baseline report
     - Regulations according to the Water Act are applied in procedures acc. to the Trade and Industry Act
     - No permitting regime of its own for installations
2. On the (Bundesländer) Provincial level:
   - 9 IPPC installation acts of the 9 Provinces (Bundesländer)

Either the Ministry (for Mining operations), the Provinces (for Waste and wastewater plants) or the District Authorities (Waste plant, Industrial plant, Wastewater plants, agriculture plants, Combustion plants) is the competent authority for permitting and inspection.

When the permitting procedure is „concentrated", it means that the competent authority according to the Trade and Industry Act applies all relevant federal laws and a single permit is issued.

Procedures according to Länder laws (provincial law) are coordinated, but draft for including nature conservation and technical building provisions in Trade and Industry Act.

Main points in the implementation of the IED are:
- Definitions baseline report
- Adaptations to comply with new or amended BAT-conclusions within one year after publication of BAT conclusions (for main activity). The operator has to inform the competent authority, if BAT for installation has changed
- Within 4 years the installation has to comply with new BAT-Conclusions
- Environmental Inspections Plan
    - The national Inspection plan is drawn up by the federal ministry of environment and ministry of economic affairs, additional provincial Inspection plans can be published by the governments of the provinces, according to provincial laws
    - There is a register of all installations covered by the plan
    - It also includes the procedures for drawing up programmes for routine and non-routine environmental inspections
    - The inspection programmes are drawn up by the governors of the nine provinces for federal law and from the government for provincial law
    - Annual work schedules are drawn up by the supreme authority for IPPC installations
    - Inspections and reports are made by the competent authority

General remarks for the inspection of IPPC installations:
As mentioned before the inspections for also under the federal laws falling installations (e.g. the Industrial code) is done by the (Bundesländer) Provincial Authorities (this is called the "indirect federal administration") ~90% of the IPPC installations. Only under the direct federal administration falling laws installations e.g. the Mining Code (Mineral Resources Act) the inspection is done direct by them.

The inspection of IPPC sites is generally done by public authorities and therefore it is cost free for the owners of the installation and as the inspection bodies are public authorities with civil servants, they are financed by the public budget (taxes).

Administrative fines are comparable low but the competent authority, mainly the District Authority, can close a line of production or the installation immediately if there is acute danger for lives and health without a court decision.

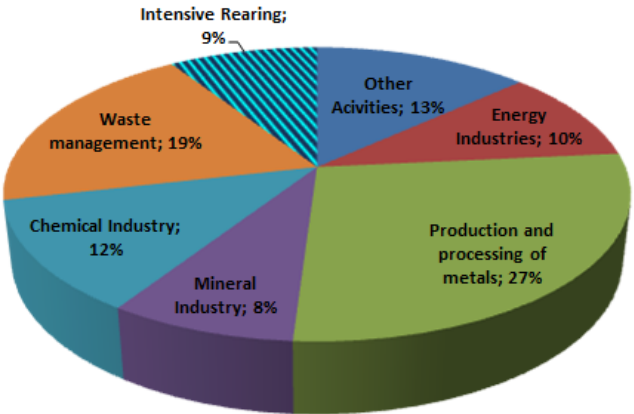**Federal/Provincial Working Group Environmental Inspection**
Consists of representatives from all **9 Provinces** and **Federal Ministries** of concern It discuss and develops and publishes:
- best practice examples
- guidance
- IRAM parameters
- Standardized short version of the environmental Inspection Report
- Q + A

Structure (shareholder) of Environmental Inspection (EI):	
FM of Agriculture, Forestry, Environment and Water Management – EI: legal coordination and international coordination – EDM board – Other FM deriving from their legal competence	**Environmental Agency** EDM operation EI short report on Internet

Provincial Government
– EI: Coordination, programme and schedule with IRAM tool
– technical expert departments, expert pool
– EI-Report short version compilation

District Authority
– EI – competent authority
– technical, legal experts
– head of the EI
– EI-Report long version

Installation
– EI
– EDM basis data
– Annual report

IED installations in Austria

Number of IED Installations in Austria:	
Upper Austria	183
Lower Austria	166
Styria	131
Tyrol	56
Vienna	39
Vorarlberg	28
Burgenland	27
Salzburg	36
Carinthia	57
Total:	723

Intensive Rearing; 9%
Other Acivities; 13%
Energy Industries; 10%
Waste management; 19%
Production and processing of metals; 27%
Chemical Industry; 12%
Mineral Industry; 8%

2.5. Styria

Styria is a federate state (Bundesland), located in the southeast of Austria. In area it is the second largest of the nine Austrian federal states, covering 16,401 km². It borders Slovenia as well as the other Austrian states of Upper Austria, Lower Austria, Salzburg, Burgenland, and Carinthia. The population is 1,210,700. The capital city is Graz which has 276,526 inhabitants.

There are 13 districts:

- Bruck -Mürzzuschlag
- Deutschlandsberg
- Graz-Umgebung
- Hartberg-Fürstenfeld
- Leibnitz
- Leoben
- Liezen
- Murau
- Murtal
- Südoststeiermark
- Voitsberg
- Weiz
- Graz

The district of Voitsberg is partner in this project. It is situated in the western part of southern Styria and divided into 15 municipalities. The total area is 679 km² and there are 51.840 inhabitants.
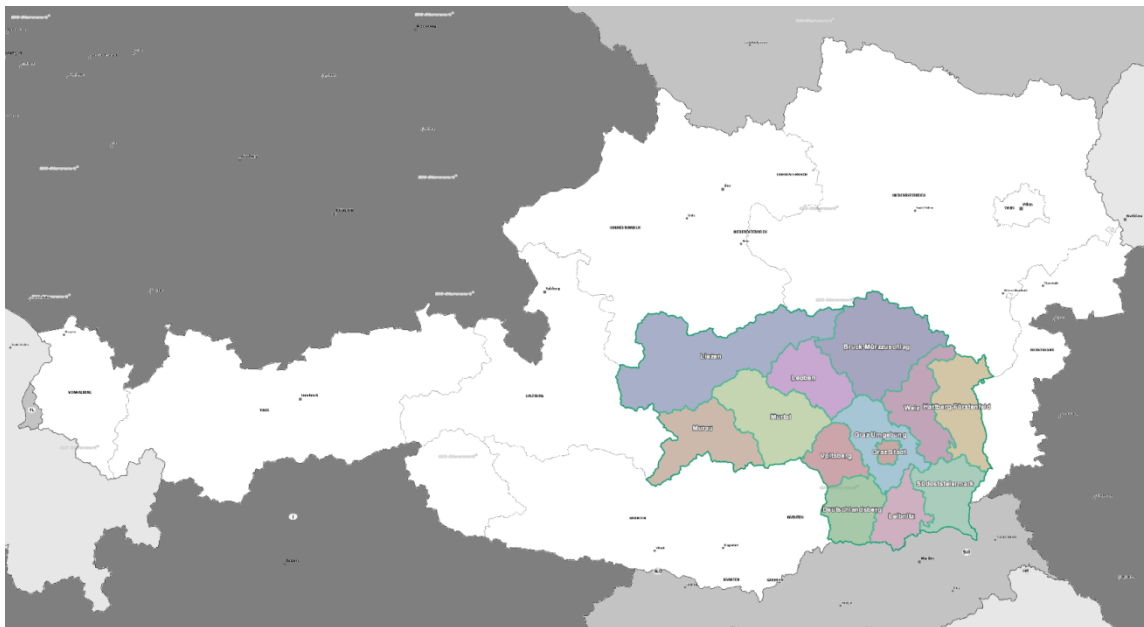
Provincial government & provincial administration (Landesregierung & Landesverwaltung)
- Provincial government is the highest organ of the provincial administration
- Provincial government makes decision as a collegiate body → no "provincial minister" but the department of the provincial government which does the administrative tasks of the provincial government
- Beside the provincial government there are two administrative authorities: the municipalities and the district authorities, but the most important are the district authorities.
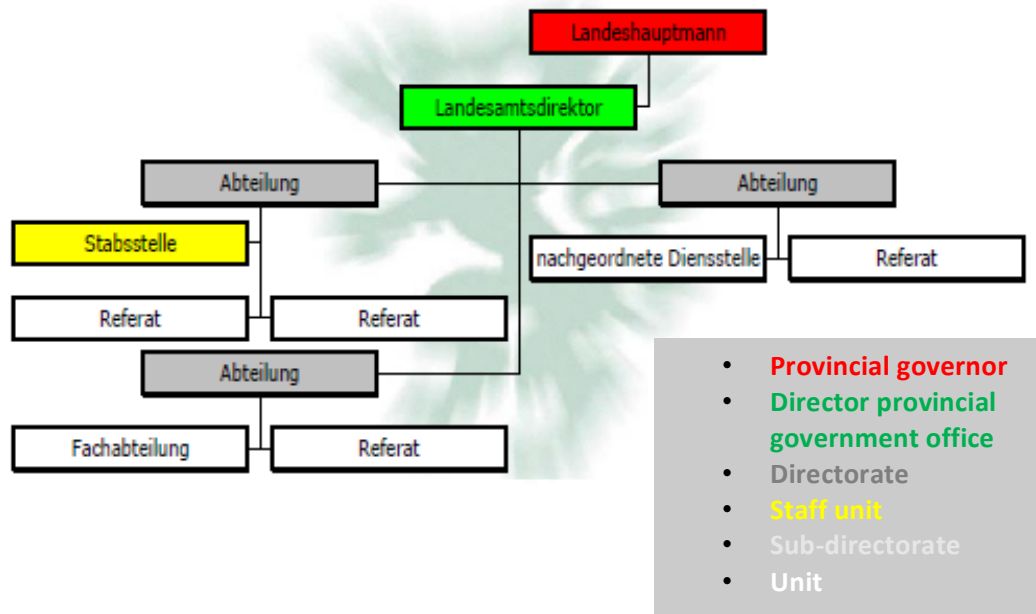
Provincial governor (Landeshauptmann)
- Head of provincial government
- Head of the provincial government office
  (Vorstand des Amtes der Landesregierung)
- Responsible for the indirect federal administration
  (Träger der mittelbaren Bundesverwaltung)
- Head of the province
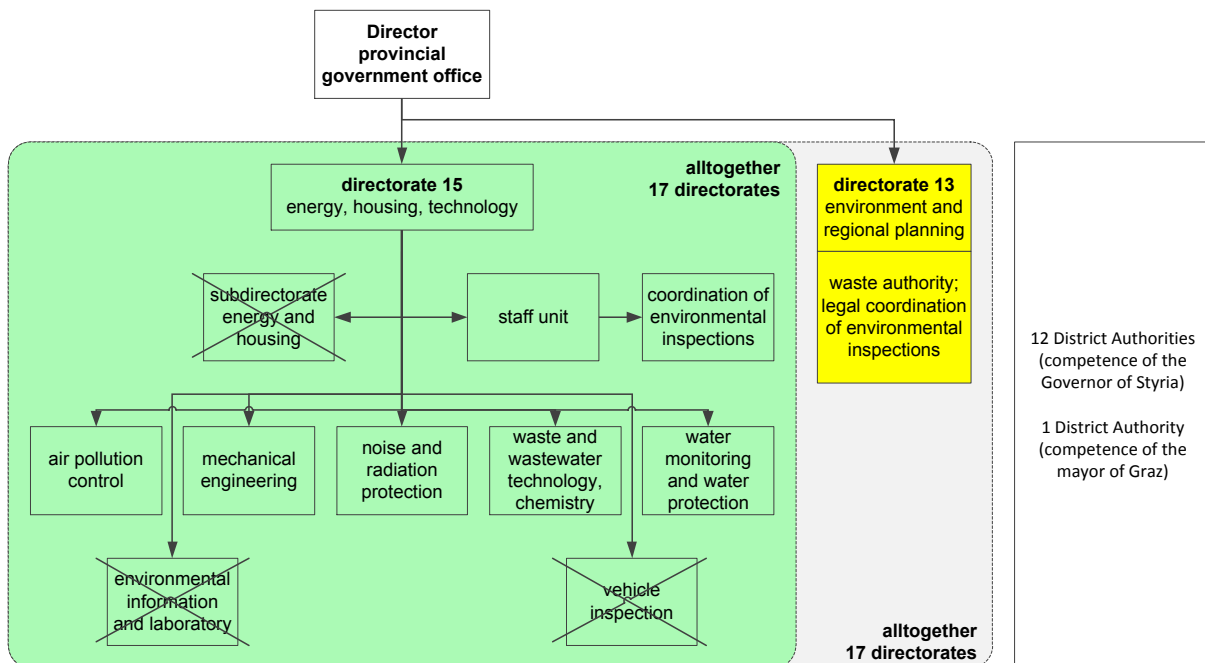
Boxes that are crossed are not involved in environmental inspections

