



## **Pilot studies on sectoral reference documents on best environmental management practice – the Retail Trade and the Public Administration sectors**

### **Note on the EMAS workshop for Public Administration held at JRC/IPTS on 24 June 2009 in ES-Seville**

#### **INTRODUCTION**

The Community Eco-Management and Audit Scheme (hereafter EMAS) was originally established in 1993 by Regulation (EC) No 1836/93. This voluntary scheme was originally restricted to companies in industrial sectors. EMAS was revised in 2001 by Regulation (EC) No 761/2001 of the European Parliament and of the Council of 19 March 2001 allowing participation by organisations from all economic sectors<sup>1</sup>, which is currently in force. Now, a second revision of EMAS is on the way, called EMAS III.

On 2 April 2009, the European Parliament adopted the text of a new EMAS regulation with a number of amendments which were the result of a compromise negotiated with the Council. So, the current text reflects the final political compromise and no major changes are expected. The new regulation foresees the development of sectoral reference documents on best environmental management practice (Article 46). The goal of the current pilot studies is to bring stakeholders together and to collect views and opinions on how to create the reference documents. These documents should be functional and helpful for organisations concerned. The participants of the workshop held in JRC/IPTS in Seville on 24/06 /2009, constituted a representative sample of experts relevant for Public Administration (PA) (see Annex 1: list of participants).

#### **1. PRESENTATION Purpose and goals of the workshop (Annex 2)**

The text of the new Article 46 was presented pointing out that this Article introduces a requirement to develop sectoral reference documents including best practice in implementing EMAS. The same Article also requires the Commission to produce a users' guide. From this the general goal of the workshop was to use the PA sector as an example to discuss the:

- Content of reference documents.
- Suitable environmental performance indicators.
- Derivation and use of benchmarks.
- Structure of EMAS reference documents.

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<sup>1</sup> OJ L 114, 24.4.2001, p. 1.

- Methodology to develop reference documents including future nature of stakeholder involvement, aiming to arrive to a coherent series of reference documents.

## **2. PRESENTATION            The European Eco-Management and Audit Scheme and its revision (by Gilles Vincent - Annex 3)**

The background and the principles concerning the revision of the EMAS regulation were presented by DG Environment. The revision of the EMAS regulation started in 2006, based on the assumption that EMAS leads to good levels of environmental performance. However, its uptake remains low. In the revision process it was endeavoured not to weaken the legal compliance aspect while raising at the same time the attractiveness of the scheme. The adopted document of 2 April will undergo a legal "clean-up", which involves mostly editorial work and should not modify the substance. Then it will be translated into all EU languages and will go back to the Council for formal approval and may be published in the OJ by the end of the year.

Sectoral reference documents: The reasons behind the introduction of this new concept of reference documents are to safeguard the voluntary character of EMAS but to help organisations better focus on the most important environmental aspects in a given sector. At the same time the inclusion of benchmarks should lead to making EMAS stronger, ambitious and encouraging for organisations to improve their environmental performance. Nothing in the reference documents will be mandatory. It is expected that they will be used as a helping guide for organisations who may incorporate elements of these documents to their management system. Verifiers will be required to take account of the documents to refine their approach when they are auditing an organisation.

Other elements of the revised EMAS regulation: "EMAS global" will allow registration of non-EU-based organisations. It is an important instrument for competent bodies to assess whether organisations outside the EU meet the environmental performance standards acceptable inside the EU. The "Corporate registration" and the "Cluster approach" are two additional tools aiming to raise the attractiveness of the scheme. Regarding reporting requirements, the use of core performance indicators has become mandatory.

The speaker appreciated the diversity of the workshop audience with respect to countries of origin and expertise, and confirmed its commitment to EMAS. Whilst sectoral reference documents will be developed under the provisions of the EMAS regulation they may be useful for non-EMAS registered organisations who might see it as a reference. The contribution of the stakeholders is critical for this pilot project, to determine how the PA and Retail Trade documents will look in the future but also for the other sectoral reference documents that will follow.

## **DISCUSSION**

In EMAS2, organisations who had ISO 14001 could update their system to EMAS, without having to do an initial environmental review. In EMAS3, the possibility to build on existing environmental management systems (EMS) and upgrade them towards EMAS is reinforced. Moreover ISO 14001 is not the only EMS that could be used as a first step towards EMAS. It

is expected that Member States will put forward requests related to EMS, including ISO 14001, for organisations to be allowed to use existing systems to be upgraded to EMAS.

