



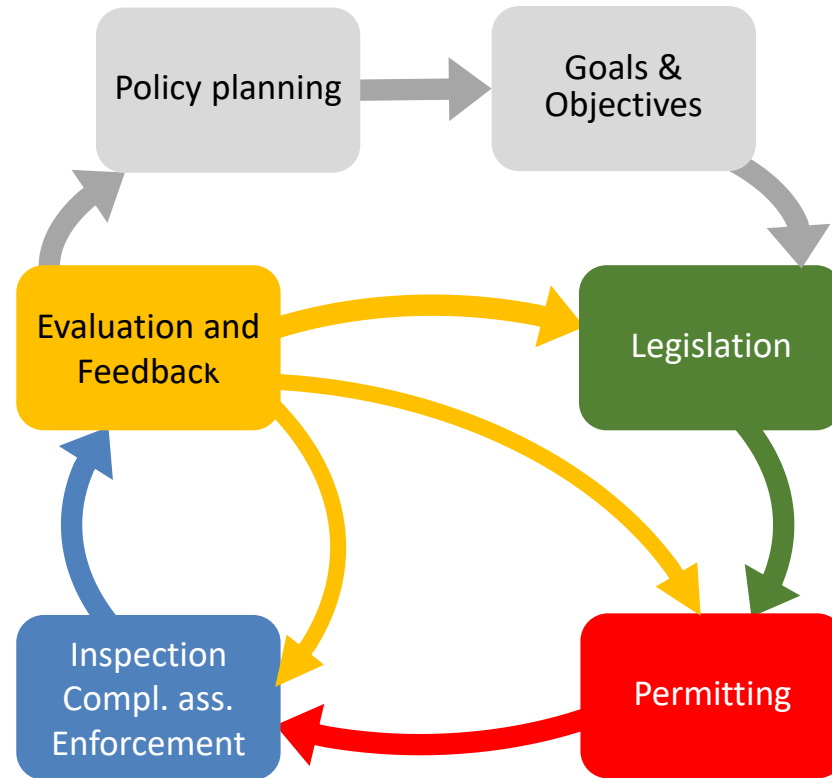
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**EU4Environment**  
Green Economy in Eastern Partner Countries

5 December 2022

# “Doing the Right Things” Methodology

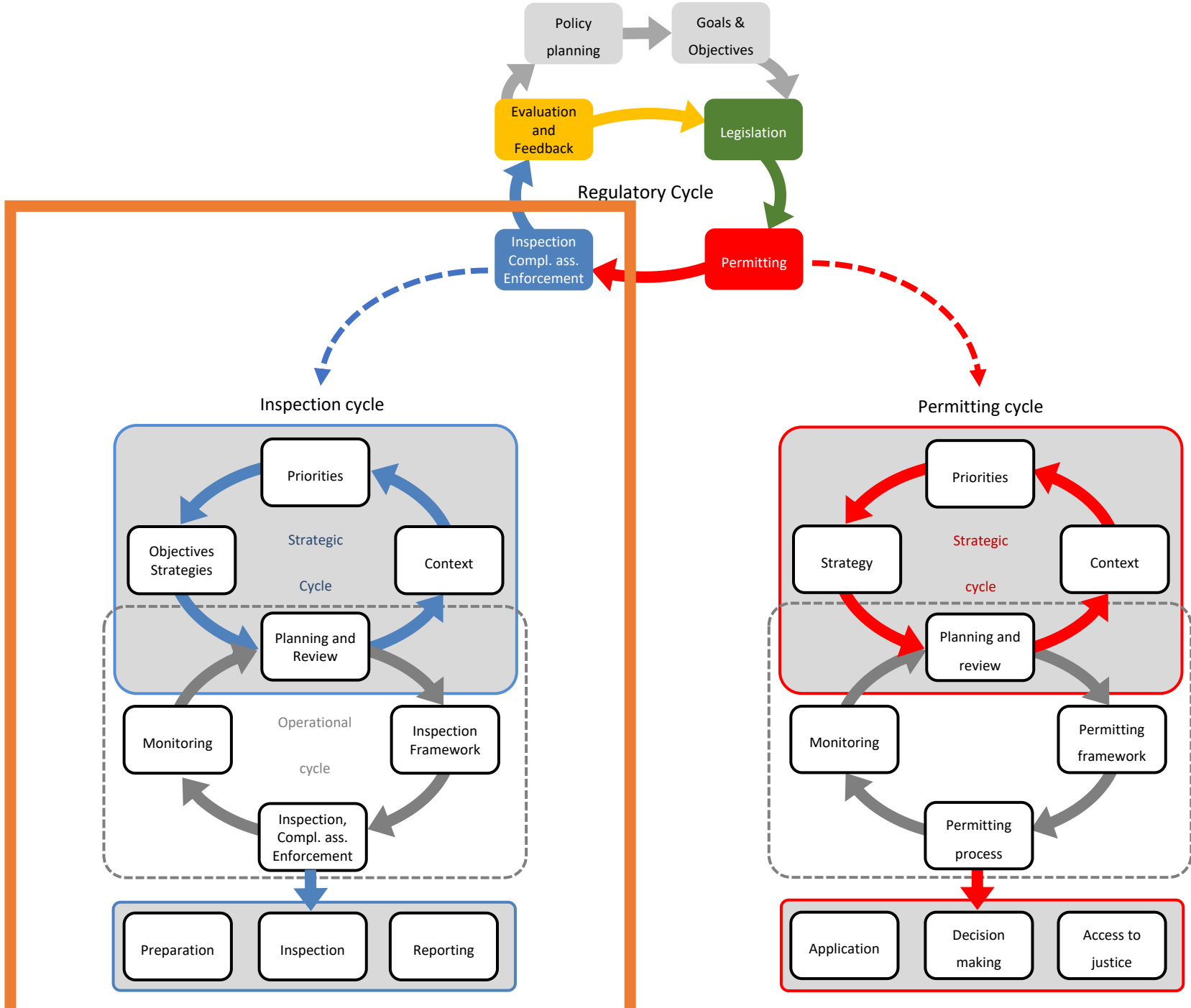
# Regulatory Cycle



- Steps are interrelated
- Missing or underdeveloped step effects the steps that follows

