



IMPEL 2022-2024 Work Programme

<u>Project</u>			<u>Subproject</u>	<u>Short Description</u>
2022-24(I)	Supporting IED Implementation (2022-2024)	The project aims to share knowledge and good practices among regulatory professionals and developing guidance and training materials to support the effective implementation of the Industrial Emissions Directive (IED).	1. Risk assessment and Planning IRAM II	This group will focus on the application of risk-based approaches to the planning and execution of regulatory interventions so that the limited resources of environmental authorities can be more effectively applied in targeting installations and activities that are having the greatest impact on people and the environment and help to address the most serious cases of non-compliance with the IED. It will build on risk-based strategies and tools that have already been successfully applied in IMPEL's projects, and in particular, the Integrated Risk Assessment Methodology (IRAM I) that has enabled more targeted and effective planning of environmental inspections.
			2. Prevention and Intervention	This group will focus on joint inspections and the assessment of enforcement actions related to IED installations. It will address both routine and non-routine inspections. Through a multi-annual programme of joint inspections across different industry sectors it will bring together practitioners to identify and exchange good practices
			3. IED and Circular Economy	This group will look at how the application of different aspects of the IED can help to promote a more circular economy. It will build on and further develop the work previously carried out through a collaboration between IMPEL and the European 'Make it Work' project that produced guidance on 'Making the Circular Economy Work'. The work will be carried out jointly with the IMPEL project 'Waste management and the Circular Economy'.
			4. Public Nuisance	This group will look at the problems of public nuisance caused by industrial installations. It will build on work already started in 2020 that has considered the problems of odours. Initially it started with a questionnaire approach to identify the main sources and regulatory challenges associated with odours. After surveying what should be asked, it became clear that most of the issues were already being identified. The project will continue by looking at potential solutions and will identify good practices for regulatory organisations.
			5. Various aspects of BAT conclusions and permits	This group will focus on understanding a range of interconnected interpretational issues related to BAT Conclusions (BATc) under the IED and look at how they are dealt with and implemented in the Member States. Its work will build on previous projects that have looked at specific issues related to BAT interpretation and implementation.
			6. Operator Self-monitoring	The first year the project has concentrated on operator self-monitoring of emissions to air, continuous and non-continuous. A workshop will be organised face-to-face in Lisbon in 2022. Areas of interest are:



				<ul style="list-style-type: none"> ○ Self-monitoring in wastewater emission ○ Continuous monitoring system ○ Fugitive emissions ○ Odour emissions
			7. Learning from BREF Cycle	<p>This group will look at how IED implementation is driven by the BREF cycle:</p> <ul style="list-style-type: none"> ○ from actualization of a BREF at EU level (policy) ○ to implementation at country level: legislation (policymakers), BAT implementation (permitters), and enforcement (inspectors) ○ followed by a process of evaluation towards a new actualization, closing the cycle.
			8. Improving Air Quality	<p>This working group will be concerned with improving air quality by better implementation of the IED and other European Environmental Legislation. It will focus on priority substances of concern and how ongoing air quality problems can be addressed by regulators through better implementation of existing legislation.</p>
			9. Waste Incineration	<p>Initially, this group will deal with the published BREF and BAT Conclusions on Waste Incineration. A working group has been set up to examine the implementation issues related to each of the 37 individual BAT Conclusions for the Waste Incineration sector. The group will gather views from permitting and inspection authorities in Member States and work to develop solutions to promote a level regulatory playing field across Europe. A particular focus of the work will be on self-monitoring requirements.</p>
			10. Poultry and Pigs IRPP BAT	<p>This working group has been focusing on administrative tools to ease BATs implementation: BATs operator's statement, permit templates, BAT1: simplified environmental management system, checklist for BATs inspection, Mass-balance Emissions calculators.</p> <p>The objective of this working group for 2022-2023 will be the assessment of BATs' implementation in IED farms.</p>
2022-24(II)	Lessons Learnt from Industrial Accidents (2023)	A seminar to promote the development of good practices regarding industrial accidents by the exchange of experience and methods of working. A 2-day seminar for 300 participants and the largest possible number of member states represented	-	
2022-24(III)	Waste Management & Circular Economy (WMCE) (2022-2024)	The project aims to promote Eco-innovation and Circular Economy and create a level playing field and common understanding in permitting and inspection processes.	1. Value-Retention circular processes (2022-2024)	<ul style="list-style-type: none"> ○ A first work-strand is on by-products. The aim is to provide regulators with the tools to assess about the by-product status, the connection with products legislation and help them to build related inspections. ○ A second strand concerns the study of waste/reusable streams of particular interest due to quantities produced across EU and reuse-recycling possibilities, namely: plastic waste, construction & demolition waste, organic waste (for biometahne production)



