



Minutes V08.01.2020

19th IMPEL General Assembly

19-20 November 2019
Helsinki, Finland

Tuesday 19 November 2019

Session 1: Welcome & Opening address

Chair: *Juha Lahtela*

Juha Lahtela opened the meeting and welcomed all the participants to the city of Helsinki for the 19th IMPEL General Assembly.

1. Opening address by Chair of IMPEL

General Director Leena Ylä-Mononen warmly welcomed all the participants to Helsinki. She emphasised the importance of enforcement of environmental law. She highlighted the importance of IMPEL's work to ensure enforcement. She wished a fruitful discussion to the General Assembly.

2. Statement by the Chair of this session about the late submission of documents for this General Assembly meeting

Juha Lahtela informed the General Assembly about the late submission of documents. No objections are received from the General Assembly about the late submission.

3. Adoption of the agenda

Alessandro (Italy) suggested to change the order of the agenda items and to have the election of Chair and Vice Chair on the morning of 20 November.

General Assembly agreed to change the agenda accordingly.

4. Key note speech from Director of DG Environment, Aurel Ciobanu Dordea

Mr Dordea started his words with thanks to the host. He emphasised the importance of compliance and enforcement and IMPEL's role towards better implementation. Environment and climate change are high priority for the Commission. Priorities of the Commission are biodiversity, circular economy and zero pollution ambition.

Commission's expectations from IMPEL always grow and the resources offered also grow. Effectiveness of compliance assurance authorities is important. Work of IMPEL helps the work the member organisations domestically.

Next ECA meeting will take place in February 2020. Mr Dordea invited IMPEL to the meeting and said that draft work programme of ECA will come in February.

Mr Dordea emphasised that IMPEL and the Secretariat is growing rapidly. Commission will continue to support IMPEL financially. The key to a successful growth is to know how to use the resources efficiently.

Waltraud Petek (AT) asked about the how the zero pollution ambition would be implemented.

Mr Dordea said that it is early to comment much about this issue. Most of the attention will fall on implementing the existing obligations. For instance, obligations on water. There is chronic exceeding of standards. There will be a lot of work on implementation. There will be zero tolerance approach soon. Target will be zero exceeding in air quality, good drinking water, and no illegal landfilling. Often this is about investments. How we work with local authorities is important.

Juha Lahtela thanked Mr Dordea for his speech and highlighted the importance of IMPEL's role in implementing these goals.

Session 2: Ongoing management of the IMPEL network

Chair: *Kristina Rabe*

1. Resignation of Chair, Dimitris Dermatas

Kristina Rabe provided a short introduction about the issue. General Assembly received the letters about the resignation. This issue was also discussed in the National Coordinators Meeting which took place on 18 November. There is a difference between resignation and dismissal of Chair (Article 13). Resignation is declaration of will. Kristina proposed the General Assembly to accept the decision made by Chair with thanks for his engagement.

Jean Luc Perrin (FR) thanked Dimitris and the Board for their efforts and emphasised the importance of finding solutions for future.

Ana Garcia (PT) took the floor and she also spoke on behalf of the former IMPEL chair Chris Dijkens, as former Chair and Vice-Chair, recognizing the warning signals as they had also experienced in several situations and occasions during their mandate, that show that all needs to be done to achieve a situation of sound governance of the network based on openness, constructive dialogues and mutual respect. She expressed it was also fair towards the Chair that stepped down that the GA expresses its acknowledgement and gratitude for Dimitris' work and efforts, to help implementing IMPEL's ambitions, vision and strategy for the coming years as included in IMPEL's Position Paper and as was approved by us as General Assembly and to provide proposals to improve the governance of our network. IMPEL's governance, internal structure and organisation needs a profound, serious and timely reflection and assessment and was strongly recommended.

Alessandro Peru (IT) highlighted the importance of understanding the reasons of this resignation and said that he hopes things would be better in the future.

Henk Ruessink (NL) agreed with Ana that there are signals. Netherlands is not waiting for details about what happened. IMPEL should look at the root causes. Huge time consumption is needed. It is almost a full-time job. IMPEL should look into this issue to learn what happened. Reasons should be analysed. Session 6 on External Assessment is already in the agenda.

Decision: The GA approved the decision to accept resignation of former Chair and thank him for his work.

Session 3: European Compliance Assurance (ECA) Initiative

Chair: *Kristina Rabe*

Chair explained the purpose of this session and gave the floor to Simon Bingham to explain the state of play regarding the ECA Initiative.

1. ECA Initiative

Simon Bingham gave an overview of the developments in the last couple of years regarding the ECA Initiative. The journey started with Next Generation IMPEL Position Paper in 2017. The question is: Where does IMPEL want to be in 10-15 years? IMPEL started considering Knowledge and Innovation Centre.

Simon gave information about all 9 actions of ECA Initiative and mentioned the ones that IMPEL is involved in.

As Mr Dordea mentioned there will be a High Level ECA Forum in February next year.

Simon said that IMPEL was represented in the previous meeting by former Chairs. Chris Dijkens attended the meeting in December 2018 and Dimitris Dermatas attended the meeting in May 2019.