Overview of the Styrian Government structure and its environmental relevant departments:

		expert team			monitoring
		standard[1]	extended[2]	Nr. of experts	
Dir.15	coordination of environmental inspections	coordination of experts		4	
	air pollution control	air emission	air immission	3	ambient air (air quality)
	mechanical engineering	IPPC status legal compliance	mechanical engineering based on BAT conclusions	13	
	noise and radiation protection	Noise	vibration	4	ambient noise
	waste and wastewater engineering, chemistry	- wastewater management - waste management - chemical storage and manipulation		4 3 2	- soil contamination - wastewater control - environmental electronical data management - environmental alert service
	water monitoring and water protection		hydrogeology limnology	2 2	- water quality - groundwater quality
Dir.13					electronical waste data management
Dir. 10			forestry	1	forestry monitoring
sewer operator					wastewater monitoring
local authority					information about complaints

Direct federal competences are not dealt by the provincial government of Styria.
As described in the chart below indirect federal competences and provincial competences are executed from provincial authorities.

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[1] This is the expert team inspections are normally executed.
[2] Sometimes more topics have to be investigated. This is the list of experts which may be additionally asked to join the environmental inspection, if it is requested by the situational content (for example from information from monitoring units)

Competences
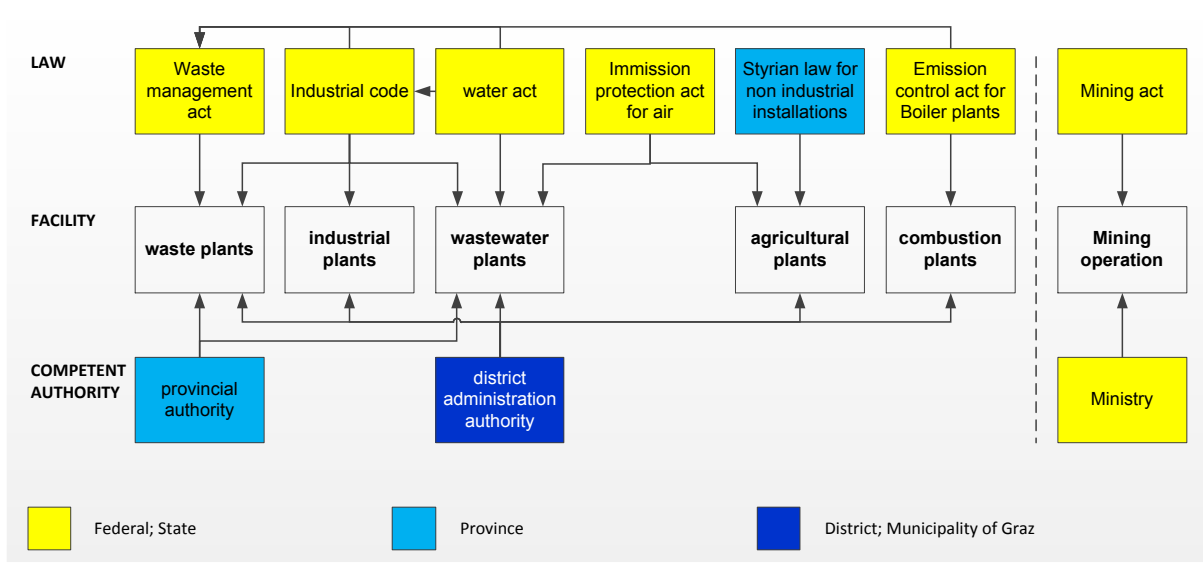
As a rule: the authority that issues the permit will also do the inspection.
The provincial government office is in charge for waste and waste water plants (directorate 13), smaller waste and waste water plants and all other installations are the duty of the 13 district authorities. Most of the experts are situated in directorate 15, as well as the coordination team for environmental inspections.

The district authority of Voitsberg is one of the 13 district authorities mentioned above. It is part of the Styrian team at this IRI.

District Authority Voitsberg
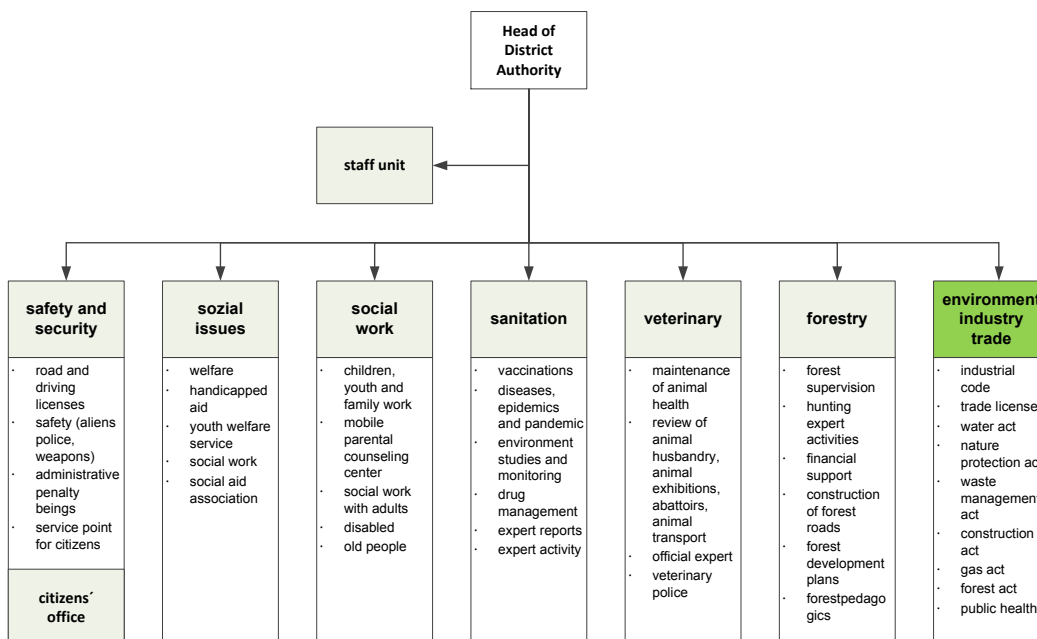
2.6. Coordinators of directorate 15

