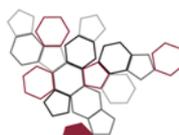




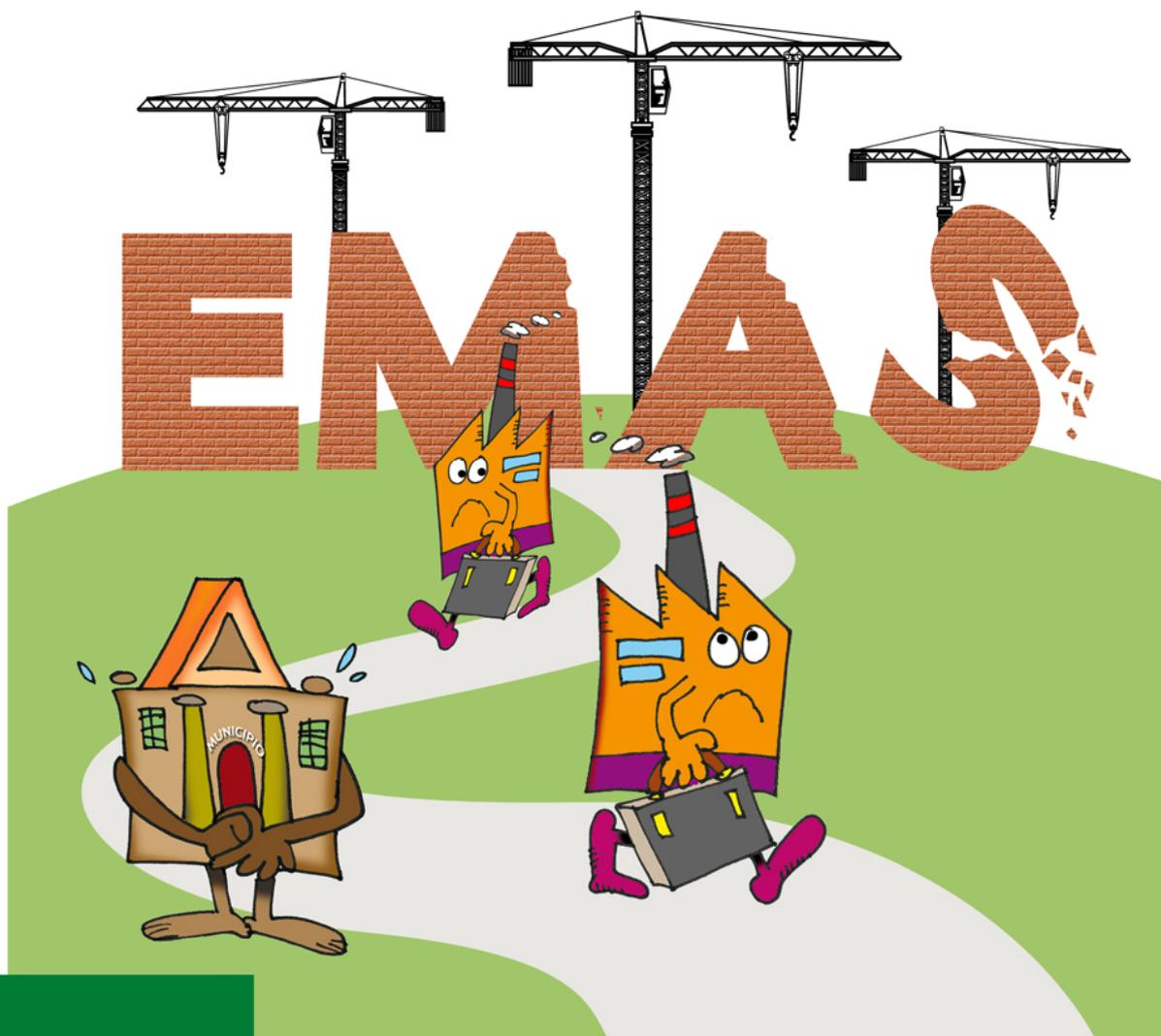
**ISPRA**

Istituto Superiore per la Protezione  
e la Ricerca Ambientale



Sistema Nazionale  
per la Protezione  
dell'Ambiente

# Survey on Italian organizations that dropped out of EMAS: analysis of motivations and potential measures to re-launch the Scheme





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## INTRODUCTION

In recent years, the number of the Italian organizations that have decided not to renew EMAS registration has considerably increased. This research arises from the necessity to investigate the phenomenon that has arisen in the last few years. By looking at the data of the “ISPRA Environmental Issues 2009 – 2014”, also in 2009-2010 there had already been an increase in the organizations that did not renew the Registration. However, the phenomenon was not attributed to any specific factor but to a physiological decline following the European negative trend. In the same period, the stability in the number of registrations in Northern Italy and the growth of registered Public Administrations were considered as a strengthening of the scheme and as a new possible fresh start.

The economic crisis, re-emerging in 2011 and exploding in all its seriousness in 2012, has critically hit the Italian production system, showing its effects on SMEs (Small & Medium Enterprises) with negative consequences on the participation in EMAS. This specific group of firms has shown the most considerable decline in the number of registrations.

In order to better understand the phenomenon, a forum was organized with all the relevant EMAS Stakeholders (EMAS Forum 2015 edition). From the forum, a more complex picture emerged, not justifiable only with the "economic crisis". Therefore, a survey was conducted to examine in depth results of the *Forum*, targeting all the organizations that decided to withdraw from the EMAS registration between 2010 and December 2015.

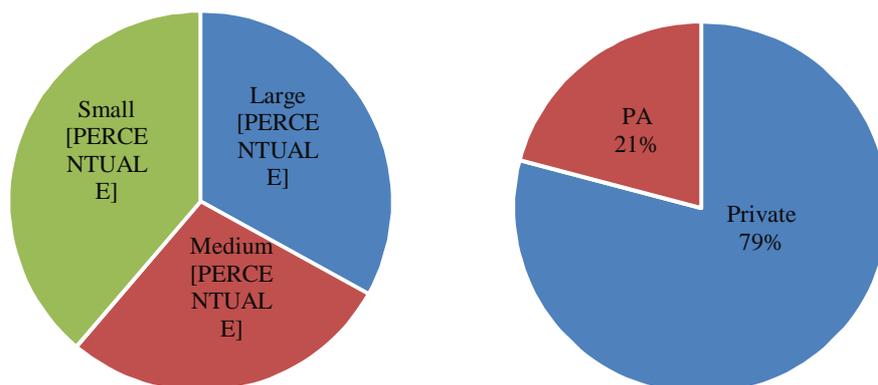
*Ing. Salvatore Curcuruto*

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## 1. CHARACTERISTICS AND EVOLUTIONARY DYNAMICS OF EMAS REGISTERED ORGANIZATIONS

The number of EMAS registrations declined from December 2013 to December 2015 (-7.5%), with the number of organizations decreasing from 1,098 to 1,016. At European level, at the end of 2015, Italy was ranked second after Germany (1,200 units) and followed by Spain (943 units)<sup>1</sup>.

Considering the type of organizations participating in the Scheme, Figure 1 shows a homogeneous distribution by organization size.



**Figure 1 - Number of EMAS registrations by Size and Public Administrations (31/12/2015)<sup>2</sup>.**

Generally speaking, the main features of the Italian production system have not changed during the two recessive phases that have affected Italian economy: 95% of production units continue to be micro-firms (with less than 10 employees). Conversely, the share of large firms (with over 250 employees) is 0.1%. It is worth mentioning that the comparison between the percentages of large EMAS registered firms (33%) and the distribution of large firms (0.1%) remains a significant indicator of larger companies' propensity to comply with the Regulation. In addition, approximately 79% of registered organizations are private-owned, while 21% are Public Administrations (PAs).

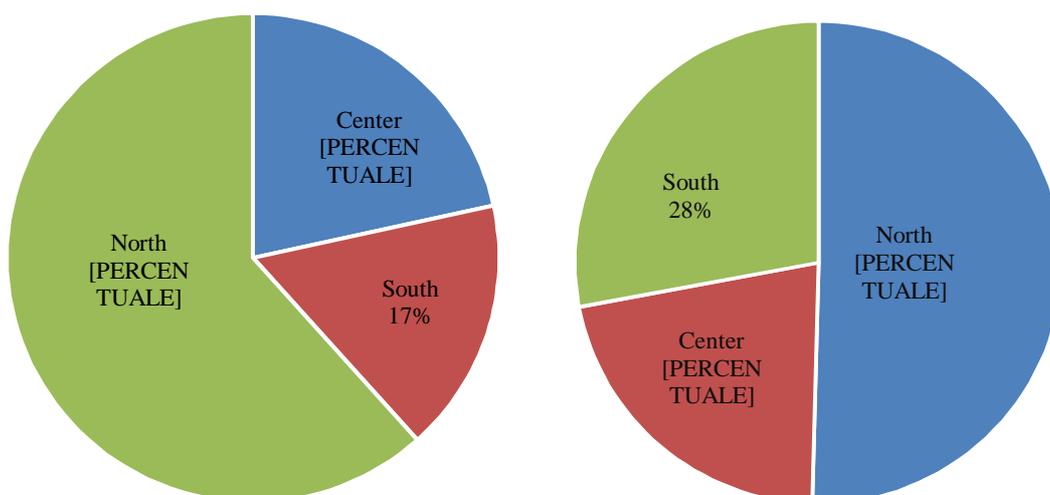
The popularity of EMAS within large-sized firms over time is attributable to the advantages obtained, such as extended duration and the simplification of procedures for some environmental authorizations, financial facilities, and the Environmental Declaration used as a credible and transparent communication tool, in particular with regards to stakeholders. In general, it is evident that registered firms are not consistently distributed according to the dimensional characteristics of the Italian production system.

Looking at the geographic distribution, Northern organizations (62%) have historically maintained the leadership, followed by the regions of the Center (21 %) and the South (17%). The northern regions' leadership is reflected in the number of regional-level measures to stimulate EMAS diffusion, especially in Emilia-Romagna, Liguria, Piemonte, Lombardia, Friuli-Venezia Giulia and Trentino-Alto Adige. By comparing the geographical distribution of EMAS with the distribution of firms in Italy, it may be noted that in Central Italy the proportions are maintained, while in the South the EMAS organizations are less (17%) than their distribution across Italy (28%).

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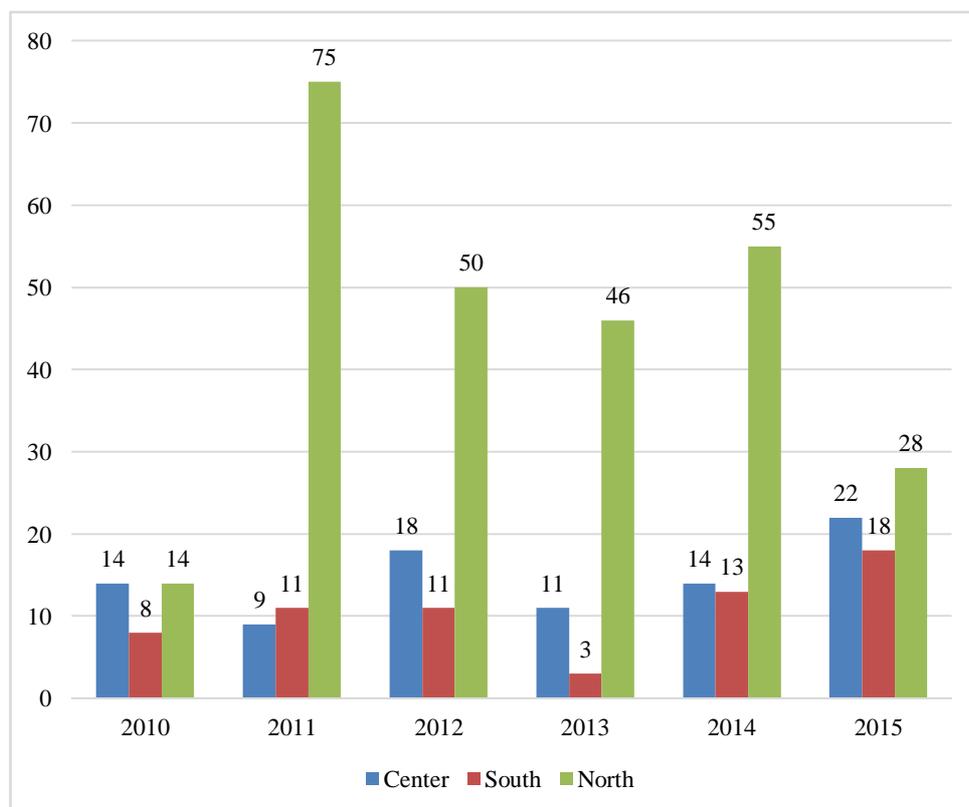
<sup>1</sup> Figure updated at December the 31st, 2015 - Source: [http://ec.europa.eu/environment/emas/index\\_en.htm](http://ec.europa.eu/environment/emas/index_en.htm)

<sup>2</sup> The size of the organizations employed in this work was provided by the European Commission Recommendation of 6 May 2003 on the definition of micro, small and medium-sized enterprises (notified under document number C (2003) 1422). Official Journal no. L 124 of 20/05/2003 p. 0036-0041.