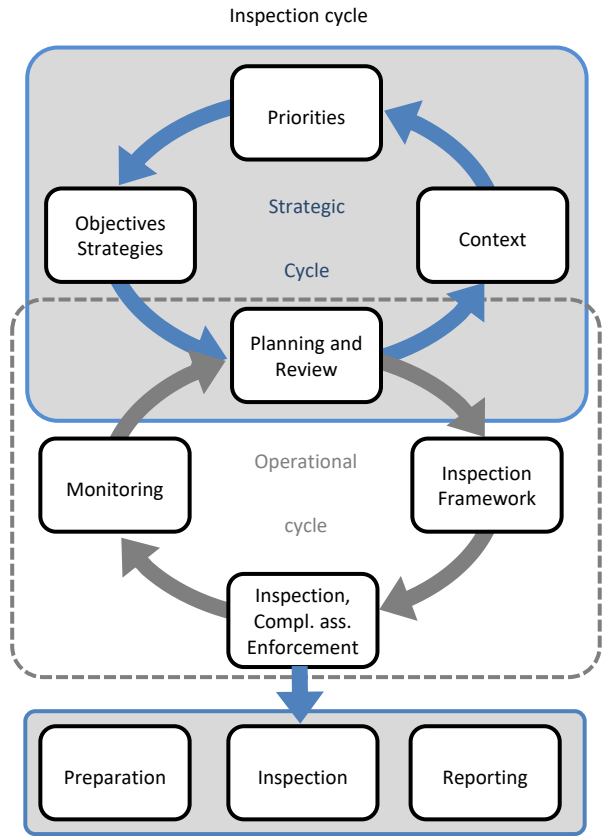
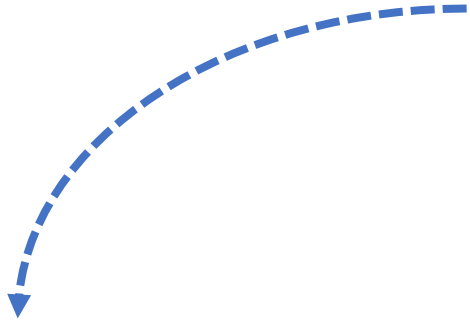
e.g.

- Inspection is effective if permits or legislation is adequate
- Monitoring makes only sense if an inspection system is in place



Permitting

Inspection  
Compl. ass.  
Enforcement



Inspection cycle

Strategic  
Cycle

Context

Operational  
cycle

Identifying the scope and gathering information to describe policy, priorities, objectives and strategies.

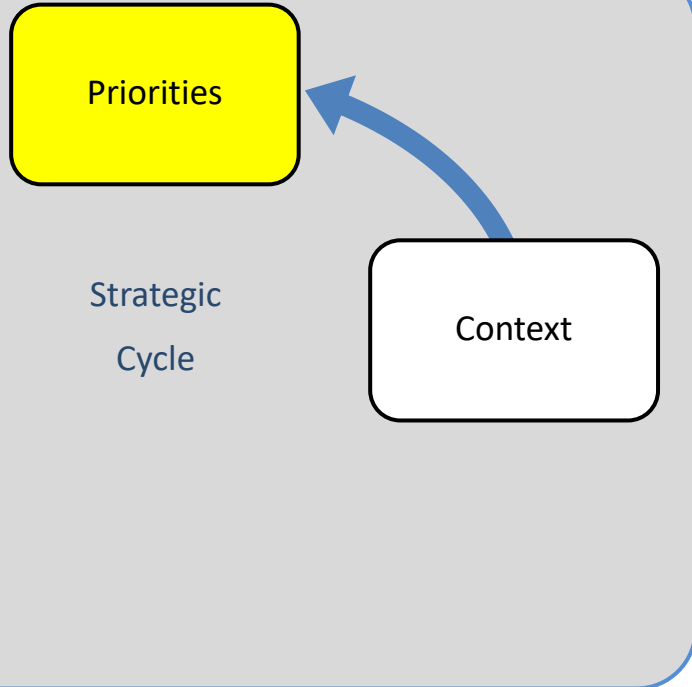
Identifying the scope

- Geographic area
- Established environmental policy and priorities
- Missions and goals
- SDG's
- Environmental outcome that needs to be achieved
- Statutory tasks and competences
- Applicable legislation
- Interests of stakeholders
- Public opinions
- Register of activities / installations

Gathering information

- State of the environment
- Monitoring data
- Installation specific info: Location, Permit situation, Performance records, Emissions, Complains, Incidents and accidents, Complexity
- Compliance behaviour,
- Frequency of inspections
- Changes in legislation
- Quality in enforceability
- etc

Inspection cycle



Operational  
cycle

Setting priorities is done through a risk assessment that will result in a list of inspection tasks or objects that are ranked and classified.

- But what if your organisation also has other tasks besides EID?
- Before you assess the risk of your IED installations, you do a risk assessment on a more general level.
- To assess how important your tasks are compared to each other and to prioritise them.
- If necessary adapt your organisation so you can achieve the goals that are linked to these priorities
- This is called: **Strategic Alignment**
  
- To easily adapt your organisation you need a flexible organisation
- However, most organisations are structured by legislative tasks

Risk assessment (RA):

- There are different methods of risk based approach
- IMPEL developed Integrated Risk Assessment Method
- Output general risk assessment: list with prioritised tasks
- Output detailed RA: list ranking high, medium and low risk activities or installations