For the internal interaction between the Province of Styria and the Competent Authorities with regards to Environmental Inspections the coordinator (or inspector) plays an important role.
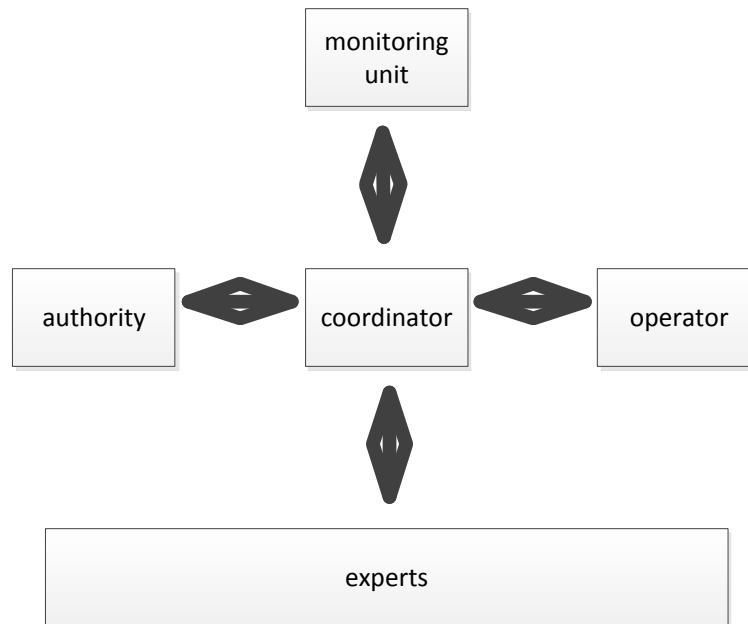
The coordinators are responsible for:
- *IPPC coordination*
    o Creation of inspection plans, programs and annual work schedule
    o keep the list of IPPC installations up to date, including inspection frequency
    o data reporting
- Environmental inspections coordination
    - Coordination of the expert service for environmental inspections
      To facilitate the quality of communication an IT platform based on the Microsoft software "SharePoint" – called EI (environmental inspection)-database - has been installed (see information below).
    - Preparation of operator
    - Carrying out environmental inspections
    - Creating environmental inspection reports and conclusions

For communication between the authority, the experts, the monitoring units and the coordinators an IT tool has been installed, based on the Microsoft software "SharePoint" – called EI (environmental inspection)-database - has been installed. The information about all installations, including the corresponding environmental inspections and all relevant data is stored there. The competent authority, the experts and the coordinators can communicate there. The coordinator also stores all relevant information from the operator there; the relevant permits are available there, too. Monitoring units are asked through this device for their information and can store it directly to each inspection. An electronic reminder is also in charge of the timetable. Monitoring units and experts get e-mails, if they are asked for assistance. A calendar gives information about the progress of the inspection. It is planned, that the sequence of the process of each environmental inspection can be comprehended.
The database contains checklists and templates as well.

2.7.   The formal experts of directorate 15

The role of the experts is to deliver opinions for approval procedures and inspections according to Administrative Procedure Law. The technical or non-technical experts are specialists in one or more subject areas. The experts give advice, on request, to the Competent Authority.

The experts are independent: they don't depend on any of the involved parties; the competent authority can't influence the expert, the experts are independent when rendering their expert opinion. Their opinion must contain the description and status of the project and the opinion itself. The fees to be paid by the operator are rather low and only cover the approval procedure. Costs of preparation, post processing and inspection are not allocated to third parties.

The experts all have a university degree and some have a higher technical education in specific areas. Training plan for the technical expert consist of a basic training (97 hours), a special basic training (6 months) and technical training of directorate 15.

Besides their primary tasks the experts are also involved in:
- Standardisation process
- Drafting of legislation
- Working groups to define the state of art of specific topics
- National working groups on BAT

Special attention is given to information and knowledge exchange. One of the applications used for this (related to environmental inspections) is the use of an intranet database. Here information can be found on: reports on conferences, rendering expert opinion, guidance on certain issues, new developments, permits, EIA procedures, environmental inspections.

The questionnaires that are used by the experts for permitting and inspections are general. The experts decide how detailed and broad the expertise will be. There are no standardisations of the questionnaires of the experts.

At environmental inspections there are detailed questions for each expert.The coordinator decides together with the competent authority how detailed or broad the inspection will be. There is a standardisation of the questions to each expert for environmental inspections, which are adapted for the need of each environmental inspection.

The strength of the expert: Independent and well trained staff
The weakness of the expert: benchmarking between experts is difficult, Competent Authority can choose their own favourite expert.

Field	Nr of expert
coordination of environmental inspections	4
emission to air	7
emission to water	4
Noise	7
manipulation and storage of chemicals	3
leak proof ness	13
waste management	9

Budget issues

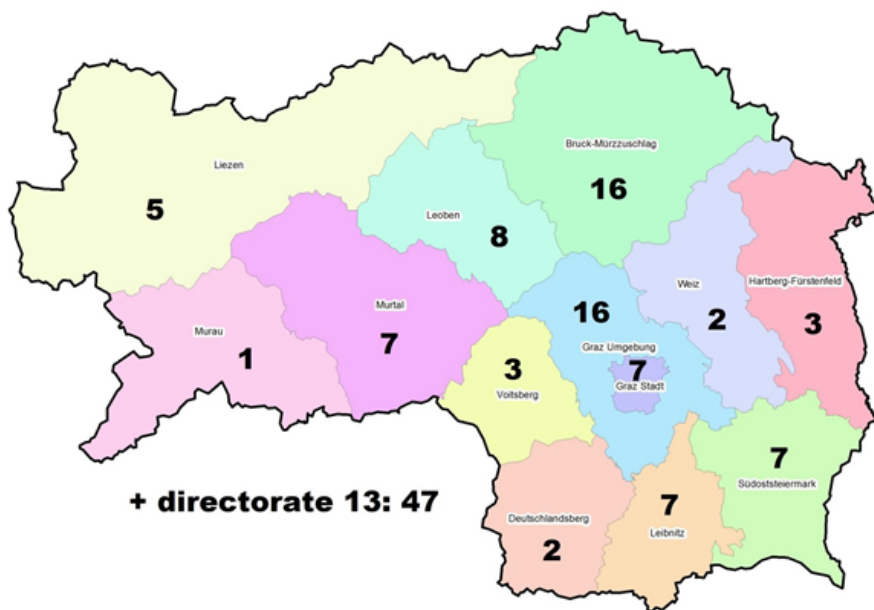Activities of the environmental inspection team are covered by the general government budget. Activity costs are not calculated individually.

Identify the different industry sectors and numbers of installations covered, include the geographical distribution and main characteristics of these sectors and installations in terms of environmental impact and operator performance.

IED installations in Styria

IPPC Nr	Bruck-Mürzzuschlag	Deutschlandsberg	Graz-Umgebung	Hartberg-Fürstenfeld	Leibnitz	Leoben	Liezen	Murau	Murtal	Südoststeiermark	Voitsberg	Weiz	Graz	directorate 13	total
∑	16	2	16	3	7	8	5	1	7	7	3	2	7	47	131
1.1.			3	1	1	1							2		8
2.1.						1									1
2.2.	2					1							1		4
2.3.	2					2			3						7
2.4.							1								1
2.5.					1		1					1			3
2.6.	7		2		1	1	1			1		1	1		15
3.1.			2		1										3
3.3.											2				2
3.5.	1	1	1	1			1		1	1					7
4.1.			2				1		1	1					5
4.2.	3	1													4
4.6.								1							1
5.1.														6	6
5.2.														1	1
5.3.														7	7
5.4.														28	28
5.5.														3	3
6.1.	1		3			1			1						6
6.3.										1					1
6.4.					2				1	3	1		1		8
6.5.					1										1
6.6.³			1	1											2
6.7.			2										2		4
6.11.						1								2	3

The columns Bruck-Mürzzuschlag through Graz are grouped under the heading **District Authority**.

³ Number of installations is currently charged

+ directorate 13: 47

2.8. External interaction

Involvement of public

For the permitting procedure, done by the competent authority (is outside the scope of this IRI), the involvement of public is secured. Also the independent opinions of the official Experts of the Province (Directorate 15) are publically available. In case the Competent Authority disregards the experts' opinion this information will still be open for public.

In case of Environmental Inspections there is no role for the public and they are not directly involved. The local and district authority as well as the municipalities and the monitoring units are asked whether there are any complaints. After the environmental inspection the conclusions are published on the website of the Austrian Federal Ministry of Agriculture, Forestry, Environment and Water Management: Https://secure.umweltbundesamt.at/edm_portal/home.do

Filing complaints by public

At the request of a neighbour the authority has to check if they are sufficiently protected. Although the operator is in compliance with the requirements specified in the permits, the authority has to prescribe measures (§§ 79 und 79a Industrial Code).

If there are any defects the operator and the experts define measures and compliance dates. These measures are listed in the record of hearing. The compliance with the measures has to be reported to the competent authority. If the information cannot be verified by the competent authority, she will ask the experts to verify it. They will inform the competent authority, if a site visit is necessary. In each law misbehaviour can be punished by the competent authority. She can shut down entire installation or parts of it.

Transboundering issues

Transboundary issues are federal competence. Environmental inspections do not include neighbours or other states. In Austrian law member states are seen as neighbours, having the same rights and duties. Along the rivers Raab and Mur there are committees installed, where neighbour states are involved (Mur committee: Slovenia; Raab committee: Hungary), which are informed about all changes of discharges into the river and about all monitoring results. Results of environmental inspections are not seen as relevant information.

3. Part C – Performing inspection tasks (Environmental Inspection Cycle)

In part C the inspection tasks were reviewed based on the steps of the Environmental Inspection Cycle, see annex 1. The review team gained an understanding of how the authority operates in terms of: planning of inspection activities (gathering data, setting priorities, defining objectives and strategies and developing an inspection plan), the provisions, instructions, arrangements, procedures and equipment that are in place to enable inspectors to carry out inspection activities, how the inspections are executed and reported and how the authority deals with monitoring of its performance.

Overview of Environmental Inspection tasks in Styria

The following table will show how the different inspection tasks are divided between federal, provincial and district level.

	National Law		Provincial Law
	Waste management act	Industrial code	Styrian law for non industrial installations
Creating Environmental Inspection Plan	Federal Ministry of Agriculture, Forestry, Environment and Water Management		Governornment of Styria
Creating Environmental Inspection Program	Governor of Styria		Governornment of Styria
IPPC coordination	Legal coordination: directory 13		
	Technical coordination: directory 15		
Competent authority for environmental inspections	Directorate 13 or district administr. authority	district administration authority	
Coordination of the expert service for environmental inspections	Environmental inspection coordination team (directory 15)		
Carrying out environmental inspections	Directorate 13 or District adm. auth.	district administration authority	
	Environmental inspection coordinator (directory 15)		
	Experts (directory 15)		
Creating environmental inspection reports	Environmental inspection coordination team (directory 15)		
Publishing environmental inspection reports	Federal Ministry of Agriculture, Forestry, Environment and Water Management		

Note that only the inspections executed at IED installations are defined as "environmental inspections". Inspection that are executed at non-IED installations are defined as "inspections"

3.1. Planning of inspections

Describing the context

The National Environmental Inspection Plan is set up by the Federal Ministry of Agriculture, Forestry, Environment and Water Management in coordination with the Federal Ministry of Science, Research and Economy and after hearing the 9 Provincial Governors.

