

EMAS registration and verification- barriers to access for SMEs

Representing SMEs' interests in order to make the EMAS
Regulation more SME friendly

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Introduction



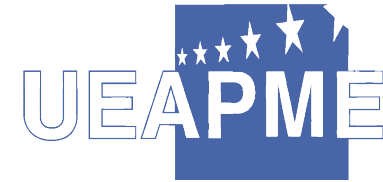
UEAPME welcomes :

- ✓ the revision of the EMAS Regulation and its inclusion in the SCP package in order to make it more SME-friendly and as a way to promote EMAS-registered organisations
- ✓ the various mentions of small business in the proposed regulation
- ✓ the reduction of registration fees for small organisations
- ✓ better promotion, increased visibility at national level (art.34,36,37)
- ✓ improved incentives (art.39)

⇒ **Attention: red tape and costs for SMEs!**

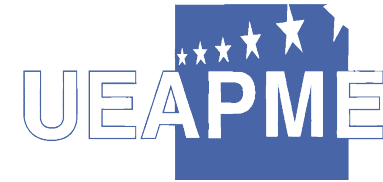
⇒ **Danger: introduction of minimum time for verifiers!**

Favourable provisions for SMEs (I)



- **Art.7** derogation for small business (upon request)/better if applied automatically
- **Art. 33** obligation of M.S. to provide assistance to SMEs in the process of registering to EMAS on legal requirements
- **Art. 37** obligation of M.S. to promote participation of SMEs through a series of support measures (information, technical assistance, reasonable registration fees, etc.)
- **Art. 38** obligation of M.S. to ensure the provision of assistance to clusters of organisations by local authorities
- **Art. 39** obligation of M.S. to adopt measures facilitating organisations to become or remain EMAS-registered (i.e. regulatory relief and better regulation)
- **Art.40** fee structure adapted to the size of the organisation and to the work to be done.

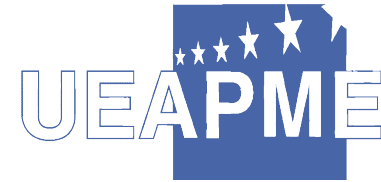
Favourable provisions for SMEs(II)



Article 25 on verifiers: This article summarizes the content of the current guidance for the verification of small organisations with EMAS, written by UEAPME in co-operation of the European Commission.

- ✓ Take into account the specific characteristics of small organisations
 - ✓ Conduct the verification and validation without imposing unnecessary burdens on small organisations
 - ✓ Not necessary to apply the same standard method as with big organisations and rely exclusively on written documentation
- ⇒ **Attention:** “*Guidance document on Time Allocation for EMAS Verifiers*” should not jeopardise the spirit of article 25
- ⇒ **Danger:** introduction of minimum amount of time for verifiers!

Not so favourable provisions for SMEs



- **(Chapter II, III, IV):** Overarching structure is maintained bureaucratic and long
- **Art. 6.2:** introduction of the environmental performance and the environmental performance report adds another layer of bureaucracy and will have discouraging effects
- **Art. 18:** obligation of environmental verifiers to validate any updated information in the environmental statement & performance report by environmental verifiers every year
- **Art.38:** does not mention SME organisations at local and regional level and just mentions chambers of commerce and industry associations as the actors to provide assistance to clusters of organisations

Conclusions



- Red tape and costs for small organisations linked to the implementation phase should be reduced
- Implementation should be adapted to the structure and working methods of micro and small businesses
- Verification should be adapted to the structure and working methods of micro and small businesses (reinforce & clarify article 25 against wrong interpretation by verifiers)
- Environmental performance and environmental performance report should not be introduced
- Derogation of art.7 « applied upon request » should be « automatically applied » by national C.B. to small organisations