				<ul style="list-style-type: none"> o A third strand is related to the “extended use of products” with reference to the R-ladder of circular strategies. It aims at facilitating a common understanding and application in practice of the definition of ‘waste’, including the term ‘discard’, and should consider new circular business models in which, for instance, a substance or object is transferred from one holder to another holder without the intention to discard.
			2. REACH & Circular economy (2022)	For the next edition of the ‘Making the Circular Economy work’ Guidance the application of REACH in relation to by-products and end-of-waste will be looked at in more detail (resulting in additional guidance/tools etc.).
			3. IED & Circular economy (2022-2023)	This group will look at how the application of different aspects of the IED can help to promote a more circular economy. The work will be carried out jointly with the IMPEL project ‘IED Implementation’ and a joint working group has already been set up to take this forward.
			4. End-of-waste and By-products Database (2022-2024)	A first demo of the voluntary End-of-waste database as outlined in the ‘Making the Circular Economy work’ Guidance has been issued in 2021. The database can help permit writers, inspectors and operators to find information on end-of waste (case-by-case) decisions (permits, legal opinions) or end-of-waste operator self-assessments and EoW national criteria. The demo version will be converted into the IMPEL website.
			5. Waste incineration BAT Conclusions (Joined with the IED Implementation project) (2022-2024)	The aim is to examine the implementation issues related to each of the 37 individual BAT Conclusions for the Waste Incineration sector. A particular focus of the work will be on self-monitoring requirements. The field of analysis will then be widened to waste-to-energy installations to build an overview of environmental impacts and critical points as well as the requirements for input waste and air emission control.
			6. Training activities (2022-2024)	The training package proposal in the field of waste regulation and relevant aspects on Circular Economy, drafted in 2021 will be carried out in the 2022-2024 period. The aim is to share knowledge and build skills on crucial aspects of waste management and Circular Economy, Value-Retention circular processes, End of Waste and By-products, connection among waste, REACH and shipment of waste inspections, landfill inspection and pre-treatment of waste.
			7. Waste-to-energy (2024)	The field of analysis in this project will be widened to waste-to-energy installations to build an overview of environmental impacts and critical points as well as the requirements for input waste and air emission control.
2022-24(IV)		The project aims to develop an active international community of practitioners both within and outside	1. Ship Recycling (2022-2024)	This WG does not focus on the enforcement of illegal shipments itself but on the improvement of collaboration between environmental and maritime authorities involved,