- The national environmental inspection plan is drawn up according to Article 23 IED and includes a general assessment of relevant significant environmental issues (like air, water, climate & energy, surface & contaminated sites, waste and noise).
- It covers the whole Republic (all 9 Provinces)
- It contains all IPPC installations covered by federal law. The IPPC Installations are registered in the EDM (Electronic Data Management, www.edm.gv.at).
- It sets the criteria for a risk based approach (adopted IMPEL IRAM tool) for prioritizing the frequency of inspections in three categories according to a 1, 2, 3 year frequency of inspection for the "Environmental Inspection Programme" which is drawn up by the 9 Provinces.

This step only includes data that is available on federal level. The data of the monitoring unit (directorate 15 of Styria) and environmental policy of the province and of the districts is however not taken aboard. The next step (setting priorities) is steered on the local situation.

Setting priorities

There are two procedures used for setting priorities for environmental inspections:
   a) Austrian IRAM Tool
   b) Asking all monitoring units about peculiarities.

ad a) Austrian IRAM Tool:

Within the IRAM tool the following two main aspects are considered:

1. Effects of the installation to the environment and its vulnerability
   (Incidents, complaints, emissions to air, -water, -surface according to PRTR data, amount of dangerous waste, distance to sensitive areas, and risks of accidents by dangerous substances)

2. Performance of the operator (engagement of the operator to target his environmental goals set in the permit and beyond, willingness/time line to bridge gaps, implementation of an environmental management systems e.g. EMAS).

1. Effects of the installation to the environment and its vulnerability

air emission	emission in relation to threshold value EC-PRTR-R
water emission	emission in relation to threshold value EC-PRTR-R
soil emission	emission in relation to threshold value EC-PRTR-R
hazardous waste	Tons of waste leaving the site
influence to environmental quality	emission of respective pollutant in significant quantities in areas, where environmental quality objectives are exceeded
Distance to sensitive areas / objects	Kindergarten, schools, hospitals, Groundwater protection areas Natura 2000 sites (protected landscape)
Accident risk because of dangerous substances	Storage or manipulation with substances listed in Seveso III directive
complaints / accidents / incidents	legitimate complaints of environmental damage or environmental accidents

2. Performance of the operator

legal compliance	number of violations
willingness to comply with requirements	number of requirements, occurred during the environmental inspection
environmental management system	registered for ISO or EMAS

ad b) Asking all monitoring units about peculiarities
All monitoring units are asked during the creation of the next year's annual work schedule, if they know IPPC installations, where problems might have occurred. In these cases detailled information has to be provided to decide, if the installation has to be taken into the annual work schedule.

The results (low – medium or high risk) of the risk assessment for the IED installations in Styria are presented in the table below. The higher the risk the higher the inspection frequency.

Risk category	inspection period	Nr of installations
High risk	1 year	0
Medium risk	2 years	6
Low risk	3 years	123
to be determined	to be determined	2
		131

If problems have been identified by the monitoring units, non-routine inspections are planned. The coordinator is not involved in the non-routine inspections

For most IED installations the inspection frequency is once every 3 years (= low risk). Only 6 installations score medium risk and 0 installation scores high risk. This was due to the selection of the risk criteria and their scoring system.

For non-IED installations (falling under the Industrial code) a system called KRIBA is established that categorises all facilities in 10 categories (K0 – K9). For each category the expected amount of time and resources (per function per year) is identified. The system gives a clear insight how much staff is needed.

The amount of time that is needed to execute the environmental inspections at the different industrial sectors is not identified. The amount of staff needed for the environmental inspections is therefore unclear. Because of the low inspection frequency this has not yet lead to a problem.

Besides the environmental inspections the province also identifies:
- non routine inspection (inspection corresponding to a complaint or investigation of an incident or an accident) and;
- follow-up inspection (of a non-compliance) at IED installations.

Only for the environmental inspection the coordinator is involved. For the latter 2 inspections the coordinator is not involved and the input or assistance of the experts of directorate 15 is directly arranged by the competent authority.

The only "non-routine environmental inspections", that can occur are additional site visits, carried out within 6 months, because of identified important cases of non-compliance with the permit conditions (Art. 23 (4) IED). In Austria they are handled as routine environmental inspections.

Time spent on follow-up activities, enforcement actions and non-routine inspections is not monitored.

During the first environmental inspection it is checked, which topics are relevant for the installation. All topics causing direct impact can be part of an inspection. These are:
- emission to air
- emission to water
- noise

indirect impact is controlled by the following topics:
- manipulation and storage of chemicals
- leak proof ness
- waste management

After the first environmental inspection the list of relevant topics is fixed and controlled ever after.

Defining objectives and strategies

Inspection targets in output

The IED was transposed into Austrian law in 2013. The maximum inspection frequency between two inspections is three years. The organisational target for 2016 is to inspect all installations before the end of 2016. These targets are output driven.

Inspection targets on outcome

The targets set in legislation and permits are used as the basis for the environmental inspections. During this three year circle the main technical objective is to examine, if there are any emissions from diffuse sources at the site, to valuate, if there are any impacts from them and if necessary define orders (this target is written down in the air quality management plan 2011, established by the Styrian Government). These targets are more or less outcome driven.

Inspection targets on outcome, related to the quality in a certain area, are not defined. The data from the monitoring unit could be used to make the link between the state of the environment and the inspection targets.

Inspection strategy

Inspection strategies, other than onsite inspections are not defined.

Communication strategy

For communication the EI (Environmental Inspections) database is in place. This IT tool is based on the software SharePoint.

For each environmental inspection a coordinator is appointed. To ensure the relationship between coordinator and operator will not be to close the coordinator will be changed on a regular basis. Good contacts and communication between the operator, the competent authority and the experts is the responsibility of the coordinator. He or she will draft the inspection agenda, the inspection report and the summary. To ensure all necessary information will be exchanged between all participants, the province established this IT platform. The information about all installations, including the corresponding environmental inspections, relevant permits, and all relevant data are stored on this platform. The competent authority, the experts and the coordinators also use the platform to communicate to each other. Monitoring units are asked through the platform for their information and can store it directly to each inspection. A calendar gives information about the progress of the inspection. Monitoring units and experts get e-mails, if they are asked for assistance. It is planned, that the sequence of the process of each environmental inspection can be comprehended.

Inspection plan and inspection programme
Austria uses the following planning and inspection documents:
1. Strategic documents:
   a. Plan: as defined in Art 23 (3) IED / federal competence:
   b. Program: as defined in Art 23 (4) IED
   c. Annual work schedule

Inspection plan:
The inspection plan has been created in 2013 on federal level and there is no intention, that it will be revised as long as no great changes occur. Austria considers that with this plan they fulfil the requirements of the IED and the Austrian law. The topics of the plan are not expected to change within the next five to ten years. As an annex a list with risk criteria are included to this plan

Inspection program:
The inspection program has been created in 2014 on provincial level and also for this program they do not expect any changes within the next few years. The annex of the program contains the list of the IPPC installations and the inspection interval and is updated regularly at least every year (together with the annual work schedule). New data comes from the outcome of each environmental inspection or the annual work schedule as well as from competent authorities on new or closed IPPC installations.

Annual work schedule:
During each on site visit the risk assessment is updated and the year of the next inspection will be written down in the Record of hearing.
Before creating the list for the next year's inspection the monitoring units are asked about obvious problems or special occurrences with IPPC installations, or where IPPC installations could be involved. All this data will be taken aboard in the Annual work schedule.

The following results of the monitoring units may also lead to changes in the annual work schedule:
• Forestry: exceedance of emission limit values in spruce needles
• air monitoring: exceedance of emission limit values of ambient air, ideas about possible polluters and complaints
• noise: exceedance of emission limit values of noise and vibration, ideas about possible polluters and complaints
• water body monitoring: changes of quality
• ground water monitoring: changes of quality
• wastewater control: exceedance of emission limit values
• environmental alert service

2.1. *Execution framework*
Handbooks, guidance and protocols
Handbooks and protocols for the coordinator are missing. As a guidance for environmental inspections the EI-database is installed. It consists of a list of steps along the inspection process and includes templates for all minutes and protocols needed from the coordinator.
The record of hearing is written by the competent authority and varies in some minor parts between the authorities. Experts are creating their expertise based on internal rules. For each inspection they get defined questions for to answer. These questions are stored in templates

Handbooks, special guidance and protocols are in place for the experts

Equipment

The monitoring units are equipped with the relevant means. At the moment there is no lack of resources for the equipment that is needed for environmental inspections. Environmental Inspections have a high priority; other monitoring duties therefore might have to be postponed sometimes. The experts do not take samples during the on-site visit except waste water samples in some cases.

Each expert has his own laptop, where he or she can write down the expertise during the on-site visit. The coordinator is also equipped with a laptop to gather all expertise and create a consolidated list of measures.

The journey to and from the site should be done by public transport, but normally is not possible because of the range of papers and the location of the installation. Normally the coordinator organises a staff car.

Qualifications of staff

- Coordinators are experts with a special training and have to have management education (two of them are even management auditors).
- Experts are only employed, when they can prove their knowledge. They all have to have an academic degree.
- Representatives of the competent authority for IPPC installations have to be lawyers.

Recruitment

There is a special admission procedure for candidates. After they are employed, they have to undertake themselves a two years trainee programme.