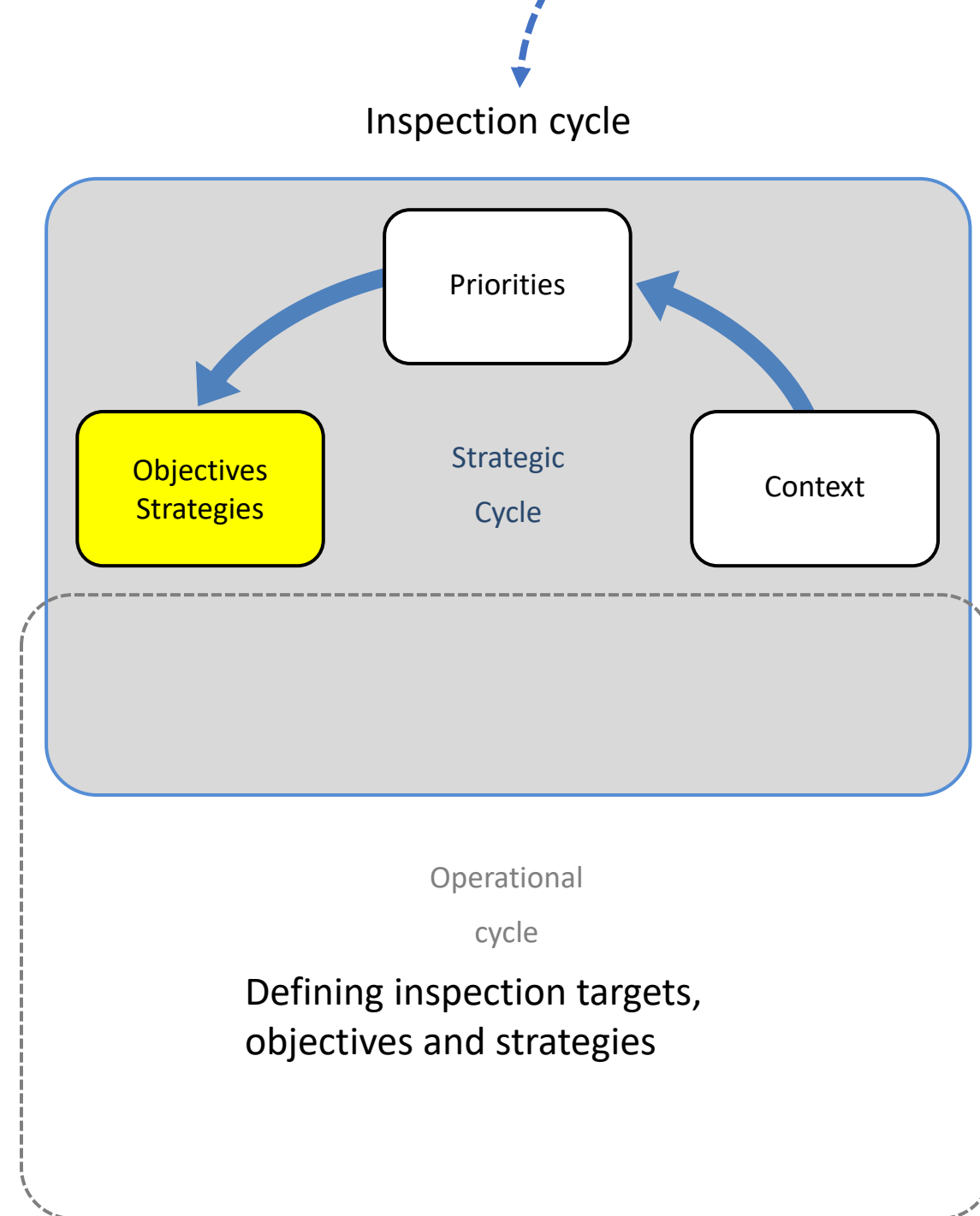
Objectives describe what you want to achieve, strategies describe how you want to achieve it.

#### Objectives:

- Objectives are directly related to inspection activities and could be derived from the overall goals the authority wants to achieve
- Make objectives more concrete with SMART targets
- Difference of input, output and outcome
- With outcome the authority shows her added value
- Performance indicators to monitor if (multi annual) objectives are going to be achieved

#### Strategies:

- Inspection strategies to ensure compliance.
- Objectives describe what you want to achieve, strategies describe how you want to achieve it
- The different ways of compliance checking
- Compliance promotion activities
- Intervention strategies



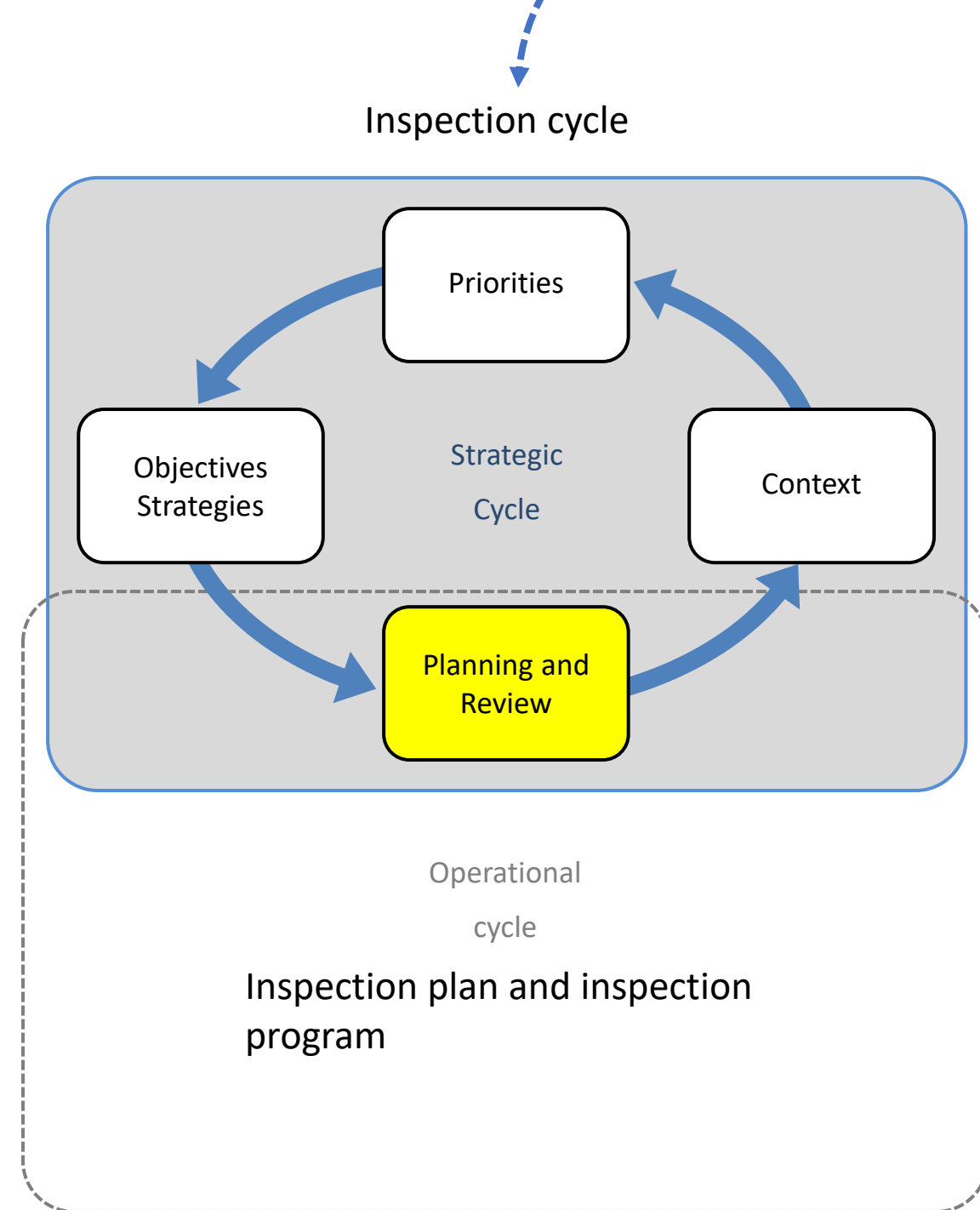
- Planning is based upon the previous steps
- Plan is publicly available
- For some legislation (e.g. EID) plan is mandatory