	Transfrontier Shipment of Wastes Project (2022-2024)	the EU to deal with trans-frontier shipment of waste and further developing the intelligence-led systems and procedures for inspection and enforcement using new digital technologies.		preventing illegal shipments, developing guidance material for authorities and other stakeholders involved and capacity building for inspectors and other stakeholders.
			2. Implementation of Article 17 of the WEEE Directive (2022-2024)	When a producer, established in a country, wants to sell his products in another European country, where he has no establishment, he is required to appoint an authorised representative in that country, who must fulfil his obligations there according to the WEEE directive (especially registration). When a producer has not appointed an authorised representative, it is difficult for the national regulatory authority to prosecute him abroad (e.g. in his home country). That is why the regulatory authorities need to work together. One solution is to bring the cross border free-riders (producers without registration) to the attention of the competent national authority in that country, in which the producer has his establishment. In this way, there are less difficulties associated with prosecution or with translation of relevant documents.
			3. Plastic Waste Shipments (2022-2023)	An amendment to Regulation 1418/2007 was published in October 2021. This lists the non-OECD destination countries that can accept plastic waste (B3011) under green list and notification controls while also listing the countries that it is prohibited to send plastic waste to from the EU. This has the potential for new countries to emerge as destinations, which will be monitored by this project. It will also be important to monitor 'local controls' introduced by destination countries (e.g. Malaysia) to see how this impacts any pre-inspection requirements for plastic waste exports from Europe. It is still unclear what provisions apply for shipments of plastic waste to certain destinations including OECD and non-OECD countries, so it is important to provide some clarity on this topic.
			4. Big/Little TFS (2022)	Throughout several years and multiple IMPEL projects the initiators of the project have identified that multiple TFS inspectors together have had thousands of inspections in the field of TFS. All these inspections have boiled down to an extensive knowledge of the legislation connected to physical inspections of transboundary shipments of waste. However, despite several legislative changes and reviews of the legislation, there are still lacking a connect between legislators and inspectors out in the field when it comes to some of the details in the legislation. These "details" could be where there are certain intentions with the legislation but due to the disconnect due to long lines of communication and many agencies between legislators on an EU-level and TFS inspector and the level of which such "details" might not be brought up higher in each nations priorities towards the commission since they are just that, "details".
2022-24(V)			1. NCP meeting (2022-2024)	NCP meetings aim to improve the collaboration and alignment of enforcement, frequent contact between the European enforcement authorities is necessary. Therefore, it would be



	Operational and Strategic Work of IMPEL W&TFS ET (2022-2024)			much helpful if enforcers have structural, personal, and frequent contact moments where they can strengthen their network, exchange experiences and best practices, discuss ongoing cases and align their WSR enforcement activities together.
			2. W&TFS Annual Conference (2022-2024)	Conference aims to improve the collaboration and alignment of enforcement, frequent contact between the European enforcement authorities and partner organisations such as the European Commission, the Secretariat of the Basel Convention, ENPE and EUFJE is necessary.
			3. Network Collaboration (2022-2024)	A large volume of waste shipments is destined for countries outside Europe it is important to have good contacts with the authorities in these destination countries. Environmental damage such as e-waste dumping in Africa and plastic dumping in Asia is unfortunately quite common and we see a high number of structural illicit traffic taking place. The market is dynamic and because of recent political developments such as the import ban in China and European authorities struggle to keep up with what is the situation in practice. In these cases, international collaboration is essential.
2022-24(VI)	Water and Land Project (2022-2024)	<p>The new European Green Deal provides an action plan to boost the efficient use of resources by moving to a clean, circular economy restore biodiversity and cut pollution. Reaching this target will require action by all sectors of our economy in the following policy areas:</p> <ul style="list-style-type: none"> ○ Clean Energy ○ Sustainable Industry ○ Building and Renovation ○ Farm to Fork ○ Eliminating pollution ○ Sustainable mobility ○ Biodiversity ○ Zero pollution action plan <p>Water and Land Project with its Subprojects / Working Groups (WG) enters in most of the policy areas.</p>	1. Wastewater in Natural Environment (2022-2023)	This work intends to help Member States on the transition to the Circular Economy within the water cycle. Through the share of good practices in urban, industrial and food production water management, in terms of water use and reuse is intended to identify and improve solutions in terms of water use efficiency that may contribute to zero pollution solutions and, whenever possible, linked with the nexus water-food-energy-ecosystems. The use of the Water Circularity Index intends to identify the water use areas that are strongly interlinked and therefore, needed to be mutually reinforced paying attention to the potential trade-offs between economic, environmental, and social objectives.
			2. Tackling illegal groundwater drilling and abstractions (TIGDA) (2022-2024)	Groundwater shortage is no longer an exclusive problem for arid or Mediterranean countries. As the different aquifers and aquitards in the member states are drilled (through) for these purposes it is useful for the states to share knowledge or have guidance on: <ul style="list-style-type: none"> ○ Which specific legislation and requirements are in place for groundwater protection (drilling, instalment, and exploitation); ○ Which specific methods are in use for enforcement of this legislation (site visits, checklists, use of experts, best practices).
			3. Trend reversal in groundwater pollution (2022)	This subproject aims to reduce a serious implementation deficit in the EU regarding groundwater protection, where only a few Member States can show some success with achieving a trend reversal by looking at possible instruments and best practices at administrative level, especially of regional and local water authorities.