### **3. PRESENTATION**                      **Stockholm – European Green Capital 2010 (by Mikael Lindell – Annex 4)**

Stockholm has been selected by the EC as the first European Green Capital for 2010. This was due to its already achieved environmental results and for its ambitious environmental goals. After a continuous decrease in GHG emissions, Stockholm aims to be fossil fuel free by 2050. District heating and cooling, congestion charges and sustainable urban design are some of the measures implemented by the city to reduce its environmental impact. An EMS is in place since 1976, ensuring that environmental issues are included in the city's budget and using easily accessible indicators to monitor progress against objectives. Six priority areas have been identified: transport, dangerous substances in buildings and goods, energy, land and water, waste treatment and indoor environment.

To judge the significance of environmental aspects a methodology has been developed taking into account not only the "own impact" but also the impact of the citizens. The aspects are chosen inside a group of national environmental quality objectives. They are then evaluated with respect to their severity, scale and sources. A score is then given to every aspect, allowing their prioritisation. A web-based "environmental barometer" is informing on the environmental problems, presents the goals and reports on the state of the environmental indicators.

### **DISCUSSION**

Challenges: Stockholm was part of the MUE (Managing Urban Europe) project, aiming towards the sustainability management of the whole urban city area. Any EMS should demonstrate that it can be a tool that can achieve not only improved management of housekeeping issues but that it can be expanded to other activities (e.g. land use planning, climate change) and even serve as a basis to sustainability management. The real challenge for EMAS is to be considered not just a housekeeping tool but as a tool capable to deal with environment issues at regional and national level.

Small PA: Regarding small PA, the level of ambition demonstrated by Stockholm might be too high. This should be taken into account in the reference document so as not to discourage small PA. The general approach should however remain the same, progressing with EMAS from housekeeping to development issues.

### **4. PRESENTATION**                      **Overview of EMAS in the PA sector (Annex 5)**

The EMAS registrations in the sector total 340 for 783 sites (data from the EMAS database). 13 countries out of the EU-27 have organisations registered in EMAS. The size of the organisations is highly variable, ranging from 40 organisations with fewer than 10 employees to just 14 organisations with more than 1000 employees. The biggest share is taken by 200 organisations with between 20 and 1000 employees. New organisations are achieving EMAS, others are leaving, whereas others might be on their way to EMAS through other EMS like ISO14001. Hence, the figures of the database give a partial picture of the actual numbers of

EMAS related organisations. Together with size, EMAS-registered PA vary from small single function departments to more complex multi-function entities. The current pilot study focuses on organisations that provide a variety of different services. An important issue for the pilot document is to see to what extent can be covered by such a document targeted at organisations with low levels of communality. A possible way forward is to focus on the most important common issues, instead of trying to cover a huge range of disparate activities. The input of stakeholders to identify these common important issues is necessary.

## **DISCUSSION**

Reasons for low EMAS uptake: A number of PA who have decided not to implement EMAS have done so because of the existence of attractive alternatives like the Aalborg commitments. One reason is that these instruments have benefited from wider publicity. Additionally, at a more political level sustainability as a whole is more "attractive" than environmental management only. EMAS should be used as a means to support political vision. At a more practical level EMAS is associated with an important effort to deal with red tape. This, with the exception of Belgium for which EMAS is now mandatory, may put off some PA. In the United Kingdom, where a big range of monitoring instruments are already implemented in the PA sector, EMAS is sometimes perceived as an additional "measurement". However, the benefit of EMAS lies in the fact that it is comprehensive. It should be explained to PA that EMAS is in fact a tool to manage existing indicators and that it is not an additional indicator. In the early days of EMAS there were not so many possible alternatives. Nowadays EMAS is called to compete with them whereas it should be seen as a facilitator.

Some registrations were motivated by EU projects like LIFE. Once the project and the related incentives cease to exist, the PA has to maintain the scheme. This is one of the reasons why some of the organisations withdraw from the scheme after initial registration. In addition to EU funding the national drivers play a role. In some Member States EMAS is not yet included as a tool to implement the environmental policy.

Scope of the Reference Document: Given that a small number of registered PA have more than 1000 employees, and in fact these are the ones who are dealing with the most important issues, focussing on these issues only may result in leaving outside the document's scope the majority of the EMAS-registered PA. A barrier to getting feedback from small organisations is that they have difficulties to participate in information exchange due to lack of resources.