#### Inspection plan (strategic)

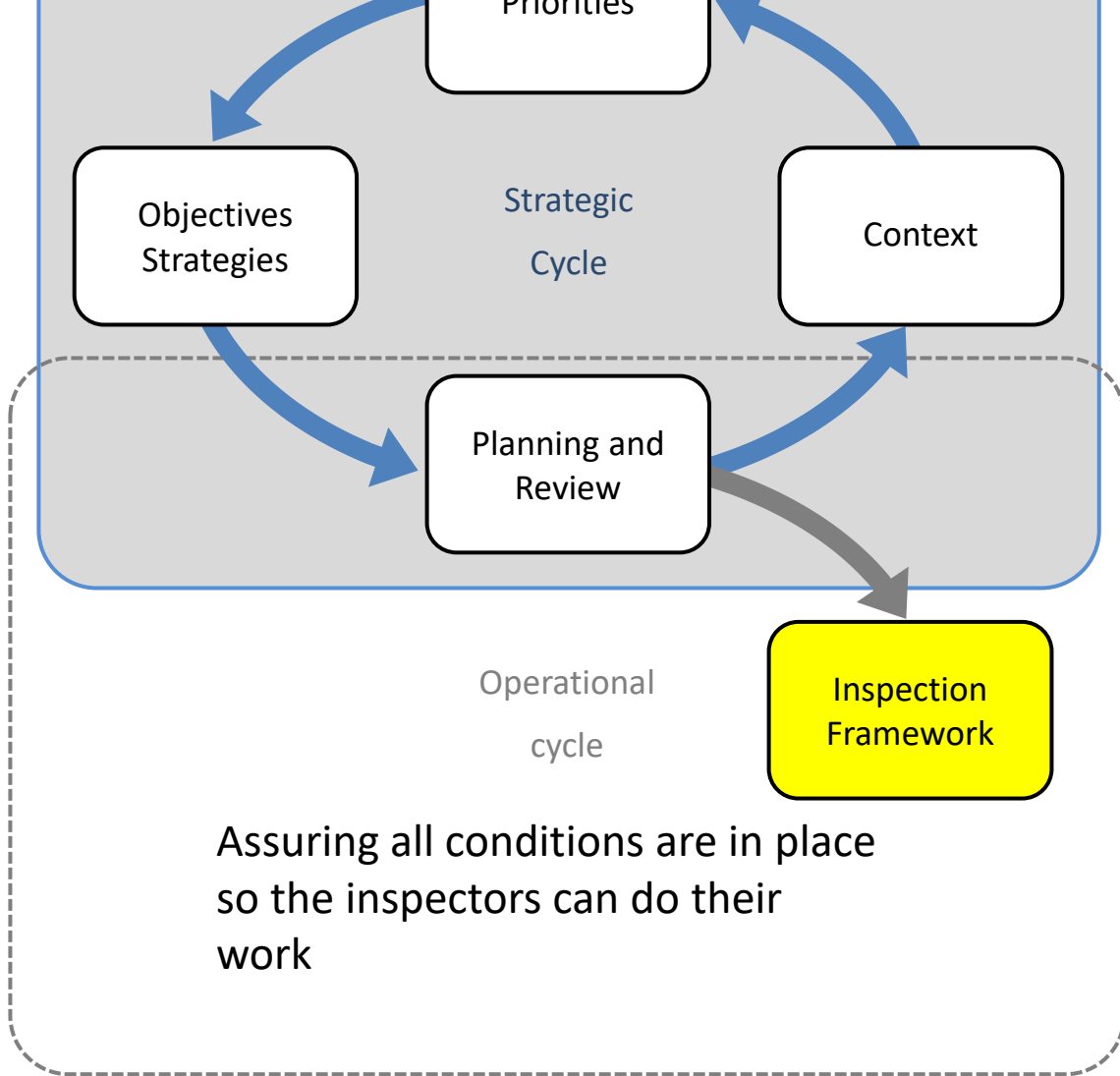
- Defined time period and area
- Scope
- Priorities
- Objectives and targets
- Inspection activities
- Strategies and procedures