Inspector's ethics. Combating issue-blindness

There are binding rules for civil servants about ethics. Experts have to be independent in their expertise. Coordinators change from time to time to ensure the relationship with the operator will not get to close. Apart from this there are no measures against operational blindness.

Training

The state government office of Styria has a training academy, where seminars to different topics are provided (on 2016-11-30 a seminar about IPPC installations is offered). More over experts can attend external seminars during their working time, paid by the office.

For the experts special training plans are developed and followed.

For the coordinators there are no requirements for personal improvement and there is no special training for environmental inspections for coordinators and experts.

Information on new developments

Regularly updates with coordinators from other provinces guarantee a high level of knowledge. International cooperation within twinning programs keep up a top standard of international know-how exchange.
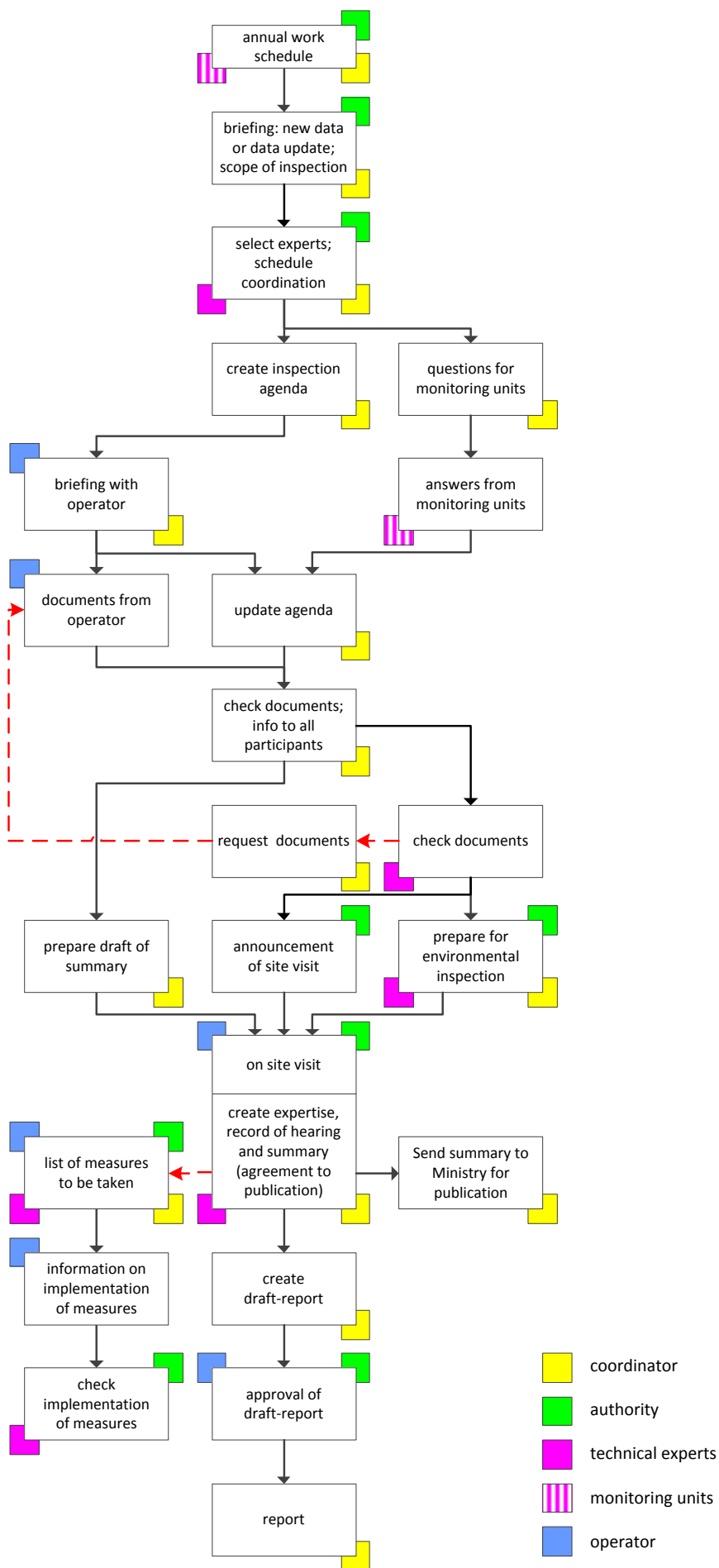
A continuous improvement process is established within the coordination team. At least quarterly step by step the whole inspection process is reviewed. At the time the questions to the experts are checked. The review includes the check of the legal situation, experience from previous inspections and discussion with the experts.

Within the directorate there have been a technical information system installed, where new information, guidelines, checklists and templates are available.

2.2. Execution and reporting

For the preparation, execution and reporting the following steps are described:

Environmental inspection process

annual work schedule

briefing: new data or data update; scope of inspection

select experts; schedule coordination

create inspection agenda

questions for monitoring units

briefing with operator

answers from monitoring units

documents from operator

update agenda

check documents; info to all participants

request documents

check documents

prepare draft of summary

announcement of site visit

prepare for environmental inspection

on site visit

create expertise, record of hearing and summary (agreement to publication)

list of measures to be taken

Send summary to Ministry for publication

information on implementation of measures

create draft-report

check implementation of measures

approval of draft-report

report

coordinator

authority

technical experts

monitoring units

operator

Based on the Annual work schedule the preparation of the environmental inspection will start:

- The coordinator checks all permits (especially the new ones since the previous inspection), relates the parts of the IPPC installation to the permits, checks the information in the annual work schedule and the measures of the previous inspections and informs the competent authority.
- The competent authority defines the content of the inspection based on the information from the coordinator. The authority and the coordinator discuss the topics in beforehand, the authority decides who goes on site.
- The coordinator makes notes from the meeting with the authority.
- The competent authority and the experts communicate through the IE database. For each topic a special area is established, where the relevant data is stored.
  Experts will be asked on the following subjects:
  - o relevant parts of the installation
  - o relevant specifications in laws, regulations and permits
  - o necessary reports
  - o fulfilment of specifications of relevant laws, regulations and permits
  - o deficiencies and measures
  - o obvious non environmental defects
  - o (accordance with bat conclusions)
- Information from previous inspections will be retrieved.
- The questions to the monitoring units and their answers are also stored in this database.
- The coordinator can set dates, where they are reminded about their tasks.

The inspection agenda;

- The agenda is created before the briefing with the operator. The operator gets the agenda and is so fully informed about the content of the inspection. The agenda includes all relevant information about:
  - – the installation itself
  - – the reason of the inspection
  - – the range of the IPPC installation
  - – the name of the competent authority and the coordinator
  - – the experts by profession and by name
  - – the relevant permits and laws
  - – the necessary documents from the operator
  - – the questions to the experts
  - – information about the risk assessment and its preliminary result
  - – information about the report and the conclusions
  - – if possible the draft-conclusions

During the inspection:

- Expertise: result of the environmental inspection, done by each expert
  Example of the checklist for chemical management is:
  - o Describe the current situation of the chemical management and chemical storage.
  - o Does the handling and storage of chemicals take place in accordance with the requirements of laws, regulations and permits?
  - o Which deficiencies were found based on the on-site inspection, which measures were proposed by the operator, and do they fulfil the requirements?
  - o Were obvious non environmental defects found during site inspection, if so, how do they look like, which measures were proposed by the operator, and do they fulfil the requirements?

- Record of hearing: result of an environmental inspection, made at the end of the on-site visit including all expertise including list of findings and measures
- List of measures: list of measures including the measure itself, the implementation date and the profession of the expert, who will check the implementation
- The conclusions (the summary) are approved by the operator at the end of the on-site visit and afterwards sent to the Ministry for publishing.

Reporting of the inspection
- The report is created after the on-site visit and sent to the operator for approval. The results are available to the public.
- Summary: conclusions of the environmental inspection, published on the EDM-website of the FM of Agriculture, Forestry, Environment and Water Management. Results of follow up inspections are not put on the EDM – website but it is only changed after the next routine inspection that will be in 3 years.

The public is not involved in the environmental inspection process. Never the less all monitoring units, the municipality and the competent authority are asked if there have been relevant complaints, the monitoring units also about detailed situation of the surrounding area. The gathered information will be part of the inspection. The conclusions are published on the internet and there is information in the conclusions, where the public can ask for the report.

If there are any defects the operator and the expert define measures and compliance dates. These measures are coordinated by the coordinator and listed in the record of hearing. The compliance with the measures has to be reported to the competent authority. If the information can't be verified by the competent authority, she will ask the experts to verify it. They will inform the competent authority, if a control visit is necessary. In each law misbehaviour can be punished by the competent authority. She can shut down entire installation or parts of it.

Involvement of Competent Authority
The competent authority is the permitting and inspecting authority. CA is involved into the inspecting process and can follow all steps through the EI-database.
In each law misbehaviour can be punished by the competent authority. The CA can shut down entire installation or parts of it. In most cases enforcement activities are decided upon case by case by the CA. Normally the operator works off the list of measures for improvement, created during the on-site visit.

The CA does not have the legal basis to revise existing permits. In some situations, the number of permits for 1 facility is more the 100 because of all the changes in the installation.

Accidents and incidents
Inspections based on the Seveso III Directive do not interfere with environmental inspection as written down in environmental legislation. If it is possible both the inspections are coordinated together and held at the same date.

Non routine inspections are handled the same way as routine inspections. Emergencies are not seen as environmental inspections. Results of inspections based upon incidents or accidents are considered by the coordination staff and may lead to non-routine environmental inspections. The results are than part of the next inspection.

Complaints
The competent authority tries to verify the content of the complaint, if it is necessary experts are asked to verify it, this can also be done on a site visit. Results of complaints are considered by the coordinator and may lead to non-routine environmental inspections. The results will be included in the next inspection.