The case of Belgium : Belgium is the only country where EMAS is mandatory for PA. At federal level a governmental decision foresees that the ministry of environment should implement EMAS. In Wallonia, EMAS is mandatory for water companies, waste incineration and sewage facilities which are considered to be PA even though they are strictly companies. After some time, no subsidies will be given to PA which are not EMAS registered. However, the mandatory registrations do not by themselves create environmental performance. In some occasions this does happen, in others PA are following the scheme to assure their legal compliance but do not implement a strong environmental program. Also in Estonia it was mentioned that water and heating companies have EMAS and are considered also to be public services.

General suggestions: PA are in need of guidance to measure indirect aspects, especially small PA. A common reference tool can help. Setting the boundaries of a PA is necessary. For example, in some countries water supply may be under PA control or outsourced to the

private sector. The document should focus on facilitating processes that PA have to do anyway.

Important Conclusions: The EMAS revised regulation does not specify how the reference documents may look like. The views of stakeholders are necessary to decide on how to develop the documents. The national and regional competent bodies are the main source of information to identify these stakeholders, possibly through the Forum of competent Bodies.

## **5. PRESENTATION                      Implementation of EMAS in PA (Annex 6)**

PA function by definition within a framework different from commercial organisations. They have a limited flexibility to choose which activities they would like to perform. Another distinctive characteristic is that unlike companies, they are not in business competition with each other. Consequently PA are likely to be willing to share information and not see it as confidential. A specificity of activities carried out by PA is that many of them are taking place outside of their premises. Some examples include waste collection and disposal, street cleaning, maintenance of green areas, inspections. These activities cross the boundary between direct and indirect aspects. Regarding the choice of indicators, these are sometimes imposed on PA by higher authorities. PA have less freedom to select indicators suiting their particular needs, or if they do so they will still be required to report on the indicators imposed upon them. Examples of successful collaborative projects in the PA sector are "NEST" which was partly managed by "Global to Local".

## **DISCUSSION**

Collaborative models and EMAS: a clear distinction exists between the so-called "housekeeping" issues, such as water saving, energy saving etc. and other PA activities linked to indirect aspects and for which, as generally accepted by the participants, the environmental impact can be much larger. For the first type of issues the way to implement them, in EMAS, is already more or less known, since this has been done in PA since 15 years now and experience is available. EMAS can indeed be used to deal with the housekeeping issues to begin with and then focus on the more important issues like pension fund investments, capital expenditure, investment etc. There the collaborative models can be of great help to expose some of the most important indirect environmental effects arising from decisions made as part of the overall management of a PA.

Decision power of PA: It is true that PA are in many occasions given a fixed work program, however they also possess statutory powers on behalf of the well being of the local community. PA can be innovative, obtain funds and participate in development programs which can have large impacts overall.

Definition of the PA sector: a study should be launched to identify the main sectors inside the PA sector. This should be done first at local level and then at EU level. Given the diversity of the sector it seems logical that guidance for EMS should be developed over time, in an iterative process drawing on experiences as they come along.

Added Value of EMAS: It has helped higher management identify important environmental issues and has been a driver to promote e-government and the image of the PA.

## 6. PRESENTATION

### Common environmental issues in the PA sector (*Annex 7*)

Based on a review of selected environmental statements, energy use is the key environmental issue faced by PA. Energy use in buildings (heating, cooling, ventilation) is highly dependent on weather patterns. Some approaches to manage different environmental issues may in fact have an impact on energy consumption as a side effect: the introduction of flexitime to fight against road congestion may result in increased energy consumption due to longer hours of use per day. Other energy relevant issues include the purchase of renewable electricity or the increasing energy consumption of IT infrastructure. The second most common issue for PA is the fuel use in transport followed by issues like the reduction of water use, reduction of waste generation and recycling. The reference document should promote holistic thinking on the environmental issues. Finally issues with mixed direct and indirect aspects include: air quality, use of private vs. public transport, effects on biodiversity from green areas planning and maintenance and procurement policy.

## DISCUSSION

Direct versus Indirect Aspects: Reporting on direct environmental aspects (e.g. use of IT) can be improved. However, indirect aspects and how they are reported in the environmental statement, represent the real challenge. For example the main impact of UKAS is related to the delivery of accreditation and this impact is much bigger than its direct aspects. "It is far more important than turning the lights off". PA should establish the link between the policy decisions they take and the impact of these decisions. Some examples of indirect aspects: rail transport, use of other modes of transport, green procurement (key issue to gauge an organisations true intentions regarding environment), mobility, inspections ecological management of green areas, urban planning for biodiversity keeping track of red listed species, use of chemicals in the city centre. Examples of PA who have integrated all relevant impacts to their environmental statements exist, like the Bologna province (Italy), awarded the EMAS 2006 award.