#### Inspection programme (operational)

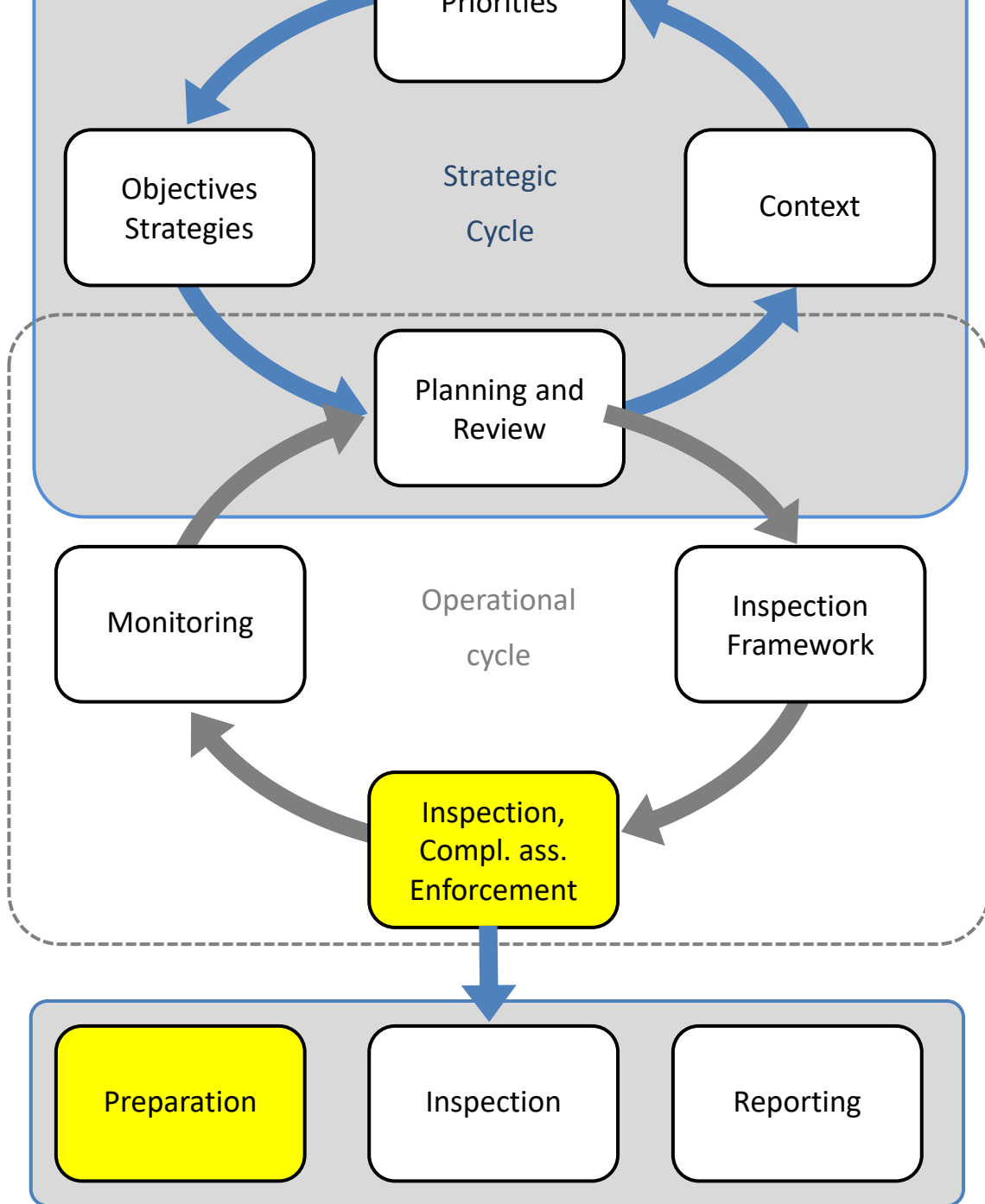
- Defined time period
- List of installations to be inspected
- Inspectors or inspection units
- Type of routine inspections
- Date, time and frequency
- Amount of time and staff needed
- Co-operation with other authorities