2.3.   *Performance monitoring*

All data about the performed environmental Inspections are collected in the EI database.
With all this data monitoring is possible. However this is done mostly on output (numbers). The system does allow to monitor on the improvement of the environment and reducing risk by establishing compliance.

Performance indicators are not defined and therefore not used to monitor performance. Data from the monitoring unit (on the environment) are used for the annual working schedule and for preparing inspections but they are not used for setting priorities. Because of this it is impossible to define inspection targets on environmental outcome and as a consequence to define performance indicators.

4. Part D – Site visit

In part D the relationship between the environmental authority and industry and how this works in practice was reviewed during the site visit. The site visit took place at Stölzle – Oberglas GmbH on 15th of June 2016.

The relationship between the environmental authority and the operator
The operator has one contact person within the competent authority. This person is in charge of permitting and inspection matters. Environmental inspections are coordinated by a coordinator.
The authority decides which experts are necessary for permitting and inspections but in beforehand the coordinator and the authority discuss what kind of expertise is needed for the inspections. The operator has to provide all necessary documents beforehand. There is a 14 days governmental announcement time before the inspection. At environmental inspections the public is not informed. The authority has to inform the operator about his legal duties whenever applicable.
In the developing phase for permitting the authority is available for questions about regulatory requirements. This can be addressed with qualified experts at dedicated office hours.
An integrated approach is ensured by collaboration within expert teams. The procedure is usually smooth due to organisation by coordinators. The relationship with the operator is usually insured by competent contact persons during the on-site visits. There are occasional weak points, such as incomplete and/or debatable documents, inadequate timing or late involvement of experts that can be time consuming for the experts when they are preparing the inspection to the site.

According to the operator there is a win-win situation to have all documents ready at all times when it comes to legal issues. There are good communications according to the operator with the environmental authorities. The company has many permits and there is much communication with authorities. According to the operator the authorities are efficient and their work counts and fits very well.

Understanding of the process used to determine non compliance

The coordinator decides in accordance with the authority, which topics shall be inspected, asks the operator for relevant documents and measurement-reports, sends the expert all relevant information including the relevant permits and asks the experts about:

- Which are the relevant parts of the installation?
- Which are the relevant targets based on permits and laws?
- Did the operator send all relevant documents, are there still some missing?
- Do the documents fulfil the requirements?
- Based on the documents and the on-site visit which non compliances have been detected?

The experts study their documents in advance and control the relevant parts of the installation during the site visit.

On site, non- compliances are evaluated due to their impact on the environment, minor non compliances are evaluated to have no significant impact on the environment.

If there are any defects the operator and the expert define measures and compliance dates. These measures are coordinated by the coordinator and listed in the record of hearing. The compliance with the measures has to be reported to the competent authority. If the information can't be verified by the competent authority, she will ask the experts to verify it. They will inform the competent authority, if a control visit is necessary. In each law misbehaviour can be punished by the competent authority. She can shut down entire installation or parts of it.

Compliances to BAT are evaluated according to several factors such as abate techniques, process technology, ambient air quality, monitoring results and emission limit values.

Frequency of visits of the authority to the site

The interval for environmental inspections is 2 years.

If there are changes to be permitted, the competent authority is in contact with the operator, assisted by relevant experts.

If there are complaints the authority will investigate, if necessary with the help of experts and monitoring units.

Environmental risk assessment to recalculate the inspection interval, Stölzle-Oberglas GmbH

criteria	result		valu-ation	remarks
Release of emissions into the air related to PRTR data		emission : threshold value Annex II, column 1a EC-PRTR-R) < 1	1	Nox: 106.107 kg 2008 (threshold value: 100.000 kg/a) no report announced since then
	x	emission : threshold value Annex II, column 1a EC-PRTR-R) > 1.		
		emission : threshold value Annex II, column 1a EC-PRTR-R) > 5.		
		emission : threshold value Annex II, column 1a EC-PRTR-R) > 10		
Direct introduction of emissions into surface water related to PRTR data	x	no threshold value (Annex II, column 1b EC-PRTR-R) is exceeded.	0	no threshold value is exceeded
		at least (Annex II, column 1b EC-PRTR-R) > 1 x threshold value.		
		sum (Annex II, column 1b EC-PRTR-R) > 5 x threshold values.		
		sum (Annex II, column 1b EC-PRTR-R) > 10 x threshold value.		

Introduction of emissions to soil related to PRTR data	x	no threshold value (Annex II, column 1c EC-PRTR-R) is exceeded.	0	no threshold value is exceeded
		at least (Annex II, column 1b EC-PRTR-R) > 1 x threshold value .		
		sum (Annex II, column 1c EC-PRTR-R) > 5 x threshold value .		
		sum (Annex II, column 1b EC-PRTR-R) > 10 x threshold value .		
Transfer of hazardous waste		hazardous waste leaving the site <= 2 t/a	1	acc. to waste management plan ~200t/a
	x	hazardous waste leaving the site > 2 t/a		
		hazardous waste leaving the site > 5kt/a		
		hazardous waste leaving the site > 20.000 t/a		
Influence to the quality of the environment		objectives are met or the installation concerned does not contribute to ist exceedance in a relevant way	1	installation lies within a sensitiv area for PM10 and emitts dust in a relevant amount
	x	one objective is not met and the installation contributes to that by emitting the pollutant in a relevant amount		
		one objective is not met and the installation contributes to that by emitting the pollutant in such a high quantity, that it has to be reported under PRTR provisions		
		wo objectives are not met and the installation releases the pollutants in a relevant amount and at least one in such a high quantity, that it has to be reported under PRTR provisions		
Distance to sensitive areas or objects		sensitive areas or objects in a distance of >= 2 km	2	secondary school within 400m
		sensitive areas or objects in a distance of 500 m til < 2 km		water protection area (WV Köflach-Voitsberg, Stadtwerke Köflach) 0m lies upstrem
	x	sensitive areas or objects in a distance of 50 m til < 500 m		
		within a sensitiv area or sensitive areas or objects in a distance of < 50 m		
Risk of accidents due to hazardous substances pursuant to Seveso III directive	x	no hazardous substances are used or the quantity does not exceed any threshold	0	the quantity of hazardous substances used does not exceed any threshold
		amounts of hazardous substances exceed threshold 1 but not threshold 2		
		amounts of hazardous substances exceed threshold 2		
		amounts of hazardous substances exceed threshold 2 ten times		
complaints / accidents / incidents	x	no qualified complaint about environmental accident or incident within the last three years	0	
		at least one qualified complaint, accident or incident within the last three years		

		more than two qualified complaints, accidents or incidents within the last three years		
		a qualified complaint about serious environmental damage or a serious accident or incident within the last three years		

Betreiberbezogene Kriterien

legal compliance	x	no significant non-compliance	-1	
		only one occurrence of significant non-compliance		
		more than one occurrence of significant non-compliance		
willingness to comply with requirements	x	no considerable non-compliance or defect or immediate remediation	-1	
		remediation of defects only after written request by the competent authority		
		remediation of defects only after more than one written request by the competent authority or after administrative sanctions or no remidiation at all		
environ-mental management system		operator or site is listed in the EMAS-register (Eco Management and Audit Scheme)	1	
		operator works with another approved environmental management system		
	x	operator does not work with any approved environmental management system		

Auswertung / Ergebnis

datacheck	ok
max. level of impact	2
number of max. levels	1
result of the performance criteria	1
result of operator behavior	0
risk category	1
inspection interval [a]	3

Coordination with other relevant authorities in inspection/ permitting tasks
The duties from the municipality do not overlap with the duties of the district authority.
If there are more competent authorities in charge for the installation than those
for permitting:
- different laws do not overlap,
- the operator has to apply for all relevant permits at the relevant competent authority
- only if the operator has all required permits, he is allowed to operate the installation.
For environmental inspections:

The coordinator also coordinates different authorities. All competent authorities are inspecting the installation at the same date. Therefore the environmental inspection database secures that all participants are well informed all the time and the necessary documents and information are provided.

Management systems used by the operator
The operator has no environmental management system. The company has ISO 9001, 15378 and 50001 management systems. ISO 14001 environmental management system is now in the process to be implemented.

5. Summary of findings

In this section the conclusions, good practices and opportunities for development are presented. The main part of this section is communicated during the reporting back session on the 16th of June2016 to the representative of the Regional minister and the high management.

5.1. Conclusions

Legal framework / permitting

- Transposition of the IED is in more than 9 sectoral laws. The holistic and integrated approach of the IED is therefore at risk.
- The Province (coordinator/inspector) can only execute environmental inspections for IED installations. In case the company also has non IED installations, even when technically connected, these installations will not be inspected by the coordinator. The holistic and integrated approach will therefore be missing.
- The companies are legally obligated to inform the CA for changes in BAT conclusions. There is however not a mechanism (other than the inspection) at the authority to make sure that changes in BAT conclusions will lead to revision of permits.
- There are no legal possibilities for the CA to revise the permit situation at the company into 1 consolidated permit. (this could be needed in case there are many changes).
- Permitting and inspections are done by the same person at the Competent Authority.
- Because of the low inspection frequency (once every 3 years), coordinators will not gain experience with the individual installation.

Inspection planning

- There is a lot of monitoring data available but this is not used at the start of the planning process. Data on the state of the environment is therefore not used to set priorities within IRAM. The data is only used to influence the annual work schedule and to prepare inspections.
- IRAM is used/steered in a way that most IED installations have an environmental inspection frequency of once every 3 years.
- Results of non -routine inspections are not communicated on daily basis to the Coordinator (inspector) of the Province. The results will therefore not directly influence the frequency of environmental inspections.
- The inspection program is a static document. It describes the methodology and the list and frequency of the IED installations. It's not a strategic document in which the Province defines the environmental outcome they would like to achieve.
- Directorate 15 is too depended on the initiatives of the Competent Authorities regarding to environmental inspections. The Competent Authority also decides on the topics of the environmental inspection, even if this is against the advice of the coordinator.
- There are no inspection targets, performance indicators and inspection strategies defined for the IED installations.
- Involvement and information exchange between inspections (in average once every 3 years) for the coordinator (inspector) is very low. There is no or little contact with the operator and data needed for the risk assessment (e.g. operator performance) is only exchanged while the preparation takes place.