			4. Europe Marine Transborder Transect (2022)	At present data collection and the following analysis of the networks have gaps as are not properly/explicitly designed to respond to the European legislative drivers and to support decision making at EU level. In addition, there is a strong need for different bodies involved in this activity to meet and strengthen the collaboration, the best practices, and the development of a common monitoring protocol. This work is part of a Road map towards the guidelines.
			5. Sustainable Landspreading (2022-2023)	Sustainable landspreading is necessary to better understand the nature and impacts of waste being spread to land. There is currently a wide variation into how sludge to land is treated by IMPEL members. This work is required to bring a suggested consistency of approach and sharing of best practise to landspreading of waste material, especially sludge. Phase III will also seek to implement circular economy principles into the general handling of waste to land materials.
			6. Management of mining waste (2022)	This subproject aims to compare the transposition of the Directive by Member States to evaluate common guidelines for better management of extractive waste, also in agreement with the exploratory opinion of the European Economic and Social Committee (EESC), which recommends to Member States to promote initiatives for the exploitation and use of "new fields" of raw materials, such as extractive waste.
			7. Water and Land Remediation (2022-2024)	Water and Land Remediation is a process that has different speeds in Members States. This is due partly on difference in legislation that would mean different definitions as for making some examples "potentially contaminated sites", "contaminated sites", "remediated sites". This subproject aims to speed up the process, focusing to the remediation phase that is often the bottleneck, with monitoring parameters specific for each remediation technology, that may clearly show the progress of activities towards the target. Then, the subproject has also the objective to promote in situ technologies with a clear scheme for their monitoring over time.
			8. Water & Land Conference (2022-2024)	Activities carried on, and experiences built in water and land field need to be shared among IMPEL members and the annual Water and Land Conference is an instrument for a wide contact and discussion. Furthermore, "the EU Green Deal", promoted by the European Commission pose new challenges that need to be investigated, discussed, to find out proposals to fulfil the ambitious IMPEL's further evolution perspective.
2022-24(VII)	GreenForce (2022-2024)	The EU Habitat and Bird Directives are the cornerstones of Europe's legislation to halt and reverse the loss of biodiversity across Europe. In response to the declining biodiversity of Europe and the world, the	1. Tackling Illegal Activities Connected to Hunting Tourism (2023)	The issue of 'hunting tourism' was identified as an opportunity to work together to identify the scope of this activity and to identify legal and illegal aspects. This case had deep impact on nature protection status, and it seemed that illegal activities continue.