Mr Dordea announced the date of the next ECA meeting as 14 February.

Chair: *Juha Lahtela*

2. Contributions by IMPEL

a) Michael Nicholson made a short introduction about Enforcement Actions. Enforcement Actions for TFS has been running for many years and delivered important outcomes. The model this program established, can be implemented in other areas. TFS Enforcement Actions establish collaboration from different authorities in the compliance chain.

It is now possible to apply this in other thematic areas. IED joint inspections and green force fit well in this scheme. Michael raised the following questions: Can we go further? Can we look for other areas?

- Simonne Ruffener took the floor to explain the developments on this issue under SWEAP. SWEAP covers not only enforcement but also compliance promotion and inspections. There are 5 work packages. These are: capacity building and training, innovative enforcement tools, co-ordinated inspections, international collaboration and intelligence gathering and sharing.

- Alfred Dreijer gave information about the GreenForce Project. Goals of the project are develop new tools, forensics and methods, facilitate operational networking and enforcement actions, support the adoption of more effective and harmonised prosecution strategies, share knowledge on current trends in wildlife crime, organising training activities and to organize joint enforcement actions involving more EU member states. Project is in the stage of finding partners and finances.

- Horst Buether explained the joint inspections carried out under the IED Project. 14 inspections are carried out in last 5 years in 10 host countries. 33 inspectors from 20 countries attended. Goal of joint inspections is to exchange procedures and tools, knowledge, Inspection approaches, innovations in industry, application of BAT, check lists, and how to deal with non-compliance. 6 joint inspections are planned for 2020.

Henk Ruessink (NL) asked Horst to explain how the experiences are shared after the joint inspections.

Horst said that the leader of the group is Marinus Jordaan from the Netherlands. He developed guidance for joint inspections. It covers all the aspects of this activity. The team also want to develop training materials for inspections.

Kristina Rabe (DE) asked Alfred whether there was any work on protected species.

Alfred told that this issue was not mentioned in GreenForce Project proposal. But it is one of the important aspects we can include this in the project.

Michael gave information about the application status of GreenForce Project. IMPEL contacted ISFP fund (DG Home). The project proposal was rejected since IMPEL was the beneficiary of the project. IMPEL is now looking for alternatives for funding.

b) Patricia Weenink gave a presentation about IMPEL Review Initiative (IRI). IMPEL started carrying out IRI's in 2001 and changed it since that time. It is possible to carry out an IRI on different aspects such as permitting, inspection, nature etc. There are a number of countries that had no IRI yet. IMPEL agreed to carry out 4 IRI's every year. But this number can be higher in the future. IMPEL wants to support countries to implement areas with opportunities with development. IMPEL wants to have water (blue) and waste IRI next year. Where possible include other partners such as judges, police etc. can be included in the study. There are lots of choices for the countries if they want to have IRI. Increasing number of team leaders and rapporteurs is also necessary.

In 2020, Iceland will have IRI on permitting and Luxembourg will have IRI on permitting and inspections. Other potential countries are Greece and Switzerland. Patricia asked the members of the General Assembly to contact her if anyone wants to take part in these IRI's.

c) Tony Liebrechts gave a presentation about the work done on Capacity Building & Training. Milieu was assigned by the Commission in 2018 to carry out Training Needs Assessment. IMPEL has been working to develop a programme for capacity building and training. Project ToR was presented last year in Vienna and then was revised and approved via written procedure in April. Consultancy cost is taken out of the budget. This work will be carried out by the new IMPEL member Infomil. Specific Grant Agreement is approved by the Commission. Soon the agreement will be signed. The plan is to start in December.

There are 3 pillars (WP). WP1: Multiannual strategy, WP2: Knowledge and Innovation Centre: finding the best way to organise, WP3: Toolkit: what is already been developed by IMPEL, what should be developed in future. Good involvement from all members is needed.

Milieu presented the conclusions and recommendations in the report. Tony emphasised that this work is dynamic. The needs of the members and legislation continuously change. Monitoring changes and progress is important.

Hans Lopatta (Commission) said that the Commission has received the report and asked whether IMPEL would send a list of training needs.

Tony said that it would be possible to send a list in December.

Kristina Rabe (DE) asked whether the language problems for trainings and guidance documents are addressed or not in the study.

Tony explained that this issue was discussed within the team. The idea is to organise a train the trainer programme. The trainings can be given in English. Translation of guidance documents is related to the budget. It is not possible to translate all the documents to all the languages. This would have a very high cost.

Waltraud Petek (AT) asked how the Knowledge and Innovation Centre would be structured.

Tony said that there is no final decision on this issue. In pillar 2 the project team will look for alternatives.

d) Marco Falconi gave a presentation about Mining Waste as a source of raw materials (ECA Action 6). He provided information about Mine Waste Management Project. The project aims to compare the transposition of the 2006/21/EC by Member States in order to assess any critical issues to be improved and to find also the better management for extractive waste of closed or abandoned facilities, also to evaluate them as new sources of raw materials. Marco explained a case study from Italy about active and closed mines. Marco emphasised the importance of participation from all countries and asked volunteers to contact him.