Execution of Inspections

- The coordinator (inspector) of the Province is not involved in the follow-up inspection and or the enforcement actions.
- Inspections are performed by a group of experts of Provinces that are usually also involved in the permitting procedure.

Execution framework
- There are no handbooks and guidance available for the coordinator (inspector). There is no training plan for the coordinator. New staff is trained on the job.

Performance monitoring
- Performance monitoring is mostly done on output (quantity) data.

5.2. Good practices

Legal framework / General / permitting
- The province established an 24/7 Alerting unit. This is a hotline and service in case of environmental issues that needs to be solved. A team of experts is always available.
- 1 stop shop (at the CA) for all permits
- The operator is legally obligated to inform the CA about the changes necessary to follow up on new BAT conclusions within one year of publishing.
- Permitting procedure: public is well involved and is able to see what independent expert have said (their opinion)
- EDM portal (internet) gives public information on inspection plan, inspection programs and summary of inspection reports (non-compliance and actions to be taken).
- Because the Province is working according to a QMS the inspection process is well documented and the roles and responsibilities are well defined.
- The monitoring unit and laboratory are well equipped and believed to be of high quality.

Inspection planning
- In December the annual working schedule is prepared by the coordinator (inspector) together with the experts and the CA. Together all data necessary to prepare a good plan will be available.
- For non-IED installations (falling under the Industrial code) a system called KRIBA is established that categorises all the facilities in 10 categories (K0 – K9). For each category the expected amount of time and resources (per function per year) is identified. The system gives a clear insight how much staff is needed.

Execution framework
- Advanced training program for experts (there is enough budget to continue trainings).
- Clear role of all participants at the environmental inspection and experts are independent in their opinion (stipulated by law) so independence is guaranteed.
- Common environmental platform (SharePoint) for Inspectors, experts, monitoring units and competent authority.

Execution and reporting
- There is a lot of expertise available in the province. Environmental inspections can be executed with high quality of expertise.
- The environmental inspections already include the presence and implementation of Environmental Management Systems of the company.
- The role of coordinator (inspector) as the manager of the inspection is separated from the role as expert.
- The administrative burden for the operator is minimised because of intensive preparation and coordinated inspection

5.3. Opportunities of development

Legal framework /permitting

- To explore if it's possible to enhance the role of the Province (coordinator) regarding environmental inspections by giving mandate so:
    - The Province can initiate and execute environmental inspections by themselves.
    - The Province can decide on the focus of the environmental inspection.
    - The Province has the right to inspect IED company as a whole (not only the IED activities).
    - The Province will be responsible for the follow-up inspecting and update the EDM system.
    - The Province will be involved in the enforcement phase.
    - The Province will receive the information from non-routine inspections (from the competent authority) so they are able to include this while prioritising their work.
- To establish a mechanism within the competent authority that ensures that IED permits will be reviewed when BAT conclusion are changed, without having to rely on the operators.
- To change legislation so that the Competent Authority has the right to completely revise the permit situation of a company into a consolidated permit when this seems appropriate.
- Explore the cons and pros of having the same person at the competent authority to be responsible for permitting and enforcement.
- Discuss if it's possible to increase the fees for expert opinion in the permitting process. Use this budget to employ more staff for environmental inspections.
- Although there is no problem getting experts for environmental inspections at this point, when using the risk assessment differently the inspection frequencies will change and expert resources might be an issue. Start collecting key data on time allocated on environmental inspections by the experts so this can be used in the annual inspection programs.

Planning of inspections

- To change the procedures for planning of inspections by:
    1. Extend the step "describing the context" in the planning cycle with the state of the environment (from the monitoring unit) and priorities of the province and the competent authorities.
    2. See IRAM as added value and not as a mandatory tool. Use criteria and scoring system that will differentiate the low and high risk facilities. Set priorities that justify the importance of the different IED installations.
    3. Define objectives and (smart) targets on environmental outcome for the IED facilities. Define the performance indicators that can be used to monitor the performance of your organisation.
    4. Define inspection strategies that will be used to effectively and efficiently achieve the objectives and targets.
    5. Develop an annual inspection program as a strategic plan. Include important elements above like: environmental goals, the priorities, objectives and targets on outcome, performance indicators and inspection strategies. Revise your inspection program every year.

Execution Framework

- Develop handbooks and guidance for the coordinators (inspectors) to make sure work is done consistently, in a high quality and will give support to new staff.
- Develop a training plan (based on a training needs assessment) for the coordinators (inspectors), especially on inspection skills.
- Include the official experts in the training plan of the coordinators (inspectors) as trainers. They have important knowledge that could be exchanged.
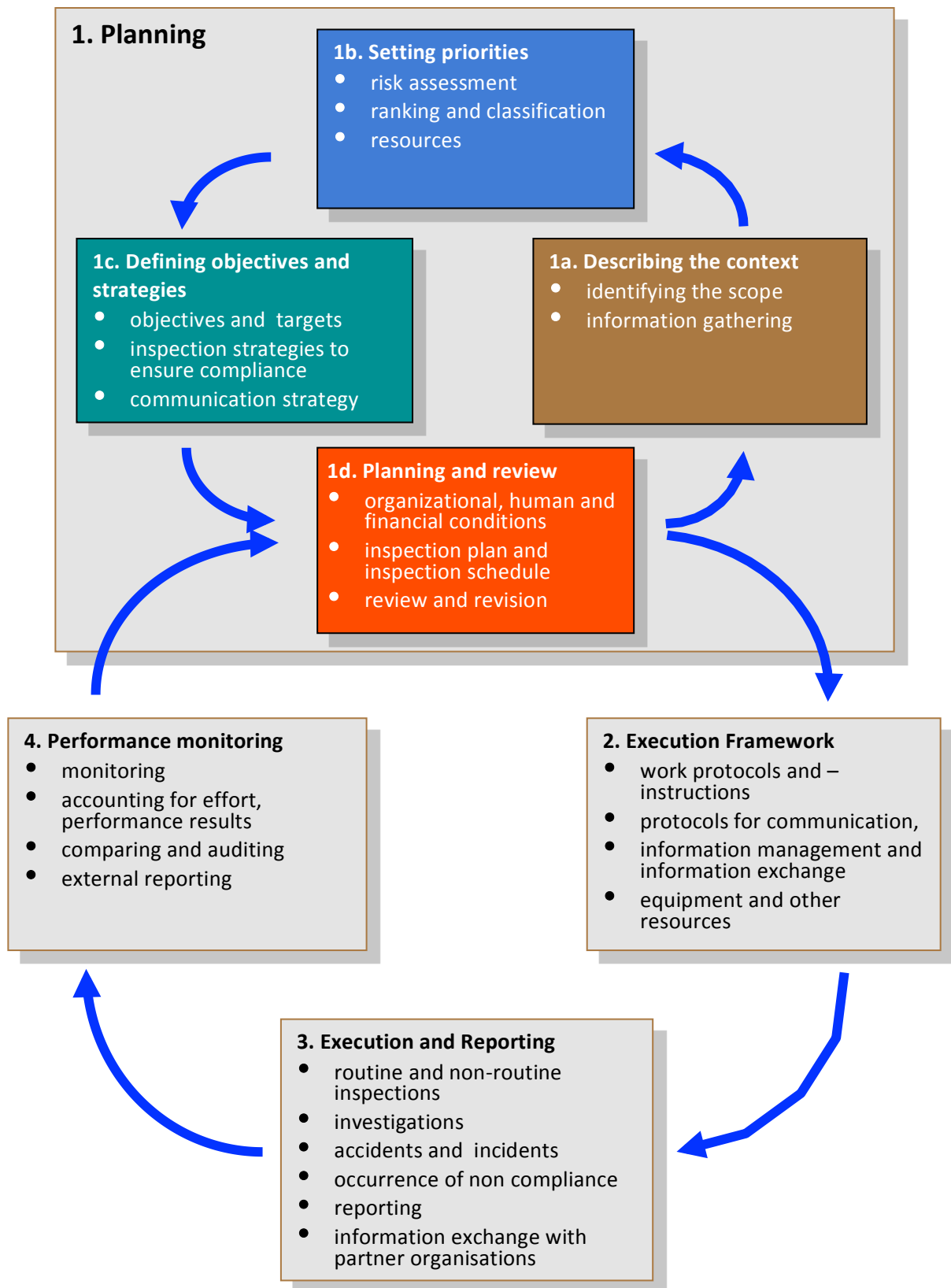
Executing and reporting

- Discuss if the role of the coordinators (inspectors) can be made stronger - transfer the coordinators into real inspectors. Advantages: less capacity and less coordination needed, more inspections possible.

Disadvantages: Less experts in the field could result in the situation that the inspector might not feel comfortable to demand measures. Overcome this disadvantage by changing the procedure, that reports need to be drafted on site.

- Encourage the coordinators and experts to act more as an inspection team by organising pre-inspection meetings.
- Define the check on the Environmental Management Systems of operators as mandatory subject during an environmental inspection.
- Explore if it's possible to streamline the questionnaires that are used by the different experts during the inspections. The questionnaires are now mostly custom made by the expert. A more uniformed approach could strengthen the use and inspection outcome.

Annex 1: Environmental Inspection Cycle

1. Planning

1b. Setting priorities
- risk assessment
- ranking and classification
- resources

1c. Defining objectives and strategies
- objectives and targets
- inspection strategies to ensure compliance
- communication strategy

1a. Describing the context
- identifying the scope
- information gathering

1d. Planning and review
- organizational, human and financial conditions
- inspection plan and inspection schedule
- review and revision

4. Performance monitoring
- monitoring
- accounting for effort, performance results
- comparing and auditing
- external reporting

2. Execution Framework
- work protocols and – instructions
- protocols for communication,
- information management and information exchange
- equipment and other resources

3. Execution and Reporting
- routine and non-routine inspections
- investigations
- accidents and incidents
- occurrence of non compliance
- reporting
- information exchange with partner organisations

Annex 2: Terms of Reference for IMPEL project

DRAFT 12.5.2015!