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2022-24(VIII)	Cross-cutting Tools and Approaches Project	<p>European Union has developed the EU Biodiversity Strategy for 2030 to make agricultural and urban areas greener and to address invasive species. European Green Deal priorities include protecting our biodiversity and ecosystems. Effective implementation of the Directives according to nature conservation contributes to public confidence, legal predictability and a level playing field. Effective implementation includes an enhanced system of inspections and surveillance, good access to justice and public access to information. The Nature Protection Expert Team (ET) aims to contribute to the 4th priority in the 7th Environmental Action Programme in order to maximise the benefits of the Union’s environment and nature legislation by improving implementation. The ET focuses on quality and quantity of inspections, effectiveness in the chain of inspection – prosecution – verdict, sharing of intelligence and information, promoting cooperation with networks of practitioners, collaboration with NGOs and public participation. The ET facilitates knowledge sharing by the exchange of good experiences and good practises.</p>	<p>2. Testing and improving the proposed planning tool for inspections of Natura 2000 sites (NIRAM) and Roadmap for a project series on invasive alien species (2022-2024)</p>	<p><u>Part A:</u> Development of an easy and flexible tool as a part of the planning of inspections of Natura 2000 sites linked to European environmental law and the RMCEI <u>Part B:</u> Setting up a roadmap for a project series on invasive alien species (IAS) As IAS are a priority item of the Commission (see above), IMPEL will set up a roadmap for projects on the item. The project team will benefit from the experience of countries which dealt with that item at a very early stage (e.g. PT) and from those which carried out projects in that field (e.g. LV).</p>
			<p>3. IKB exchange of information between Enforcement and other Stakeholders (IMPEL-ESIX) (2022-2024)</p>	<p>The aim of this project is to improve the way (method) information is shared and exchanged between EU Member States, enforcement teams and NGO’s working in the field of IKB and EU Timber Regulation.</p>
			<p>4. EU Action Plan Against Wildlife Trafficking (2022-2024)</p>	<p>Wildlife trafficking has become a billion-euro criminal industry dominated by organized criminal groups. It is even more attractive as the risk of detection is low, penalties are often insignificant, whereas the profits are comparable to arms and human trafficking. An important action to take it will be to analyse the different good practices to implement the EU tools to tackled wildlife trafficking and to publicize test and develop an orientation guide, already produced that can be share and used by all Member States. This work will be done on several workshops and joint inspections.</p>
			<p>5. Implementation of the Bird and Habitat Directives at European Aerodromes (2022-2024)</p>	<p>While most small animal species at aerodromes are not hazardous towards the safety of aircrew, passengers and aircraft, the aerodrome’s heavy and/or flocking animals are one of the major flight safety hazards for landing and departing aircraft. The aim is to investigate:</p> <ul style="list-style-type: none"> ○ The number of animals, specified per species, killed by aircraft; ○ The number animals killed/ nest destroyed based on the derogations specified per species; ○ The level of compliance of the aerodromes with the Bird and Habitat Directives; ○ The methods that aerodromes execute to prevent aircraft-wildlife collisions; ○ The methods that could be applied to have a win – win situation for flight safety and biodiversity
			<p>1. IMPEL Review Initiative (IRI) Programme (2022-2024)</p>	<p>The IMPEL Review Initiative is a long running project designed to support host organisations implement EU environmental legislation, effective tools, and approaches. It is a capacity-building programme where five experts from donor organisations, a team leader and rapporteur review a host organisation. It is not an audit. The subject matter of the review is</p>



						<p>Aims of the project are as follows:</p> <ul style="list-style-type: none"> • Building capacity through inter-MSs peer review & post review support (e.g. IMPEL Review Initiative (IRI) and projects designed to support 'opportunities for development' identified during IRI's); • Support and guidance related to a refresh of the EU Recommendation for Minimum Criteria of Environmental Inspections (RMCEI) and implementation of any potential new Commission instruments on Compliance Assurance; • Development of tools, systems and processes to implement aspects of the regulatory cycle e.g. permitting, risk assessment, inspection, compliance assurance techniques, enforcement, environmental impact and damage assessment, reporting (etc) that could be used horizontally across the four thematic Expert Teams; • Development of new technology and new ways of working to support the implementation of the regulatory cycle from drones, monitoring equipment, handheld and mobile technology to back-office systems etc; • Support of better regulation, refit and fitness checks e.g. streamlining monitoring & reporting; and • Better enforcement & development of cross-cutting legislation such as the Environmental Liability Directive, Environmental Crime Directive, Environmental Impact Assessment Directive, EMAS etc. 		selected by the host organisation and could be policy, permitting or inspection driven depending on the needs of the host. On themes such as industry, waste, nature, or water.
							2. Financial Provision (2022)	The impact of direct environmental incidents as well as business insolvency resulting in risk to the environment must be protected against. In cases where there is either an environmental incident which results in actual/potential harm to the environment or where a company becomes insolvent and can no longer meet its obligations, suitable financial provision can mitigate or prevent an impact on both the environment and/or the public purse. The aim is to produce an online tool based on the practical guide. This will improve accessibility and allow capacity building in the cross cutting regulatory challenge of financial provision.
							3. Criteria for the Assessment of the Environmental Damage (CAED) (2022-2024)	The aim of the project is to provide proper criteria, methods, procedures, planning and assessment tools, as well as training and capacity building activities, for the determination of the environmental damage and imminent threat of damage, to strengthen and possibly improve preventive or remedial measures.
							4. Compliance Assurance Conference (2022)	To gain compliance assurance a wide range of tools and techniques need to be deployed beyond purely traditional regulatory enforcement tools. Knowledge of the successful implementation of many of these tools is often limited within the regulatory community. The aim of the project is to showcase these tools and approaches to help make regulatory bodies more effective and efficient and to ultimately give high levels of environmental protection.
							5. Climate Emergency Umbrella Programme (2022-2024)	The declaration of a climate emergency (as well as an increasing awareness of the impact of plastic, biodiversity decline and now the impacts of a global pandemic & potential green recovery) are having a profound impact on policy, how we regulate and on those that we regulate. The pressures to contribute to the reduction of greenhouse gases, the reduction of carbon or supporting green recovery are increasing yet, few regulators have the correct tools to begin to tackle with these issues. This programme hopes to tackle these issues by designing tools and approaches that regulators can use to meet these emerging challenges.
							6. IMPEL for sustainability- Heal the world (2022-2023)	The subproject aims to get insight into the interest of the IMPEL network on Education for sustainability topic. The first step would be to know the interest within the IMPEL community in developing the Education for Sustainability topic. The project is intended to test among the IMPEL community about the opportunity to create a specific structure to develop Education for Sustainability.