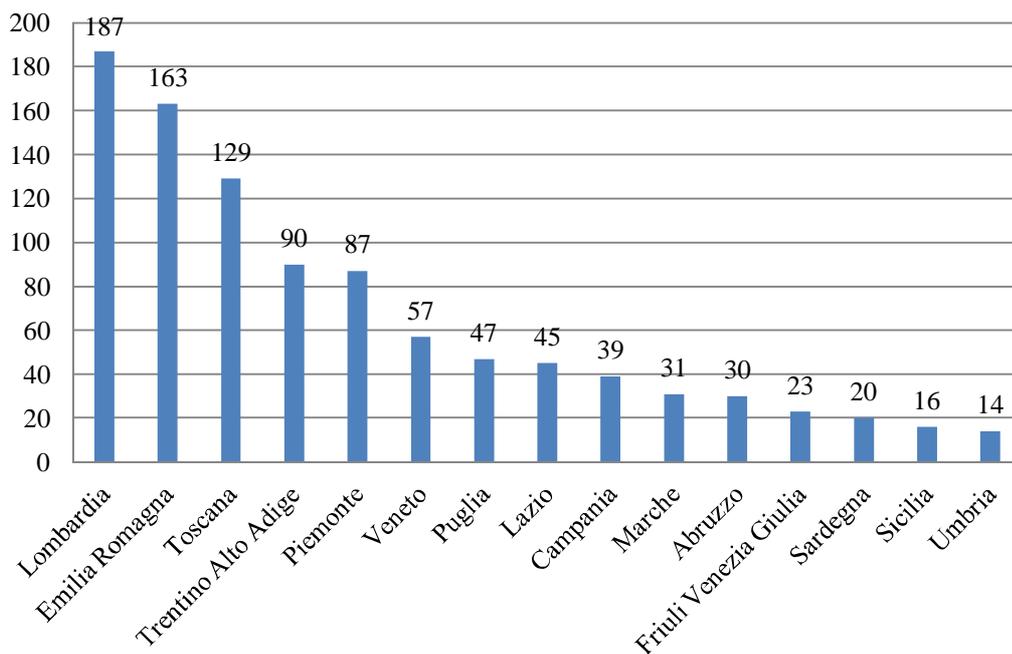
**Figure 2 - Localization of EMAS registered organizations and all other firms across Italy<sup>3</sup>.**

The geographical analysis shows an evolutionary dynamic that has changed the national ranking (Fig.4), in which Lombardia leads (187), followed by Emilia-Romagna (163), Toscana (129), Trentino-Alto Adige (91), and Piemonte (86).



**Figure 3 – Evolution of EMAS new registrations for each geographical area (31/12/2015).**

<sup>3</sup> ISTAT. 9<sup>th</sup> General Census of Industry and Services 2011.



**Figure 4 - Evolution of EMAS registrations by region (31/12/2015).**

Considering the 2010-2015 period, in five regions there has been a positive increase in EMAS registrations: Valle D'Aosta (+ 66.6%), Lombardia (+ 32.5%) Piemonte (+ 29.4%), Lazio (+ 21.1%) and Trentino-Alto Adige (9.6%).

**Table 1 - Percent increment of EMAS registrations by region (2010-2015).**

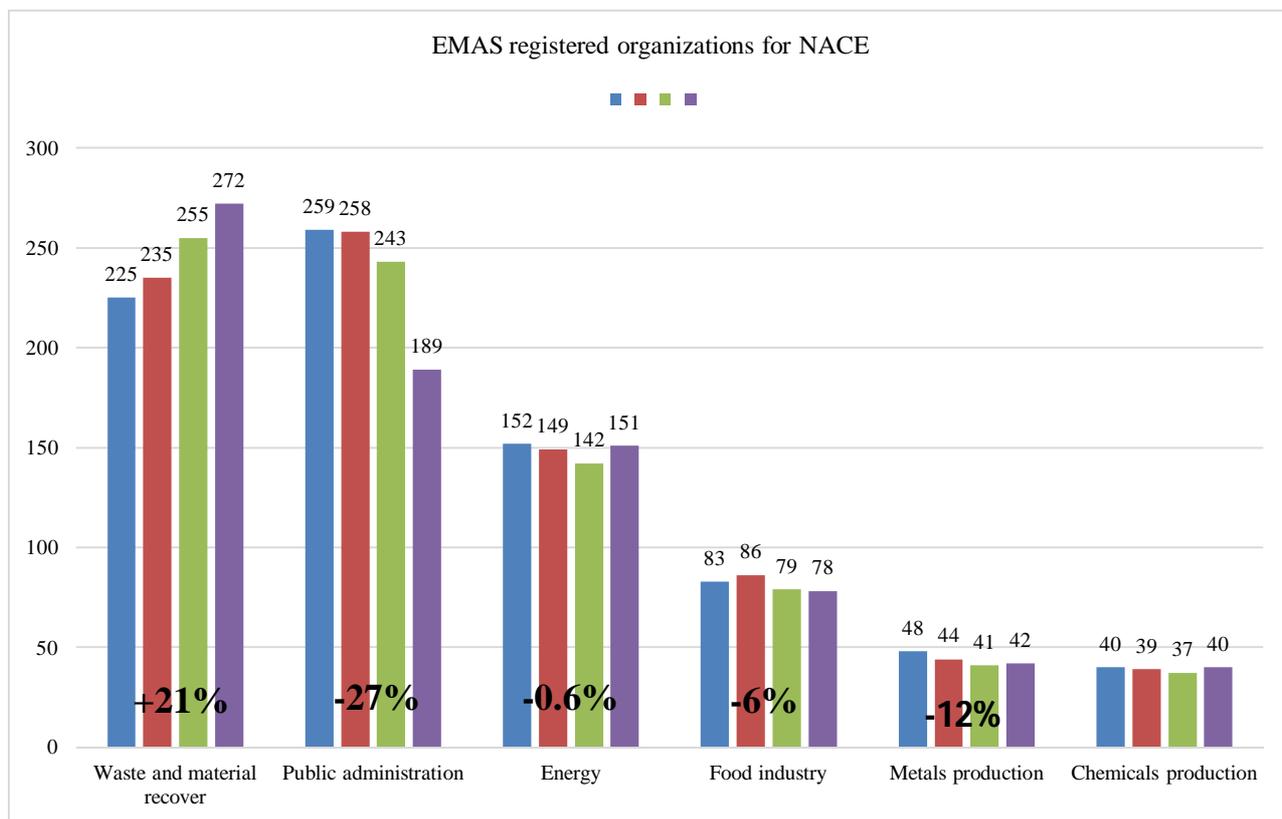
Regions	Variation of n. of registered organizations (2010 - 2015) (%)	Area
Piemonte	29,4	North
Valle D'Aosta	66,7	
Lombardia	35,2	
Trentino-Alto Adige	9,6	
Veneto	-7,1	
Friuli Venezia Giulia	-33,3	
Liguria	-55,0	
Emilia-Romagna	-13,6	Center
Toscana	-8,2	
Umbria	-48,1	
Marche	-14,7	
Lazio	21,1	
Abruzzo	-6,3	South
Molise	-40,0	
Campania	-47,5	
Puglia	-35,2	
Basilicata	-83,3	
Calabria	-42,9	
Sicilia	-69,6	
Sardegna	-5,0	

Analyzing the sectoral dynamics, service firms occupy the first three positions (Fig.5).

This trend arises from a multiplicity of factors such as:

- Financial facilities such as the reduction of bank guarantees for the waste sector;
- Funding and ad hoc projects for the promotion of EMAS in Public Administrations (PAs);
- Administrative simplifications for energy-production firms included in the Integrated Environmental Authorization (AIA).

More in detail, the waste sector shows a 21% growth confirming the success of financial aid. It is also important to emphasize that, before 2014, the PA sector was more represented than the waste sector.



**Figure 5 - EMAS registered organizations trend in Italy for the main industrial sectors.**

The PA sector registered a 27% decrease, mainly located in the Trento Province, where a territorial reorganization has taken place merging several municipalities (reorganization to which it is possible to attribute about 40% of EMAS withdrawals). However, it has been found that several PAs have decided to abandon the Scheme for the limited financial resources, for the unfulfilled expectations in terms of image improvement (e.g. increase in tourist flows) and the lack of regulatory relief and public funding. A further 13% abandonment rate has taken place in Piemonte, mainly due to the economic crisis and the National Balance Law, which resulted in a shortage of resources. The remaining percentage of abandonment, equal to 47%, is homogeneously distributed in the other regions (Liguria, Veneto, Lazio, Emilia-Romagna).

For the Energy-production sector, the 6.5% decrease in 2014 was almost entirely reversed (-0.6%) in 2015, and the sector remains one of the most represented in EMAS, also benefiting from several supporting measures<sup>4</sup>.

Analyzing the ISPRA Yearbook 2009 - 2014<sup>5</sup>, the increase of EMAS drops out started in 2009 with a slight decline, and has constantly been evolving over the years. This first signal was not attributed to any specific factor.

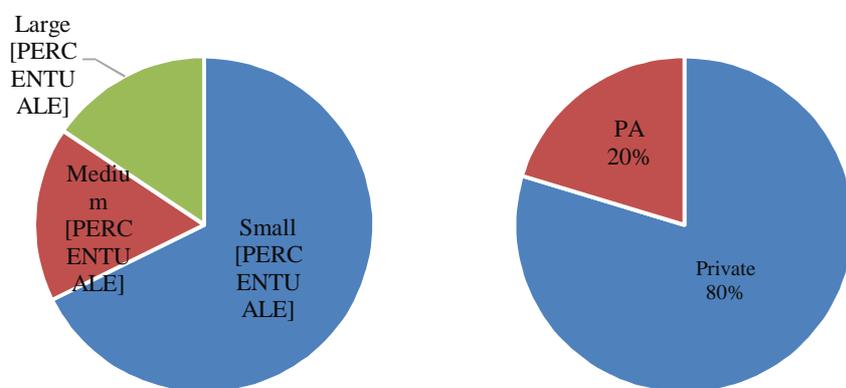
4 D'Amico, M. D'Alessandro, B. Tropea, V. Basile, G. Curcuruto, S. (2016) Environmental certification as a tool for sustainability: state of the art and future evolution - Acts XVI CIRIAF Congress - 2016, Assisi (PG)

5 ISPRA Yearbook 2009-2014

In 2011, there was a slight growth of registrations. The following year (2012), in the wake of the economic crisis, there was a new downturn (-0.6%), which mainly involved SMEs, reducing their overall role in EMAS from 36% to 33%. The abandonment phenomenon exploded in all its gravity in 2013, with a -5.2%. With the persistence of the economic crisis, other system vulnerabilities emerged, such as the lack of expected returns in terms of both logo recognition and administrative simplifications. In addition, the weight of small businesses continued to lose another two percentage points (31%). Even in the period between December 2013 and December 2014, the number of registered organizations went down (-3.6%). This negative trend particularly concerned micro and small organizations (45% of total drops out in 2014).

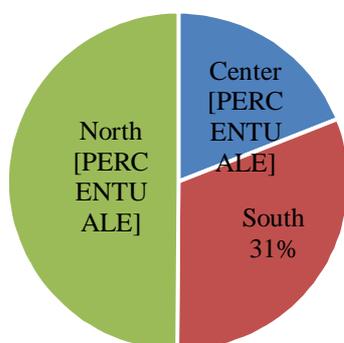
## 2. CHARACTERISTICS OF THE ORGANIZATIONS THAT HAVE NOT RENEWED EMAS

Using a different point of view, the following section describes the characteristics of the organizations that have not renewed the registration, expanding the time span from 2010 to 2015. Figure 6 shows the distribution of organizations that did not maintain the registration.



**Figure 6 - Distribution of organizations that did not renew EMAS.**

Especially small-sized organizations (68%) decided not to renew the registration. Additionally, 20% consists of PAs, while the remaining 80% were private-owned firms (Fig.6). Organizations' localization points out that the regions most affected by the phenomenon are those in the North (50%) followed by the South (31%) and the Center (19%) (Fig. 7).



**Figure 7 – Organizations that did not renew EMAS by geographical distribution (2010- 2015).**

Considering the geographical distribution, the four regions most affected by the EMAS abandonment are Emilia-Romagna (75), Toscana (45), Campania and Puglia (35) (Fig.8). In Emilia-Romagna, a slight decrease (-4%) had already been recorded in the 2013-2014 period and had mainly involved the food sector

organizations of the Provinces of Parma and Reggio Emilia<sup>6</sup>. In fact, by investigating the trend by sectors (Fig.9), in the first three places there are the PA (74), the agri-food sector (40) and the Energy sector (29).

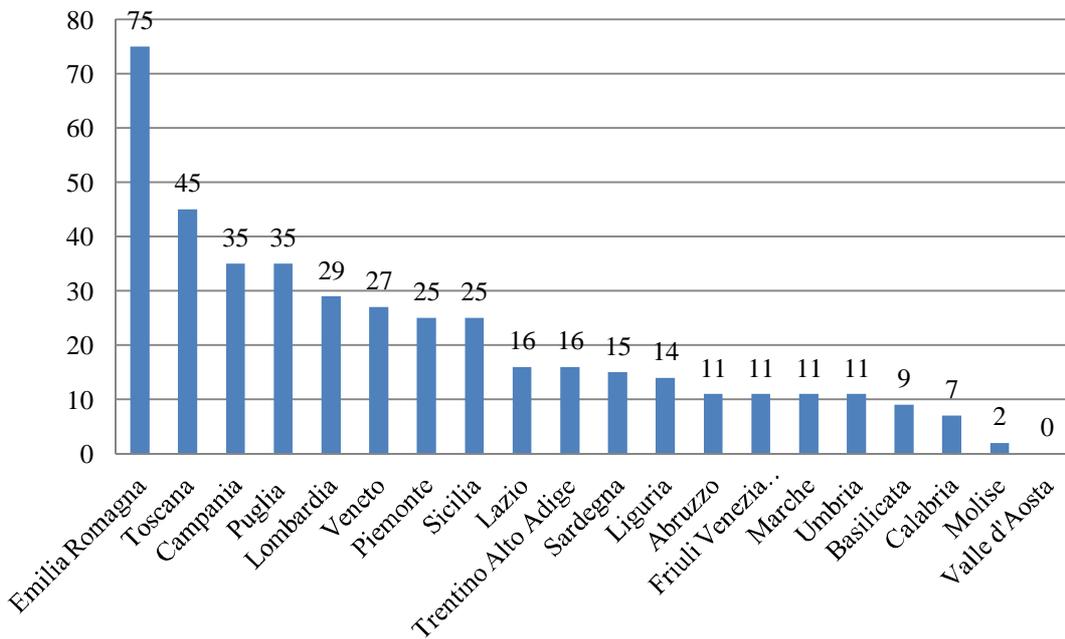


Figure 8 - Number of organizations that did not renew EMAS by region, from 2010 to 2015.