Jean Luc Perrin (FR) said that this was an interesting project and we should analyse what is in the directive and what is not.

Hans Lopatta (Commission) mentioned this is challenging topic and said that they could organise a workshop together with the policy makers.

Session 4: Climate Change Emergency

Chair: *Juha Lahtela*

Simon Bingham gave a presentation on behalf of the Board regarding a proposal for IMPEL to contribute to tackling emissions. He explained calculations made to estimate the impact of travelling for IMPEL on climate change. The results show that the impact for 2019 (YTD) is equivalent to 73 people (annual average CO₂). Options to reduce this are less travelling and fewer flights. Simon highlighted the importance of showing leadership in this area as we are working for the environment. Less travelling can be maintained by having video conferences, having back-to-back meetings, communicating via Basecamp etc.

Alessandro Peru (IT) suggested to have more video conferences, starting from expert teams. He mentioned that the Secretariat is already using these tools.

Moa Ek (SE) strongly supported this issue and volunteered to share their national experiences, if necessary.

Sigrún Ágústsdóttir (IS) told that they used Skype for business within their organisation and this also lowers the costs.

Rob Hayes (UK) mentioned that IMPEL is growing and with more project need for booking flights increases. IMPEL should have a travel hierarchy. Do we really need a face to face meeting for meetings with 4-5 people? Limiting number of participants is another option. IMPEL is struggling to find Chair/Vice Chair. Travelling is one of the causes for this.

Henk Ruessink (NL) supported the ideas and said that centralising the meetings could be an option. He suggested to have a small group working on this issue.

Decision: The GA decided to ask the board to start a feasibility study on climate change emergency.

Session 5: IMPEL's future Strategy post 2020

Chair: *Waltraud Petek*

Chair emphasised that the current work programme is until the end of 2020. Chair asked Tony Liebrechts to present the proposal of the Board.

Tony mentioned that the Board has a draft programme for post 2020. We have foreseen an Extra GA in Spring 2020. We are planning to break into groups and work on it. We want all National Coordinators to contribute in this process. Proposed timetable is as follows:

- General Assembly Helsinki (19/20 November 2019)
- Representatives of Board and NC's meet to discuss a first draft (December 2019)
- Teleconference to review progress (January 2020)
- First draft of documents to be submitted to GA (31 January 2020)
- Extraordinary General Assembly in Brussels (04-06 March 2020)

- Written Procedure to adopt strategy and programming (Summer 2020).

Chair asked for volunteers to work on this issue and any ideas about the process.

Kristina Rabe (DE) said that it is good to consider ongoing multi annual programme of IMPEL. It is good to give the opportunity to contribute. There is relatively short time according to the timetable. 7th Environmental Programme is finishing. There will be a new one. Kristina emphasised the Green Deal. There will be developments in ECA Forum. She referred to her letter of recommendation and highlighted the important of efficiency. Expert teams should have a role in discussions. An Extra GA can be then organised. IMPEL should give the process more time. Expert teams can meet early in Spring 2020. Basecamp can be used for discussions. With an integrated program we can go to Extra GA. Extra GA needs resources (budget and time).

Henk Ruessink (NL) supported Germany. It does not seem to be logical to organise an Extra GA so soon. Governance review will be also important.

Robert Ruzicka (SK) supported Germany and the Netherlands. Extra GA can be in late summer. Discussions on governance issues is very important.

Olita Smirnova (LT) supported Germany and stressed the importance of a broad discussion. Awareness of IMPEL should be raised.

Ana Garcia (PT) agreed that an extraordinary General Assembly in early March to discuss IMPEL's future Strategy post 2020 was too soon. She suggested to use other means to work on the issue in 2019 and said that the ambitions already stated in the IMPEL ECA Position Paper are very important for this discussion, because they already contain a framework for IMPEL's future strategy.

Michael Nicholson mentioned that the Framework Partnership Agreement (FPA) with the Commission is until 2020. There is no decision about a follow-up yet. But it is likely that we will continue. IMPEL might need an early indication for our long term work.

Tony said that we would need a new FPA. Knowing what IMPEL will be doing in 2021 is important. The first idea was to have an Extra GA. Kristina suggested that we use expert teams for discussions. Tony supported this idea.

Hans Lopatta (Commission) confirmed financial support for post 2020. There will be an FPA first, which can be seen as a shell. Then an Operating Grant (annual) can be provided. SGA can be multiannual. Agreement can be for 4 year or more. This framework allows more flexibility. It doesn't have to start in January. These are linked with the multiannual plan of IMPEL.

Kristina Rabe (DE) suggested that the working group should be broader than the Board. Expert Team involvement is necessary. IMPEL might need to analyse first our capacity and then come up with a strategy.

Ana Garcia (PT) stressed that IMPEL's strategy should take into account how we will be able and fit to respond to present and future challenges such as the implementation of our ambitions

stated in IMPEL ECA Position Paper but also to the significant new funding model of IMPEL's work, other funding streams and a significant expansion of the Secretariat capacity.