Local/national aspects: environmental issues are interpreted differently according to local perceptions and/or local conditions. In some countries the decoupling of environmental protection and growth is still to be proven. In Italy, PA frequently use old/historical buildings which are difficult to put in conformity with e.g. fire protection norms. This direct aspect can be a barrier for some PA. On the other hand water quality for potable or surface water (touristic resorts) is very important and EMAS has been used as a sign of excellence in these areas.

Difference between information contained in the environmental statement and the reference documents: the environmental statement is for the general public and should contain information that can be understood by everybody with no need for technical background. PA statements are often lengthy and indigestible. If all the aspects and impacts are to be included the resulting statement would be very big. It seems reasonable to select reporting items based on stakeholder request.

General Suggestions: Create a cross-sectoral document on indirect aspects and how to manage them. Provide guidance on how to determine significant aspects. Use qualitative indicators together with quantitative ones. Provide training to auditors on how to judge these indicators. EMAS cannot be required as a performance requirement within procurement guidelines but a generic EMS can.

Important Conclusions: The indirect aspects represent the main environmental impact of the activities of a PA. The challenge is to provide guidance on how to integrate the indirect aspects to the EMS. In the case of PA, the impacts of their policy decisions can have large impacts on a wide part of the population. Equally, those organisations providing environmental services and advice can have far reaching effects through delivery of their services. A few participants cited the increase in carbon footprint due to the direct delivery of their services (especially transport) was heavily outweighed by the potential savings which could be made subsequently by the organisations receiving their services. Notwithstanding the focus on direct effects more generally included in published environmental statements, which are intended for public disclosure, there are examples of PA addressing the wider and more indirect impacts. As the reference documents would be more aimed at EMAS professionals we should try and explore more into these far reaching effects although, given the breadth of the PA sector, a balance needs to be maintained between the information needs of large and small PA.

## **7. PRESENTATION                      Environmental Techniques used in the PA sector (*Annex 8*)**

There is little information on techniques used by PA in the environmental statements. The achieved targets are presented but not how these were achieved. More information can be obtained from networking projects like NEST. A number of techniques are not specific to PA but could apply to any organisation: reduction of water use, energy efficiency of appliances, recycling and/or disposal of materials. Other techniques are specific to the PA sector: reducing the use of private cars to favour other modes of transport (public transport, cycling, walking etc.), waste collection, street cleaning, infrastructure maintenance and use of more efficient vehicles.

The following structure on how to describe the techniques, integrating all the relevant aspects was presented. The structure should be universal, i.e. be able to accommodate the specificities of all possible techniques.

### Presentation structure for techniques:

- Description
- Achieved environmental benefit
- Environmental indicators
- Cross-media effects
- Operational data
- Applicability
- Economics
- Driving force for implementation
- Reference organizations
- Reference literature

## DISCUSSION

Suggestions for additions/modifications: add a headline explaining which are the barriers to be overcome in implementing the technique and how has this been achieved.

Add the best practice related to the running of the management system itself. For example how EMAS was implemented to integrate other management instruments in the organisation. This can be an additional technique.

Sources for technique selection: A number of case studies and existing examples are already logged in the EMAS database. The participants discussed if the pool of techniques should be restricted to the ones used by EMAS registered organisations only. It was agreed that even if the EMAS register contains a big number of organisations that could provide examples of best practice it would be counterproductive not to be able to profit from best practice examples which are available outside the EMAS community. The EMAS awards were mentioned as one specific source of information as there is a jury which acts as peer review. Verifiers mentioned also that other information is available outside EMAS for example from ISO 14001 related documents and much of this is in the public domain.

General Suggestions/Comments: create a reference database with continuous additions of case studies. This will give the picture of the state of the art. Make a link to other aspects of sustainability.

Differentiate between different administration categories and their specific issues. The techniques presented should be achievable and not out of reach. Still, they should be ambitious enough to inspire/promote improvement. The approach of having a given structure to present information about techniques makes sense. The reference documents have to be practical tools and this approach ensures it. Technical officers within PA have to achieve support from politicians in order to implement techniques and therefore the presentation of techniques in a reference document should also address this need.