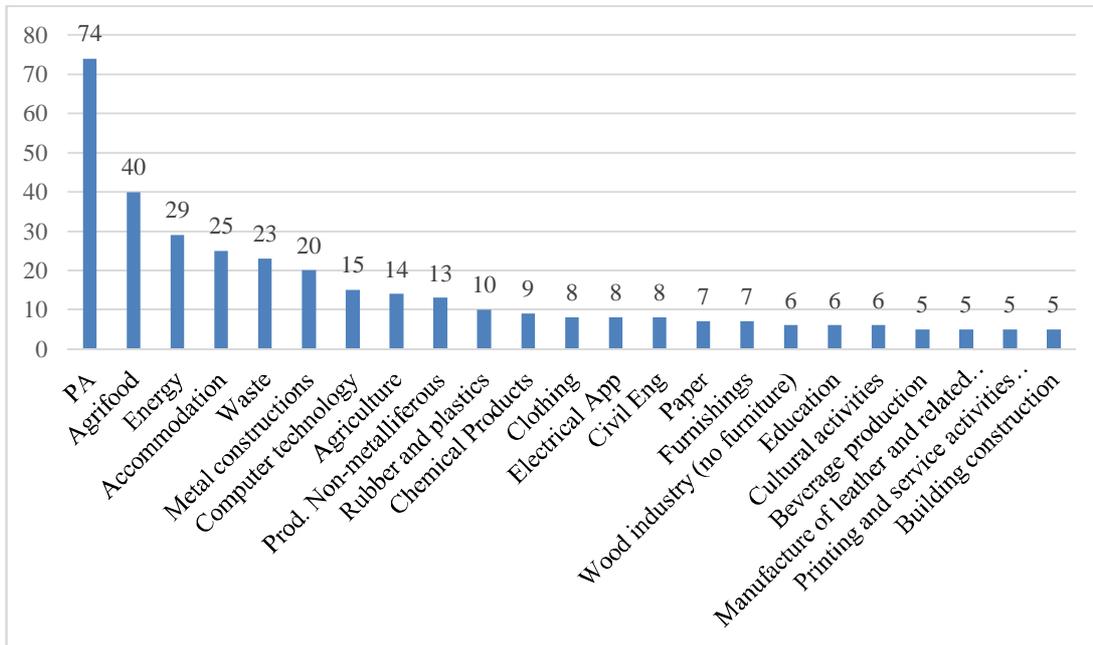


Figure 9 - NACE codes' of organizations that did not renew EMAS between 2010 and 2015.

6 Cancila, E. Amorusi, A. Ottolenghi, M. a cura di (2015) Delivering Voluntary Tools for Sustainability Management in Emilia Romagna - Emilia-Romagna Region, ERVET, greenER - Bologna

7 NACE codes represented by at least 5 organizations

### 3. COMPARISON BETWEEN THE ORGANIZATIONS THAT HAVE NOT RENEWED EMAS AND EMAS REGISTERED ORGANIZATIONS

Figure 10 identifies the trend inversion in EMAS registrations occurred in 2012, year in which the number of dropouts exceeded the number of new registrations. The counter-trend year 2013 corresponds to the vacatio period of the Ecoaudit Ecolabel Committee<sup>8</sup>, during which its activities were interrupted. With the establishment of the new Committee from July 2014, the phenomenon continued its negative trend, recording 113 dropouts in 2014 and 106 in 2015.

The 2014-2015 period closed negatively (-38) (Fig.11), especially for small organizations (Fig.12). The trend of large and medium-sized organizations remained positive. Also PAs maintained a positive trend. Considering the geographical localization, the North maintained a fair positive balance (+30) (Fig.13, Central regions a steady trend, and Southern regions a significant negative trend (-74).

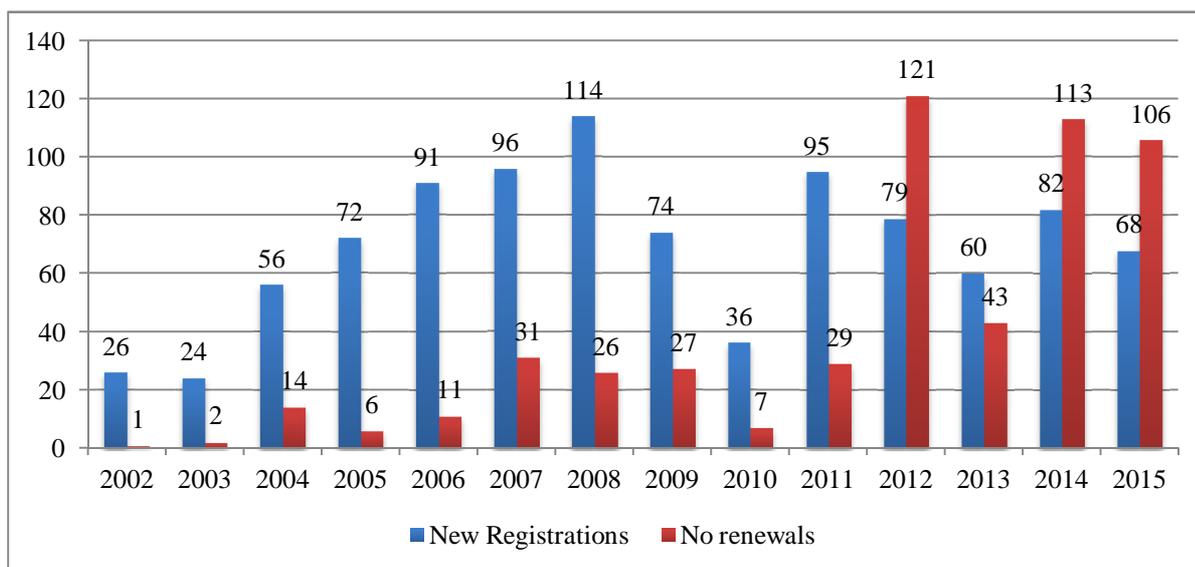


Figure 10 - Comparison of new EMAS registrations and dropouts from 2002 to 2015.

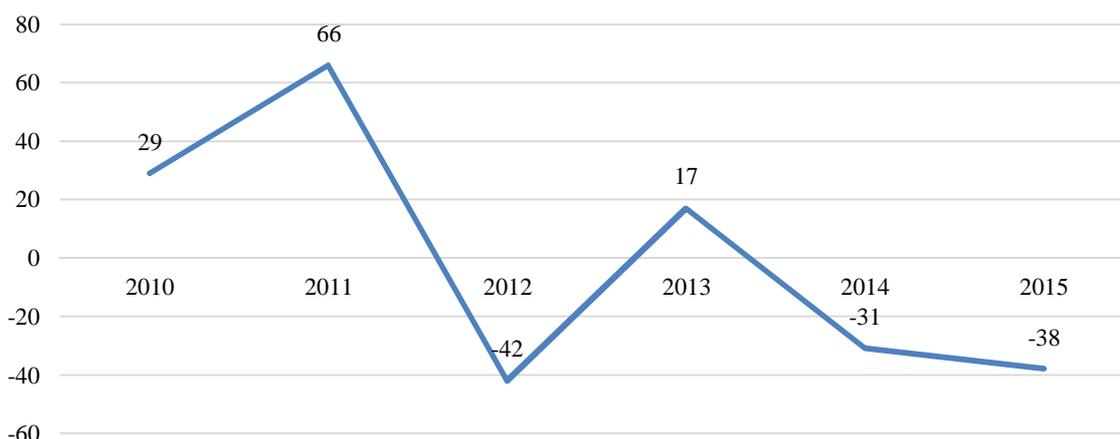
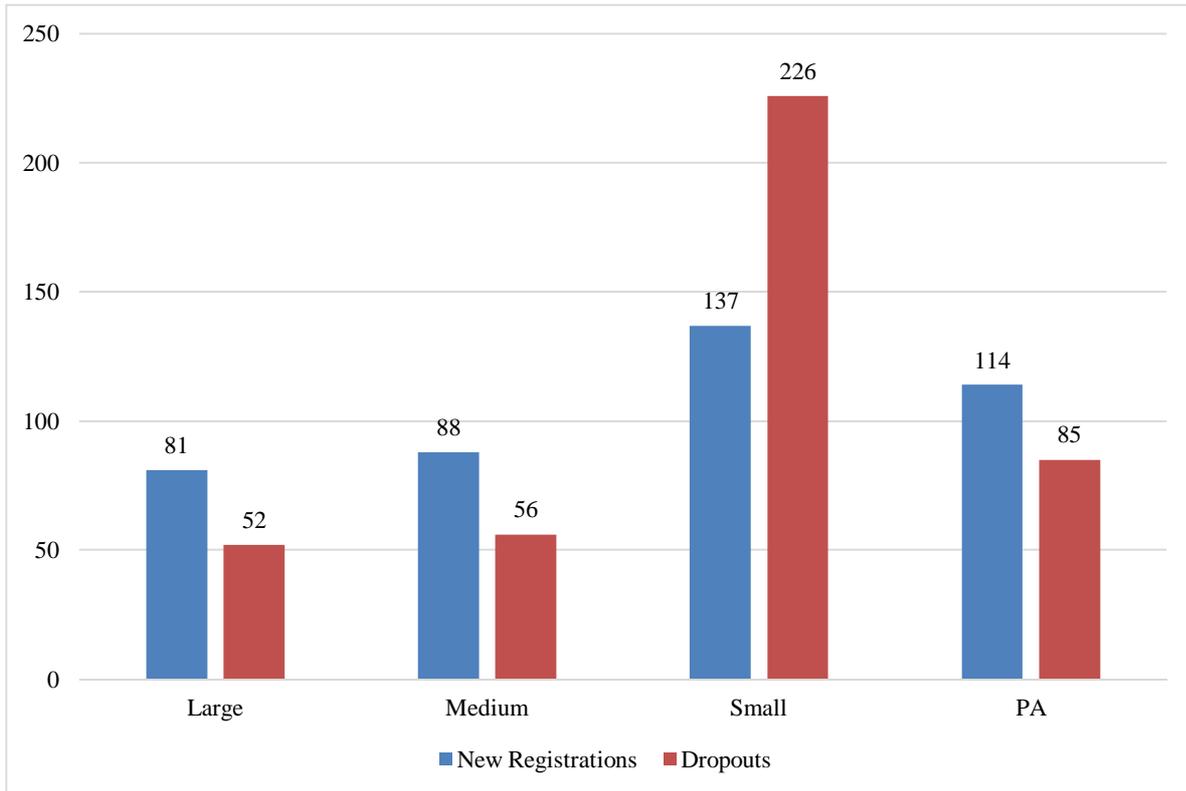
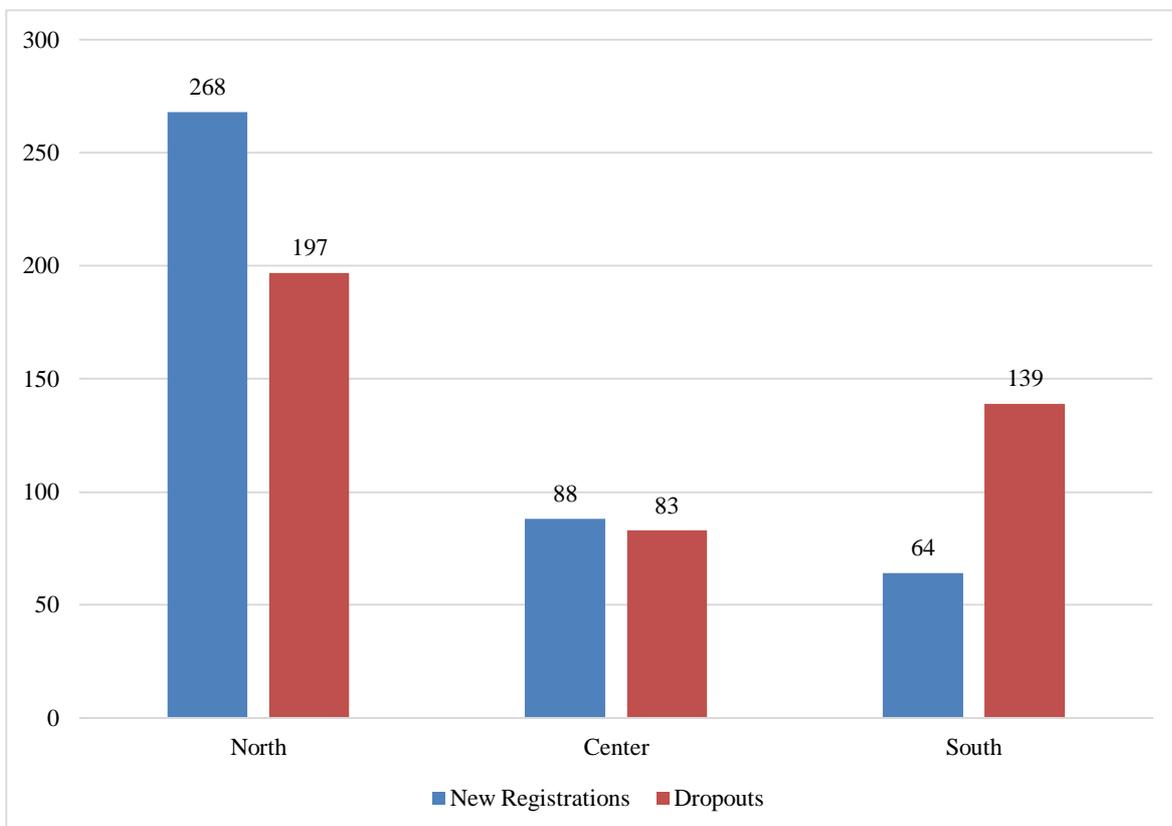


Figure 11 - Difference between new EMAS registrations and dropouts from 2010 to 2015.

<sup>8</sup> EC Regulations 1221/09 EMAS and EC 66/10 ECOLABEL provide that each Member State shall establish national Competent Bodies to carry out the task of implementing these schemes. The Italian DM 413/95 has established the Ecolabel-Ecoaudit Committee to carry out the functions attributed to the Competent Bodies, and for this purpose has also decided that it will use the technical support of ISPRA. The same decree provides that members of the Committee, composed of representatives of the Ministries of the Environment, Economic Development, Health and Economy, and Finance, will remain in office for three years and that the assignment may be renewed only once.



**Figure 12 - Comparison by the size of organizations and Public Administrations, between new EMAS registrations and dropouts between 2010 and 2015.**



**Figure 13 - Comparison by the location of organizations between new EMAS registrations and dropouts from 2010 to 2015.**

The analysis based on the regional trend showed a positive balance for Lombardia, Trentino-Alto Adige, Piemonte, Toscana, Marche and Lazio. A negative trend occurred in the other Regions (Fig.14).