Henk Ruessink (NL) suggested IMPEL should both work on the strategy and governance at the same time next year.

Robert Ruzicka (SK) mentioned that IMPEL should be more realistic with timing. There was a discussion about zero pollution in previous sessions. This can be included in the strategy.

Decision: The GA decided that Board should take the lead and work with Expert Teams and National Coordinators and more time is needed to have an Extra GA.

Chair asked for volunteers from National Coordinators to take part in this work.

National Coordinators of the Netherlands, Belgium, UK, Portugal, Finland, Germany and Slovakia volunteered.

Session 6: Possible review of IMPEL's governance arrangements

Chair: Waltraud Petek

Kristina Rabe introduced the topic about a possible review of IMPEL's governance arrangements. A document prepared by former Chair was shared with the GA. IMPEL has grown significantly. Secretariat has grown. There are issues about transparency. How can we have more people to participate? Statutes and rules are not sufficient sometimes. Kristina mentioned that she led to the conclusion that external assessment is necessary and she supported the idea of the former Chair.

She mentioned that IMPEL should make this a project within the Network and have contribution from members. Labour law, liability etc. can be assessed. Everyone should be able to see the results on Basecamp. Consultants experienced in the field should be able to apply and the results should be ready late summer.

Alessandro Peru (IT) stressed the need for time to properly develop what we want in this evaluation.

Ana Garcia (PT) highlighted the following areas for assessment:

- Composition of the IMPEL Board, leadership role of Chair and Vice-Chair, to ensure timely, constructive and transparent decision making;
- Programme Management Group, the need to play an active role, ensuring availability of resources, efficiency, synergies and prioritising work, in an integral, constructive and collective building of one IMPEL work programme under the Framework Partnership Agreement and other funding mechanisms, with added growing value to IMPEL outputs and deliverables for practitioners;
- IMPEL Secretariat, structure and organisation, responsibilities of its members, line and work management of human resources, and hiring processes.

Ana mentioned that a tendering procedure for this Governance assessment, selection of external applicants and payment through stages according to the quality of deliverables are very important for this work.

Jean Luc Perrin (FR) mentioned that the size of the Board has not changed for a long time. For external management IMPEL only has Chair/Vice Chair. IMPEL has been working with this structure for 5 years.

Henk Ruessink (NL) raised the discussions about having two Vice Chairs, all members having a vote, growth in Board. These should be considered.

Rob Hayes (UK) mentioned that Network is growing and changing. The finances should be managed properly. There are big projects. They should be also managed properly. Another issue is whether IMPEL has enough human resources or not.

Thalia Statha (GR) supported the suggestions from Portugal and mentioned that this work is necessary to overcome the challenges of growth.

Kristina Rabe (DE) suggested to do this work as a project. It needs to be a transparent project. Broader input this way will be possible this way. A timetable is needed. Following timeframe can be possible: Call for tender in January, select a company in March and work until autumn. Expert Teams can comment on this. Everyone should have access to the information and be able to comment. It is closely linked to the Strategic Work Programme.

Chair asked the GA if a lead is needed for this project and asked for volunteers.

Kristina Rabe (DE) expressed that she would volunteer to be the lead if the GA approves. She emphasised the importance of broad contribution.

Alessandro Peru (IT) suggested to have a steering committee to assure wider contribution.

Henk Ruessink (NL) mentioned that as Kristina announced her candidature for Chair, she might not have enough time to carry out all the work. She will work internally and externally and will have a great workload. Henk suggested to have a group of people working on this issue. They should prepare ToR and share with us.

Hans Lopatta (Commission) made a remark regarding the budget. He stressed that this work is not in the current budget but can be added to the new budget.

Michael Nicholson said that this should be added to the proposed budget which is in the GA documents sent previously. To do so, we need to know the provisional amount for this work.

Decision: The GA decided to approve having an external assessment.

Chair asked for volunteers from National Coordinators to take part in this work.

National Coordinators of the Netherlands, Belgium and Italy volunteered to take part in the working group.

Session 7: IMPEL activities

Chair: Waltraud Petek

1. Presentation of projects in 2019

The five Expert Team Leaders each presented the work carried out by their respective Expert teams as well as the project reports ready for adoption.

a) Waste & TFS: Simonne Ruffener gave a presentation about the following projects: Waste Management and Circular Economy, Effects of the Chinese Import Ban on the ESM of Plastic Waste, Enforcement Co-operation in European WEEE Enforcement Network (EWEN), End of life ships, Waste & TFS annual Conference / NCP best Practise Meeting.

b) Industry & Air: Horst Buether gave a presentation about the following projects: Supporting IED Implementation 2019, Lessons Learnt from Industrial Accidents: 13th seminar, Onshore oil and gas regulation and lessons learned for other subsurface activities.