TOR Reference No.:	Author(s):
Version:	Date:
TERMS OF REFERENCE FOR WORK UNDER THE AUSPICES OF IMPEL	

1. Work type and title: IRI Austria Styria 2016

1.1 Identify which Expert Team this needs to go to for initial consideration	
Industry & Air	☑
Waste and TFS	☑
Water and land	☐
Nature protection	☐
Cross-cutting – tools and approaches -	☑
1.2 Type of work you need funding for	
Exchange visits	☐
Peer reviews (e.g. IRI)	☑
Conference	☐
Development of tools/guidance	☐
Comparison studies	☐
Assessing legislation (checklist)	☐
Other (please describe):	☐
1.3 Full name of work (enough to fully describe what the work area is)	
IRI Austria – Styria region	
1.4 Abbreviated name of work or project	

2. Outline business case (why this piece of work?)

2.1 Name the legislative driver(s) where they exist (name the Directive, Regulation, etc.)
Recommendation (2001/331/EC) providing for minimum criteria for environmental inspections (RMCEI), IED (2010/75/EC)

2.2 Link to IMPEL MASP priority work areas	
1. Assist members to implement new legislation	☐
2. Build capacity in member organisations through the IMPEL Review Initiative	☑
3. Work on 'problem areas' of implementation identified by IMPEL and the European Commission.	☐

2.3 Why is this work needed? (background, motivations, aims, etc.)

The IRI scheme is a voluntary scheme providing for informal reviews of environmental authorities in IMPEL Member countries. It was set up to implement the European Parliament and Council Recommendation (2001/331/EC) providing for minimum criteria for environmental inspections (RMCEI), where it states:

"Member States should assist each other administratively in operating this Recommendation. The establishment by Member States in cooperation with IMPEL of reporting and advice schemes relating to inspectorates and inspection procedures would help to promote best practice across the Community."

The potential benefits of the IRI include:

- providing advice to environmental authorities seeking an external review of their structure, operation or performance by experts from other IMPEL member countries
- encouraging capacity building in environmental authorities in IMPEL member countries
- encouraging the exchange of experience and collaboration between these authorities on common issues and problems
- spreading good practice leading to improved quality of the work of inspectors and other officials working within environment authorities
- environmental authorities and contributing to continuous improvement of quality and consistency of application of
- environmental law across the EU ("the level playing-field").

The European Parliament and Council Recommendation on Providing Minimum Criteria for Environmental Inspections in Member States (2001/331/EC)

Recommendation 2001/331/EC – Scope and definition. Article 4: "In order to promote best practice across the Community, Member States may, in cooperation with IMPEL, consider the establishment of a scheme, under which Member States report and offer advice on inspectorates and inspection

procedures in Member States, paying due regard to the different systems and contexts in which they operate, and report to the Member States concerned on their findings."

2.4 Desired outcome of the work (what do you want to achieve? What will be better / done differently as a result of this project?)

To undertake an IRI of the Austrian/Styrian Environmental Inspection system
The benefits of the project are:

- Austria/Styria will benefit from an expert review of its systems and procedures with particular focus on conformity with the RMCEI and the IED Directive.

- the participants in the review team will broaden and deepen their knowledge and understanding

of environmental inspection procedures

- other Member States will benefit through the dissemination of the findings of the review through the IMPEL network.

Austria/Styria will, in particular, benefit from an expert review of the risk based planning of future permitted IED installations which is currently being developed in Austria, taking into account the criteria in the RMCEI and the IMPEL Guidance book on inspection planning "Doing the right things".

2.5 Does this project link to any previous or current IMPEL projects? (state which project's and how they are related)
IRI's of all other MS Recommendation 2001/331/EC – Scope and definition. Article 4: "In order to promote best practice across the Community, Member States may, in cooperation with IMPEL, consider the establishment of a scheme, under which Member States report and offer advice on inspectorates and inspection procedures in Member States, paying due regard to the different systems and contexts in which they operate, and report to the Member States concerned on their findings."

3. Structure of the proposed activity

3.1 Describe the activities of the proposal (what are you going to do and how?)
This particular IRI will include the following aspects: • give an overview of the main national environmental policies applicable to the authority, • legal and constitutional setting of the authority, • structure and managerial organisation, including funding, staffing and lines of authority and responsibility for regulatory and policy functions, • procedures for assessment of training needs and provisions for training and maintaining current awareness, • qualifications, skills and experience of inspection staff, • overview of the environmental permitting regime. • workload related to IPPC sites & other industries in terms of permitting and compliance requirements, • setting the priorities for IPPC and other installations: the evaluation aspects, the risk assessment and classifications of risk, • procedures, criteria and guidance for the development and revision of inspection plans and inspection schedules, • procedures for carrying out of routine and non-routine inspections, including follow-up and reporting, • procedures related to penalties in cases of non-compliance with permits or illegal activities, • performance monitoring: evaluation of the output and where feasible environmental outcome of inspection activities. The assessment of the quality of inspection

performance and for improvement if appropriate,

- relationships between public environmental authorities in charge of controls and self-check / self-monitoring systems,
- systems used to collect and store data on the Inspectorate's activities and the use of these data.

3.2 Describe the products of the proposal (what are you going to produce in terms of output / outcome?)

In addition to the benefits listed in Section 1.6, tangible products will include:
- A written report of the review for Austria,
- Relevant extracts from the review report, as agreed with Austria, for dissemination to IMPEL members and the European Commission, Training and Educational material on "lessons learnt" and on examples of good practice for incorporation into training schemes of IMPEL member country inspectorates.

3.3 Describe the milestones of this proposal (how will you know if you are on track to complete the work on time?)

- Preparatory meeting – 3 days in February 2016 in Graz
- Project meeting – 4-5 days in Graz – June 2016

3.4 Risks (what are the potential risks for this project and what actions will be put in place to mitigate these?)

4. Organisation of the work

4.1 Lead (who will lead the work: name, organisation and country) – this must be confirmed prior to submission of the TOR to the General Assembly)

Mr Ulf Steuber, State of Styria - Austria

4.2 Project team (who will take part: name, organisation and country)

- IRI review team – to be decided. Participants from Germany and Czech Republic have been confirmed. Participants from Turkey (last IRI) and Wallonia? (next IRI)
- FM of the Environment Austria
- Provincial Government Styria

4.3 Other IMPEL participants (name, organisation and country)

4.4. Other non-IMPEL participants (name, organisation and country)

5. High level budget projection of the proposal. In case this is a multi-year project, identify future requirements as much as possible

DRAFT!	Year 1 (exact)	Year 2	Year 3	Year 4
How much money do you require from IMPEL?	€ 7.590,00			
How much money is to be co-financed				
Total budget	€ 7.590,00			

6. Detailed event costs of the work for <u>year 1</u>

	Travel € (max €360 per return journey)	Hotel € (max €90 per night)	Catering € (max €25 per day)	Total costs €
Event 1 *Preparatory meeting* *February 2016* *Graz* *2* *3 days / 2 nights*	2 x € 360,00 = € 720,00	2 x € 90,00 x 2 = € 360,00	2 x € 25,00 x 3 = € 150,00	€ 1.230,00
Event 2 *IRI Project* *June 2016* *Graz* *8* *5 days / 4 nights*	8 x € 360,00 = € 2.880,00	8 x € 90,00 x 4 = € 2.880,00	8 x € 25,00 x 3 = € 600,00	€ 6.360,00
Total costs for all events	€ 3.600,00	€ 3.240,00	€ 750,00	€ 7.590,00

7. Detailed other costs of the work for year 1

7.1 Are you using a consultant?	☐ Yes ☑ No
7.2 What are the total costs for the consultant?	
7.3 Who is paying for the consultant?	
7.4. What will the consultant do?	

7.5 Are there any additional costs?	☑ Yes ☐ No
7.6 What are the additional costs for?	Host country Austria/Styria Namely: Meeting room, dinner, travel within Austria, etc.
7.7 Who is paying for the additional costs?	Host
7.8. Are you seeking other funding sources?	☐ Yes ☑ No Namely:
7.9 Do you need budget for communications around the project? If so, describe what type of activities and the related costs	☐ Yes ☑ No Namely:

8. Communication and follow-up (checklist)

	What		By when
8.1 Indicate which communication materials will be developed throughout the project and when *(all to be sent to the communications officer at the IMPEL secretariat)*	TOR ˅ * Interim report ˅ * Project report ˅ * Progress report(s) ˅ Press releases News items for the website ˅ * News items for the e-newsletter Project abstract ˅ * IMPEL at a Glance ˅ Other, (give details):	☑ ☐ ☑ ☐ ☐ ☑ ☐ ☑ ☐ ☐	September 2015
8.2 Milestones / Scheduled meetings (for the website diary)	.. February 2016 Preparatory meeting Graz .. June 2016 IRI Graz		
8.3 Images for the IMPEL image bank	☐ Yes ☐ No		
8.4 Indicate which materials will be translated and into which languages	• Final Report in English and German • Project abstract (website) in English and German		

8.5 Indicate if web-based tools will be developed and if hosting by IMPEL is required	
8.6 Identify which groups/institutions will be targeted and how	Federal Ministries and all 9 provincial governments (Länder) and interested people by the website FM Environment, Styrian Government;, and seminars and IMPEL homepage.
8.7 Identify parallel developments / events by other organisations, where the project can be promoted	-

ˇ) *Templates are available and should be used. *) Obligatory*

9. Remarks

Is there anything else you would like to add to the Terms of Reference that has not been covered above?

In case of doubts or questions please contact the IMPEL Secretariat. Draft and final versions need to be sent to the IMPEL Secretariat in word format, not in PDF. Thank you.