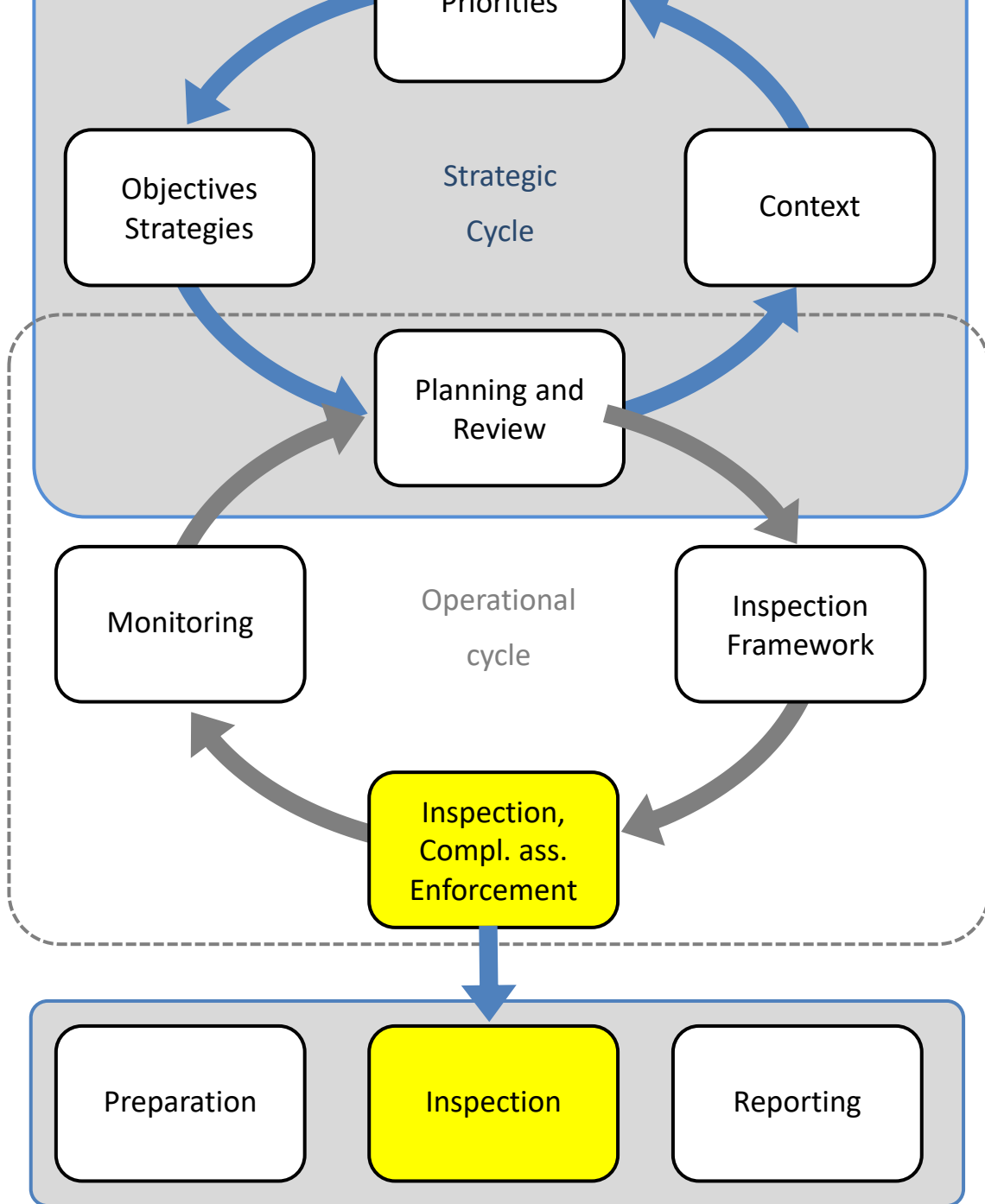


- Training programmes
- Protocols and working instructions for (non) routine inspections
- Procedures for sanctions
- Development of inspection and enforcement handbooks
- Protocols for communication (public, industry)
- Information systems and information exchange
- Provisions and memorandum of understandings with relevant partners
- Clear authorisations and competencies
- The necessary assistance from the operators to carry out inspections or take samples
- System for planning, programming and monitoring
- Facilities and materials needed (e.g. computers, transport, means of communication)
- Maintenance and calibration of equipment
- etc



Preparation of inspections

- Type of inspection
- Staff or inspection team
- (safety) equipment
- Gathering information and data
- Inspection tools
- Inspection checklist
- Inspection agenda?
- Announce an inspection?

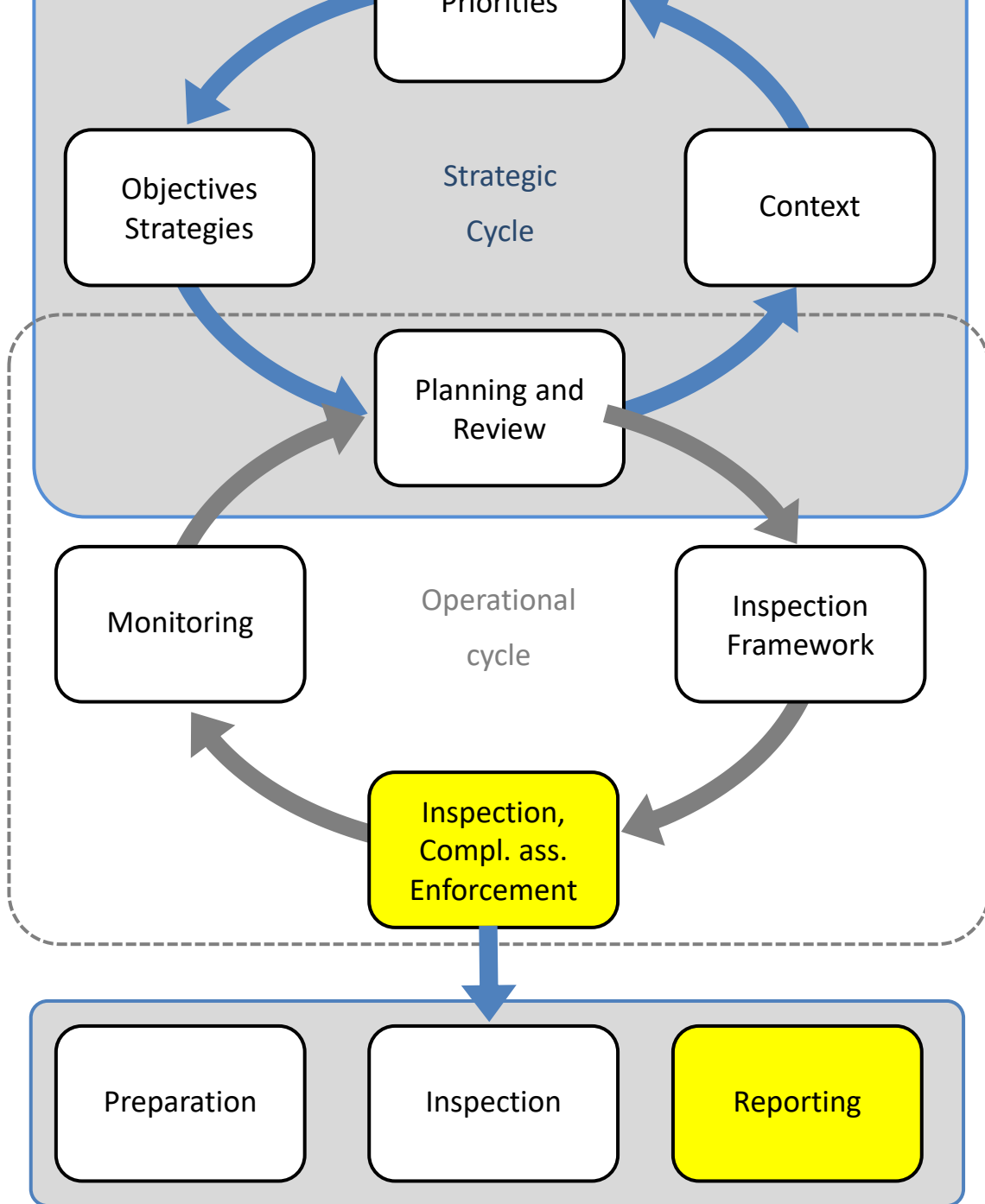


### Routine inspections

- Monitoring the emissions
- Verification of self-monitoring
- Check internal reports
- Follow-up documents
- Checking of techniques used
- Physical inspection of installation
- Environmental management of installation
- etc