c) Cross Cutting Tools & Approaches: Simon Bingham mentioned that they had 2 Expert Team Meetings and the key discussion points were Broadening IMPEL's Membership, 2019 XCET projects, development of the training & knowledge centre, ECA initiative, IRI's & future idea's for mini-conferences. He gave information about the following projects: Mini-Conference: Advances in the use of technology in environmental and regulatory monitoring, CAED: Criteria for the Assessment of the Environmental Damage and Environmental Incident Public Communications.

d) Water & Land: Marco Falconi presented the following projects: Integrated Water Approach and Water Reuse, Management of Mining Waste, Landspreading and Capacity of Soils to Accept Contaminants, Risk Analysis Based Control of Agriculture, Water Crimes II and Water and Land Conference 2019.

e) Nature Protection: Alfred Dreijer gave information about the following projects: EU Plan Wildlife Trafficking, Planning Tool Inspection Natura Sites, Tackling Illegal Hunting Tourism and IMPEL-ESIX. He informed the GA that they had an Expert Team Meeting, the week before the GA, with a great involvement from partners.

Wednesday 20 November 2019

Morning Session

Chair: Henk Ruessink

The GA agreed to change the agenda and cover National Peer Review Initiative (NPRI), Elections, Presentation from New Members and Work Programme first.

1. National Peer Review Initiative

Giuseppe Sgorbati gave information about the NPRI project. Most countries have many organisations responsible for environment and it is important to evaluate the work carried out by various organisations. Work is going on now and will continue until March. Project conducted a

successful survey. 28 answers from 26 organisations from 22 countries received. The objective of this project is to develop a systematic approach for a NPRI based on flexibility and specific country needs, to set the basis for a better understanding of the common needs within competent authorities, to determine which support actions can be delivered within or by a National Network of authorities and to provide IMPEL members with a new concept and approach, including guidance on how a NPRI scheme could be implemented. In 2020, IMPEL Project Team will support Organizations in the development of customised schemes based of specific Country's needs.

2. Election of Chair & Vice Chair

Chair asked the Candidates for the position of Chair and Vice-Chair of IMPEL to give a brief presentation of their vision for IMPEL over the next few years. The General Assembly is then asked to vote on who should be chosen as the next Chair and Vice-Chair.

Kristina Rabe started her words by introducing herself. She referred to her letter of motivation which was presented to the GA. IMPEL is supporting the organisations in the compliance chain. The work that IMPEL is doing is very valuable. She said that IMPEL should prioritise the work. She supported having a professional assessment and thanked the GA for supporting this in Session 6. She made a remark on participation in this work. More contribution is needed. She also mentioned that she would appreciate if the GA could support Robert as Vice Chair.

Robert Ruzicka introduced himself to the GA. He referred to his letter for application for Vice Chair which was presented to the GA. He expressed his motivation to work internationally and that he found the work of IMPEL very valuable for their inspectors. They so many practitioners who want to be involved in IMPEL. As Kristina said it is for the benefit for all of us. He stressed that environment has no boundaries and it is crucial to work together.

Henk Ruessink (NL) raised a question about division of tasks and asked for their opinion.

Kristina mentioned that the division of tasks have already been circulated by the Secretariat and that she agrees with having a description. But it is necessary to exchange what we do where necessary. In general, having distinction for duties of Chair/Vice Chair is necessary.

Robert agreed with Kristina. He expressed the necessity to have priorities and to get into the internal matters as soon as possible.

Decision: Kristina is elected as Chair of IMPEL and Robert is elected as Vice Chair of IMPEL with a two-third majority as of 20 November 2019.

3. New IMPEL members organisations

Chair asked the new members that joined IMPEL by written procedure to introduce themselves to the GA:

Bram Segijn gave a presentation about the new IMPEL member, Rijkswaterstaat InfoMil. In his presentation he explained who Rijkswaterstaat is, their mission, what has been done for IMPEL and their focus within IMPEL. Rijkswaterstaat Infomil will be mainly focusing on Capacity Building and Training, Knowledge and Innovation Centre and IMPEL Review Initiatives.

John Sayas introduced the Greek Ombudsman to the GA. He gave information about their organisation and thanked the GA for approving their application for membership.

4. IMPEL work programme 2020

Michael Nicholson made an introductory statement about the technicalities of the 2020 funding framework. The funding system has changed recently. IMPEL has a FPA with the commission. It establishes the relations between IMPEL and Commission and enables IMPEL to apply for Operating Grant which covers the budget for GA, Board, Secretariat, Website etc. It is an annual grant. It will end at the end of this year.

On the other hand, SGA is for the projects and core activities. There was a delay this year, so the projects started with a delay. The end date for SGA is March 2020. Projects will continue until March. The new projects will start in April and end in December. They will have 9 months. Current European funding comes to an end in 2020. After 2020 IMPEL will need a new FPA.

SGA for training and capacity building is submitted and provisionally agreed. IMPEL also has external projects. Information about these projects will be given.