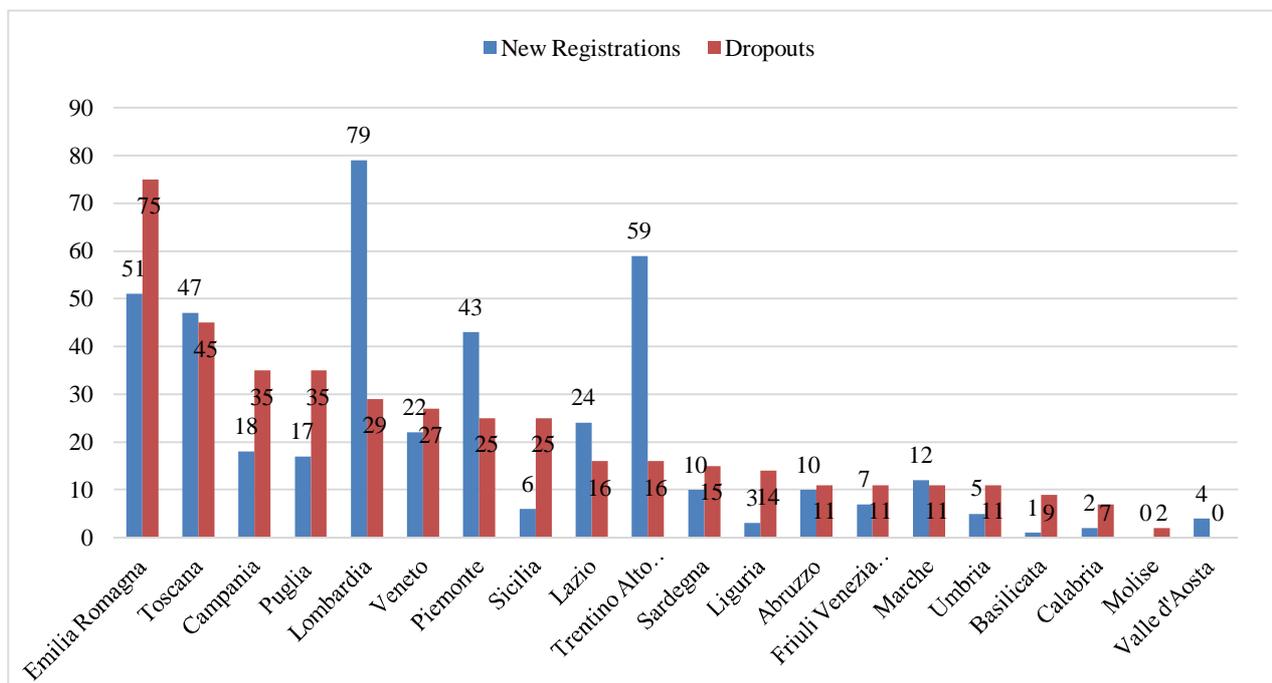


Figure 14 - Comparison by region between EMAS registrations and dropouts from 2010 to 2015.

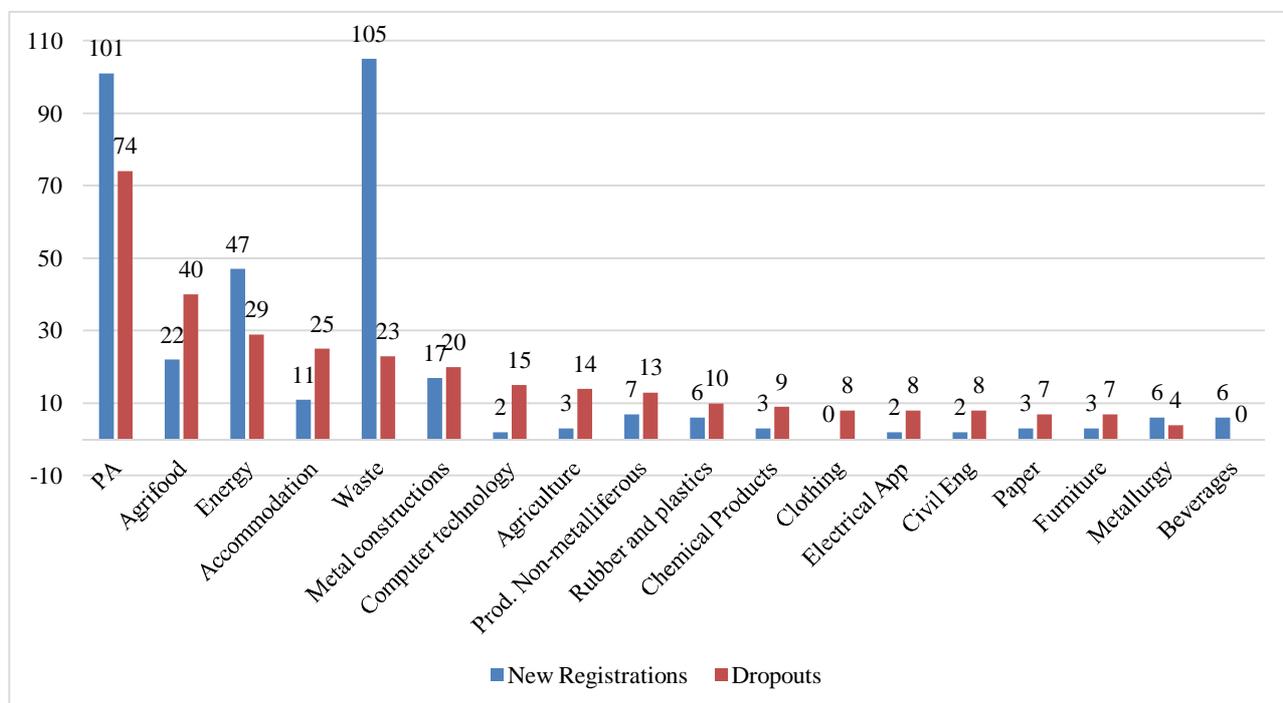


Figure 15 - Comparison between new EMAS registrations and dropouts from 2010 to 2015 according to the 10 most representative sectors (NACE codes).

Analyzing the activity sectors, waste management (105), PA (101) and energy-production (47) presented a positive trend of growth (Fig.15). Considering the PA, the decreasing trend highlights a problem that mainly occurred in the Province of Trento, where there was a territorial reorganization with the unification of several municipalities. On the other hand, the success of the waste management sector, as already reported in the

comment of Fig. 5, is due to the reduction of bank guarantees required by law for organizations operating in some specific sectors (e.g. waste, mining and remediation). The bank guarantees represent an essential regulatory requirement to ensure that the operator has sufficient financial resources to prevent, avoid or repair any damage to the environment. This form of financial facility is granted to EMAS organizations, as operating through the adoption of an environmental management system ensures better management of the risks. Therefore, this tool has met a considerable success, bearing in mind that this reduction can reach up to 50% of the bank guarantees due and does not determine costs or lower income for the public administration<sup>9</sup>. Based on the 10 most representative NACE codes, it should be noted that only 3 sectors out of 10 closed the period with a positive balance between new registrations and dropouts (Fig.15).

#### 4. PRESENTATION OF THE SAMPLE AND METHODOLOGY

The survey targeted all the Italian organizations that did not renew EMAS registration between 2010 and 2015. The organizations were extracted from the ISPRA database; for each organization, name, registration number, location, size, NACE code, e-mail address and telephone contacts were acquired.

It was decided to select the organizations that have left EMAS since 2010, the year in which the last revision of the Regulation came into force and in which a strong contraction of new registrations was observed, accompanied by a significant increase in the number of withdrawals. The survey was built on the main results emerged from the EMAS Forum 2015. The items proposed in the questionnaire were based both on previous scientific literature and on the results deriving from the aforementioned Forum.

The questionnaire consists of three main sections:

- in the first one, the potential reasons for dropping out of EMAS were listed;
- in the second one, the potential measures to overcome EMAS critical issues and stimulate organizations to move back to EMAS were listed;
- in the third one, general information on organizations' characteristics was requested.

The questionnaire is based on a Likert scale from 1 to 6 (where 1 stands for not important and 6 for very important) (Tab.2).

**Table 2 – Survey Likert Scale**

Description	Value
Not Important	1
Poorly important	2
Not important	3
Quite important	4
Important	5
Very important	6

In the questionnaire (section one and two), organizations were asked to indicate the level of importance for each of the possible reasons for dropping out of EMAS and the degree of appreciation for the potential measures to be introduced to stimulate new registrations. Finally (section three), some general information was requested, such as size, NACE code, location and EMAS registration years. The initial set of data was made up of 379 organizations that requested the cancellation of the registration in the 2010-2015 period. The questionnaire was sent by e-mail and the organizations were subsequently contacted by telephone.

Out of the initial population, 40 organizations were excluded because they were no longer active at the time of the survey. It was found that 18 of them had failed, 17 were liquidated and 5 merged with other firms.

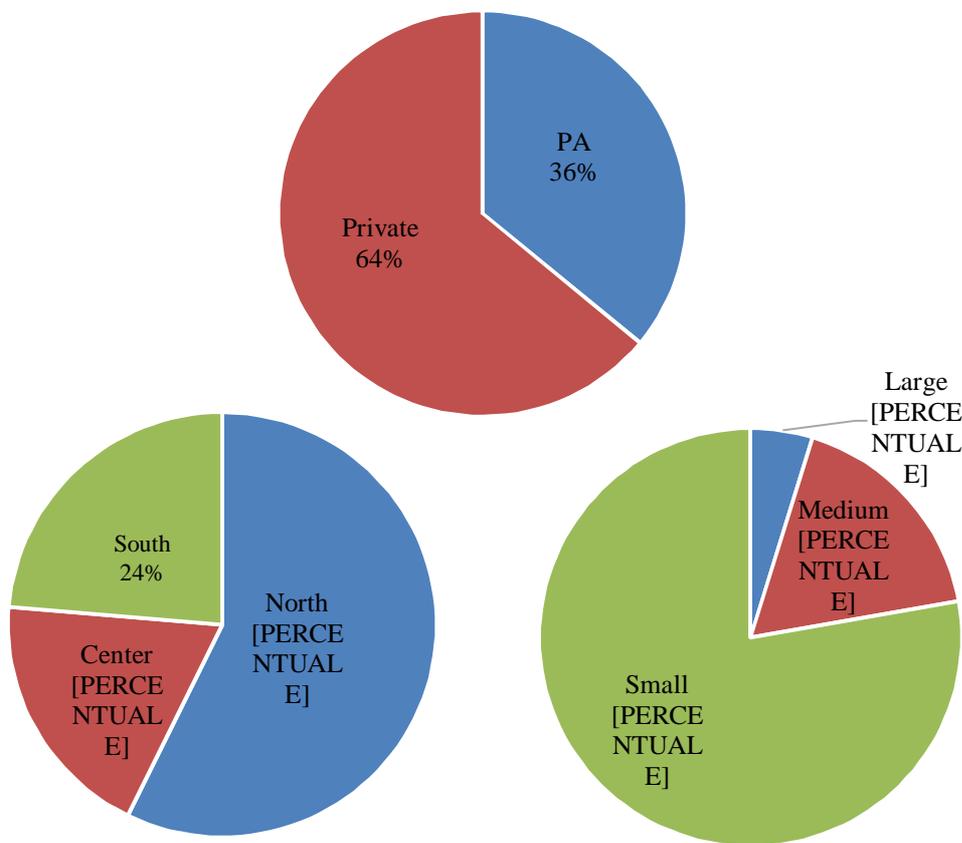
<sup>9</sup> See note n.7

Following this selection, the target organizations dropped to 339. Eventually, it was not possible to contact 104 organizations via e-mail and/or telephone (non-existent/inactive telephone number and/or e-mail address, undelivered), with a consequent reduction in the number of organizations to 235.

The respondents to the survey were 99. Considering the target of contacting 235 organizations there was a response rate of 42.13%. Considering the whole population (339 units), the response rate was 29.20% which, given the context, can be considered as a satisfactory result. The percentage of respondents is in line with the other main surveys conducted in the field of environmental management systems<sup>10</sup>.

#### 4.1 Profile of respondents

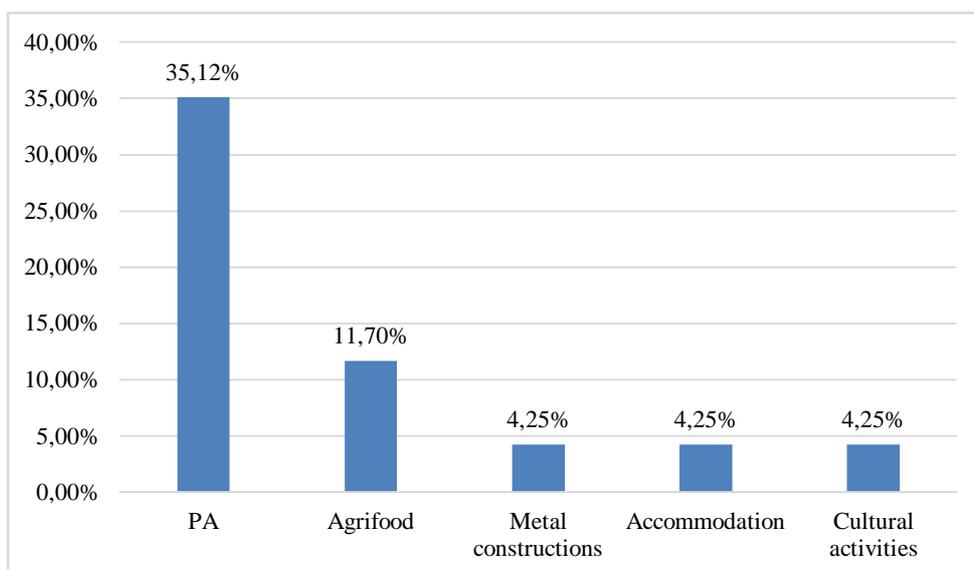
As shown in Figure 16, most of the responding organizations are private firms (64%), while the remaining 36% are PAs. Considering the size of organizations, 66% are SMEs. The organizations are largely concentrated in the North (57%) with a prevalence of organizations belonging to the private sector (64%) (Fig.16).