In order to present a comprehensive and coherent choice of techniques, the environmental statements have to be screened, the best practices have to be collected and evaluated. Criteria have to be developed for that. And a system for updating the techniques should be put in place. To this respect the importance of public procurement to boost environmental innovation must be highlighted.

Important Conclusions: There was a general acceptance of the presentation structure for the techniques and strong support by stakeholders ready to contribute with examples of best practice used in their home PA and also from verifiers since related information belonging to the public domain is available. It is important to note that at this stage, a structured presentation of techniques does not de facto lead to conclusions on "best available techniques" as this is not a concept mentioned in the EMAS regulation whereas "best management practice" is mentioned and it would be good to have information useful for many users of the foreseen reference documents. To achieve this it would be useful to include techniques implemented by many organisations and reflecting their various experiences regarding that technique. Finally it was mentioned that many techniques are applicable for more than one NACE sector and we should take care to present techniques in a way to address all relevant readers.



## **8. PRESENTATION Environmental performance indicators and benchmarks (Annex 9)**

The reference document will contain environmental indicators and benchmarks for the PA sector where appropriate. However, before evaluating best practice with respect to a benchmark some fundamental questions should be answered, since benchmarks can be defined using different approaches. They can vary from the best performance achievable ever or achievable by very few (in which case then may be called benchmarks of excellence) to current/potential average in the PA sector. Another issue when designing benchmarks relates to the relative success or failure achieved with respect to it. It is in fact not informative to use a very ambitious benchmark, for example of the individual carbon footprint compared with a given reduction target, that is systematically not reached. It is more informative to use as benchmark a set point, for example of the carbon footprint compared with the national average, however this approach fails to clearly indicate best practice if average performance is used.

In summary, benchmarks should:

- Inform on what is potentially achievable under certain circumstances
- Allow to form an opinion on the performance of the organisation
- Be meaningful with respect to the environmental impact

Benchmarks and indicators should be used to compare between organisations at specific activity or unit operation level and not at organisation level.

### **DISCUSSION**

Existing approaches: a number of regional/national initiatives are already in place to benchmark PA. In the Netherlands average energy use for PA are monitored. In Vienna's ecobusiness plan all organisations have to register their environmental performance to an online database. For public procurement green procurement targets are in place (in Belgium with green lists of products), the indicator used being the number of products bought in volume and in value (is it however difficult to evaluate different "shades" of green in the product list). In Germany, many indicators, including for indirect aspects are developed for local authorities. Many of these indicators are initiated because of EU legislation. Reference should be made to these indicators instead of creating new ones.

Suggestions/Comments: Benchmarks should be used only for specific processes, otherwise one ends up comparing different things. Setting the absolute best as the benchmark might put people off, even if some organisations may want to aspire to be the best. The use of benchmarks to compare organisations seems feasible for direct effects, however it would be interesting to see how benchmarks for indirect effects might be set. Benchmarks should be used as an education and support instrument, to gauge potential for improvement in an objective way.

Caution should be applied when using benchmarks which compare between commercial/industrial organisations which may not be willing to be compared with each other. This may constitute a reason for an organisation not to implement or even to withdraw from EMAS.

DG Environment explained how the use of benchmarks is understood in the revised regulation saying that the mandatory elements of the environmental statements do not include a reference to benchmarks. Therefore it is not mandatory for an organisation to compare itself with a given benchmark, unless the organisation wishes to do so. During verification and audit, the best practice benchmarks included in the reference document should be a communication and information exchange tool between the organisation and the verifier. Competent bodies will hopefully make a strategic use of the benchmarks, as a stimulant towards best practice and under no circumstances use it as a criterion to refuse registration/renewal. Benchmarks can be related to incentives, subsidies or to regulatory relief.

Important Conclusions: It is not possible to rank organisations or even to calculate averages or a percentile performance without having a comprehensive set of data. Setting a benchmark at activity level can be done by building consensus among stakeholders to a reasonable level. Benchmarks for the indirect effects were considered to be far more difficult to derive than benchmarks for direct effects. In general an "average" benchmark was not considered sufficiently ambitious for EMAS although setting benchmarks too high carries the risk to push potential organisations away from EMAS. For indicators, it was strongly suggested to follow current developments on indicators within the EU.