Michael gave an overview of funding status for 2018-2023.

a) Waste & TFS: Kevin Mercieca presented the following projects for 2020:

- Waste Management and Circular Economy (WMCE),
- Effects of the Chinese Import Ban on the ESM of Plastic Waste,
- Enforcement Co-operation in European WEEE Enforcement Network (EWEN),
- End of life ships,
- NCP best practise meeting
- Annual TFS and Waste conference,
- Intercontinental TFS collaboration.

b) Industry & Air: Horst Buether informed that there are 4 project proposals for 2020 as follows:

- Supporting IED Implementation
- Joint inspections and assessment of enforcement actions in IED installations
- BAT Conclusions for Intensive Rearing of Poultry or Pigs
- Integrating Climate Change Adaptation into Regulatory Practice – ICCARP

Since there is only 9 months for these projects, they joined the projects together under Supporting IED Implementation. Horst informed the GA that they have already discussed the issues for 2021-2024. They will be working on issues such as, Air Quality, Climate Change, New and revised BAT Conclusions, Farming and Agriculture, Joint inspections, Public nuisance problems, Training, Improving the effectiveness of regulators, Guidance on verification of self monitoring, Tools for rewarding good performers.

Hans Lopatta (Commission) made a remark about air quality and self monitoring and said that these issues are topics that they are interested in.

c) Cross Cutting Tools & Approaches: Simon Bingham informed the GA that they foresee two Expert Team Meetings for 2020. The proposed projects are:

- Financial Provisions Web-Tool
- CAED: Criteria for the Assessment of the Environmental Damage
- Mini-Conference: Advances in compliance assurance tools and approaches

Hans Lopatta (Commission) made a remark about financial provisions and environmental damage and said that it is important to have these in the work programme.

d) Water & Land: Marco Falconi introduced the following projects for 2020:

- Wastewater in Natural Environment (WINE)
- Water and Soil Security in Europe 3
- SWETE6: Safeguarding the Water Environment Throughout Europe
- MANAGEMENT OF MINING WASTE
- Trend Reversal in Groundwater Pollution
- WLR: Water and Land Remediation
- TIGDA: Tackling Illegal Groundwater Drilling and Abstractions
- Fixed Line Transects
- Conference: Soil Monitoring in Europe
- National Peer Review Initiative – NPRI 2
- IMPEL Water & Land 2020 Conference

Jean Luc Perrin (FR) mentioned that we should not overlap with other networks such as Common Forum.

Marco said that they would work with them about soil pollution.

e) Nature Protection: Alfred Dreijer introduced the following projects:

- EU Plan Wildlife Trafficking
- Planning Tool Inspection Natura Sites
- Tackling Illegal Hunting Tourism

Michael gave information about the budget. For SGA there are still issues that IMPEL has to be work on. The period for SGA will be 1st April-31st December and the budget will be €690000. There are certain assumptions in the document. Nature Expert Team budget is not clear. More time is needed to go through their budget. The application will be developed after the GA. Personnel costs were included last year in SGA. This year these are in OG budget. Co-financing rate is lower for OG. For co-financing we have membership fees, in kind contribution (time spent).

OG is applicable from 1st of January. So, application will be made soon. Secretariat will turn into an application and send it to the Commission. Personnel costs are higher than previous years. Because costs are moved to OG from SGA and IMPEL is planning to hire new people. IMPEL might also hire a deputy manager.

Regarding travel, types of activities are given in the document. The activities are ET meetings, large conferences, NCP group, 4 networks conference, board meetings, external engagement (this is a provisional amount), GA, secretariat meetings, EUFJE, manage communication, purchase of new equipment, external assistance (new item, translation for small number of IMPEL documents), overheads (website, printing etc.), other direct costs.

Chair suggested to have a written procedure for the work programme or Extra GA. Nature protection projects should be added. But the GA has to make a decision about the OG.

Kristina Rabe (DE) proposed not to have an Extra GA in Spring, but to discuss this issue on Basecamp and approve via written procedure.

Ana Garcia (PT) agreed to have a written procedure. Ana made a remark that Expert Team Meetings should be in line with IMPEL rules and have a ToR if they include an activity with technical content that is back to back to the Expert Team meeting and requires funding, referring to items 4.3 and 5.1

Michael confirmed to follow this up with Ana directly.

Kristina Rabe (DE) mentioned that external assessment should be added to the OG.

Michael said that in order to add it to the budget we need to have an idea about the cost.

Kristina Rabe (DE) asked whether co-financing would be available for this budget proposal.

Michael stresses that we will need more contributions from members in order to fulfil the responsibilities regarding co-financing. If members do not contribute, then IMPEL will need to reduce the expenditure or find other incomes. For 2019, amount for co-financing is almost complete, but there aren't enough member contributing. All members should contribute. Michael also explained the process for contribution and told that using average wage is not possible.

Decision: The GA approved the Operating Grant provided that external assessment is added to the budget. The GA decided to have written procedure for the work programme and SGA.