### Non-Routine inspections

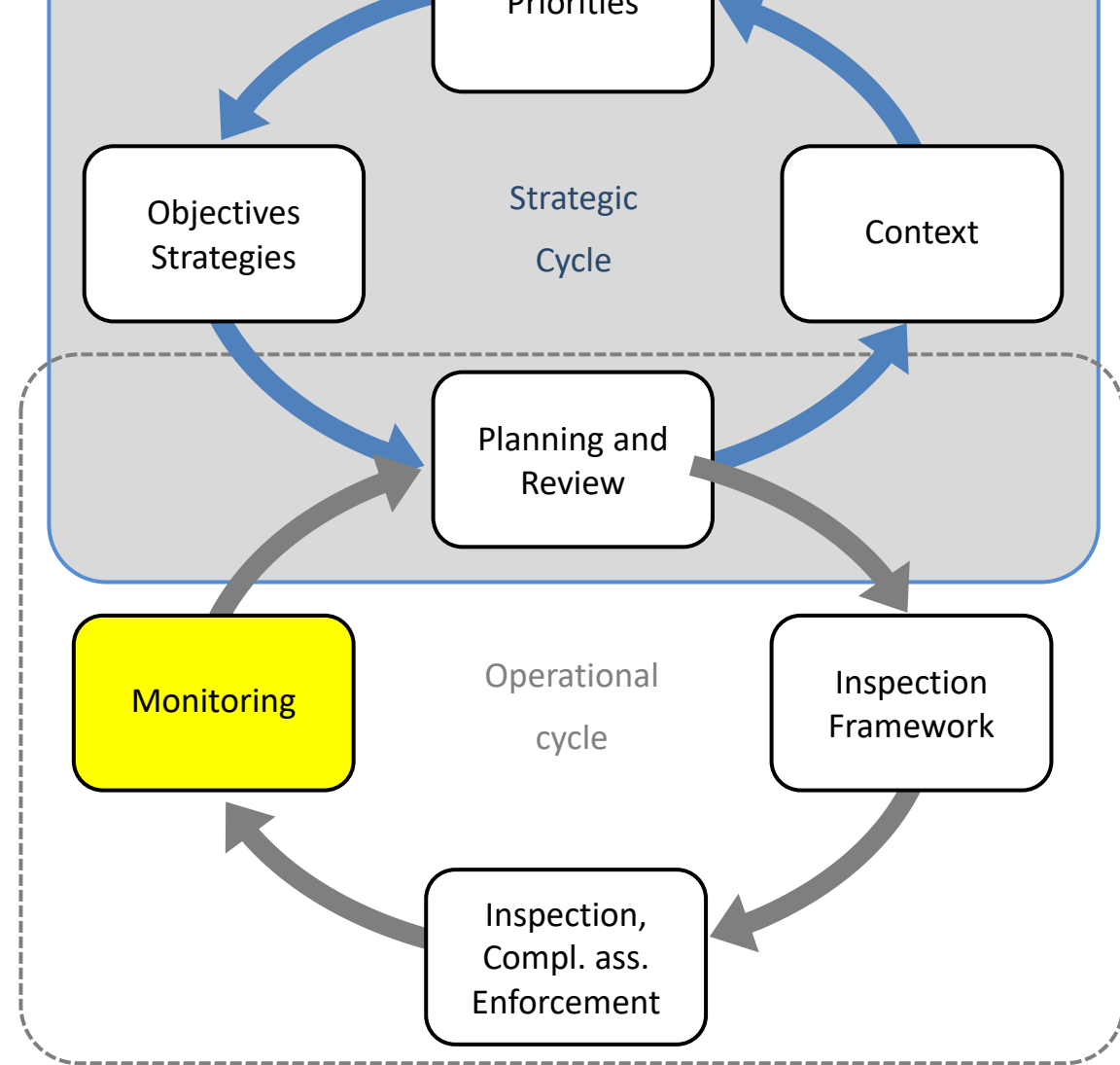
- Complaints, incidents or accidents
- Clarify cause of impact
- Responsibilities, liabilities and consequences
- Actions to mitigate / remedy the impact
- Actions of prevention
- Actions taken by operator
- Enforcement actions