**Figure 16 - Profile of respondents (Private companies and PA, geographical distribution, and size).**

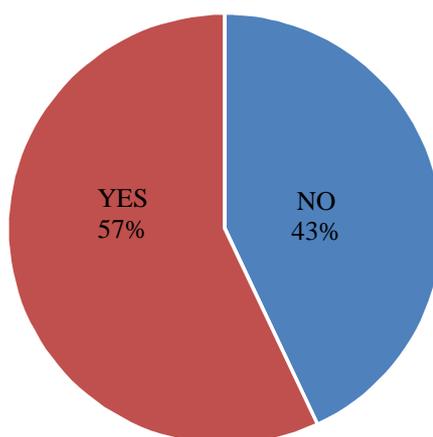
Considering the sector of activities, Fig.17 shows the sector of activities of respondents. Over 36% belong to the PA, followed by the food industry (11.70%), the manufacture of metal products (4.25%) and the accommodation services (4.25%). Fig. 17 does not show values lower than 2.5%.

<sup>10</sup> (Babakri et al., 2003; De Oliveira et al., 2010; Heras-Saizarbitoria et al., 2015; Martin-Pena et al., 2014; Phan and Baird, 2015; Quazi et al., 2001; Schylander and Martinuzzi, 2007)



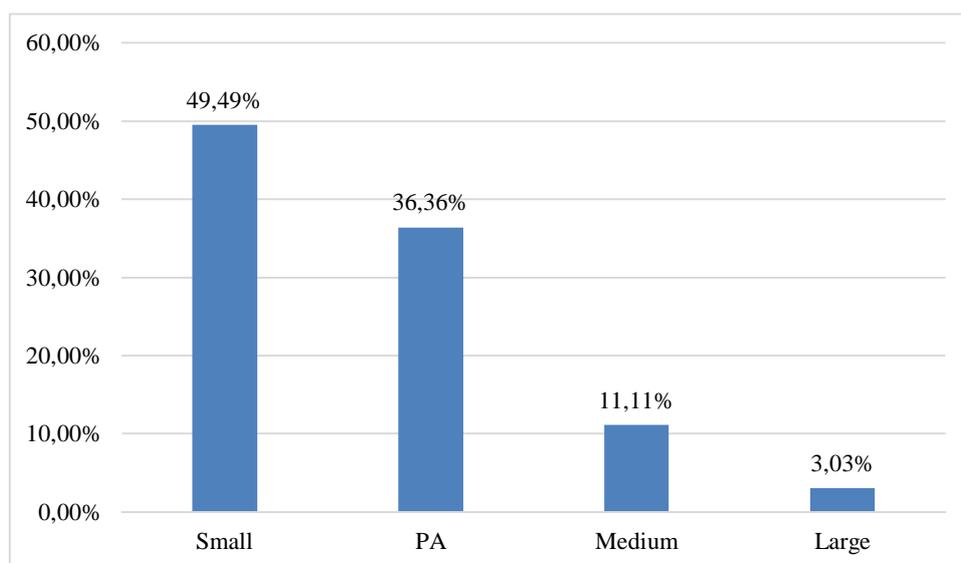
**Figure 17 – Organizations’ sector of activities.**

Over the years, the legislator has pushed EMAS adoption through the recognition of benefits and incentives. Different measures were issued both nationally and locally. Among these measures, public funding has played an important role, boosting the diffusion of this certification. In Italy, most organizations have exploited resources from the European Community (e.g. Structural Funds, European Funds). Other forms of public funding derived from the Regional Operational Programs (POR) and from the European Regional Development Funds (FERS). Typically, such measures have, by their nature, a temporary duration. The aim of the questionnaire is to understand if this public funding has affected the decision not to renew EMAS. 57% of the organizations that did not renew EMAS used a form of public funding (Fig. 18), whose temporary nature probably conditioned the final choice not to renew EMAS.



**Figure 18- Organizations that have benefited from a public funding to obtain the EMAS.**

Results described in Figure 18 show that mainly SMEs (60.60%) obtained public funding, followed by the PA (36.36%) and the large-sized organizations (3.03%) (Figure 19).



**Figure 19- Size of companies and PAs that benefited from public funding to obtain EMAS.**

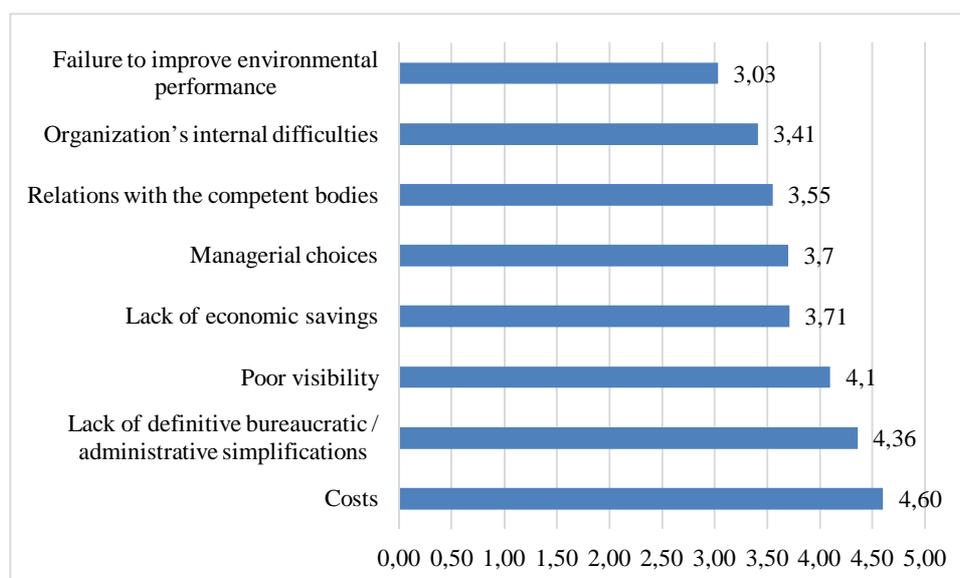
## 4.2 Results of the survey

The following section shows the results of the questionnaire investigating the reasons that led organizations not to renew EMAS (Section 4.2.1).

Section 4.2.2 describes the level of importance assigned by the respondents to the different measures that may be implemented to facilitate organizations to move-back to the Scheme (enabling measures).

### 4.2.1. Reasons for dropping out of EMAS

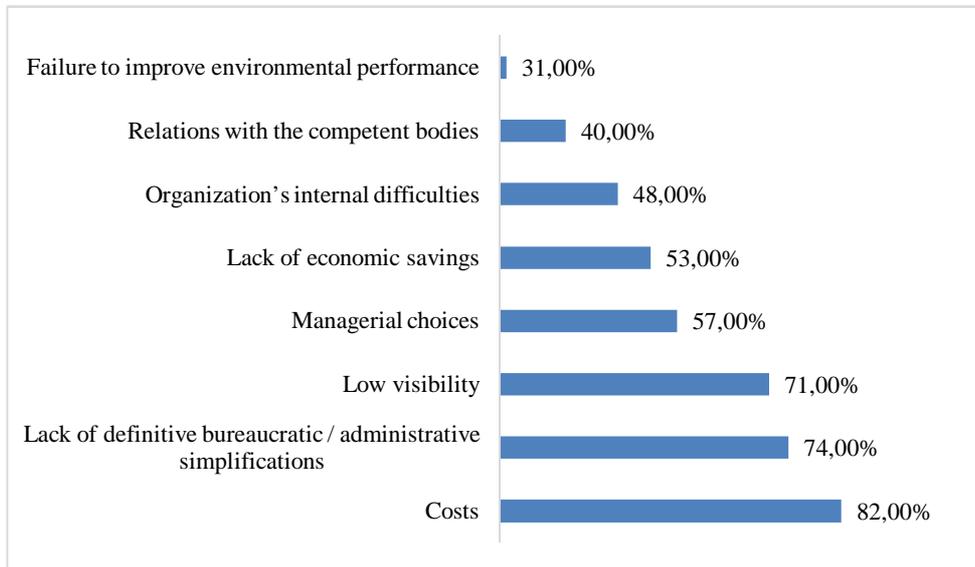
Section one of the questionnaire aims to identify the motivations that have been critical for the decision of not renewing the registration. The most significant motivations to decide not to renew EMAS were the costs with a value of 4.62, followed by the lack of administrative/bureaucratic simplifications (4.37) and the lack of visibility (4.28). On the other hand, the item concerning the lack of improvement in environmental performance had the lowest score (3.00) (Fig.20).



**Figure 20 – Importance of reasons for dropping out of EMAS.**

The same variables were used to verify which motivations were crucial in choosing not to renew EMAS, providing an affirmative/negative answer.

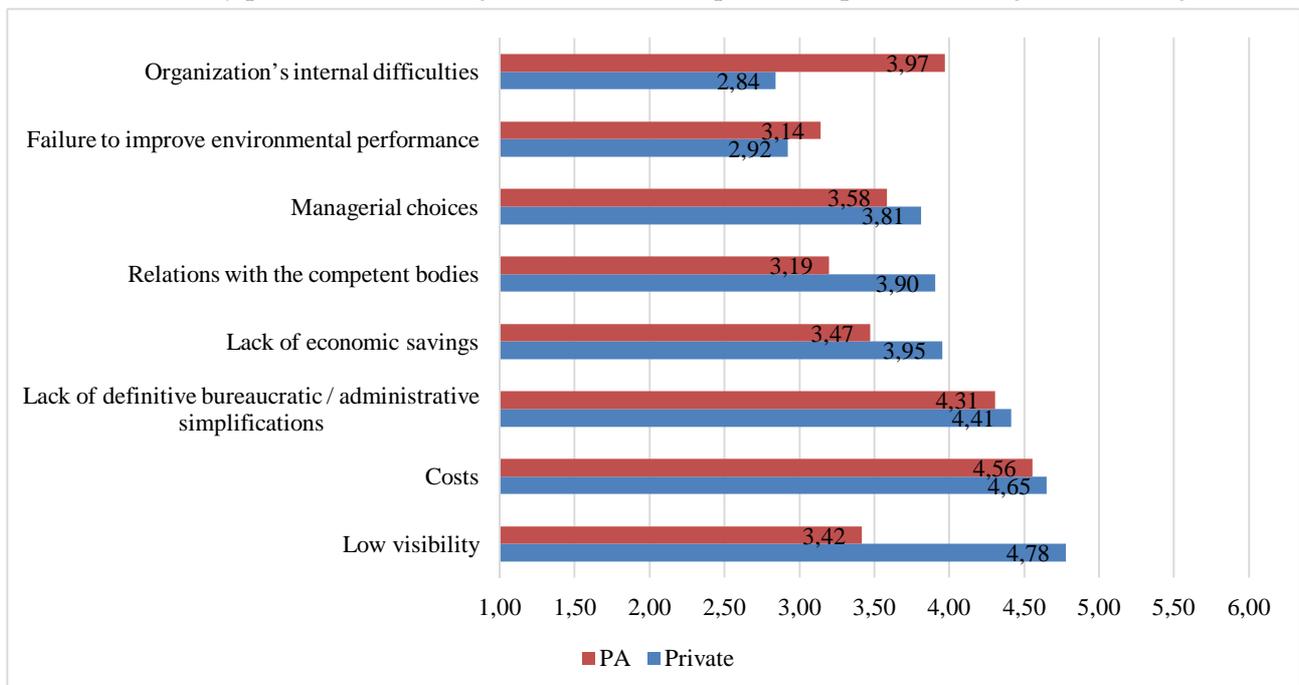
Costs obtained 82% of affirmative answers, followed by 74% due to the lack of bureaucratic-administrative simplifications and by 71% due to the lack of return in terms of visibility. Even with this formulation, findings show that only 31% of the interviewees did not renew the registration due to the lack of environmental improvements (Figure 21).



**Figure 21 - Percentage of the reasons that have been crucial for dropping-out of EMAS.**

Considering separately, Private-owned organizations and PAs, the costs and bureaucratic-administrative simplifications assume significant values for both categories.

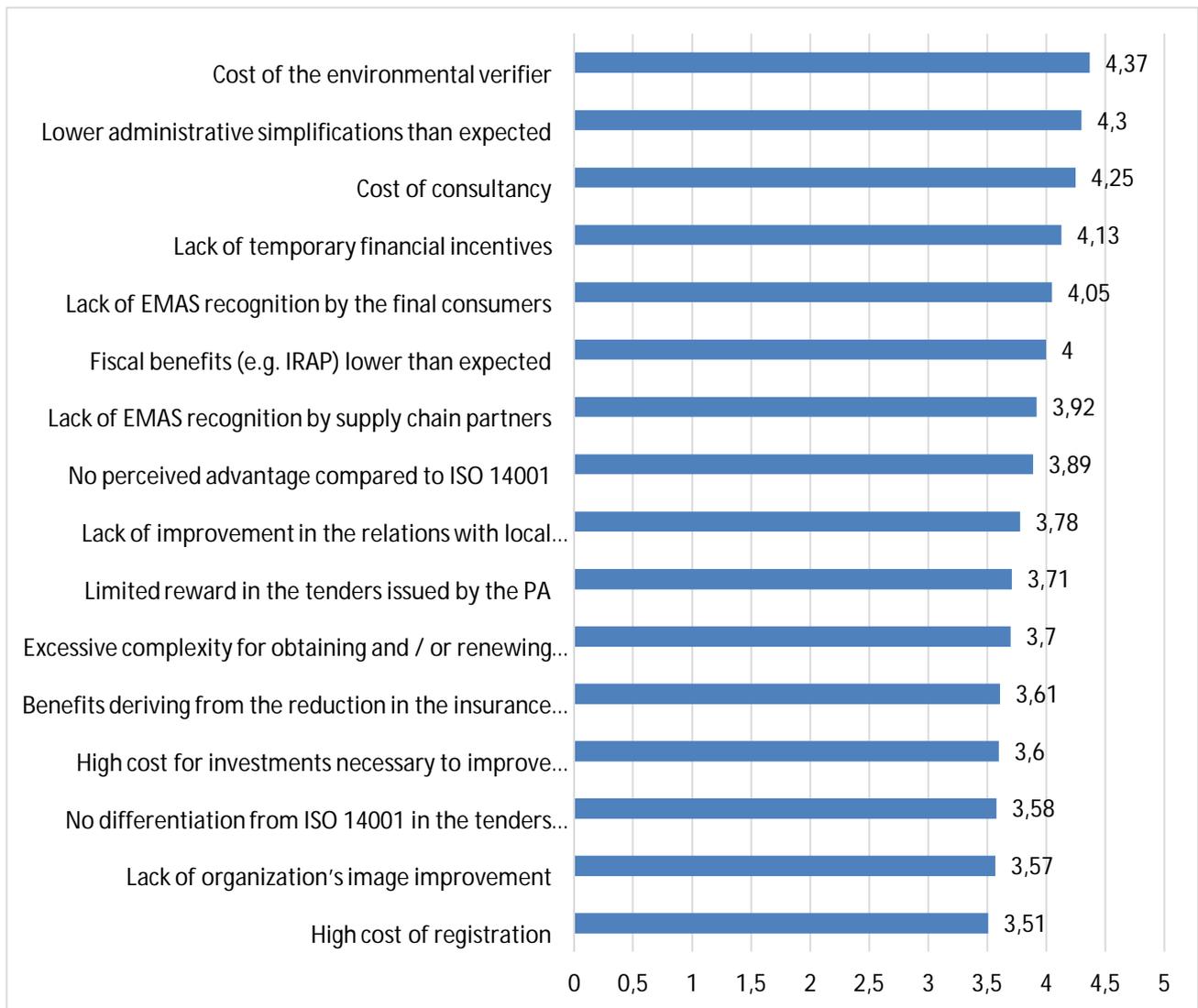
Firms point out a lack of visibility improvement on the market and a lack of improvement in the relationships with the Competent Authorities. In contrast, the PAs show that the organization internal difficulties are crucial for dropping out of EMAS. Probably, these difficulties can be associated to a variety of reasons (stability pact, territorial reorganization, lack of specialized professional figures etc.) (Fig. 22).