Session 7, continued: IMPEL activities

Chair: Waltraud Petek

2. Externally funded projects:

a) SpiderWeb: Flora Kqiku (KO) gave an update on SPIDERWEB (Strategic Project to Increase the Detection and Disruption of Environmental Crime in the Western Balkans). It is funded by GIZ and there are 6 beneficiaries. Duration of the project is 1.5 year. First a consultation group was established, and a consultant carried out a baseline study and training needs assessment. Different organisations are involved in the project. Trainings are given in 6 countries (Albania, Bosnia and Herzegovina, North Macedonia, Kosovo*, Montenegro and Serbia). Final Conference of the project took place the week before the GA in Zagreb.

b) SWEAP: Kevin Mercieca (MT) gave an update on SWEAP (Shipment of Waste Enforcement Actions Project). The project started in 2018 and will end in 2023. The overall purpose of the project is to support the circular economy by disrupting the illegal waste trade at the EU level by: capacity building and training, coordinated inspections, innovative tools, international cooperation and awareness raising and intelligence.

c) WasteForce: Katharina Aiblinger-Madersbacher (DE) gave an update about WasteForce Project. Project aims to boost the operational activities and capacities of authorities involved in the fight against illegal trade and management of waste by developing new strategies and methodologies, supporting international operational networking in EU-Asia Pacific Region, promoting the use of forensics and creating new tools, and delivering multi-stakeholder capacity building activities.

d) PROWhIBIT: Thalia Statha (GR) gave an update about PROWhIBIT (PREvention Of Waste crime by Intelligence Based InspectIons) project. Project started in October 2019 and end in January 2024. Objectives of the project are to enhance capacity & efficiency in combating Environmental Waste Crime (EWC), by promoting coordinated effort-actions of all actors along the compliance-chain and development of Information System for managing EWC cases, capacity building through targeted training & joint initiatives-inspections, use of advanced technologies, e.g. satellite imagery. Grant Agreement is signed on 29th October 2019.

e) SRSS Malta: Michelle Piccinino gave an update about SRSS Malta. The organisation is established in 2016. So, capacity building is needed for future challenges. It is a 2-year project and activities regarding assessment of the situation, capacity building, compliance and enforcement will be carried out. The project request is approved via written procedure. IMPEL and Commission will sign an agreement and then the project will start.

f) SRSS Cyprus: Chrystalla Stylianou gave an update about SRSS Cyprus. The project covers the revision of the National Municipal Solid Waste Management Plan, revision/improvement of the National Waste Prevention Plan, identification of the main impacts that may be expected from the revised plans, and feasibility study for the proposed infrastructure. Project proposal is presented to the GA for written procedure.

3. Approval of project reports and activities from 2019

Decision: Following Final Reports (FR) are approved by the GA:

- IRI Slovakia
- Development of a Planning Tool Concerning Inspection of Natura Sites
- Lessons Learnt from Industrial Accidents Seminar
- Mapping the European Agencies (report plus spreadsheet of results)

Session 8: External Engagement

Chair: *Waltraud Petek*

1. European Commission

a) Simon Bingham gave an update about the engagement activities with European Commission. Members from the Board attended the following meetings and events in 2019:

- Meeting with Director of DG Environment 11 April 2019
- EU Heads of Units, 12 April 2019
- Meeting with Miroslav Angelov, Liam Cashman & Hugo de Groof, 24 July 2019

- Waste Shipments Regulation Correspondent Group, 13 September 2019
- Meeting with representatives of European Commission, 30 September 2019
- Compliance Assurance Governance Forum ECA, 14 May 2019
- EU Green Week, 13-17 May 2019
- Eastern Action Partnership Vienna, 27-28 May 2019

b) Hans Lopatta provided a brief update from the European Commission on general legislative developments at a European level. Hans explained the developments in the following topics:

- Industrial Emissions Directive
- Hydrocarbons, Ambient Air Quality
- New Emissions Ceiling Directive
- WEEE Directive
- End-of Life Vehicles Directive
- Packaging Waste
- Ship Recycling
- Construction waste; Extractive Waste Directive
- Circular Economy Package – Plastics Strategy
- Water Framework Directive
- Floods Directive
- Water reuse
- Drinking Water Directive
- Bathing Water Directive
- Nitrates Directive
- Natura 2000 Network
- Environmental Compliance Assurance
- Combatting Environmental Crime
- Environmental Liability Directive
- Strategic Environmental Assessment Directive

2. Networks & Partners

Simon Bingham provided information about engagement with other networks and partners. IMPEL participated the following events:

- «Make it Work» Conference in Rome, 20-21 March 2019
- EUFJE Conference in Helsinki, 13 September 2019
- EMPACT / ENVI CrimeNet meeting hosted by Europol in The Hague, 17-18 September 2019
- Heads of EPA network plenary in Tallinn, 26-27 September 2019
- ENPE Conference hosted by Eurojust in Cyprus, 28-30 October 2019
- LIFE Smart Waste project, final conference in Brussels, 14 November 2019
- Interpol Pollution Working Group in Brussels, 14 November 2019
- SEE workshop in Beijing, 10-14 October 2019
- Study Tour of Chinese Ministry of Environment and Ecology in Utrecht, 09-13 December 2019
- National Engagement Meeting with Belgium (Wallonia, Flanders and Brussels Regions) 01 April 2019
- National Engagement Meeting with Norwegian Environment Agency, 27 November 2019

Chair: Henk Ruessink

4. Annual Reporting

Marco Falconi provided feedback to the General Assembly on the results of the 2016 Annual Report. NC's are invited to complete the template for 2017. Marco highlighted the need and benefits of having more insight in the use, update and imbedding of IMPEL practices by the members. 20 member countries have responded, and Marco provided a summary of the annual reports.