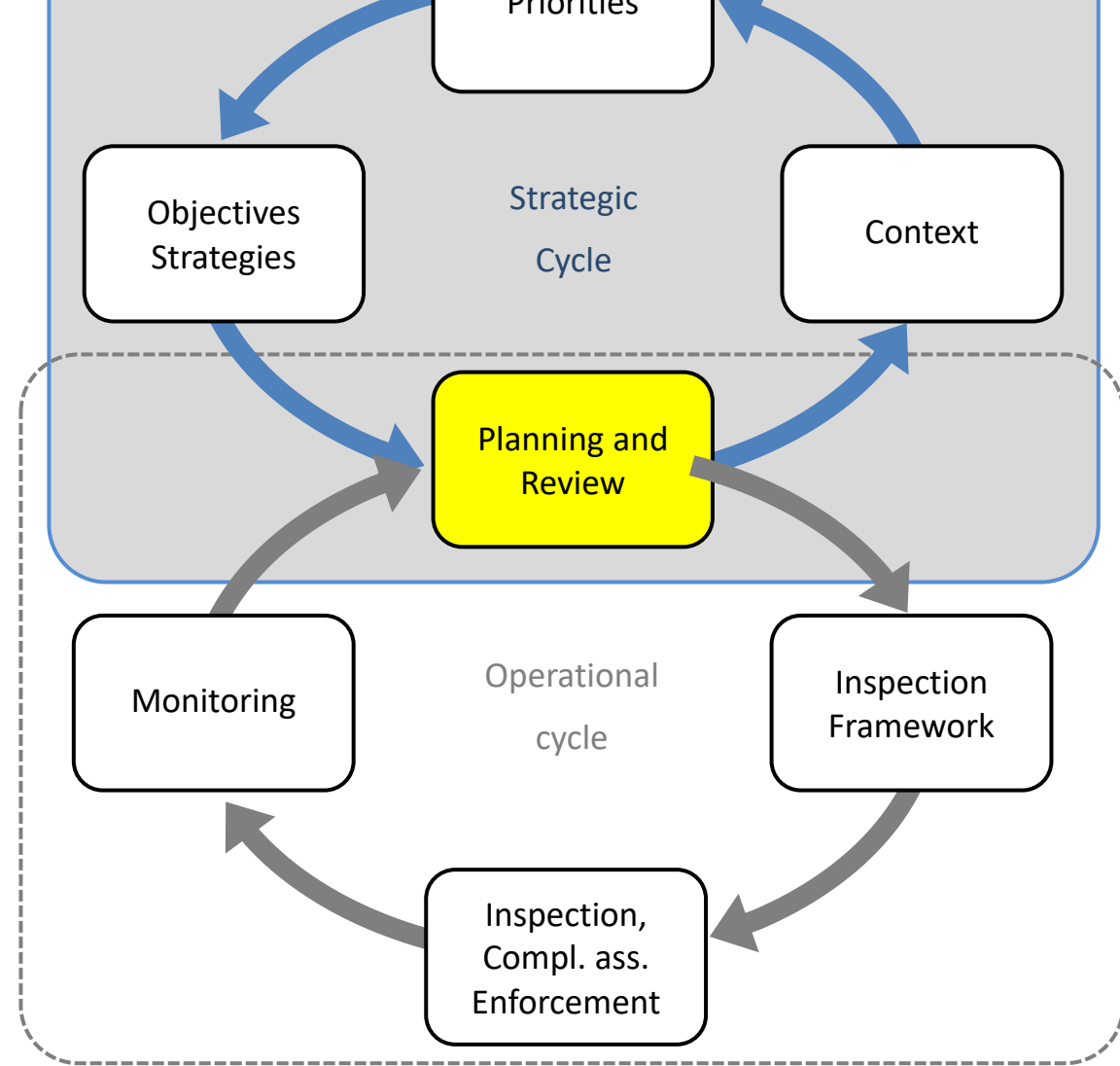
### Reporting of inspections

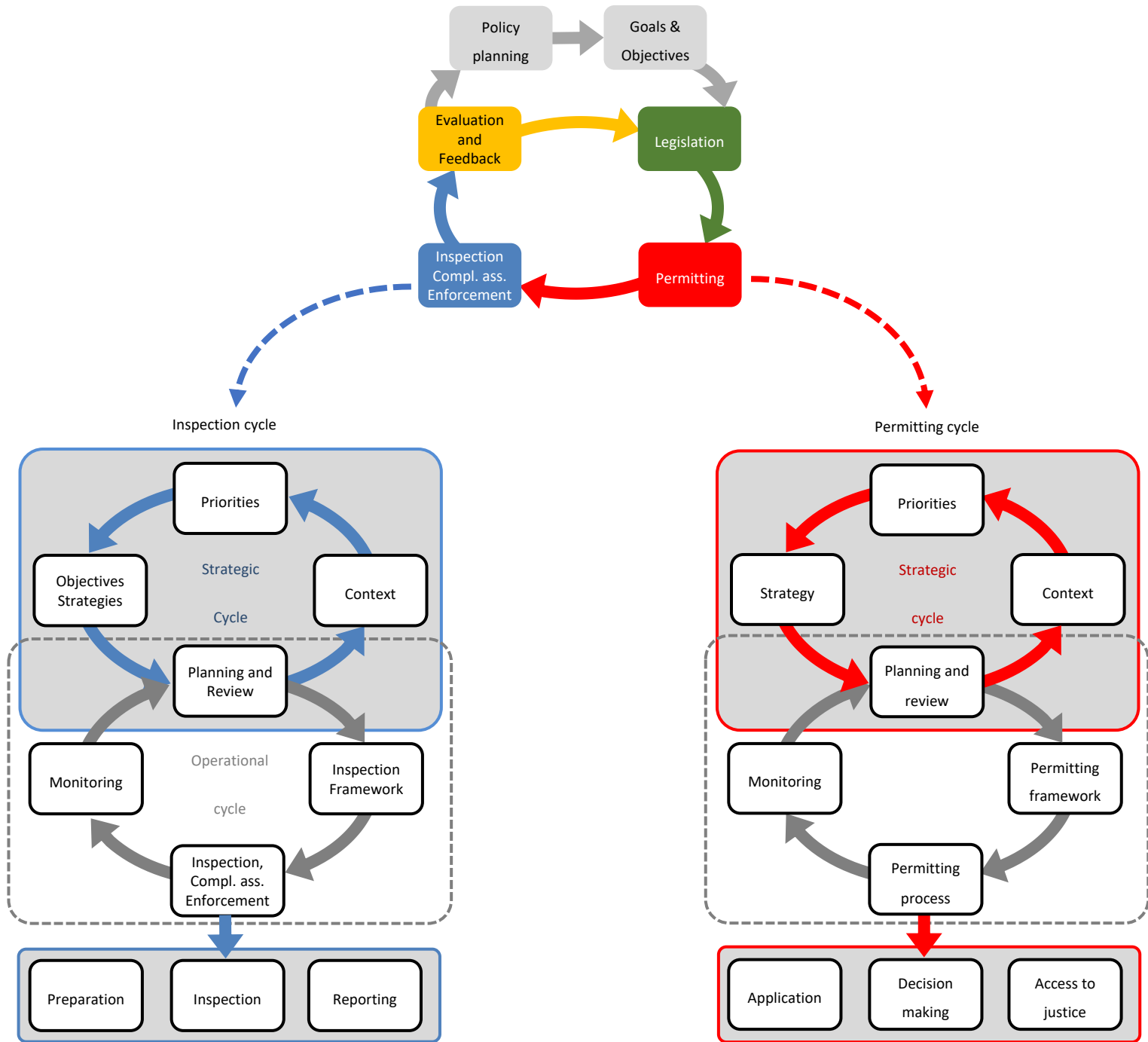
- After a site visit
- Process/ store inspection data
- Evaluation for further actions;
- Finalised a.s.a.p.
- Keep record of reports
- Accessible database
- Notified to the operator (within 2 months after an inspection is completed)
- Publicly available (within 4 months after an inspection is completed)
- Exchange information with partner organisations

- Monitoring to make sure we meet the objectives set in our inspection plan and programme.
- Did we achieve the objectives that we have set
- What was the effect of our work --> the outcome



- Closing the cycle
- Are there changes in the context, have priorities changed, then strategic cycle
- Otherwise we continue in the operational cycle





Thanks for your attention