**Figure 22- Importance of reasons for dropping out of EMAS for the PA and private-owned organizations.**

With the aim of increasing the level of detail, a more comprehensive framework (45 items) of potential reasons for dropping out of EMAS was proposed. Figure 22 shows the 10 items with the highest scores (the complete list of results can be found in Annex 1).

Among EMAS-related costs, which emerged as predominant, the most significant is the one for the Environmental Verifier (4.37 value) followed by the consultancy cost with a value of 4.25. All the costs items range between 4 and 5, between “quite important” and “important”. Specifically, other costs reported by the organizations range from the costs for the registration process to the costs for the adoption of the BAT (Best Available Technologies); missed opportunities are represented by the low reduction in insurance premium costs, for which no real advantage was perceived.



**Figure 23- Motivations for dropping-out of EMAS with a score above 3.5 (complete list provided in Annex 1).**

Considering the lack of bureaucratic/administrative simplifications, the most interesting answer is "Lower administrative simplifications than expected" with a score of 4.30. Based on a survey conducted within the BRAVE project out of 250 European organizations, it was found that for 55% of the organizations interviewed the main reason for adopting EMAS was the possibility of using simplifications.

Additionally, considering the item "Fiscal benefits (e.g. IRAP) lower than expected" a value lower than we expected (4.00) was found. This can be explained by the fact that in the Italian scenario, only Toscana and Veneto regions had taken measures for offering tax relief to EMAS registered organizations. This type of measure was not replicated in other regions.

The limited provision of temporary financial incentives obtained a value equal to 4.13, although 43% of respondents had benefited from them. This demonstrates the validity of the measures only in the short term.

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Interestingly, respondents consider EMAS not very effective for obtaining competitive market advantages. This critical issue was detected both in terms of relations with the supply chain partners (3.92) and towards the final customer (4.05) (Figure 22).

#### **4.2.2. Enabling factors to encourage new registrations**

This section of the questionnaire was created with the aim to identify the best options to reduce EMAS critical issues emerged in the previous section and to collect feedback from ideas emerged during the EMAS Forum 2015.

Fig. 24 shows the measures that the organizations consider strategic to move back to EMAS (score above 4.50 on the Likert 1 - 6 scale):

- 1) increasing permanent bureaucratic and administrative simplifications (e.g. Longer Permits and/or simplifications for obtaining approvals and permits, reduction of controls) (value 4,96);
- 2) implementing financial facilities (reduction of fees, charges and rates for inspections, environmental preliminary expenses) (value 4,91);
- 3) giving greater importance to EMAS in obtaining public funding (European, national, regional funding) (value 4,82);
- 4) increasing tax benefits in the long-term (e.g. Reduction of the Italian Regional Tax on Productive Activity - *IRAP*, reduction of environmental hygiene tax etc.) (value 4,79);
- 5) giving greater importance to EMAS in the public funding mechanisms compared to ISO 14001 (value 4,51).

As the diffusion of EMAS has been supported by various measures over time, the result reported in point 1) should certainly consider the type of simplifications defined at “zero cost”, since their activation does not generally require the use of economic resources. They are based, for example, on time reduction for authorization releases, on the extension of their duration, on the possibility of using facilitated procedures and self-certifications. Considering that the controls are carried out by competent authorities, EMAS organizations should benefit from reduced controls.

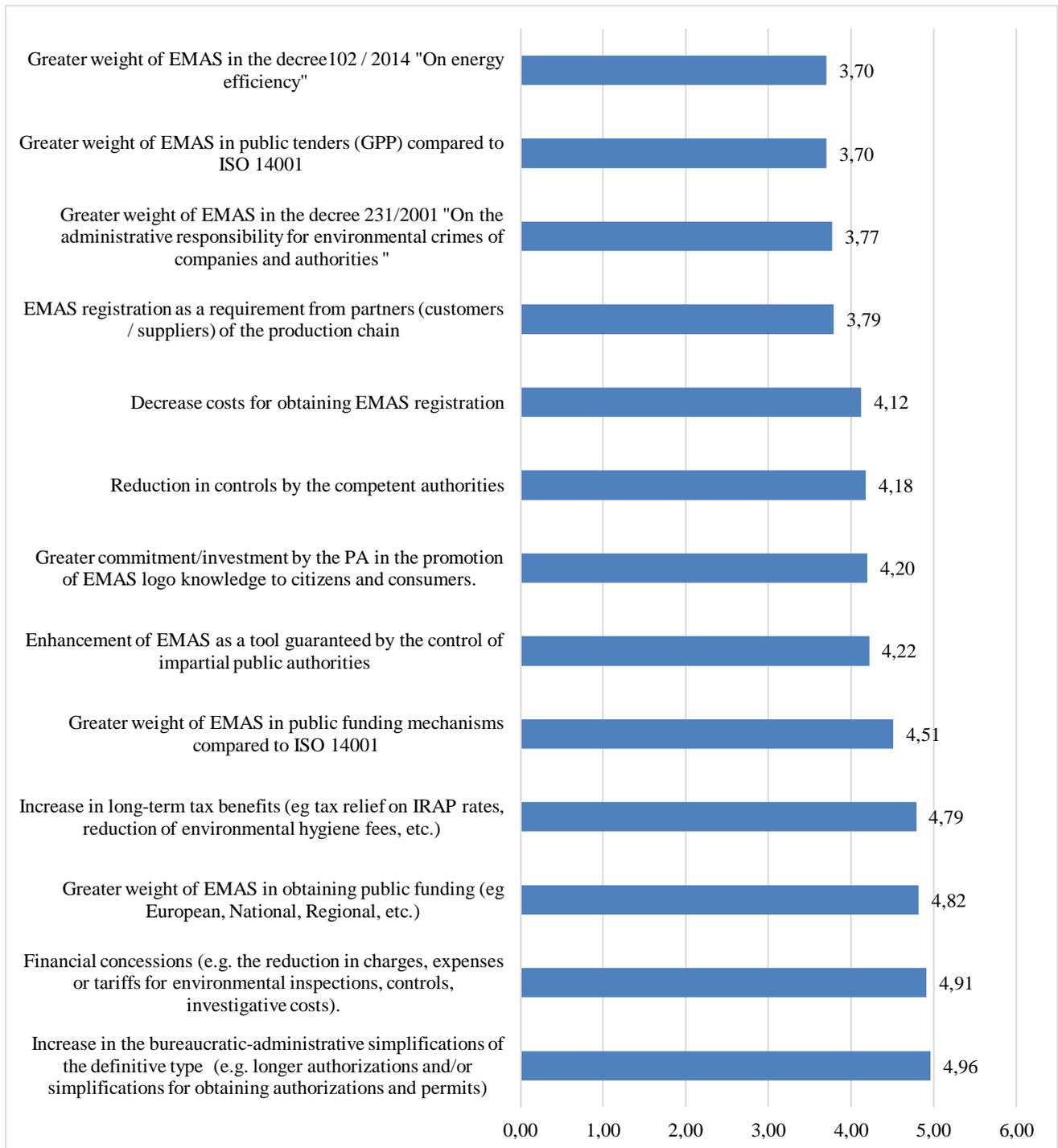
Point 2) refers to financial instruments, which should be provided for EMAS registered organizations (e.g. the reduction in charges and tariffs related to public authorities’ inspections and investigations and, more generally, the reduction in charges deriving from environmental controls).

Point 3) refers to benefits for EMAS organizations in calls and public tenders (e.g. Green Public Procurement), in which EMAS should have a greater reward in the rankings.

The tax benefits (point 4) could be provided with reduced rates (e.g. for *IRAP*). In some regions (Toscana and Veneto), this measure has already achieved considerable success in terms of EMAS diffusion.

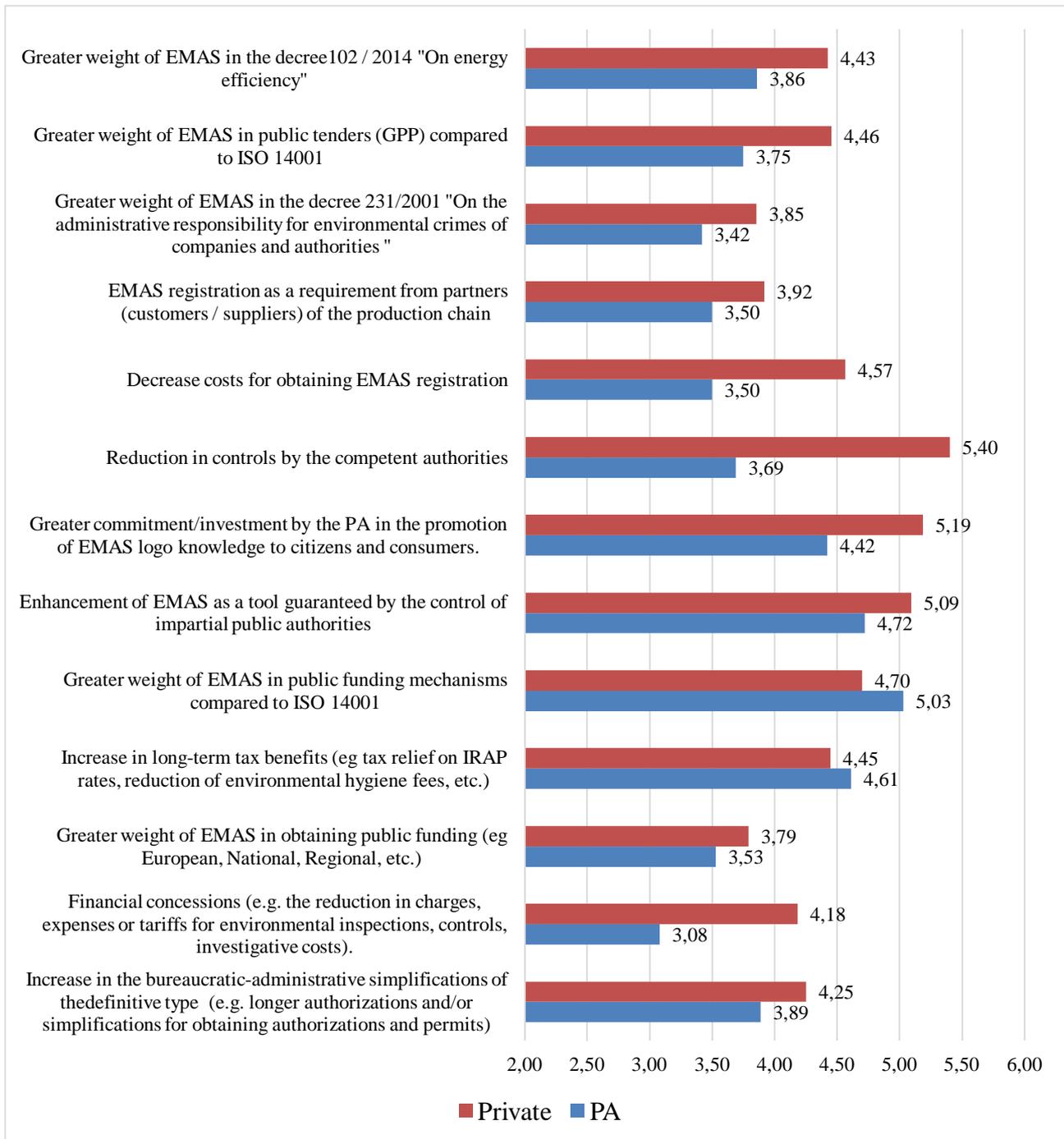
Point 5) shows a controversial aspect, regarding the comparison between EMAS and ISO 14001. In fact, in many measures (for example public tenders), the two certifications are reported without any distinction: if, on the one hand this broadens the audience of those entitled, on the other hand it does not attribute to EMAS a recognized competitive advantage, given its greater environmental value.

Additionally, analyzing the feedback of enabling measures with a score between 4.10 - 4.30 (quite important), we find that the enhancement of EMAS through promotional Logo campaigns, the reduction of environmental controls and related costs are considered significant by respondents. The lack of logo recognition could be overcome with an integrated multilevel strategy according to which the Member States are forced by European institutions to promote the EMAS logo. At the national level, it is necessary to launch campaigns to promote and disseminate the EMAS system, the Logo and the real benefits that can be achieved through its adoption.



**Figure 24 – Importance enabling measures to stimulate organizations to move-back to EMAS.**

In Fig. 25 results have been grouped into PA and Private-owned organizations. In general, the call for enabling measures is more relevant for private organizations, especially considering the long-term fiscal benefits, the reduction in controls and the use of EMAS to improve commercial relations.