Some highlights:

- Some countries have still few representatives in 5 ETs, mostly in Water and Land and Nature Protection
- leading or co-leading of projects is carried out by a small number of countries
- total of 463 participants
- 31 events in 20 countries
- 7 countries have dedicated areas on their website about IMPEL

5. Secretariat Update

Michael Nicholson gave an update about the Secretariat. The Secretariat has been growing and there are new positions. Secretariat now has 6 employees. They organise activities, finances, funding etc. Michael made a remark regarding the growth in the Network and that this is a challenge for the Secretariat. Michael informed the GA about the roles of each member of the Secretariat.

6. Financial matters

Michael Nicholson gave an overview of the financial status. In 2018, the budget was balanced. IMPEL overspent less than 1%. This was the previous funding arrangement. It was audited and signed by the external auditor.

For the new funding arrangements, IMPEL received 9 letters of support for co-financing. This is slightly less than the target. IMPEL will continue looking for support regarding co-financing in 2020.

Michael also explained the status for 2019. Project activities started with a green light on 16 May 2019. This has delayed the start of projects. Projects will finish as 31 March 2020. Most projects on track to finish spending by December 2019. Some are due to continue into early 2020. Expert Team meetings & ET Conference spending broadly in line. GA spending Helsinki 19/20 November 2019 plus NC's meeting is on track. Board spending higher than planned due to extra 'engagement' activities with 3rd parties e.g. networks, EU Institutions. Secretariat costs are higher than expected due to extra hours being worked. Board has been informed about this issue in June & October.

IMPEL received contributions for reserve fund from members. Retained Equities stood at € 218,485 at the end of 2018.

Session 10: Membership

Chair: Henk Ruessink

2. IMPEL's UK based member authorities after Exiting the European Union

Rob Hayes (UK) explained that there is a period of uncertainty about Exiting the European Union. Rob said that solutions should be found to keep the relations between IMPEL and UK based member authorities.

Chair said that the developments are followed closely by IMPEL and necessary solutions would be found to keep the relations between IMPEL and UK based member authorities after Exiting the European Union.

3. An IMPEL strategy on strengthening membership to our network

a) 'Mapping the European Agencies' project

Michael Nicholson gave a presentation on the key findings from the IMPEL project: 'Mapping the European Agencies'. Report is posted on Basecamp and approved by the GA in previous sessions. Large number of authorities have been identified. But this is not complete. There are many more that IMPEL can cover. 108 potential member organisations have been identified. Development and implementation of a deliberate strategy to broaden and deepen membership, particularly from Water, Nature, Permitters and Associations of regional and local authorities is recommended.

b) Broadening IMPEL's membership

Simon Bingham gave a short presentation regarding IMPEL membership. The ToR for this project was submitted and approved at the GA in Vienna. Simon highlighted the fact that there is a lack of rules. It is possible to become a Board member or project manager without working for a member organisation. Growing nature and water teams is one of the priorities. Simon stressed that most of the benefits listed in the Benefits Report are also available for non-members.

Ana Garcia (Portugal) said that this issue gives rise to discussion of principle questions that should be covered under the umbrella of the IMPEL governance assessment.

Giuseppe Sgorbati (IT) raised the issue about having one vote for one member country and said that this issue should also be covered in governance assessment.

Session 12: Conclusions and close of meeting

Chair: Juha Lahtela

Date of next meeting

Kristina Rabe (DE) announced that the 20th General Assembly will be held on 2-3 December 2020 in Berlin, Germany. On 1 December the National Coordinators meeting will be held in Berlin as well.

Conclusions and close of meeting

Michael Nicholson summarised the decisions made by the General Assembly:

- The GA approved the decision to accept resignation of former Chair and thank him for his work.
- The GA decided to ask the board to start a feasibility study on climate change emergency.
- The GA decided that Board should take the lead and work with Expert Teams and National Coordinators and more time is needed to have an Extra GA.
- The GA decided to approve having an external assessment.
- Kristina is elected as Chair of IMPEL and Robert is elected as Vice Chair of IMPEL with a two-third majority as of 20 November 2019.
- The GA approved the Operating Grant provided that external assessment is added to the budget. The GA decided to have written procedure for the work programme and SGA.
- Following Final Reports (FR) are approved by the GA:
 - IRI Slovakia
 - Development of a Planning Tool Concerning Inspection of Natura Sites
 - Lessons Learnt from Industrial Accidents Seminar
 - Mapping the European Agencies (report plus spreadsheet of results)

Juha Lahtela closed the meeting by thanking all the members of the General Assembly.

During these two days the GA had good discussions about the route that allows for a more structured robust and consistent approach to our future work, enabling to support our Members Countries in the needs and challenges they face.