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				The primary objective of that project would be to create a network of experts working together on the deployment of education for sustainability reference in Europe for all educative community and citizenship in general, which comes to be called education for lifelong.
			7. Knowledge and Information Programme (2022-2023)	A proof-of-concept project is envisaged in 2022, followed by a scalable future if it can demonstrate its value. KIP will be designed from the outset to complement and enhance existing IMPEL structures and not to replace them or duplicate activities carried out within them.
			8. 4 Networks Conference (2023)	This subproject aims to organise a joint conference of the 4 Networks that will emphasize that police, inspection, prosecution, and the courts are part of ONE enforcement chain and can form a "fist". The talks should be practical, and the presentations should focus on real cases.
			9. National Peer Review Initiatives (NPRI) (2022-2024)	The subproject aims to improve the scheme(s) for NPRI and will provide support to Countries to achieve more unified approach of environmental authorities across country in implementing environmental legislation requirements.



External Projects – Short Description

Waste & TFS	LIFE SWEAP	<p>The Shipment of Waste Enforcement Actions Project (SWEAP) project is co-funded by the European Commission LIFE fund and co-ordinated by the IMPEL Network. The project runs between September 2018 to June 2023. The overall purpose of the project is to support the circular economy by disrupting the illegal waste trade at the EU level by:</p> <ul style="list-style-type: none"> ○ Increasing skill set amongst inspectors and law enforcement agencies ○ Intensifying collaboration nationally and internationally ○ Developing innovative tools and techniques ○ Creating EU-wide inspection data set ○ Providing intelligence products <p>Project means are:</p> <ul style="list-style-type: none"> ○ Delivering capacity building activities. ○ Development of new systems with a focus on providing tangible benefits to agencies using innovative enforcement, tracking and e-reporting tools. ○ Coordinated inspections. ○ The involvement of Europol, Customs, and national Police Forces in this project to strengthen existing enforcement networks and improve the flow of intelligence on illegal shipments and the actors involved and getting a better understanding of trend and patterns to develop strategies to prevent and disrupt the illegal waste trade.
Nature	BIOVAL Eco System Recovery Calculation (Joint project of EUFJE, IMPEL, ENPE, and KU Leuven)	<p>The project aims to develop a pricelist to calculate the damage that is caused by infringements to ecosystems and protected species. The pricelist gives an indication to prosecutors and judges to be used by prosecution and verdict or to calculate the payment for recovery of damage to the eco system and protected species.</p> <p>The value of species should be clearly distinguished from the use that will be made of it. There can be different uses of the value of species (for compensation, for determining sanctions), but there can only be one value of a species.</p> <p>Under BIOVAL, we want to perform a meta-analysis with the data we collected e.g. why are mammals valued higher than birds, big birds higher than small birds etc. Ngo's, judges often use the cost of a reintroduction program to determine the value of a bird, but this does not reflect the real value of a species. This is wrong from an economic point of view.</p> <p>The restoration cost is a relevant criterion because Member States have obligations under the Birds and Habitats Directive to achieve certain numbers of species. We need an instrument that will be supported by the judiciary because the judiciary was involved in the creation of the instrument.</p>