**Figure 25 - Importance of enabling measures for the PA and Private-owned organizations.**

To clarify the results, Tab.3 synthesizes the answers in the range 4.5 - 5 (quite important/important) and gives an overview of those in the 4 – 4.5 range (quite important) by dividing organizations by size and category. In the set of measures to be implemented, we highlight the importance of increasing the bureaucratic and administrative simplifications for both the PA and Private-owned organizations. The increase in long-term tax benefits and financial facilities, on the other hand, is significantly required by SMEs. The greater relevance of EMAS in obtaining public funding compared to ISO 14001 involves the PA and small firms, while the request of controls reduction by the competent authorities is mainly required by SMEs. By exploring the range of responses between 4 - 4.50, the SMEs require greater public investment in the promotion of EMAS and in the reduction in registration costs (Table 3). Tab.4 shows the scores obtained according to the size of Private-owned organizations.

**Table 3 - Importance of enabling measures by respondent's category (PA and Private-owned organizations) and size (Small, Medium and Large).**

Measures	Private companies			PA
	Large	Medium	Small	
Range 4.50 - 5				
Increase in long-term tax benefits (e.g. tax relief on IRAP rates, reduction in environmental hygiene fees, etc.)				
Financial concessions (e.g. the reduction in charges, expenses or tariffs for environmental inspections, controls, investigative costs)				
Increase in the bureaucratic-administrative simplifications of the definitive type (e.g. longer authorizations and/or simplifications for obtaining authorizations and permits)				
Greater weight of EMAS in obtaining public funding (e.g. European, National, Regional, etc.)				
Reduction in controls by the competent authorities				
Greater weight of EMAS in public funding mechanisms compared to ISO 14001				
Range 4 – 4.50				
Greater commitment/investment by the PA in the promotion of EMAS logo knowledge to citizens and consumers				
Decrease in costs for obtaining EMAS registration				

In conclusion, organizations were asked whether they had considered returning to EMAS. 90% answered negatively; however, if the measures reported were implemented, 60% declared their willingness to adhere to the Regulation again, indirectly attributing a truly strategic nature to the enabling measures proposed in this section.

**Table 4 - Importance of enabling measures by size of Private-owned organizations.**

Measures	Large	Medium	Small
Decrease in costs for obtaining EMAS registration	3.00	3.91	4.70
EMAS registration as a requirement from partners (customers / suppliers) of the production chain	3.00	4.45	4.26
Greater weight of EMAS in public tenders (GPP) compared to ISO 14001	4.00	4.09	3.78
Greater weight of EMAS in public funding mechanisms compared to ISO 14001	3.33	4.45	4.52
Greater weight of EMAS in obtaining public funding (e.g. European, National, Regional etc.)	3.33	4.64	5.01
Increase in the bureaucratic-administrative simplifications of the definitive type (e.g. longer authorizations and/or simplifications for obtaining authorizations and permits)	5.00	5.36	5.03
Financial concessions (e.g. the reduction in charges, expenses or tariffs for environmental inspections, controls, investigative costs)	3.67	5.18	5.22

Increase in long-term tax benefits (e.g. tax relief on IRAP rates, reduction of environmental hygiene fees etc.)	4.00	5.36	5.54
Reduction in controls by the competent authorities	3.00	4.91	4.55
Greater weight of EMAS in the decree 231/2001 "On the administrative responsibility for environmental crimes of companies and authorities "	3.33	4.45	3.84
Greater weight of EMAS in the decree 102 / 2014 "On energy efficiency"	3.33	3.82	3.93
Greater commitment/investment by the PA in the promotion of EMAS logo knowledge to citizens and consumers	3.33	3.82	4.75
Enhancement of EMAS as a tool guaranteed by the control of impartial public authorities	3.33	4.36	4.54

## 5. CONCLUSIONS

The decrease in the number of EMAS registrations (-7.5%) between 2013 and 2015 confirmed a negative trend occurred also between 2009 and 2010 and further worsened by recession phase that affected Italian economy.

The feedback of the EMAS Forum 2015 highlighted that the motivations behind the decision to drop out of EMAS were not only due to the economic crisis, but they had to be traced back into a more complex picture. To further understand this phenomenon, a survey was carried out with the aim of reaching all the Italian organizations that in the 2010 - 2015 period did not renew EMAS.

First we presented an overview of the organizations that dropped out of EMAS. In the 2010-2015 period, mainly small firms (54%) left EMAS, followed by the PA (20%) and by large and medium-sized firms (13%).

The geographical distribution pointed out that the regions most affected by the phenomenon were those located in the North of Italy (50%) followed by the South (31%) and the Center (19%). The regions with the higher abandonment rate were Emilia-Romagna, Toscana and Campania. Considering the sector of activity, the PA was in the first place, followed by the food and energy-production industries.

The overall balance, estimated over the 2010-2015 period and obtained by calculating the difference between new registrations and non-renewals, was negative for small firms, while the medium and large firms, and PA maintained a positive trend.

In order to carry out the survey, a questionnaire was developed in three sections: the first section with the aim of identifying the reasons for not renewing EMAS, the second aimed at identifying the measures to be implemented to overcome the identified criticalities, the third one for acquiring general information on the organizations interviewed. From an initial set of 379 organizations that requested for a cancellation between 2010 and 2015, 40 of them were excluded from the analysis because they went bankrupt, were liquidated or merged with other firms. Eventually, the sample size was reduced to 339 organizations. The respondents were 99, with a response rate of 29.20%.

The responding organizations were mainly SMEs (61%), followed by PAs (36%) and large firms (3%); the largest percentage of respondents was in the North (57%) with a prevalence of private-owned organizations (64%). Among the sectors of activities, the first place was covered by PA (35.1%) followed by the agri-food sector (11.7%) and metal constructions sector (4.2%). The survey showed that over 40% of the respondents benefited from a form of public funding for the EMAS registration.

Considering the motivations that pushed organizations to drop out of EMAS, it emerged that the costs incurred (costs for the Environmental Verifier and for consulting) were crucial, followed by the lack of returns in terms of visibility and the lack of bureaucratic - administrative simplifications. Examining the results by organizations size and PA, it emerged the costs-related items were quite important for both groups, while the lack of simplifications and poor image returns weighed more for private firms.

Regarding the second section, which was aimed at identifying enabling measures to stimulate organizations to move-back to EMAS and, at the same time, to stimulate new registrations, the most significant in order of importance were:

- 
- the increase in bureaucratic-administrative simplifications, a measure transversely requested by the PA and firms of all sizes;
  - the increase in long-term tax benefits and financial facilities, mainly required by SMEs;
  - a greater recognition of EMAS compared to ISO 14001 in public tenders, requested mainly by the PA and small firms;
  - the reduction in controls, especially for SMEs;
  - an increase of public investment to improve EMAS recognition by the market and final consumers, highlighted especially by SMEs.

According to the findings, if implemented the suggested measures would result in the possible return to EMAS of 62% of respondents.

The results of the survey, together with the feedback of the EMAS Forum, highlighted an articulated framework of factors to face EMAS critical issues and to contain dropouts.

The main reasons behind the decision to drop out of EMAS are also those to be considered to relaunch the Scheme. The first step towards a greater recognition of EMAS can be found in the Environmental addendum to the 2016 Stability Law, in which a package of measures addressed to the "green economy" was presented. Among the modifications that have changed environmental legislation towards a greener and more sustainable economy, EMAS was cited in several articles. Specifically, in art.16 named "provisions to facilitate the use of green procurement", a reduction of guarantees required in public tenders for EMAS registered organizations has been established. Also art.17 "Measures to promote the adoption of the EU Ecolabel and EMAS systems" provides that the environmental certifications (EMAS, ISO 14001, EU Ecolabel etc.) is an element of preference in defining the rankings for obtaining grants, subsidies and loans.

However, the critical issues identified require more detailed interventions, which should be based on the adoption of an integrated "multilevel" strategy that includes specific actions to be activated at European, national and local levels. Surely among the possible interventions, the most important are:

- to reinforce the system of simplifications and incentives, with particular reference to small and medium-sized firms and PA;
- to require Member States to promote EMAS with more efforts, in order to increase its visibility;
- to adopt a greater number of measures with a "structural" nature and a homogeneous diffusion on the national territory, such as the reduction of environmental controls and the reduction of taxes;
- to ensure a real competitive advantage of EMAS compared to ISO 14001.

The adoption of the measures emerged from the study (especially those related to the cost of registration) would make EMAS an investment with a strategic value. In other words, organizations would be more willing to bear all costs related to the implementation of EMAS in the face of greater recognition of their environmental commitment.

Eventually, decision makers should concretely recognize the role of EMAS in reducing the environmental impact of firms and promoting sustainability. As emerged from the survey "the failure to improve environmental performance" was not a significant parameter for the registration abandonment. This finding shows that the active and beneficial role of EMAS for the environment is recognized by organizations. Rewarding organizations that decide to invest in EMAS could thus stimulate organizations that dropped out of the Scheme to move back to it and open to a wider audience, while contributing to spread voluntary environmental management tools, which are essential for achieving the ambitious objectives that the Community poses with the Europe 2020 plan.

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## ANNEX 1

Importance of reasons that determined the decision not to renew EMAS.

Reasons for not renewing EMAS	Motivazioni	Average
Cost of the environmental verifier	Costo del verificatore ambientale	4,37
Lower administrative simplifications than expected	Ottenimento di semplificazioni amministrative inferiore alle attese	4,30
Cost of consultancy	Costo di consulenza	4,25
Lack of temporary financial incentives	Mancati incentivi di carattere finanziario temporanei	4,13
Lack of EMAS recognition by the final consumer	Insufficiente riconoscimento da parte del consumatore finale	4,05
Fiscal benefits (e.g. IRAP) lower than expected	Benefici di carattere fiscale (ad es IRAP) inferiori alle attese	4,00
Lack of EMAS recognition by supply chain partners	Insufficiente riconoscimento da parte dei clienti (imprese)	3,92
No perceived advantage compared to ISO 14001	Nessun vantaggio percepito rispetto a ISO 14001	3,89
Lack of improvement in the relations with local authorities	Insufficiente miglioramento dei rapporti con la comunità locale	3,78
Limited reward in the tenders issued by the PA	Limitata premialità nei Bandi emanati dalla PA	3,71
Excessive complexity for obtaining and / or renewing the registration	Eccessiva complessità per l'ottenimento e/o rinnovo della registrazione	3,70
Benefits deriving from the reduction of the insurance premium lower than expected	Vantaggi derivanti dalla riduzione del costo del premio assicurativo inferiore alle attese	3,61
High cost for investments necessary to improve environmental performance (e.g. machinery, BAT)	Costo per investimenti necessari al miglioramento delle prestazioni ambientali (es. macchinari, BAT)	3,60
No differentiation from ISO 14001 in the tenders issued by the PA	Nessuna differenziazione da ISO 14001 nei Bandi emanati dalla PA	3,58
Lack of organization's image improvement	Insufficiente miglioramento dell'immagine	3,57
High cost of registration	Costo di registrazione	3,51
Priority to other economic performance targets	Priorità ad altri obiettivi di performance economica	3,42
Lack of human resources to be allocated to the EMS	Carenza di risorse umane da destinare anche al SGA	3,41
Insufficient penetration capacity in the foreign market (leave blank if not applicable)	Insufficiente capacità di penetrazione nel mercato estero (lasciare in bianco se non applicabile)	3,33
Re-allocation of EMAS resources on other projects not related to environmental sustainability	Riallocazione dell'investimento per EMAS su altri progetti aziendali non relativi alla sostenibilità ambientale	3,31
Costs of internal staff dedicated to EMAS	Costi del personale interno dedicato ad EMAS	3,29
No costs reduction for waste management	Mancata riduzione dei costi nella gestione dei rifiuti	3,23
Non-reduction in legal fees	Mancata riduzione delle spese legali	3,22
Processes innovation lower than expected	Innovazione dei processi inferiore alle attese	3,07
Staff training costs	Costo di formazione del personale	3,05
No reduction in energy costs	Mancata riduzione dei costi energetici	3,05
Difficulty in maintaining legislative compliance	Difficoltà nel mantenimento della conformità legislativa	3,04
Difficulty in implementing the EMS	Difficoltà nell'implementazione del SGA	3,03
Lack of energy costs savings	Insufficiente riduzione dei consumi energetici	2,99
Lack of reduction in costs for production inputs (e.g. raw materials)	Mancata riduzione dei costi per gli input produttivi (es. materie prime)	2,94
Lack of reduction in controls by the Competent Authorities	Mancata riduzione dei Controlli da Parte delle Autorità Competenti	2,93
Excessive waiting times for obtaining	Tempi di attesa eccessivi per l'ottenimento della	2,92

registration and / or renewing it	registrazione e/o del rinnovo	
Lack of reduction in waste production	Insufficiente riduzione della produzione di rifiuti	2,84
Difficulty in involving and motivating internal staff	Difficoltà nel coinvolgere e motivare il personale interno	2,83
Lack of Top Management support	Scarso sostegno dell'Alta Direzione	2,75
Lack of reduction in the use of production inputs (e.g. raw materials)	Insufficiente riduzione dell'utilizzo di input produttivi (es. materie prime)	2,73
Lack of reduction in environmental risks	Insufficiente riduzione dei rischi ambientali	2,71
No costs reduction in water management	Mancata riduzione dei costi nella gestione della risorsa idrica	2,70
Lack of organizational culture	Carenza di cultura organizzativa	2,69
No cost reduction in atmosphere emissions management	Mancata riduzione dei costi nella gestione delle emissioni in atmosfera	2,69
Lack of environmental risks reduction	Mancata riduzione dei rischi ambientali	2,65
Lack of water consumption reduction	Insufficiente riduzione dei consumi idrici	2,53
Lack of skills within the company	Carenza di competenze interne all'azienda	2,51
Lack of atmosphere emissions reduction	Insufficiente riduzione delle emissioni in atmosfera	2,46
Re-allocation of EMAS investment on tools for environmental sustainability based on life cycle analysis (e.g. LCA, Ecolabel etc.)	Riallocazione dell'investimento per EMAS su strumenti per la sostenibilità ambientale basati sull'analisi del ciclo di vita (es. LCA, Ecolabel, etc.)	2,31

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## ANNEX 2 (ALLEGATO 2)



# ISPRA

Istituto Superiore per la Protezione  
e la Ricerca Ambientale



### **Indagine sulle criticità del Sistema di Gestione Ambientale EMAS**

L'ISPRA (Istituto Superiore per la Protezione e la Ricerca Ambientale) in collaborazione con Il Dipartimento di Studi Aziendali dell'Università Roma Tre sta svolgendo uno studio sull'implementazione del Sistema di Gestione Ambientale EMAS in Italia.