## **9. PRESENTATION**      **Possible structure of EMAS reference documents (Annex 10)**

The following structure was proposed:

- Executive Summary
- Preface
- Scope
- General Information
- Available Techniques Reflecting Best Management Practice
- Emerging Techniques/Approaches
- Conclusions

## **DISCUSSION**

Suggestions for additions/modifications: Additional chapters/contents might deal with placing EMAS inside the broader political context (e.g. sustainability strategy) and how EMAS can help PA to manage existing tools used by PA. The preface could be the same or be a separate document to avoid having it repeated in all documents.

Scope of the reference document versus scope of the EMAS guide: It was clarified that the issues of how to develop EMAS step by step or how to extend it to the whole of the PA, or highlighting the benefits of EMAS, will be treated in the EMAS guide and are not within the scope of the reference document. The document should not explain how a PA is functioning or how EMAS is operating, but should contain the best practice techniques, together with environmental aspects and impacts. DG Environment explained that the reference document is not intended as a promotion tool for EMAS, other tools will be developed, or already exist, for that purpose. If the reference document ends up promoting EMAS as a "side effect" it is of course ok, but it is not its primary goal.

In general, bearing in mind that a whole series of reference documents is foreseen, a standard preface or stand alone introductory document should explain the status and context of reference documents and the heart of each document should be technical information on best practice, benchmarks and indicators keeping it as brief as possible commensurate with being useful.

## **10. PRESENTATION**

### **Way Forward/Information Gathering (*Annex 11*)**

Part of the goals of the pilot project is to test a methodology for developing the reference documents and assign a role to the different stakeholders. The methodology and the related structure of the document need to fit all sectors, to obtain a homogenous outcome. Two possible ways forward were described. The so-called "desk approach" whereby the author/editor of the document collects and evaluated all the information by desk research and eventually by using questionnaires, telephone interviews and visits to selected sites. In this approach the author is based on his own judgment and bears all the responsibility for the outcome. The "information exchange approach" whereby the role of experts/stakeholders of the PA sector is primordial. The tools of the "desk approach" may still be used to start the work. The advantages of information exchange are clear: information coming from the field, exchange of views and promotion of consensus. The outcome is then under the responsibility of the whole stakeholder group, together with the author.

## **DISCUSSION**

Role of different stakeholders: The EMAS-registered organisations together with the verifiers can provide techniques and case studies to support the development of the document. The PA are the ones implementing the techniques in their working environment. The verifiers audit different organisations and have information on a big variety of practices, from various sectors and even outside the EMAS community.

The competent bodies can have a networking and stakeholder identification role. They possess information on EMAS-registered organisation, verifiers and associations of organisations. The Forum of competent bodies is a key instance for this work.

The accreditation bodies may not be in a position to provide information on actual practice within organisations. Their role is to supervise and accredit the verifiers who will use the document during verifications. The accreditation bodies should follow the development of the documents and how they are applied, but may not need to be continuously involved in the development process. All the stakeholder have an important role in peer-reviewing the document.

Way Forward/Information Gathering: the following roadmap was agreed:

- The workshop participants will submit examples of techniques used in the PA sector to support the development of the pilot document.

- The techniques will be incorporated to the current document by IPTS following the agreed structure, taking into account the comments made by the group.
- The improved document will be send back to the workshop group for peer review, to produce a final pilot text.

During this pilot phase the exchange of information and related documents will be restricted to the participants of the workshop.

## GENERAL CONCLUSIONS

The general approach to develop reference documents, together with the proposed structure for the document and for the presentation of the techniques was accepted by the participants of the workshop. The chapter on techniques which reflect best management practice is clearly the heart of the document. These techniques and the related indicators of environmental performance is a scientifically robust way to compare performances but only at process/unit operation level. It does not seem feasible or scientifically sound to compare performances at organisation level.

The derivation of benchmarks is a delicate issue. These benchmarks have a role to play in promoting environmental ambition but they have to be used with prudence.

The indirect aspects are responsible for the main environmental impacts of PA. They are more complex to report than the indirect aspects. After dealing with the so-called housekeeping issues, a challenge for the reference documents is to demonstrate that it can handle equally well the indirect aspects of PA.

The way forward for the development of the pilot document will be based on information exchange between a sample of stakeholders. Techniques/case studies will be provided by the group, incorporated to the document. The improved document will be peer-reviewed by the participants of the workshop to produce a final pilot reference document for the PA sector.

All the participants expressed their willingness to provide information or to support the development of the pilot reference document in some way such as

- examples of best environmental management practices
- information on environmental indicators and/or benchmarks
- case studies
- environmental statements
- any other information which is considered to be useful for the purpose of the development of the reference document for the public administration sector
- peer review and commenting on draft documents