L'Italia è uno dei paesi europei dove EMAS è maggiormente diffuso tra le organizzazioni. Tuttavia, negli ultimi tre anni molte organizzazioni hanno deciso di non rinnovare la registrazione, determinando una riduzione della diffusione di tale strumento sul territorio italiano.

*L'indagine alla quale vi preghiamo di partecipare è rivolta alle organizzazioni che non hanno rinnovato la registrazione EMAS a partire dall'anno 2010, è proposta sotto forma di questionario e vuole:*

- Rilevare le motivazioni che hanno spinto le organizzazioni a non rinnovare EMAS;
- Valutare l'impatto di eventuali proposte per incrementare l'efficacia dello strumento.

I risultati della ricerca saranno alla base di un progetto volto ad effettuare delle proposte alle Autorità Competenti per aumentare l'efficacia di EMAS, e renderlo uno strumento maggiormente appetibile e utile per le organizzazioni italiane.

La compilazione del questionario richiede circa 5 minuti. Si prega di rispedirlo compilato [questionario.EMAS@isprambiente.it](mailto:questionario.EMAS@isprambiente.it)

Rimaniamo a disposizione per qualsiasi chiarimento.

Cordiali saluti,

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## **SEZIONE 1: Aspetti che hanno determinato la decisione di non rinnovare EMAS**

**1. VISIBILITA':** Indicare quanto ognuno dei seguenti aspetti è stato importante nella scelta di non rinnovare EMAS

(1= Non importante; 6= Molto importante)

	1	2	3	4	5	6
A) Insufficiente miglioramento dell'immagine	<input type="checkbox"/>					
B) Insufficiente riconoscimento da parte del consumatore finale	<input type="checkbox"/>					
C) Insufficiente riconoscimento da parte dei clienti (imprese)	<input type="checkbox"/>					
D) Insufficiente miglioramento dei rapporti con la comunità locale	<input type="checkbox"/>					
E) Insufficiente capacità di penetrazione nel mercato estero (lasciare in bianco se non applicabile)	<input type="checkbox"/>					

**2. DIFFICOLTA' INTERNE DI GESTIONE:** Indicare quanto ognuno dei seguenti aspetti è stato importante nella scelta di non rinnovare EMAS

(1= Non importante; 6= Molto importante)

	1	2	3	4	5	6
A) Scarso sostegno dell'Alta Direzione	<input type="checkbox"/>					
B) Carenza di cultura organizzativa	<input type="checkbox"/>					
C) Carenza di risorse umane da destinare anche al SGA	<input type="checkbox"/>					
D) Carenza di competenze interne all'azienda	<input type="checkbox"/>					
E) Difficoltà nel coinvolgere e motivare il personale interno	<input type="checkbox"/>					
F) Difficoltà nell'implementazione del SGA	<input type="checkbox"/>					

**3. COSTI:** Indicare quanto ognuno dei seguenti aspetti è stato importante nella scelta di non rinnovare EMAS

(1= Non importante; 6= Molto importante)

	1	2	3	4	5	6
A) Costo di registrazione	<input type="checkbox"/>					
B) Costo di consulenza	<input type="checkbox"/>					
C) Costo del verificatore ambientale	<input type="checkbox"/>					
D) Costi del personale interno dedicato ad EMAS	<input type="checkbox"/>					
E) Costo di formazione del personale	<input type="checkbox"/>					
F) Costo per investimenti necessari al miglioramento delle prestazioni ambientali (es. macchinari, BAT)	<input type="checkbox"/>					

**4. RISPARMI ECONOMICI:** Indicare quanto ognuno dei seguenti aspetti è stato importante nella scelta di non rinnovare EMAS

(1= Non importante; 6= Molto importante)

	1	2	3	4	5	6
A) Mancata riduzione dei costi energetici	<input type="checkbox"/>					
B) Mancata riduzione dei costi per gli input produttivi (es. materie prime)	<input type="checkbox"/>					
C) Mancata riduzione dei costi nella gestione dei rifiuti	<input type="checkbox"/>					
D) Mancata riduzione dei rischi ambientali	<input type="checkbox"/>					
E) Mancata riduzione dei costi nella gestione	<input type="checkbox"/>					

della risorsa idrica						
F) Mancata riduzione dei costi nella gestione delle emissioni in atmosfera	<input type="checkbox"/>					

**5. SEMPLIFICAZIONI E INCENTIVI: Indicare quanto ognuno dei seguenti aspetti è stato importante nella scelta di non rinnovare EMAS**

(1= Non importante; 6= Molto importante)

	1	2	3	4	5	6
A) Ottenimento di semplificazioni amministrative inferiore alle attese	<input type="checkbox"/>					
B) Benefici di carattere fiscale (ad es IRAP) inferiori alle attese	<input type="checkbox"/>					
C) Vantaggi derivanti dalla riduzione del costo del premio assicurativo inferiore alle attese	<input type="checkbox"/>					
D) Mancati incentivi di carattere finanziario temporanei	<input type="checkbox"/>					
E) Limitata premialità nei Bandi emanati dalla PA	<input type="checkbox"/>					
F) Nessuna differenziazione da ISO 14001 nei Bandi emanati dalla PA	<input type="checkbox"/>					
G) Mancata riduzione delle spese legali	<input type="checkbox"/>					

**6. RAPPORTI CON LE AUTORITA': Indicare quanto ognuno dei seguenti aspetti è stato importante nella scelta di non rinnovare EMAS**

(1= Non importante; 6= Molto importante)

	1	2	3	4	5	6
A) Difficoltà nel mantenimento della conformità legislativa	<input type="checkbox"/>					
B) Mancata riduzione dei Controlli da Parte delle Autorità Competenti	<input type="checkbox"/>					
C) Eccessiva complessità per l'ottenimento e/o rinnovo della registrazione	<input type="checkbox"/>					
D) Tempi di attesa eccessivi per l'ottenimento della registrazione e/o del rinnovo	<input type="checkbox"/>					

**7. FATTORI STRATEGICI: Indicare quanto ognuno dei seguenti aspetti è stato importante nella scelta di non rinnovare EMAS**

(1= Non importante; 6= Molto importante)

	1	2	3	4	5	6
A) Nessun vantaggio percepito rispetto a ISO 14001	<input type="checkbox"/>					
B) Priorità a obiettivi di performance economica	<input type="checkbox"/>					
C) Riallocazione dell'investimento per EMAS su altri progetti aziendali non relativi alla sostenibilità ambientale	<input type="checkbox"/>					
D) Riallocazione dell'investimento per EMAS su strumenti per la sostenibilità ambientale basati sull'analisi del ciclo di vita (es. LCA, Ecolabel, etc.)	<input type="checkbox"/>					
E) Innovazione dei processi inferiore alle attese	<input type="checkbox"/>					

**8. PRESTAZIONI AMBIENTALI: Indicare quanto ognuno dei seguenti aspetti è stato importante nella scelta di non rinnovare EMAS**

(1= Non importante; 6= Molto importante)

	1	2	3	4	5	6
A) Insufficiente riduzione dei consumi energetici	<input type="checkbox"/>					
B) Insufficiente riduzione dell'utilizzo di input produttivi (es. materie prime)	<input type="checkbox"/>					
C) Insufficiente riduzione della produzione di rifiuti	<input type="checkbox"/>					
D) Insufficiente riduzione dei rischi ambientali	<input type="checkbox"/>					
E) Insufficiente riduzione dei consumi idrici	<input type="checkbox"/>					
F) Insufficiente riduzione delle emissioni in atmosfera	<input type="checkbox"/>					

**9. Indicare quanto ognuno dei seguenti aspetti è stato importante nella scelta di non rinnovare EMAS**

(1= Non importante; 6= Molto importante)

	1	2	3	4	5	6
A) Difficoltà interne all'organizzazione	<input type="checkbox"/>					
B) Costi	<input type="checkbox"/>					
C) Scarsa visibilità	<input type="checkbox"/>					
D) Mancanza di semplificazioni burocratiche-amministrative di tipo definitivo	<input type="checkbox"/>					
E) Rapporti con gli enti competenti	<input type="checkbox"/>					
F) Scelte manageriali	<input type="checkbox"/>					
G) Mancati risparmi economici	<input type="checkbox"/>					
H) Mancato miglioramento delle prestazioni ambientali	<input type="checkbox"/>					

**10. Indicare se i seguenti aspetti sono stati determinanti nella scelta di non rinnovare EMAS**

	Sì	No
A) Difficoltà interne all'organizzazione	<input type="checkbox"/>	<input type="checkbox"/>
B) Costi	<input type="checkbox"/>	<input type="checkbox"/>
C) Scarsa visibilità	<input type="checkbox"/>	<input type="checkbox"/>
D) Mancanza di semplificazioni burocratiche/amministrative di tipo definitivo	<input type="checkbox"/>	<input type="checkbox"/>
E) Rapporti con gli enti competenti	<input type="checkbox"/>	<input type="checkbox"/>
F) Scelte manageriali	<input type="checkbox"/>	<input type="checkbox"/>
G) Mancati risparmi economici	<input type="checkbox"/>	<input type="checkbox"/>
H) Mancato miglioramento delle prestazioni ambientali	<input type="checkbox"/>	<input type="checkbox"/>

**11. Quale dei due aspetti ha influenzato maggiormente sulla decisione di non rinnovare EMAS?**

Disattesi benefici interni all'organizzazione (risparmi rapporti con il personale, ottimizzazione dei processi interni, etc.)

Disattesi benefici esterni all'organizzazione (rapporto con stakeholder esterni, scarso riconoscimento da parte del mercato, rapporti con le autorità, etc.)

**SEZIONE 2: Fattori che potrebbero incentivare una nuova adesione ad EMAS**

**12. Indicare quanto ognuno dei seguenti fattori sarebbe importante per tornare a registrarsi EMAS**

(1= Non importante; 6= Molto importante)

	1	2	3	4	5	6
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A) Diminuzione dei costi per ottenere la Registrazione EMAS	<input type="checkbox"/>					
B) Richiesta della registrazione EMAS come requisito da parte dei partner (clienti/fornitori) della propria filiera produttiva	<input type="checkbox"/>					
C) Maggiore peso di EMAS nelle gare pubbliche d'appalto (GPP) rispetto a ISO 14001	<input type="checkbox"/>					
D) Maggiore peso di EMAS nei meccanismi di finanziamento pubblico rispetto a ISO 14001	<input type="checkbox"/>					
E) Maggior peso di EMAS nell'ottenimento di finanziamenti pubblici (es. fondi Europei, Nazionali, Regionali, etc.)	<input type="checkbox"/>					
F) Incremento delle semplificazioni burocratico- amministrative di tipo definitivo (es. Autorizzazioni più lunghe e/o semplificazioni per l'ottenimento di autorizzazioni e permessi)	<input type="checkbox"/>					
G) Agevolazioni finanziarie (s'intendono la riduzione di oneri, spese o tariffe per ispezioni, controlli, spese istruttorie di tipo ambientale).	<input type="checkbox"/>					
H) Incremento dei benefici fiscali di lungo periodo (es. sgravi fiscali sulle aliquote IRAP, riduzione tasse d'igiene ambientale, etc.)	<input type="checkbox"/>					
I) Riduzione dei controlli da parte delle Autorità Competenti	<input type="checkbox"/>					
L) Maggiore peso di EMAS nel decreto 231/2001 "Sulla responsabilità amministrativa delle società e degli enti per reati ambientali"	<input type="checkbox"/>					
M) Maggiore peso di EMAS nel decreto 102/2014 "Sull'efficienza energetica"	<input type="checkbox"/>					
N) Maggiore impegno/investimenti da parte della PA nella promozione della conoscenza e del logo EMAS verso i cittadini e consumatori.	<input type="checkbox"/>					
O) Valorizzazione di EMAS come strumento garantito dal controllo di Autorità Pubbliche imparziali	<input type="checkbox"/>					

13. Dopo la cancellazione, l'organizzazione ha preso in considerazione l'ipotesi di tornare a registrarsi EMAS?

Sì

No

14. Se no, qualora venissero attuati i cambiamenti ipotizzati nella domanda 12, la vostra organizzazione potrebbe considerare l'ipotesi di tornare a registrarsi EMAS?

Sì

No

### **SEZIONE 3: Caratteristiche dell'organizzazione**

Se la cancellazione è avvenuta prima del 2014, si prega di rispondere comunque alle domande proposte. E' importante sapere lo stato dell'organizzazione in tale anno per garantire una completezza dei dati ai fini dell'indagine.

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**15. Quanti erano dipendenti dell'organizzazione nell'anno 2014?**

- a. Da 1 a 9       b. Da 10 a 49       c. Da 50 a 249       d. Oltre 249
- 

**16. Qual è stato il fatturato dell'organizzazione nell'anno 2014?**

- a. Meno di 2 milioni di Euro       b. Meno di 10 milioni di Euro       c. Meno di 43 milioni di Euro       d. Più di 43 milioni di Euro
- 

**17. Dove si trovavano i siti registrati?**

- a. Abruzzo
- b. Basilicata
- c. Calabria
- d. Campania
- e. Emilia-Romagna
- f. Friuli Venezia Giulia
- g. Lazio
- h. Liguria
- i. Lombardia
- j. Marche
- k. Molise
- l. Piemonte
- m. Puglia
- n. Sardegna
- o. Sicilia
- p. Toscana
- q. Trentino-Alto Adige
- r. Umbria
- s. Valle d'Aosta
- t. Veneto

**18. La vostra organizzazione è una Pubblica Amministrazione?**

- Si**   
**No**

**19. Indicare i codici NACE prevalenti al momento della cancellazione da EMAS**

**20. Indicare il principale mercato di riferimento dell'organizzazione**

- a. Regionale       b. Nazionale       c. Europeo       d. Extra europeo
- 

**21. Indicare di quali certificazioni è in possesso l'organizzazione attualmente**